

SQUIRE PRIVACY POLICY (WEBSITE)

1. WHO ARE WE?

- 1.1. We are Squire Health, a private limited liability company incorporated under Belgian law, having its registered office at Brusselsesteenweg 6, 9050 Gent, Belgium, and registered with the Crossroads Bank for Enterprises (*Kruispuntbank van Ondernemingen* or *KBO*) under enterprise number 1017.608.291 ("**Squire**", "**we**").
- 1.2. We at Squire provide software solutions for automating medical documentation (the "**Software**"). This privacy policy applies to the personal data we collect and process through the use of our website <https://squire.eu> (the "**Website**").
- 1.3. We value your right to privacy and make every effort to protect your personal data in accordance with applicable data protection law, including the General Data Protection Regulation (EU) 2016/679 ("**GDPR**") and national implementing legislation. In this Privacy Policy, we explain what personal data we collect from you, for what purposes we will process this data, on what legal basis we base this processing, to whom your personal data may be transferred, how long we keep your data, how we protect your data and what rights you have in relation to the processing of your personal data.

2. FROM WHOM DO WE COLLECT DATA?

- 2.1. In the course of our business, we may collect personal data from customers, users of the Software, prospects, visitors to our Website, persons who provide their business card or otherwise their contact details to us, book a meeting via the Website, and persons who contact us by e-mail, telephone, our contact form on the Website or otherwise.

3. WHAT PERSONAL DATA DO WE REQUEST AND WHY?

- 3.1. By using our Website, we collect and process your data. Some aspects of these data can be qualified as personal data. We process the following categories of personal data, for the following purposes, on the basis of the following legal grounds:

WHY?	WHICH DATA?	ON WHAT BASIS?
To respond to the request of the Website visitor who filled out the contact form	First name, last name, company or healthcare organization/ electronic health record and email	The prior, express, free, specific and informed consent of you (art. 6.1 a) GDPR).
To book a meeting via the Website	Name, email and any non-mandatory information filled in by the Website visitor to prepare the meeting	The prior, express, free, specific and informed consent of you (art. 6.1 a) GDPR).
To analyse statistics about visitors to our Website in order to improve the Website	Data on visitors' behaviour such as the visited website pages, IP address, type of browser, access time and operating system	The prior, express, free, specific and informed consent of you (art. 6.1 a) GDPR)
For newsletters and marketing	Email address	The prior, express, free, specific and informed consent of you. (art. 6.1 a) GDPR) This authorisation can be withdrawn by you at any time
To comply with legal obligations	Data required by applicable law	Necessary to comply with a legal obligation (art. 6.1 c) GDPR).

4. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

4.1. We may disclose your personal data to the following parties:

- **With our service providers and partners:** We use third parties to help us operate and improve our Website. These third parties assist us with various tasks, including customer care, marketing, and security operations.
- **With affiliate and subsidiary companies:** In the event Squire merges with another company, your data will be transferred to the new company. In this case we will take the appropriate measures for such transfer. Currently, Squire has no affiliate or subsidiary companies.
- **With law enforcement/when required by law:** We may disclose your information if reasonably necessary: (i) to comply with a legal process, such as a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirements; (ii) to assist in the prevention or detection of crime (subject in each case to applicable law); or (iii) to protect the safety of any person.

4.2. When transferring personal data to third parties, we always ensure that we implement appropriate technical and organisational protection measures. Where necessary, we will, for example, conclude a transfer agreement or a processor agreement, which sets out restrictions on the use of your personal data and obligations in respect of the security of your personal data.

4.3. To the extent that your data is transferred in the context of this article to countries outside the European Union which do not provide an adequate level of protection for your data, Squire will ensure that the companies to which your data is transferred do provide an adequate level of protection. In particular, we have concluded Standard Contractual Clauses (SCC) with them. Squire guarantees to always verify, on a case-by-case basis, whether an adequate level of protection is in place for transfers to third countries.

5. HOW LONG DO WE STORE YOUR PERSONAL DATA?

5.1. We do not keep your personal data longer than necessary for the purposes for which it is collected and processed (as described above).

5.2. For the purposes to respond to your request send via email or contact form on the Website and for the purpose to book a meeting, to analyse website visitor statistics and for newsletters and marketing, we will retain your personal data until you have requested to no longer be contacted by us or until 1 year following your latest contact with us.

5.3. The retention periods can be longer if it is (i) necessary to cover our liability or (ii) required or permitted by law.

5.4. Regarding the data of visitors to our Website, we refer to our [Cookie Policy](#).

6. HOW DO WE SECURE YOUR PERSONAL DATA?

6.1. We take appropriate technical and organisational measures to ensure a level of security appropriate to the specific risks we have identified.

6.2. We thus protect your personal data as best as we can against the destruction, loss, alteration or unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed. More information on our security measures is available upon request.

7. WHICH RIGHTS DO YOU HAVE AS A DATA SUBJECT?

7.1. **Withdraw your consent at any time:** you have the right to withdraw consent where you have previously given your consent to the processing of your personal data.

7.2. **Object to processing of your personal data:** you have the right to object to the processing of your personal data if the processing is carried out on the legal basis of a legitimate interest, including profiling. You also have the right to object to the processing of your personal data for direct marketing purposes. This right is absolute - we will always comply with it.

- 7.3. **Right to access:** You have the right to obtain confirmation from us as to whether or not we are processing your personal data, to obtain access to that personal data and how and why it is being processed, as well as to receive a copy of that data.
- 7.4. **Right to rectification:** You have the right to obtain a correction of your personal data or to request that we complete your personal data if you notice that we are processing incorrect or incomplete data about you.
- 7.5. **Right to erasure:** You have the right to obtain data erasure in certain specific cases.
- 7.6. **Right to restriction:** You have the right to have the processing of your personal data restricted in certain specific cases.
- 7.7. **Right to data portability:** You have the right to obtain the personal data you have provided us with in a structured, commonly used and machine-readable form, and to transfer that personal data (or have it transferred) to another controller.
- 7.8. You may exercise the above rights by sending an e-mail to privacy@squire.eu. The exercise of these rights is in principle free of charge. Only in case of unreasonable or repeated requests may we charge a reasonable administrative fee. We always try to answer your requests or questions as quickly as possible. It is possible that we will first ask you for proof of identity in order to verify your identity. For further information and advice on the above rights, please visit the website of the Data Protection Authority: www.gegevensbeschermingsautoriteit.be. In addition to the above rights, you also have the right at any time to lodge a complaint with the Data Protection Authority in connection with the processing of your personal data by us. You can contact the authority at contact@apd-gba.be or by mail at the following address:

Gegevensbeschermingsautoriteit

Drukpersstraat 35

1000 Brussel

8. REFERENCES TO OTHER WEBSITES

- 8.1. Our Website may contain links to other sites that are not operated by us. If you click on a third-party link, you will be redirected to that third-party site. We strongly recommend that you review the Privacy Policy of each site you visit.
- 8.2. We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third party web sites or Website

9. CHANGES TO THE PRIVACY POLICY

- 9.1. From time to time it may be necessary to amend this Privacy Policy. When we post changes to the policy, we will change the "last updated" date at the top of the document. The most recent version of this Privacy Policy will be available on our Website at all times.

10. CONTACT

- 10.1. We have appointed a Data Protection Officer (DPO), who can be contacted by email privacy@squire.eu to answer questions regarding the processing of your personal data. The DPO will respond to your requests to exercise your rights.
- 10.2. If you have any questions or concerns regarding this Privacy Policy or our processing of your personal data, you may contact us at privacy@squire.eu or Brusselsesteenweg 6, 9050 Gent, Belgium.