

DATA CONTROLLER

The data controller responsible for processing your personal data is:

<https://www.excel-vision.eu/fr/excel-vision/> Excel Vision, located at 4 Rue des Bonnes Gens, 67000 Strasbourg, represented by its Director.

Excel Vision
Management
4 Rue des Bonnes Gens
67000 STRASBOURG
SIRET : 390 190 460 00043
Business Activity : Rental and leasing activities
Legal Status: Limited Liability Company (SARL)

Excel Vision has appointed a Data Protection Officer who can be contacted at the following email address: contact@excel-vision.net

THE DATA PROCESSED

We only collect and process the data that is necessary for your care, to fulfill our duties, comply with our legal obligations, and pursue our legitimate interests :

- Administrative and contact data: Full name, date of birth, gender, postal address, phone number, email address, etc., to allow us to identify and contact you, and to respond to your inquiries (via the website contact form).
- Health and lifestyle data: Medical history, clinical examination, test results, treatments, information regarding health risks, diseases, disabilities, family situation, emergency contacts, trusted person, primary care physician, profession, etc., to make diagnoses and provide appropriate care and treatments. These data are processed by authorized professionals within the organization who are bound by confidentiality (Article 9.2.h of the GDPR).
- Medical-administrative data: Social security number, national health identification number (INS), social insurers, mutuals, and other payers, banking information (in specific cases), for billing and ensuring the payment of our services.

PURPOSES OF THE PROCESSING

The processing of your personal data is intended for the following purposes:

- To create and maintain your medical file and provide you with appropriate and quality care, ensuring traceability of the care provided.
- To ensure the continuity of your care.
- To allow us to carry out our services.
- To respond to your requests for information.
- To generate statistics regarding our services, evaluate, and improve the quality of our services.
- To bill and ensure the payment of our services and health-related fees.
- To ensure the security of our facilities and the safety of individuals.

In accordance with the regulations, once anonymized, the data may also be used for educational and public health purposes.

LEGAL BASIS

The processing of your personal data is based on one or more of the following legal grounds:

- The execution of our services: As part of your care within our establishment.
- Your consent: For example, in relation to notifications or appointments sent via SMS or email.
- Compliance with our legal obligations: For example, concerning the creation and retention of your medical file (Articles R1112-2 and R4127-45 of the Public Health Code), as well as the management of the establishment, evaluation, and improvement of care quality, public health data, vigilance reports, etc.
- Pursuit of our legitimate interests: As well as the legitimate interests of third parties (for example, video surveillance aimed at ensuring the security of individuals and our facilities, collecting data through the website contact form).

DATA RETENTION PERIOD

- Medical file data.

In accordance with the provisions of Article R1112-7 of the Public Health Code, the data in your medical file is kept for 20 years.

« The medical file referred to in Article R. 1112-2 is kept for a period of twenty years from the date of the last stay of its holder in the establishment or the last outpatient consultation within it. When, pursuant to the provisions above, the retention period of a file ends before the holder's twenty-eighth birthday, the file retention is extended until that date. In all cases, if the person holding the file passes away less than ten years after their last visit to the establishment, the file is kept for a period of ten years from the date of death. These periods are suspended by the introduction of any amicable or legal action seeking to question the medical liability of the healthcare establishment or healthcare professionals for their interventions within the establishment. ».

Article 4 of the European Directive of September 30, 2005, recommends that the transfusion record be kept for a period of 30 years after the last transfusion.

- The video surveillance footage is kept for 15 days. It can be viewed in case of an incident by authorized personnel registered with the prefecture.
- Les données médico-administratives utilisées pour le recouvrement des frais de santé sont conservées pendant 10 ans.
- Medical-administrative data used for the reimbursement of healthcare costs are kept for 10 years.
- Data transmitted for public health purposes are kept for 5 years after transmission.
- Identification data will be kept for 3 years.

RECIPIENTS OF THE DATA (= WHO HAS ACCESS TO YOUR DATA)

These are the members of the technical and administrative teams involved in your care.

Some personal information may be shared with external establishments as part of your care (healthcare facilities, private practitioners, etc.).

The company Excel Vision is also required to electronically transmit information to insurance organizations in order to bill for healthcare services.

For public health purposes, data may be transmitted to authorized organizations (Regional Health Agency, National Institute for Health Monitoring, disease registers, etc.).

Authorized third parties: Excel Vision reserves the right to transmit your personal data in order to fulfill its legal obligations, particularly if required by a judicial subpoena.

In accordance with the applicable regulations, your personal data may be transmitted to organizations, judicial auxiliaries, and public officers authorized by a legislative or regulatory provision, as part of a specific mission or the exercise of a right to access.

When Excel Vision is faced with a request for communication from a third party based on a legal text, we ensure that the provision cited is in effect and that it indeed grants a right to access for the requester.

Excel Vision ensures that only the data specified by the legal text is transmitted, or, in case of ambiguity, only the data that it deems strictly necessary to achieve the intended purpose.

The data communication will be carried out in a manner that ensures their security, adapting the measures taken to the nature of the data and the risks involved.

Subcontractors: In the event that Excel Vision entrusts data processing activities to subcontractors, only subcontractors who provide sufficient guarantees regarding the implementation of appropriate technical and organizational measures will be engaged, ensuring that the processing meets the reliability and security requirements set by the applicable regulations and guarantees the protection of individuals rights.

No personal information of the user of the site <https://www.excel-vision.eu/fr/excel-vision/> is published without the user's knowledge, exchanged, transferred, assigned, or sold on any medium to third parties.

DATA SECURITY

Given the evolution of technologies, implementation costs, the nature of the data to be protected, and the risks to individuals' rights and freedoms, Excel Vision implements all appropriate technical and organizational measures to ensure the confidentiality of personal data collected and processed, as well as a level of security suited to the risk, particularly through its information systems policy.

As part of security measures, the website uses an HDS certificate, symbolized by the padlock on the address bar. This ensures that the information transmitted between your browser and our site is secured.

The staff and collaborators of Excel Vision are also made aware of the importance of personal data protection.

RIGHTS OF THE DATA SUBJECTS

In accordance with Articles 15 to 22 of the GDPR and the Data Protection Act, you have rights to maintain control over your personal data:

RIGHT OF ACCESS	<p>You have the right to obtain confirmation as to whether or not your personal data is being processed and, when it is, access to that data, as well as information regarding the purposes of the processing.</p> <p>Requests that are clearly unfounded, excessive, or repetitive may not be responded to.</p>
RIGHT OF RECTIFICATION	<p>You have the right to obtain the rectification of your personal data that you believe to be inaccurate or outdated.</p>

RIGHT TO ERASURE	<p>You have the right to obtain the erasure of your personal data when:</p> <ul style="list-style-type: none"> • (i) the data is no longer necessary in relation to the purposes for which it was collected or processed ; • (ii) you decide to withdraw your consent (when the processing is based on consent) ; • (iii) your personal data has been processed unlawfully ; • (iv) your personal data must be erased to comply with a legal obligation ; • (v) this erasure is required to ensure compliance with applicable legislation.
RIGHT TO RESTRICT PROCESSING	<p>You can obtain the restriction of the processing of your personal data when :</p> <ul style="list-style-type: none"> • (i) you contest the accuracy of the data ; • (ii) the Data Controller no longer needs the data for the purposes of processing ; • (iii) you have objected to the processing on legitimate grounds.
RIGHT TO WITHDRAW CONSENT	<p>You have the right to withdraw your consent to the processing of your data if the processing is based on consent. The withdrawal of this consent does not affect the lawfulness of the processing based on consent carried out before the withdrawal.</p>
RIGHT TO DATA PORTABILITY	<p>You have the right to receive the personal data concerning you that you have provided to the Data Controller, in a structured, commonly used, and machine-readable format, when:</p> <ul style="list-style-type: none"> • a) the processing of personal data is based on consent or a contractual relationship; and • b) the processing is carried out using automated methods. <p>You also have the right to have your personal data transmitted directly to a third party of your choice (where technically feasible).</p>

RIGHT TO OBJECT THE PROCESSING FOR DIRECT MARKETING PURPOSES	You have the right to object to the processing of your personal data, including profiling or direct marketing communications.
RIGHT TO ISSUE ADVANCE DIRECTIVES REGARDING THE PROCESSING OF PERSONAL DATA AFTER DEATH	Under Law No. 78-17 of January 6, 1978, data subjects may set directives regarding the retention, erasure, and communication of their personal data after their death or designate a person to exercise these rights on their behalf.
RIGHT TO LODGE A COMPLAINT WITH THE COMPETENT SUPERVISORY AUTHORITY	<p>Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the CNIL if you believe that the processing of your personal data violates the applicable regulations.</p> <p>CNIL - 3 Place de Fontenoy, 75007 Paris - http://www.cnil.fr</p>