

## Privacy policy

### Data protection and handling of private data during application of „Your Anastomosis” platform

This privacy policy will explain how our organization uses the personal data we collect from you when you use our website.

The ME3D-Graft Ltd, as the operator of Youranastomosis project and platform, draws particular attention to the fact that Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (hereinafter: the General Data Protection Regulation), Act CXII of 2011 on the right to information self-determination and freedom of information. Act (hereinafter: infolaw.), other legal regulations and the data protection practice developed during the activities of the National Data Protection and Freedom of Information Authority (hereinafter: NDPFI).

#### 1. The purpose of this policy

The purpose of this information is to provide information on the data protection and data management principles applied by the Data Controller in connection with the use of the “Your Anastomosis” application in connection with the services provided to users (hereinafter the User).

#### 2. Data Controller

**Name:** ME3D-Graft Kft.

**Seat:** 7624, Pécs, Bálicsi út 67.

**Address:** 7624, Pécs Kacsóh Pongrác u 1.

**Head:** Dr. Gasz Balázs

**Phone:** +36 30 2379638

**E-mail:** balazs.gasz@youranastomosis.com

**Data protection officer:** Böröcz Gréta

**Phone:** +36 20 5686650

**E-mail:** greta.borocz@youranastomosis.com

#### 3. Scope of personal data processed

The scope of managed data includes all data that the User makes available to the Data Controller during the application of the application, or that the application generates from the User during the use of the application.

Should any changes or changes occur in the data managed by the Data Controller during the data processing period, please notify the contact person specified in point 2 without delay.

#### **4. Scope of personal data processed**

4.1. For the purpose of identification required for the use of the service, the Data Controller manages the User's name and e-mail address on the basis of Article 6 (1) a) of the General Data Protection Regulation, ie with the consent of the User.

4.2. The Data Controller manages the User's name and contact details (e-mail address, address) for the purpose of contacting the User with the consent of the User - ie Article 6 (1) a) of the General Data Protection Regulation.

4.3. For the purposes of the services to be provided to Users, ie to ensure comparability with other users, the Data Controller handles the following data with the consent of Article 6 (1) (a) of the General Data Protection Regulation, ie with the User's consent: no, practical level or other surgical specialties), position, center size (area size), frequency of cases (how often you operate, annual number of surgeries, simplified logbook) , CPB time average, surgical times), what kind of guarantor, structured and unstructured data of vascular sutures made during service (3D morphology, images of parameters, description, score, score trend, localization, angles, lengths of individual vessels, CFD numerical data, declination, deviation , measurement methodology, data of analyzes and results of their comparison, order frequency, type of simulators ordered, its time pattern).

4.4. For the purpose of issuing a data controller account, Article 6 (1) (c) of the General Data Protection Regulation, ie. a legal obligation, namely Article CXXVII of 2007 on value added tax. (VAT Act) - manages the name and address of the User.

4.5. In order to preserve the Data Controller account, it manages the name and address of the Participant in case of invoicing to the User on the basis of Article 6 (1) c) of the General Data Protection Regulation, ie. the fulfillment of a legal obligation.

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#### **5. Duration of data management**

The data management is described in 4.1., 4.2. 4.3. in the case specified in point 4.4 until the withdrawal of the consent, in this case until the invoice is issued, in accordance with case specified in Section 4.5 it lasts for 8 years (pursuant to 2000/ C law 169 §).

#### **6. The range of persons who get to know the data, data transmission, data processing**

The data can be accessed by employees with the right of the Data Controller, acting under his / her control, or by persons employed in other employment relationships.

**Data protection manager:** Róbert Keresnyei  
E-mail: robert.keresnyei@youranastomosis.com

## **7. The range of persons who get to know the data, data transmission, data processing**

The Data Controller shall ensure the adequate security of the User's personal data by applying appropriate technical or organizational measures, including protection against unauthorized or illegal handling, accidental loss, destruction or damage to the data.

## **8. The range of persons who get to know the data, data transmission, data processing**

The Data Manager's website uses a session cookie while the website is open which is needed for user authentication.

Data Manager Google IDs: UA-163204549-1, UA-163204549-2.

Google Analytics collects data about the User's website activity anonymously. Cookies are not required for the operation of the website.

## **9. User's rights**

9.1. The User shall have the right to access the information specified in Article 15 of the General Data Protection Regulation in relation to his or her data processing, including in particular that the Data Controller informs that

- what personal data,
- for what purpose and legal basis,
- from what source,
- how long you treat it, or
- to whom, when, under what legislation the Data Controller is provided with which personal data access or to whom you have transferred your personal data, and that
- what rights and remedies the User has during the data management.

9.2. The User is entitled to correct inaccurate (incorrect or incomplete) personal data concerning him / her on the basis of Article 16 of the General Data Protection Regulation.

9.3. The User has the right to delete personal data in accordance with Article 17 of the General Data Protection Regulation, especially if the purpose of the data processing has ceased or the data processing is illegal or the User's consent has been revoked (and there is no other legal basis for further processing).

9.4. The User is entitled to request a restriction on the processing of personal data as defined in Article 18 of the General Data Protection Regulation. In this case, the restricted personal data may be processed, with the exception of storage, only with the consent of the User, or for the submission, enforcement or protection of legal claims, or for the protection of the rights of another natural or legal person, or in the important public interest of the Union or a Member State.

9.5. The User, as defined in Article 20 of the General Data Protection Regulation, is entitled to receive the personal data provided by him / her in a widely used electronic form and to transfer the data to another data controller.

9.6. In the case of consent-based data processing, the User has the right to withdraw his consent in writing at any time without giving reasons in accordance with Article 7 (3) of the General Data Protection Regulation. The revocation shall not affect the lawfulness of the data processing prior to the revocation.

9.7. Pursuant to Article 22 (1) and (2) of the General Data Protection Regulation, the User is entitled to have the Data Controller take appropriate measures to protect the User's rights, freedoms and legitimate interests, including at least the User's right to to intervene, to express its views and to object to a decision which is based solely on automated data processing, including profiling, and which would have legal effects or similar effects on it.

#### **10. The User may exercise his rights at the contact details below**

You can make any complaints about data processing at the e-mail address of the contact person specified in point 2. If the User wishes to make a complaint by post, he may do so at the address or contact person specified in point 2.

The User may contact the National Data Protection and Freedom of Information Authority (mailing address: 1530 Budapest, Pf .: 5., phone: +36 (1) 391-1400, email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.naih.hu)), if you feel that there has been or is an imminent threat of an infringement of the processing of your personal data. In the event of a breach of his rights, the User may apply to a court and, at his option, institute legal proceedings before the court having jurisdiction over his place of residence or stay.

## Detailed description of data and data protection of „Your Anastomosis” platform

What data do we collect?

- Name - allows us to contact you directly;
- E-mail - We will send their results here
- Address - If we receive it from the user by post, we will also see your address, for delivering kits
- Phone number- for delivering kits
- Age – as for comparison / we compare the age and performance of the users
- Gender - for comparison / same, only with their gender
- Transaction and payment information - Necessary for the performance of a contract
- Level of practice (how many years of experience in the given or other surgical field) this data of the (non-specifically identified, anonymized) user group is compared with anonymous – data is given as voluntary basis
- Results of the sutures. – data is given as voluntary basis
- Expertise level / position - the (non-specifically identified, anonymized) user group is compared – data is given as voluntary basis -this data with the results of the vascular sutures – data is given as voluntary basis
- Center size (area size) - the size of the user centers – data is given as voluntary basis comparison as a function of their results
- Frequency of cases (cases per annum) (annual number of surgeries, possibly simplified logbook) - the (non - specifically identified, anonymized) user group is compared- – data is given as voluntary basis
- Geography - the (non-specifically identified, anonymized) user group is compared – data is given as voluntary basis
- Clinical results on morbidity, mortality, different anatomical localizations – data is given as voluntary basis (non-specifically identified, anonymized)
- Clinical data on vascular opening, aortic capture time, mean CPB time, surgical times, etc ) - a comparison of your own previous data with our analysis – (non-specifically identified, anonymized) data is given as voluntary basis
- Handness - users (not specifically identified) are compared – data is given as voluntary basis

Non-structure, anonym data, cant be binded to personal information:

- 3D morphology
- Parameter images
- Description
- Score (total score, short- and long term hazard score values)
- Score trend
- Localization of alterations
- Angles, lengths of individual vessels

- CFD numerical data
- Declination, deviation
- Measurement methodology
- The data of the analyses made so far by us and the results of their comparison
- Frequency of ordering
- The type of simulators ordered, its time pattern