

Data Privacy Policy

OneVasc, a service provided by the Pros Medical Solutions company (Besançon trade and business register [RCS] no. 893884361), is required to process your personal data when you browse the Platform and when you use the Services.

Capitalized terms are defined in the Terms and Conditions applicable to the OneVasc Platform.

1. The purpose of this Policy

The Data Privacy Policy is intended to inform you about the means that OneVasc, the data controller, implements to process your personal data, in the strictest respect of your rights.

Please note that we comply, in the collection and management of your personal data, with the applicable Data Protection regulations including:

- Law No. 78-17 of 6 January 1978 relating to data processing, files and freedoms, in its current version,
- Regulation (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data
- And any other text of a legislative or regulatory nature or any decision of a competent court liable to impact the field of personal data protection law.

2. The data we process

The term "personal data" means any data which directly or indirectly identifies a natural person.

As far as we are concerned, we only process your personal data strictly necessary for the purpose of using the Services:

General Services identification and tracking data

- Family name, first name, profession, telephone and email address;
- Contact details of the health facility where you practice.

Technical data

- Identification tokens;
- Rights open in the application;
- IP address;
- Connection logs (except password).

The personal data relating to the Patient that you provide when using the Services are **exclusively processed locally by the Equipment**. Therefore, in no case OneVasc can have information about them.

3. The purpose and means by which your data are processed

The processing of personal data carried out within the framework of the Services has the following purposes:

- the main purpose is the management of all the Services to which you have subscribed;
- the subsequent purposes are the follow-up of the relationship with you, your information on the activity of OneVasc and the establishment of statistics concerning use of the Services in order to allow their improvement.

The processing is based on:

- the collection and use of data entered or generated by your actions, in order to ensure the proper functioning of the Services;
- the storage and retention of such data until the data made available through the Services are updated;
- the storage and logging of connections and operations carried via the Services.

The collection of data is limited to the information necessary for the fulfillment of these purposes.

4. The bases on which your data are processed

The legal grounds for processing, also known as the legal basis, are as follows:

- The performance of the contract by which we are committed to you in order to provide you with the Services provided on our Platform;
- OneVasc's legitimate interest in compiling usage statistics of the Services in order to improve them;
- Your consent to allow us to respond to your requests for information on our Services.

5. The persons who will be able to see your personal data

Your data may only be consulted by authorized OneVasc staff and our subcontractors, acting in the context of the provision of the Services or their maintenance, and only on our instruction.

Public bodies may possibly be recipients of your personal data, exclusively to meet our legal obligations.

Your personal data are not the subject of transactions for consideration, i.e. they are not given to third parties who are not involved in the implementation of the OneVasc Services to ensure that these third parties may make any use of it for their own needs.

6. The time we retain personal data

Your data are kept for a fixed period as follows:

- With regard to general identification and monitoring data for the Services: until the end of the Services, then for 1 year after the end of the Services on an active basis, then for a period of 5 years of intermediate archival storage.
- Regarding data tracking your preferences for registrations to electronic communications: the information is kept for 3 years from its collection or from our last contact with you.
- With regard to technical data (tracers): 13 months.

During the intermediate archival storage period, the data may be accessible on an ad hoc basis and on a reasoned basis. Then, at the end of this period, the data are deleted.

7. The security measures implemented

Please note that we take all useful precautions, as well as the organizational, technical, software and physical measures appropriate to preserve the security, integrity and confidentiality of your personal data and in particular, to prevent them from being distorted, damaged or being accessed by third parties not authorized to do so.

8. Where your personal data are stored

Please note that your data are kept and stored, for the entire duration of their storage, on servers located in the European Union or in any territory, which ensures an adequate level of protection.

Your data are not transferred outside the European Union. However, should you wish to connect to the Platform from a country outside the European Union, depending on the level of protection of personal data in the country from which you are connecting, the access operation itself may involve certain risks.

9. The tracers (cookies) we use

In order to improve the quality of our service and better meet your expectations, OneVasc may need to access, by electronic transmission, information already stored in its electronic communications terminal equipment, or to enter information in this equipment through the use of tracers.

Tracers refer to the operations of reading and/or writing information in our Equipment, including in particular connection tracers (known as “cookies”).

In general, tracers are of different kinds:

- **Mandatory:** these are essential in order to browse the Platform and use its features, for example to allow your identification. Their use does not require your consent.
- **Functional (Preferences):** these are used by the Platform to remember your previous choices or browsing preferences (e.g. choice of language);
- **Functional (Statistics):** these are used to collect statistical information about your use of the Platform, including links clicked and pages visited.
- **Marketing:** these are used to track your online activity to provide you with a more personalized experience, including tailored advertisements. We do not use marketing tracers.

Tracers keep the information indicated above for 13 months.

The use of these tracers does not imply information specifically concerning you.

10. Your rights

The right to access, rectify or erase your data

You have a right of access, rectification or erasure for legitimate reasons concerning all the data concerning you.

This right is exercised directly as follows:

- either by email to the following address: contact@onevasc.com;
- or by post to the following address: Pros Medical Solutions (OneVasc) - 1 rue Mirabeau, 25000 Besançon.

These rights may be exercised at any time when your data are collected on the basis of your consent or our legitimate interest and in other cases, if you have a legitimate reason relating to your particular situation.

The right to oppose the processing of your data

You also have the right to object to the processing of your data in the following cases:

- During the term of the Services, when you dispute the accuracy of your personal data,
- When the processing of this data is unlawful, and you wish to limit this processing rather than delete your data.

This right can be exercised on the basis that you provide a legitimate reason.

The right to withdraw your consent

You also have the right, at any time, to withdraw your consent when the latter constitutes the legal basis for processing your data, without affecting the legitimacy of the processing based on the consent given before that withdrawal.

The right to define directives relating to the processing of your data after your death

You also have the right to formulate directives concerning the storage, erasure and communication of your data after your death.

These guidelines can be:

- General, i.e. they relate to all the personal data concerning you: in this case, the data must be registered with a digital trusted third party certified by the French supervisory authority, the National Commission for Computing and Liberties (CNIL).
- Specific, i.e. they relate only to the data processed by OneVasc.

By sending us these instructions, you expressly give your consent for them to be stored, transmitted and executed in the manner provided herein.

You can designate a person responsible for carrying out these instructions. The person will then be entitled, after your death, to read the said directives and ask us to implement them. In the absence of any such designation, upon your death your heirs will be entitled to take cognizance of your directives and have them implemented.

You can modify or revoke your directives at any time, by writing to us at the contact details below.

The right to file a complaint with the CNIL

You also have the right to lodge a complaint, electronically and/or by post, with the French supervisory authority, the National Commission for Computing and Liberties (CNIL) or with any competent supervisory authority in the Member State in which you usually reside, work or in which the infringement of your rights has occurred.

You may also bring an action before a competent administrative or judicial court if you consider that the processing of your personal data constitutes an infringement of the applicable texts.

How to exercise your rights

All of your rights relating to OneVasc may be exercised by sending:

- either an email to the following address: contact@onevasc.com;
- or a letter to the following address: Pros Medical Solutions (OneVasc) - 1 rue Mirabeau, 25000 Besançon.

Requests made in this way must be accompanied by a copy of an identity document in order to be taken into account by OneVasc, in order to verify that you are indeed the source of the request.

To respond to you, OneVasc will then have one month from receipt of your request, plus two months if necessary.

11. [Amendments and entry into force](#)

This Privacy Policy may be subject to total or partial modifications, such as further to developments in the services provided. These changes will be effective upon posting of the update.

You will be informed of this update by all suitable means.

This Policy is effective as of 24 May 2023.