

Privacy Statement Eurocept Homecare

Scope

This privacy statement applies to (all) relevant personal data which is processed by Eurocept Homecare Holding B.V.¹ within the framework of the care provided to you. Data is recorded and stored on a secure database/server for this specific process only. Eurocept Homecare has compiled this privacy statement to inform you about which data Eurocept Homecare collects, how and why Eurocept Homecare does that (for which purposes), on the basis of which grounds and how Eurocept Homecare will further handle your personal data.

Origin of your personal data

Eurocept Homecare directly receives privacy-sensitive information from you when you and your doctor opt to use our services or products, for example for assistance from our specialist nurse in the context of administering and using your medicine or device, or for the delivery of your medication to home. Eurocept Homecare may also receive data from you if you have questions about our services, or when you contact us (for example to change an appointment).

Personal data

Eurocept Homecare receives the following personal data directly from your doctor, from yourself, or from the VECOZO database*:

- Your name.
- Your date of birth.
- Your Citizen Service Number [BSN] (in the Netherlands).
- Your postal address.
- Your (mobile) telephone number(s).
- Your email address to enable contact about services.
- The name of your health insurer, your policy number and details of the prescription insofar as this is applicable in terms of claiming the costs of your medicines and/or devices, or medical treatment from your health insurer.
- The prescription from your doctor.
- The medical indication for which your doctor has requested treatment.
- The medicine for which your doctor has requested treatment.
- Your weight, if necessary for (a check of) the correct dosage.
- The name of the GP or doctor providing the treatment.
- The name and address of your pharmacy.
- The name and telephone number of your contact person.

If applicable to your treatment, Eurocept Homecare also processes additional personal data in your patient file which is necessary for the implementation of your treatment contract/care programme. For example:

- The start date of your care programme.
- Medicine and/or product usage.
- Your height (as necessary in the case of a number of care programmes).
- Blood values (as necessary in the case of a number of care programmes).
- The end date of your care programme.

Purposes of processing

Eurocept Homecare processes personal data for the following purposes:

- For communication with the care provider(s) who is/are involved in your treatment (for example your GP/doctor, nurses, or the hospital).
- For requesting and providing medical information to your treating physician to the extent necessary for proper treatment.
- For the provision of the requested care by your care provider(s).
- For administrative obligations for the purpose of providing the above-mentioned care.
- In order to answer your questions (and/or those of your designated contact person).
- For quality purposes, for example medication and device safety, or to report adverse reactions.

¹ Eurocept Homecare Holding B.V. includes Jadim Medihands B.V., Jadim Services B.V., Jadim Flexcare B.V., Klinerva B.V., Medizorg Holding B.V., Medizorg B.V., Medizorg Services B.V., Q-Pharma B.V., Sanatheek B.V., NetMedical B.V., PharmaCare B.V. en HealthCareInsights B.V.

- For client satisfaction surveys and/or questionnaires relating to the service provided by Eurocept Homecare.
- In order to process disputes, complaints and claims.
- (In a number of care programmes) For analysis and statistical surveys (including the provision of anonymised information to the manufacturer of your medicine about the provided services).

Grounds

Organisations are only allowed to process personal data if they have grounds for doing so. The General Data Protection Regulation stipulates six possible grounds. We use four of these grounds for various aspects of our work:

Contract: Eurocept Homecare concludes a treatment contract with patients for the care which Eurocept Homecare offers you, similar to the treatment contract you have with your GP or dentist. On the basis of the treatment contract it is essential that Eurocept Homecare processes your data so that it can provide you with the right care.

Permission: Eurocept Homecare may ask for your permission to issue your personal data to the pharmaceutical company whose medicine or product you are using so that they can carry out analyses of the use and effect of the medicine or product/medical device in order to improve the medicine or product.

Legal obligation: Eurocept Homecare is legally obliged to forward reports of an adverse reaction and/or other safety information, complaints and periodical safety information to the pharmaceutical company/supplier in question. On the basis of the Health Insurance Act [Zorgverzekeringswet] Eurocept Homecare is also obliged to exchange personal data with your health insurer.

Legitimate interest: Within the framework of providing services to you Eurocept Homecare may, for the delivery of medicines and/or devices to your home, share your contact details with the contracted carrier. Eurocept Homecare may also contact you to ask whether you want to participate in a questionnaire and/or client satisfaction surveys in order to be able to improve the care which Eurocept Homecare offers. Eurocept Homecare also collects and combines your data for analyses and statistical studies in order to improve the services of Eurocept Homecare and its partners.

Retention periods

Eurocept Homecare keeps your personal data for no longer than is strictly necessary in order to achieve the purposes, unless a longer retention period is required or permitted by law.

As a care provider, Eurocept Homecare is legally obliged to keep your patient file for 20 years after your treatment. In addition, Eurocept Homecare is legally obliged to keep details of product complaints, adverse reactions and safety information for life. Based on fiscal and administrative legislation, the minimum retention period is 7 years after Eurocept Homecare's final corporation tax return (approximately 10 years).

Security

Eurocept Homecare does all it can to guarantee the security of your personal data and, in that context, will take the greatest of care and, where necessary, only save or issue data in pseudonymised form. To this end we have taken technical, administrative and physical measures in order to protect personal data against loss and/or incorrect use.

Use of personal data by third parties

Eurocept Homecare uses the services of a number of specialist ICT suppliers in order to deliver your medication/device, or to send out a client satisfaction survey about our services. Eurocept Homecare has concluded data processing agreements with these organisations. They are only allowed to process personal data on our instructions and under our supervision, only for the purposes which we determine and subject to strict confidentiality. We do not transfer personal data to countries where your personal data is less protected.

Eurocept Homecare works with sole traders and temporary staff who are under Eurocept Homecare's direct authority and with whom contracts and non-disclosure agreements are concluded.

Eurocept Homecare may obtain your (medical) personal data from, or issue it to your care provider, insofar as this is necessary for proper treatment with the medicine and/or device in question (or their provision).

In some cases, Eurocept Homecare may issue your personal data to the marketing authorisation holder, manufacturer or pharmaceutical company:

- In the event of (a suspicion of) adverse reactions and/or other safety incidents, your date of birth and gender will be issued to the health authorities and/or the marketing authorisation holder or the medicine/ device manufacturer within the framework of applicable legislation and regulations. This may also be necessary in connection with the security reports which the manufacturer is legally required to submit to the health authorities. The above data may be processed by the (international) manufacturer outside the European Economic Area.
- The health authorities and/or a representative of the marketing authorisation holder/manufacturer may access your data via Eurocept Homecare in order to investigate the (legally) correct processing of information concerning adverse reactions and/or safety incidents in order to guarantee the safety of the medicine/device in question.
- In the event of adverse reactions the marketing authorisation holder/manufacturer may/can consult the care provider in connection with additional medical questions relating to the assessment of the adverse reactions in question. This will only happen if you have granted additional permission.
- Eurocept Homecare will only issue other personal data relating to the use of the medicine or product to the pharmaceutical company if you have given your explicit permission to do so.
- Eurocept Homecare shares your personal data with external parties which carry out supporting business activities on our behalf, for example to a courier so that your medication/device can be delivered.

Right to access, restrict data processing, amend or delete personal data and/or data transfer

Your personal data has to be processed in order to provide the services and/or products requested by your practitioner. In this regard it is extremely important that your personal data is correct and that you can access it and/or have it amended or deleted if it is factually incorrect. You can access your patient file at any time. In addition to the right to access, amend and delete, you can also ask us to restrict the processing of your personal data and it is possible to submit an objection to it being processed, if you do not agree to that. Lastly, it is possible, in some cases, to invoke the right to data portability. We do not use automated individual decision-making, such as profiling.

If you have any questions about the information above you can send them to fg-homecare@eurocept.nl.

Changes to this privacy statement

We are allowed to change our privacy statement and any change will be announced on our website. If we want to change the purposes for the processing drastically and the processing is based on your permission, we will first ask your permission for those new purposes.

Other questions and/or comments

If you have any questions about this privacy statement and/or our activities in the field of data processing, you can contact us via fg-homecare@eurocept.nl, or send a letter to Eurocept Homecare, Loodsboot 7, 3991 CJ Houten. Please write the words 'CONFIDENTIAL' and 'for the attention of the Data Protection Officer' on the envelope. You should also contact us in the same way to report incidents and/or file complaints relating to data processing. You can also submit a complaint to the Dutch Data Protection Authority.

** VECOZO is a secure system that manages the communication between the health insurer and care provider in which the administrative and financial data relating to your treatment is processed.*