



# Privacy statement

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# Privacy Statement Kyano B.V.

This is the Privacy Statement of Kyano B.V (hereinafter: "Kyano"), located at Moermansweg 2-22 in Groningen (9723 HM), registered with the Chamber of Commerce under registration number 85103233 and accessible online at: [www.kyano.app](http://www.kyano.app).

# Privacy Statement

Kyano attaches great importance to the protection of personal data. We therefore consider it important to handle your personal data responsibly. If you are a user at Kyano we process your personal data. What this processing exactly entails, which personal data Kyano processes and for which purposes your data are processed, is explained in this Privacy Statement. In addition, this Privacy Statement contains a description of the rights you have with regard to the processing of your data. You can also read where and to whom you can turn with questions about the processing of your personal data and its protection.

Kyano is responsible for the proper processing of your personal data and will therefore handle your data with care. Processing means that Kyano will store, supplement, edit and after a period of time, remove your data. We will only use your personal data in accordance with the purposes described in this Privacy Statement.

## From whom does Kyano process personal data?

Kyano processes personal data of:

- Users of Kyano (both consumers and businesses);
- visitors of our website;
- suppliers.

## On what legal basis does Kyano process your personal data?

Kyano may only process your personal data on the basis of a legal basis. Kyano only processes personal data because:

- this is necessary for the execution of the agreement between you and us;
- there is a legal obligation to which Kyano must comply, such as a police order to provide certain data or the provision of data for the implementation of tax laws;
- Kyano has a legitimate interest to, for example, inform you about current events or changes in our services and/or products;

## For what purposes does Kyano process your personal data?

Kyano processes your data as a healthcare provider for various purposes. In order to provide you with our services as well as possible, we process your personal data for the following purposes, among others:

- To enable you to make the best possible use of our platform and related products;
- sending (digital) invitations and appointment reminders;
- to get in touch with you, (potential) users of our platform, contact persons and other involved parties;
- To respond to your questions;
- To inform you about updates and other changes related to our products and services;
- to comply with legal obligations (administration, file and retention obligations);
- For the financial processing of the services provided;
- handling complaints and disputes;
- conducting a customer satisfaction survey.

## What personal data does Kyano process?

For the proper performance of our services, it is necessary to collect data from you. Kyano processes for the previously mentioned purposes the following personal data:

- name and address data;
- date of birth;
- contact information such as your e-mail address and telephone number;
- payment information;
- other data provided by you.

## What principles does Kyano use when processing your personal data?

Kyano ensures that your personal data is handled securely. The General Data Protection Regulation (AVG) and the rules arising from this are leading. We strive to inform you in a transparent, clear and understandable way about how we handle your data.

The following principles apply:

- your personal data will only be processed in accordance with applicable laws and regulations and in a proper and careful manner;
- we will not process more personal data than necessary to realize the previously described goals and will only use your data for the purpose for which the data were collected;
- we only process personal data if there is a legitimate purpose for doing so;
- we will ask for your explicit consent if this is necessary for the processing of your personal data. We will record this consent. If you grant us permission to process your data, you may withdraw it at any time;
- we will not retain your personal data longer than is strictly necessary;
- we will not transfer your personal data to third parties, unless there is a legal obligation or you have given your explicit consent;
- we will take appropriate technical and organizational measures to protect your personal data. When we transfer your personal data to a third party outside the European Economic Area (EEA), we make contractual arrangements with that party to ensure adequate data protection.

## With whom will your data be shared?

In order to perform our services and offer our products, it is necessary for Kyano to share your data with third parties. Kyano shares your data with the following parties:

- Virtio ICT BV (Netherlands)

## How do we take care of your personal data?

1. Kyano has taken appropriate technical and organizational measures to secure your personal data against loss or any form of unlawful processing.
2. All Kyano employees have signed a confidentiality agreement.
3. Kyano concludes processing agreements with parties involved in the execution of our services. This includes agreements on security measures and reporting data breaches.
4. Kyano registers security incidents and data leaks. A protocol has been established for this purpose.
5. Kyano has appointed an internal Privacy Officer.
6. Kyano is able to adequately respond to the rights of data subjects.

## How do we secure your personal data?

Kyano has taken appropriate technical and organizational measures to secure your personal data.

## How long are your personal data kept?

Kyano stores your personal data no longer than is necessary for the purpose for which the data was initially collected. In some cases we need to keep your data longer. This is the case if a legal retention period applies. Consider, for example, our legal financial administration obligation.

## What rights do you have regarding the processing of your data?

With respect to the personal data we process from you, you have a number of rights. There may be circumstances in which a particular request cannot be complied with. If this is the case, Kyano will always communicate this to you with reasons.

### 1. Right of access

You have the right to inspect the information we process about you. A large part of your data can already be viewed via our platform. If you want to view information that is not in Kyano, you can request access. You can do this at [privacy@kyano.app](mailto:privacy@kyano.app). This request may not be refused by Kyano.

The right of inspection only includes inspection of your own data. It is therefore possible that certain parts of your file may be protected because it contains information about someone other than yourself.

## 2. Right to transferability.

You have the right to receive the digital data provided to Kyano. You can then transfer this data to another service provider if necessary. Only data that Kyano processes on the basis of your consent or the agreement entered into with you fall within the scope of this right.

## 3. Right of correction

You can request Kyano to correct personal data if you believe that this data is factually incorrect, incomplete or irrelevant to the purpose for which it was collected. This may be the case, for example, if Kyano has made a registration error.

## 4. Right of objection

If you prefer not to have your personal data processed by Kyano, you can in some cases object to the processing of your personal data. This is for example the case if Kyano uses your data for marketing or advertising purposes.

If Kyano processes your data based on consent, you can terminate the processing by withdrawing the consent or deleting your account. In that case, objection is not necessary to terminate the processing.

## 5. Right to removal

You have the right to request Kyano to remove (part of) your data. Kyano does not have to comply with such a request in all cases. This applies, for example, if there is a legal obligation to keep your data.

## Giving and withdrawing permission

As indicated earlier, Kyano will ask for your consent for some processing. If you wish to withdraw your previously given consent, please send an email to: [privacy@kyano.app](mailto:privacy@kyano.app).

## Websites of third parties

This privacy statement does not apply to third party websites that are connected to Kyano's website through links or buttons, such as social media buttons. Kyano cannot guarantee that these third parties handle your personal data in a reliable or safe manner.

## Cookies

Cookies are small files that the provider of a website places on the equipment of a visitor. For example, on a computer, phone or tablet. Cookies allow us to collect and store information about your website visit. The Kyano website only uses functional cookies that are technically necessary for our website to work properly. For this we do not need to ask you for permission.

## Changes

It is possible that this privacy statement will be changed by Kyano. Any changes will be announced on our website. It may happen that Kyano processes your personal data for new purposes not yet mentioned in this Privacy Statement. Before we start using your data for these new purposes, we will inform you of the changes.

## Handling of complaints

On our website you can submit a complaint through our complaint form. In this form we ask for some personal and contact information from you.

## Questions or comments?

If you still have questions after reading this privacy statement, you can ask them by contacting our Privacy Officer by sending an email to [privacy@kyano.app](mailto:privacy@kyano.app). You will receive a response within 5 business days.

In addition, you have the right to file a complaint with the Personal Data Authority (AP).

This document has been translated from Dutch. The Dutch version is leading and can be found on our website: [policies.kyano.app](https://policies.kyano.app)