

MedScaler B.V.

Privacy Policy

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1 Introduction

This document is the official privacy notice of MedScaler. In order to provide its services, MedScaler processes personal data. Personal data is defined as any information relating to an identified or identifiable natural person. All personal data is processed with the greatest possible care and with due observance of the European General Data Processing Ordinance (GDPR), as well as applicable national laws and regulations.

In this document MedScaler describes its privacy policy that applies to all external parties. This privacy notice consists of a general part and a specific part to the various external parties of which MedScaler processes personal data. By using our website, you accept our privacy notice.

2 Sharing of your personal data with third parties

In the execution of its activities, MedScaler involves both parties that process personal data ("processors") on behalf of MedScaler as well as parties that act as independent controllers of the processing data involved. Independent data controllers concern partners in the context of a collaboration or a specific request for advice, our accountant, judicial authorities, administrative bodies and supervisors.

MedScaler uses the services of the following regular processors:

- Asana
- Mailchimp
- Hubspot CRM
- G-Suite
- Clockify
- eBoekhouden.nl
- Salary administration firm
- Bookkeeping firm
- Learnworlds
- Payment processors (Stripe)

In addition, MedScaler makes incidental use of the services of translators, couriers or subcontractors. MedScaler enters into a processing agreement with all processors it engages.

Processing outside the EEA

To the extent that processors are located outside the European Economic Area ("EEA"), MedScaler ensures that transfers of personal data take place only under strict safeguards. Mailchimp is certified under the EU-US Privacy Shield (adequacy decision). This means that the European Commission has judged that these US parties adequately protect your privacy.

3 Automated processing

All personal data that are processed in connection with the activities of MedScaler are included in a digital CRM system. These personal data are processed automatically and may reveal if, when and where correspondence sent by MedScaler is opened or read.

4 Security

MedScaler takes the protection of personal data seriously and takes appropriate measures for the legal profession to prevent abuse, loss, unauthorized access, unwanted disclosure and unauthorized changes. MedScaler is not responsible for information sent to MedScaler and/or its employees via unsafe networks.

5 Exercise of the rights of data subjects

Under the GDPR, data subjects have a number of rights with regard to personal data relating to them:

- The right of access
- The right of rectification
- The right of removal
- The right to limit the processing of personal data concerning him or her
- The right to data portability
- The right to object to processing

If processing, as described in this privacy notice, takes place on the basis of consent, the data subject has the right to withdraw his or her consent to the processing of personal data concerning him or her. This has no consequences for processing that took place prior to the revocation of that consent. The personal data that MedScaler has processed up to that moment will be removed, unless another processing basis is applicable to the processing that justifies the storage of the personal data.

If you do not agree with the way in which MedScaler processes your personal data or if you have any questions about the processing of your personal data or this privacy notice, we kindly request you to contact your contact person at MedScaler or our satisfaction team via satisfaction@medscaler.com. If we are unable to resolve this issue, or if you prefer not to discuss your complaint with us, you have at all times the right to contact the Dutch Personal Data Authority (Autoriteit Persoonsgegevens), the Dutch supervisory authority.

6 Opt-out

The data subject has the right to object at any time to the use of his or her personal data for marketing purposes, which means receiving newsletters and/or invitations. Unsubscribing is possible by using the link at the bottom of the newsletters/invitations or by sending an e-mail to info@medscaler.com.

7 Retention period

We do not retain data any longer than is necessary. If statutory rules on retention periods apply, then we abide by those rules. The retention periods for specific categories of external persons are described below.

8 Transfer to third party

In connection with the delivery of our services, we may, for operational (non-commercial) reasons, share personal data with third parties working on our behalf. We regulate any such processing in processing

agreements. These agreements ensure that any parties working on our behalf will protect the security and confidentiality of your data. The instances of data transfer for specific categories of external persons are described below.

9 Changes of Business Ownership and Control

MedScaler may, from time to time, expand or reduce its business and this may involve the sale of certain divisions or the transfer of control of certain divisions to other parties. Data provided by you will, where it is relevant to any division so transferred, be transferred along with that division and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the data for the purposes for which it was supplied by you.

In the event that any data submitted by you will be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

10 Categories

The data subject MedScaler processes personal data of various external persons, namely:

- (former) clients and other parties involved in a client case (Category I)
- external experts and partners (Category II)
- potential clients, prospects and leads (Category I)
- participants in events organized by MedScaler (Category III)
- applicants or students who engage with MedScaler (Category IV)
- members of MedScaler's Innovators Club (Category I)
- participants in validation projects by MedScaler (Category I)
- (former) users of MedScaler's eLearning platform (Category V)

For each category of data subjects, it will be explained below which personal data are processed, on which processing basis the processing takes place, which processing purposes apply to the processing and which retention periods are applicable.

11 Category I

Personal data

MedScaler processes the following personal data of category I external persons (or their representatives/contact persons):

- surname;
- first names;
- gender, in order to use the correct title;
- address (work, unless it concerns a private person);
- telephone numbers
- function;
- e-mail address;
- company/employer;

- domain name;
- linkedin profile;
- Relationship or contact number assigned by MedScaler;
- information provided to it by third parties, including counterparties, insofar as this holds relevance to the performance of the services;
- account numbers, in connection with the payments arising from the services provided by MedScaler to its clients;
- Contact history, such as contact notes;
- IP address (only when you visit our website);

Processing purposes

MedScaler processes the aforementioned personal data of category I external persons for the following purposes:

- the provision of services to its clients and the invoicing thereof,
- the performance of an agreement between MedScaler and its clients,
- compliance with the legal and professional obligations incumbent upon MedScaler;
- mediating and settling complaints;
- to the extent necessary, conducting legal proceedings.
- Marketing and communication activities.

Legal bases of the processing

MedScaler only processes the personal data if:

- MedScaler has a legitimate interest for the processing, which is understood to mean the provision of services by MedScaler to its clients, bringing the products and services of MedScaler to the attention of the party concerned, as well as the legitimate interest MedScaler has in running its firm (including compliance with insurance obligations and professional obligations);
- the processing is necessary for the execution of an agreement that MedScaler has concluded with the data subject;
- MedScaler must comply with a statutory obligation; or
- the data subject whose data are being processed has given his consent for the processing;

Retention periods

MedScaler shall not retain the collected personal data for longer than is strictly necessary to realize the purposes for which the data was collected, or for longer than retention is legally required. To this end, MedScaler maintains the following retention periods for each processing purpose:

- For personal data that have been processed for providing services, a retention period of seven years applies. The aforementioned term of 20 five shall apply from the moment a project is closed. A project will be closed when MedScaler is of the opinion that the client's specific request for advice has been fulfilled and no further work can be expected in the project. The project shall be considered to have been closed from the moment a closing email is sent to the client.
- Personal data that are processed for marketing purposes (including personal data that are processed for the purpose of sending the newsletter and/or advertising) are kept for five years,

unless the personal data are also processed for other purposes, for which a longer period is necessary.

Third parties

Personal data can be shared with:

- Employees, contact persons or representatives designated by MedScaler's clients;
- External experts who are called in with the client's permission in the context of a specific request for advice and with whom MedScaler cooperates;
- Judicial or administrative bodies;
- Regulators;
- The accountants or administrators of MedScaler;
- Processors engaged by MedScaler to provide specific services.

12 Category II

Personal data

MedScaler processes the following personal data of category II external persons:

- surname;
- first names;
- gender, in order to use the correct title to address the partner;
- company
- work address
- business e-mail address
- business phone number and business mobile phone number
- domain name
- relationship or contact number assigned by MedScaler;
- account numbers, in connection with the payment arising from the services provided by MedScaler to its clients.
- Contact history, such as contact notes;
- IP address (only when you visit our website);

Processing purposes

MedScaler processes the aforementioned personal data for the following purposes:

- The provision of services to its clients, the execution of an agreement between MedScaler and its clients;
- Sending and collecting invoices in connection with work performed by MedScaler;
- Mutual advice and consultation and referral of clients;
- To comply with the legal and professional obligations to which MedScaler is subject;
- Mediating in and resolving complaints;
- To the extent necessary, conducting legal proceedings;
- Participation in marketing and communication activities and dispatch of marketing communications of MedScaler.

Legal bases of the processing

MedScaler processes the personal data exclusively on the following legal basis:

- a legitimate interest of MedScaler, which is understood to mean the provision of services by MedScaler to its clients, maintaining the MedScaler supported network partners and (informal) collaborations between the data subject and MedScaler;
- the processing is necessary for the execution of an agreement that MedScaler has entered into with the data subject.

Retention periods

MedScaler will not keep the collected personal data for longer than is strictly necessary, or is legally regulated, to achieve the purposes for which the data was collected. To this end, MedScaler applies the following retention periods for each processing purpose:

- As long as the party in question is part of the MedScaler European Partner Network or can be regarded as a connection of MedScaler. This is assessed periodically;
- The processing of personal data of external experts for other purposes is subject to a retention period of five years from the end of the informal cooperation, unless the informal cooperation is renewed.

Third parties

Personal data can be shared with:

- A client of MedScaler;
- Employees, contact persons or representatives designated by a client of MedScaler;
- An external partner who, with the permission of MedScaler's client, is called in for a specific request for advice and with whom MedScaler collaborates;
- Judicial or administrative bodies;
- Supervisors;
- Processors engaged by MedScaler to provide specific services.

13 Category III

MedScaler may send its clients and other interested parties invitations to seminars or webinars. The seminars fulfil the role of network meetings. MedScaler invites its contacts at clients for these seminars. Each invitation contains the possibility to unsubscribe for further invitations (the so-called 'opt-out'). Other interested parties can also register to attend a seminar.

Personal data

MedScaler the name, job title, company name and e-mail address of the person who signs up for a seminar.

Processing basis

The personal data will be processed on the basis of the legitimate interest of MedScaler to send its clients marketing and invitations and to facilitate the participation in the seminar. After registration for a seminar, the personal data will be processed on the basis of the legitimate interest of MedScaler to invite the person concerned to further seminars. The data subject has the right to object to this processing at any time.

Based on the consent of the person involved, his personal data will be shared with other participants in the seminar. The processing of personal data is necessary for the purposes of the seminar.

Third parties

MedScaler shares the name, job title and company name of the seminar participant with other seminar participants. MedScaler also shares the personal data with its processors.

14 Category IV

In order to enable you to apply for a job with MedScaler and to help us assess whether your profile matches one of our vacancies, as well as to inform you about potential future job openings, we process personal data

Personal data

MedScaler processes the following personal data of applicants:

- surname;
- first names;
- gender, in order to use the correct title;
- home address;
- e-mail address;
- phone number and mobile phone number;
- linkedin profile;
- resume sent to MedScaler by the applicant;
- cover letter sent to MedScaler by the applicant;
- email correspondence or logged calls between MedScaler and applicant;
- list of grades provided by the applicant;
- any other attachments or referral letters shared by the applicant.
- Contact history, such as contact notes;
- IP address (only when you visit our website);

Processing basis

The personal data will be processed on the basis of the legitimate interest of MedScaler to evaluate a fit between the applicant and the job opening. The data subject has the right to object to this processing at any time.

Retention periods

MedScaler is legally permitted to retain personal data of candidates who were not hired for a period of four weeks, unless the applicant provides explicit consent that the data can be kept longer to inform the applicant about potential openings in the future. In that case, the personal data will be retained a maximum of one year.

15 Category V

Personal data

MedScaler processes the following personal data of category V persons:

- surname;
- first name(s);
- function (eg. student);
- telephone number;
- e-mail address;
- company (if applicable);
- address;
- social media account link (if added by user);
- payment information, in connection with the payments arising from services provided on the eLearning platform;
- information provided to it by third parties, including counterparties, insofar as this holds relevance to the performance of the services;
- IP address (automatically collected);
- web browser type and version (automatically collected);
- operating system (automatically collected);
- a list of URLs starting with a referring site, your activity on this website, and the site you exit to (automatically collected).

Processing purposes

MedScaler processes the aforementioned personal data for the following purposes:

- The provision of services on the eLearning platform to its users;
- Obtaining feedback to facilitate improvement of user experience and services provided on the eLearning website.
- Sending invoices and processing payments in connection with use of the eLearning platform;
- Manage referral of potential eLearning participants and process discounts;
- Mediating in and resolving complaints;
- Participation in marketing and communication activities and dispatch of marketing communications of MedScaler.

Legal bases of the processing

MedScaler processes the personal data exclusively on the following legal basis:

- a legitimate interest of MedScaler, which is understood to mean the provision of services and improvement of user experience by MedScaler to its eLearning platform users;
- the processing is necessary for providing access to the MedScaler eLearning platform once an account is made and the Terms and Conditions of the eLearning platform are accepted.

Retention periods

Any personal data you submit will be retained by MedScaler for as long as you use the services and systems provided on the eLearning platform. Data that you may submit through any communications system that we may provide may be retained for a longer period of up to one year. Information required to execute marketing activities will be retained until you unsubscribe from the marketing list in question.

Third parties

Personal data can be shared with:

- Payment processing company (Stripe);
- Official (external) partners who contributed to the content on the eLearning platform;
- Staff of MedScaler;
- Learnworlds.

16 Amendments

We make regular checks to ensure that we are complying with this privacy statement. This statement complies with the General Data Protection Regulation (GDPR). It would be wise for you to consult this privacy statement regularly. Our up-to-date privacy policy can be downloaded from our website: <http://www.medscaler.com/privacy-policy> and will be forwarded upon request.

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