



PRIVACY STATEMENT

Version 2.0

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1 Information about Eurocom Group

This Privacy Statement is published by Telezorg BV, trading under the name Eurocom Group, registered with the Chamber of Commerce under CoC number 17089222. Eurocom Group can be contacted on business days between 8:30 and 17:00 using the following contact information:

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Eurocom Group offers a wide range of technological services and products in the area of personal alarms and home care automation geared towards hospital care and non-hospital care. To do this, Eurocom Group works together with Partners (Service Providers) that deploy, implement and manage the products and services of Eurocom Group for the care institutions. Due to the nature of the service, Eurocom Group information about its clients (the Partners) and the users registered by the customers (clients, care professionals, caregivers) and care institutions in various platforms, which arise from the implementation of the agreements that Eurocom Group enters into with its customers. Additionally, Eurocom Group has (business) data about suppliers. Eurocom Group believes that it is important to ensure that the service is simple, personal and reliable. Eurocom Group is therefore continually alert to improve its services where required and to coordinate its services as much as possible to personal and commercial needs.

2 Information about this Privacy Statement

In this Privacy Statement, Eurocom Group has laid out in more detail how they deal with everyone's (personally identifiable) information. In this document, you can read what information Eurocom Group processes and what influence everyone can exert over that. To get a clear picture, Eurocom Group recommends that you read through the entire Privacy Statement.

2.1 Compliance with regulations and legislation

Eurocom Group handles this information with due care and ensures that all processing of everyone's information complies with all applicable legislation and regulations, including the General Data Protection Regulation (GDPR, implemented as of 25 May 2018). For this GDPR, specific Processing Agreements have been drawn up for our partners in those areas in which the processing of personally identifiable information (PII) relates to one or more of the platforms that Eurocom Group operates. Additionally, a Disaster Plan for Data Leaks relating to PII will take effect in the event of a data leak or a suspected leak. In all cases, the processing of data is (1) a consequence of the implementation of an agreement and/or (2) a consequence of self-reported information by users for which permission is granted.

2.2 Privacy Statement Target Group

This Privacy Statement applies for all clients that purchase services relating to Eurocom Group platforms for the purpose of alarms, access and home-automation and comfort services and for all users of Eurocom Group websites and portals. This Privacy Statement applies primarily to the processing of information on natural persons and companies. The provisions relation to the processing of traffic data, login details, surfing and click behaviour and the provisions relating to reporting in portals will apply to all commercial clients and private users.

2.3 Privacy Statement timeliness and versioning

This Privacy Statement can be changed from time to time if required as a result of new developments. The most up-to-date Privacy Statement can always be found at: www.eurocom-group.eu, and is also available upon request. When Eurocom Group makes changes to this statement, the "latest version" date at the start of the document will be changed. Eurocom Group recommends that everyone read through this statement on a regular basis, so that everyone is aware how Eurocom Group protects data.

3 Receiving unwanted information

If a private or commercial customer no longer wishes to receive unrequested commercial SMS, e-mail and fax messages, the customer can send an e-mail with contact details (name, company, medium and number at which they no longer wish to receive commercial information) to: privacy@eurocom-group.eu. However, e-mails relating to substantive changes to functionality and functioning are an integral part of the platform service and cannot be cancelled. Eurocom Group will ensure that this type of e-mail does not contain commercial content.

4 Personally identifiable information

Personally identifiable information (PII) is information that can be traced back to natural persons. Eurocom Group processes the personally identifiable information of everyone that registers as Eurocom Group customer. Eurocom Group will then record the following information: company data (including contact details and financial information such as giro or bank account number) and commercial information of contact persons (including name, gender, function and contact details, including e-mail address and telephone numbers). This information will be used for all standard and common commercial purposes for the implementation of the service, including customer contact, registering mutual agreements and invoicing.

If an account is created on a Eurocom Group website, the user will also be asked to provide a user name and password. All of this information will be processed by Eurocom Group.

Information can also be registered even after registration, for example, because information is intentionally omitted (such as on a Eurocom Group website), a fault is reported, a complaint is submitted or an invoice is not paid. This information will all be registered by Eurocom Group.

With regard to the processing of personally identifiable information, such as from clients, carers and professionals within the various platforms, Eurocom Group exclusively processes that information that is entered by the partner as a Processor and are part of the service in the Partner Agreement. Consequently, the Partner also has access to this information.

Eurocom Group will never share personally identifiable information with third parties, unless this is a legal obligation.

4.1 Purpose limitation of Eurocom Group platforms

The Eurocom Group platforms facilitate the possibility to record and in turn also process the following personally identifiable information:

Data	Description and purpose limitation	Required field in platform
Personal ID	Unique login name/ID that is generated when an account is created. The user can change this ID.	Yes
First name and last name	Names are registered to identify who initiated an alarm (clients) and who clears an alarm (professional, carer)	Yes
Address; street, house number, postcode, town/city, country	The determination of a client's home location will be made for the purpose of the alarm location for care provision. In addition, by means of geocoding, an address will also be shown on a graphic card.	Yes
E-mail	An e-mail address can be used for various purposes including: password recovery, fault messages, logging in and inviting carers.	No
Telephone number	This will possibly used as a back-up for a two-way audio connection, if one of the alarm devices with this type of functionality were to stop working.	No
Mobile telephone number	This will possibly be used as a back-up for a two-way audio connection, if one of the alarm devices with this type of functionality were to stop working. Additionally, the mobile number can be used for password recovery and login.	No
Skype name	Can be used to set up a video call with a client.	No
Key number	Can be used for access management to a client's location/room for a carer.	No
Photo	This can be used to more quickly obtain a better overview of what client has issued the alarm	No
Geographic location	Can be used for the purpose of location determination with/for alarms and/or continuous location tracking (is the client in a 'safe zone', yes or no?)	No
Language	Determines the language of the system and corresponding notifications after login.	Yes
Camera images	The platform offers you the option of camera integration for camera surveillance/monitoring. This information will <i>not</i> be saved. Camera images are blurred and will only be unblurred, and therefore visible to the care professional, in the event of an alarm.	No

Eurocom Group operates the following platforms in which personally identifiable information is processed:

- CQ-Net Live: <https://www.eurocom-group.eu/oplossingen/langer-thuis-wonen/personenalarmering/cq-net-live/>
- CQ-Net Server: <https://www.eurocom-group.eu/oplossingen/langer-thuis-wonen/professionele-thuiszorg/cq-net-server/>
- CQ-Mobile: <https://www.eurocom-group.eu/oplossingen/langer-thuis-wonen/personenalarmering/cq-mobile/>

5 Traffic data

If services are used by means of a landline or mobile telephone connection or on the Internet, Eurocom Group 'transports' information. This information will also be designated as traffic data. This relates to information such as the time and the duration of the use of a connection, the number called, click behaviour on a platform and the IP address. Eurocom Group will save the information relating to the use of services by means of the landline or mobile connection. The surfing behaviour will not be saved. Eurocom Group will not track what websites are visited. Eurocom Group can track whether a Eurocom Group website and/or portal is visited and how this website and/or portal is used. If Eurocom Group sends out an e-mail or an electronic newsletter, Eurocom Group can, for example, also monitor whether the message or newsletter is in fact opened. Eurocom uses this information to optimise its services and provision of information.

6 Location information

If a location-based service, such as mobile telephony or geographic location determination of clients, location information will be saved and processed. This information will be used to determine the location where the care must be provided and/or to be able to issue an alarm when a client moves outside a designated safe area. This can optionally be adjusted in the platforms. Location data will therefore be used for these specific purposes and will not be continuously monitored. Eurocom Group will not share location information with third parties.

7 Retention of data

Eurocom Group does not save traffic data for longer than is legally permitted and necessary for the processing for the purposes for which information is processed. How long personally identifiable information will be saved depends on the nature of the information and the purposes for which the information is processed. The retention period can therefore vary based on the type of information. Agreements will be reached in this regard with Processors and/or Controllers by means of Processors Agreements.

8 Data security

Eurocom Group will ensure suitable organisational, technical and physical protection of information. This includes, for example:

- Encryption of digital files that contain personally identifiable information;
- Security of network connections by means of Secure Socket Layer (SSL) technology or comparable technology;
- Access to the personally identifiable information is limited to authorised personnel. Additionally, these personnel will comply with company regulations regarding confidentiality of information which are inextricably linked to the Employment Contract of employees;
- Backups of the personally identifiable information to resolve physical or technical incidents promptly;
- A Data Breach Disaster Plan has been prepared, which will take effect in the event of (the suspicion of) a data breach. Eurocom Group also maintains an incident register and will submit reports to the Dutch Data Protection Authority, if the the situation demands;
- Occasionally, Eurocom Group will bring in an external party to test the systems on various security levels using ethical hacking. Based on these exercises, suitable measures will be taken if necessary.
- Eurocom Group frequently uses cloud technology to offer its services and, in that way, to also process data. Eurocom Group makes use of the Microsoft Azure Cloud service, the server for

which is physically located in Amsterdam, the Netherlands, and a back-up server is physically located in Dublin, Ireland. Microsoft in turn provides suitable organisational, technical and physical data security. For more information on the security and privacy of Microsoft Azure, please go to: <https://azure.microsoft.com/nl-nl/overview/trusted-cloud/>.

When a password is used to secure accounts and personally identifiable information, it is the customer's own responsibility to keep this information confidential and to never share this information with others.

9 Inspection, correction and deletion of personal information

As a customer/user, people have the right to inspect, correct and/or delete their own personally identifiable information. This means that users can inquire as to what personally identifiable information has been registered and for what purposes this information will be used, as well as a request for correction and/or deletion of this information. Every customer/user has the right to inspect, correct and/or delete information, even if permission was granted at an earlier stage.

A request can be submitted by sending an e-mail to privacy@eurocom-group.eu, indicating the customer/user's name, address, home and/or mobile telephone number and the specific description of the request. In response to this request, Eurocom Group will contact you within 10 business days to verify the identity of the requester and further process the issued request. Eurocom Group employs a maximum of 90 days for the processing of the request for inspection, correction and/or deletion.

Eurocom Group can charge administration costs for this. These costs will be communicated in advance.

10 Objections and complaints

An objection can be issued against the use of personally identifiable information, traffic data or location data if this information will be used for purposes other than those required for the implementation of an agreement with Processor(s) or controllers or for complying with a legal obligation.

In case of an objection to the use of information by Eurocom Group, this can also be reported to Eurocom Group by sending an e-mail to: privacy@eurocom-group.eu. In case of objection, it must be clearly indicated what use of what information is being objected to. Eurocom Group will then contact the Processor or Controller for the processing of the objection.

If you have a complaint relating to the handling of information by Eurocom Group, we recommend you always contact Eurocom Group for a proper handling of your complaint. If you would like to submit a complaint to the Dutch Data Protection Authority, you can do this at: <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-over-gebruik-persoonsgegevens>.