

Privacy Policy for PlanOp® Platform

PrediSurge is a Simplified Joint Stock Company (Société par actions simplifiée) registered at the RCS of Saint Etienne under the number 829 714 203 whose registered office is located at 2 Parvis Pierre Laroque – Immeuble One Station - 42000 Saint-Etienne – France (hereinafter “PrediSurge”)

Privacy Policy

We, PrediSurge, own and operate the website planop.ai and we are committed to protecting and respecting your privacy. This privacy policy describes how we collect, use, and protect the personal information you provide to us, in compliance with the General Data Protection Regulation (GDPR) in the European Union (EU). It also describes how we collect, use, and protect personal health information (PHI) you provide to us, in compliance with GDPR in the EU, Health Data Hosting (HDS) in France, Data Protection Act (DPA) 2018 in United Kingdom, Federal Act on Data Protection (FADP) in Switzerland.

Information Collection

We collect your personally identifiable information (PII) such as:

- surname, name,
- email address,
- company or institution,
- qualification,
- and other information you choose to provide when using our website.

We collect non-personal information such as:

- your IP address,
- browser type,
- Internet Service Provider (ISP),
- referral/exit pages,
- platform type,
- and date/time.

We collect data necessary to provide user with our simulation services, such as:

- PHI (medical images, patients’ name, age, sex),
- images (de-identified images, in-vitro tests images)
- and simulation input parameters (like proposed device reference).

The above-mentioned collected data is the strict minimum required by PrediSurge for the purposes explained in the section below.

Use of Information

We use the personal information we collect to:

- Manage user accounts and your access to PlanOp® Platform,
- Personalize your experience on our website,
- Improve our website and services,
- Contact you via email to provide information regarding our products and services,
- Respond to your inquiries and requests for information.

We use the non-personal information we collect to:

- analyze trends,
- administer the website,
- and monitor website usage.

We use data necessary to provide user with our simulation services we collect to:

- Perform simulation service provision using Planop® Aortic software (CE marked),
- Conduct research within the frame of clinical studies.

Protection of Information

PlanOp® Platform is included in the scope of the ISO27001 certification of PrediSurge and therefore benefits from the related security controls set in place in PrediSurge’s information security management system.

The infrastructure of PlanOp® Platform is hosted by Amazon Web Services (AWS), in a highly secure server environment located in Paris (France) with 24/7 assistance and monitoring to prevent unauthorized access and ensure data security. Advanced security measures, including firewalls, security agents, and monitoring, are in place to ensure continuous service and protection of your data against natural disasters, intruders, and unforeseen events. To learn more about security in the AWS cloud, please visit <https://aws.amazon.com/security/>.

We also implement by design in PlanOp® Platform a variety of security measures to protect the security, confidentiality,

availability and integrity of your personal information and any PHI when accessing your account, submitting personal information, or providing data for simulation service provision. These security measures include for example:

- data encryption at rest and in transit,
- data backups,
- hosts redundancy,
- audit trails,
- user authentication,
- user rights management,
- vulnerability vigilance,
- and other industry-standard security practices.

PrediSurge employees may download data necessary to provide user with our simulation services on on-premises computation workstations located in our offices in Saint-Etienne, France. Data is kept on the workstations only for the time of the processing and is deleted from this support right after being processed. We implement a variety of security measures to protect the security, confidentiality, availability, and integrity of your data when on our internal network.

These security measures include for example:

- data encryption at rest and in transit,
- computer and server hardening,
- user authentication,
- VPN,
- firewall,
- network segregation,
- audit trails,
- vulnerability vigilance,
- and other industry-standard security practices.

All PrediSurge employees sign a non-disclosure agreement (NDA) and therefore commit not to disclose confidential data, especially any PHI they would access.

Data retention

We retain your data for as long as your account is active or as necessary to provide our services to you. We retain and use your data as necessary to comply with our legal obligations, resolve disputes, and enforce our contracts.

Sharing of Information

We do not sell, trade, or rent your personally identifiable information or PHI to third parties, except as required by law or with your explicit consent. We contract with trusted third parties who assist us in hosting, operating or maintaining our website, communicating with users or conducting our business who may access your personal information and commit to keep information confidential.

We will not transfer your personal data to countries located outside of the EU, UK or Switzerland, and will provide you of an advance notice in the event of such transfer.

Cookies

We only use first-party session cookies for authentication purposes, without any personal information included. We do not use first-party session cookies for any other purpose, nor use any other cookie.

Consent

By using our website, you consent to our privacy policy.

We remind that you must comply with any applicable law or regulations when providing PHI on Planop[®], including obtaining patient's consent.

Contact Us

If you have any questions regarding our privacy policy or if you wish to exercise your rights on your information, you can contact us and our Data Protection Officer at the following address: gdpr@predisurge.com

We reserve the right to modify this privacy policy at any time, so please check it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.