

Privacy notice

Overview

Your privacy is of most importance to us. This privacy notice, updated on 30 December 2020, explains what personal data Biotronics3D collects from you, how we process that data, what are your rights as data subject and how you can contact us.

Our personal information handling policy and procedures have been developed in line with the requirements of the European Union General Data Protection Regulation – Regulation (EU) 2016/679, UK Data Protection Act 2018 and applicable national laws. Biotronics3D will always adhere to the EU and UK Data Protection Legislation.

This privacy notice only relates to the Biotronics3D sites and applications and does not extend to your use of the Internet outside of these domains.

Biotronics3D is committed to protecting your privacy:

- as a [visitor of our websites](#),
- as a [user of our online applications](#), and
- as a [patient data subject](#) of our online Medical Imaging solutions.

For the purposes of the EU General Data Protection Regulation or UK DPA, you can contact Biotronics3D Limited with registered office in England and Wales, Reg. number: 5029338, main address: 5 Greenwich View Place, London E14 9NN, UK. You may contact Biotronics3D's Data Protection Officer (DPO) by e-mail to dpo@biotronics3d.com.

If you are in the EEA you may also contact Biotronics3D's European Authorised Representative: Skyer Medical Imaging S.R.L., Str. Fabrica de Caramida, nr 1A, Lot C, Parcela 36, Sector 1, Bucuresti, Romania.

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For Biotronics3D websites' visitors

We collect anonym statistical information about our visitors in order to help us continually improve the products and facilities we offer. When someone visits 3DnetMedical.com or Biotronics3d.com we may use cookies to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow 3rd parties to make, any attempt to find out the identities of those visiting our website.

Use of cookies by Biotronics3D

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The section below present the cookies used on 3Dnet and its purposes.

Name: .ASPXAUTH

Duration: Session

Provenance: First-party

Purpose: Strictly necessary for authentication

Name: B3DSessionId

Duration: Session

Provenance: First-party

Purpose: Strictly necessary for authentication

Name: B3D

Duration: Persistent

Provenance: First-party

Purpose: Preferences cookie: supports remembering username for login, and number of windows to launch for viewer

For users who use our Nuance integration, there is also:

Name: NUSA_Guids

Duration: Session

Provenance: First-party

Purpose: Strictly necessary for Nuance speech recognition support

The information you provide to us will be held for Biotronics3D on servers based in the UK, and we will not transfer it, or authorise its transfer, outside the UK.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit

www.aboutcookies.org or www.allaboutcookies.org.

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For 3Dnet users

3Dnet users are registered users on 3Dnet Platform that may login and access restricted information according to their profiles, roles and organisations. Either the users are registered by the health organisation where they work, or they may register themselves as referrals at invitation of a registered health organisation.

Information about the use of your data:

- **What information is collected?**

3Dnet collects personal information to register and identify the users and logs all their actions inside the platform. We collect personal data as provided to us during the registration or purchase process, which you agree to supply us as accurate.

- **What is the purpose of processing?**

Processing is necessary to meet contractual obligations and legitimate interests in order to maintain a secure and reliable management of users, trace users' operations on data, provide analytics insights for radiology service management and provide statistics to support improvements in the 3Dnet platform. The information will not be re-used for an incompatible purpose. The processing of the data does not involve any automated profiling.

- **What is the lawfulness of the processing?**

Processing is necessary to meet contractual obligations with the health organizations to whom we provide 3Dnet services and legitimate interests of Biotronics3D to maintain security and improve the platform.

- **To whom your information is disclosed?**

3Dnet offers a service to healthcare providers enabling collaboration for medical imaging specialists. Each organisation manages its own users and according to their roles they may access other users' names of the same organisation to enable their collaboration. Each organisation has System Administrators that are responsible for managing the organisation's users. Biotronics3D support team may access this information to support any request from the users or from their organisations. Biotronics3D does not disclose the users' information to third parties. Biotronics3D will not divulge any users' personal data for direct-marketing purposes.

Nuance Communications Ireland Limited is a sub-processor for the purposes of providing 3Dnet users with voice recognition services to translate voice dictation to text and digital dictation used for processing of voice dictation to text to enable advanced reporting options. Nuance have GDPR compliance [privacy policy](#) ensuring users data is adequately protected.

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For purposes of supporting 3Dnet users Biotronics3D offers a live-chat service supported on the European service of Livechat inc. SaaS, with GDPR compliant [privacy policy](#) and adequate organisational and technical measures, ensuring users data is adequately protected.

- **How you can access your information?**

Users can access their profile in 3Dnet platform, verify its accuracy and, if necessary, correct their information. As data subjects, users have the right to object to the processing of their personal data on legitimate compelling grounds, except when it is collected in order to comply with a legal obligation, is necessary for the performance of a contract to which they are a party or is to be used for a purpose for which they have given unambiguous consent.

- **How long data is kept?**

Biotronics3D keeps the data for the time necessary to fulfil the purpose of collection.

- **What security measures are taken to safeguard your information?**

Biotronics3D implemented appropriate technical and organisational measures to secure and protect the privacy of data in 3Dnet platform.

We know your personal information is important to you. Therefore, we securely store the personal information we receive and use appropriate security features to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have internal policies which set out and guide our data security. All staff adhere to this approach and are regularly trained in data protection.

- **What are your rights as data subject?**

Biotronics3D is committed to respect your rights as data subject as identified in the GDPR. Know more about your rights in [Your rights as the data subject section](#).

- **Whom to contact?**

If you have queries or complaints you may contact Biotronics3D's Data Protection Officer (dpo@biotronics3d.com) or the Support team (support@biotronics3d.com) for technical queries. Alternative to the e-mail you may contact us by phone to +44 (0) 207 093 0903 or by post to the following address:

Data Protection Officer
Biotronics3D
5 Greenwich View Place
London E14 9NN, UK

If you are in the EEA you may also contact Biotronics3D's European Authorised Representative: Skyer Medical Imaging S.R.L., Str. Fabrica de Caramida, nr 1A, Lot C, Parcela 36, Sector 1, Bucuresti, Romania.

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For patients

Biotronics3D provides advanced Medical Imaging services for Healthcare professional organisations which subscribe our software services to support fast and accurate diagnosis. The organisations subscribing 3Dnet services are the Data Controllers and Biotronics3D that processes data under their instructions is a Data Processor. Special Categories of Personal Data concerning health are central to Biotronics3D and to its customers and are appropriately managed and protected to ensure that any sensitive, confidential or personal information is not accidentally or maliciously disclosed, accidentally deleted or accidentally destroyed. Biotronics3D operates a secure-by-default-and-by-design ethos supported by strict Information Governance and Security policies defining internal and external access to system and data, the highest levels of protection applied to data in transit or at rest, and monitoring practices.

Information about the use of your data:

- **What information is collected?**

3Dnet collects personal information and special category of personal data concerning health to support professional healthcare providers analysing and reporting medical imaging studies. Depending on the level of service subscribed we may process Medical Imaging studies and reports, request forms, patient demographics and scheduling information, containing personal identification data and special category of data concerning data subject's health.

- **What is the purpose of processing?**

Processing is necessary to meet contractual obligations in order to provide advanced Medical Imaging services that support subscribing professional Healthcare providers in the analysis and reporting of patient radiological studies to infer a diagnosis, prognosis and or treatment in order to protect the vital interests of the patients. Processing is also necessary for legitimate interests of Biotronics3D to support improvements in the 3Dnet platform. The information will not be re-used for an incompatible purpose. The processing of the data may involve automated identification of images containing particular regions of interest for diagnosis. Biotronics3D may use anonymised datasets for research and development activities.

- **What is the lawfulness of the processing?**

Processing is necessary to protect the vital interests of the data subjects, the patients, to meet contractual obligations with the healthcare organizations to whom we provide 3Dnet services and for legitimate interests of Biotronics3D to maintain security and improve the services provided by 3Dnet platform.

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- **To whom your information is disclosed?**

3Dnet offers a service to healthcare providers enabling collaboration for medical imaging specialists. Each organisation manages its own users and according to their roles they may access patients' data and share it with other users of the same organisation to enable their collaboration or with referral doctors to provide the report. Each organisation has System Administrators that are responsible for managing the organisation's users. Biotronics3D support team may, at request of the data controller, process this data to support specific requirements from these organisations. Biotronics3D does not disclose the patients' information to third parties.

- **What information may users share?**

3Dnet provides Medical Imaging Services to professional healthcare organisations to enable fast and accurate medical diagnosis. Some users, under confidentiality agreement and medical deontology code, may need to share studies and or reports with other healthcare professionals, under the same codes of conduct, and with the patient.

- **How you can access your information?**

Patients should contact the healthcare organisation that provide them the healthcare services and uses 3Dnet platform. Biotronics3D (as data processor) will provide complete assistance to the healthcare organisations using 3Dnet platform (as data controllers) to provide all required information without undue delays.

Patients who are users of the 3Dnet Health Portal platform can access their profile, verify its accuracy and, if necessary, ask their healthcare provider to correct their information.

As data subjects, patients have the right to object to the processing of their personal data on legitimate compelling grounds, except when it is collected in order to comply with a legal obligation, is necessary for the performance of a contract to which they are a party, or is to be used for a purpose of vital interest of the data subject.

- **How long data is kept?**

Biotronics3D keeps the data for the time necessary to fulfil the purpose of collection contracted with each subscribing data controller.

- **What security measures are taken to safeguard your information?**

Biotronics3D implemented technical and organisational measures to secure and protect the privacy of data in 3Dnet platform.

We know your personal information is important to you. Therefore, we securely store the personal information we receive and use appropriate security features to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have internal policies which set out and guide our data security. All staff adhere to this approach and are regularly trained in data protection.

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- **Whom to contact?**

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Your rights as the data subject

As a data subject you have the right to:

- See the information held on you on 3Dnet platform and confirm what data is processed about you.
- Ask to correct any inaccurate, out of date or incomplete personal data.
- Request to erase the personal information held on you. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.
- Request to restrict or limit the way your personal data is used.
- Request a copy of your information and where possible to provide it to you in a machine-readable format such as DICOM file if you wish.
- Object to the processing of your information.

As data processors, we will assist the Hospitals and Clinics that use 3Dnet platform, the data controllers, to answer your requests regarding your rights as data subject without undue delay. Considering we take privacy and security measures to handle your data, please be prepared to provide the adequate information to verify your identity.

If you have queries or complaints you may contact **Biotronics3D's Data Protection Officer** (dpo@biotronics3d.com) or the Support team (support@biotronics3d.com) for technical queries. Alternative to the e-mail you may contact us by phone to +44 (0) 207 093 0903 or by post to the following address:

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If you feel that your personal data has not been handled correctly, please write to us in the first instance, so that we can do our best to correct this. If you are still unhappy with our response you have the right to lodge a complaint with the [Information Commissioner's Office \(ICO\)](#).

You can visit their website for information on how to make a data protection complaint.

If you are in the EEA you may also contact **Biotronics3D's European Authorised Representative:**

Skyer Medical Imaging S.R.L.
Str. Fabrica de Caramida, nr 1A, Lot C, Parcela 36,
Sector 1, Bucuresti, Romania.

You can also find the Data Protection Authority in your country at the [EDPB members list](#).

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VERSION	CHANGES	AUTHOR	APPROVED BY	DATE	SIGNED
1.0	Creation	Har.Hatzakis	COO, CTO	01/09/2010	HH, SG
2.0	GDPR Compliance	Joao Correia	CEO, DPO	30/04/2018	HH, JC
2.1	Updated Sub-processors	Joao Correia	CEO, DPO	20/03/2019	HH, JC
2.2	Updated Sub-processors and cookies information	Joao Correia	CEO, DPO	21/08/2020	HH, JC
2.3	Updated EU Representative	Joao Correia	CEO, DPO	30/12/2020	HH, JC