

## **Digital Solutions**

### **EMEA General Privacy Policy – EU/EEA**

#### **General**

Your privacy is important to your healthcare institution (referred to as “your institution” or “institution”) and to the Johnson & Johnson family of companies, here represented by Cilag GmbH International (“Johnson & Johnson” and jointly referred to as “we” or “us”) a Swiss entity which has DePuy Ireland UC as representative in the European Union (“EU”). This privacy statement informs you of how we process your personal data when using or accessing certain online services and facilities we make available as part of our Digital Solutions Platform (“Cloud Services”). Personal data is defined as all information that would allow us to identify you either directly or indirectly. It is important to us that you understand how we will handle your personal data and that you are aware of your rights.

We may amend this privacy statement at any time. Notification of changes to this privacy statement will be posted on: [www.visiblepatient.jnjmedicaldevices.com](http://www.visiblepatient.jnjmedicaldevices.com). This privacy statement was last updated on 8 March 2021.

#### **Our identity and role**

Your institution is the Data Controller as defined in the General Data Protection Regulation (“GDPR”) with regards to the processing of your personal data as described in this privacy statement. Johnson & Johnson acts as a Data Processor of your personal data on behalf of your institution.

#### **What personal data do we collect on behalf of your institution collect, how do we collect it, and why?**

##### *Registration*

Institution has created an account to use our Cloud Services on your behalf. Johnson & Johnson receives your contact information which includes, but is not limited to: full name, email address, phone number, institution name and mailing address, that you enter in the registration form. We use this information to confirm your registration and enable you to make use of the Cloud Services. This processing of personal data is necessary for the purposes of the legitimate interest pursued by us to perform the contract that we have entered into with your institution for governing the use of the Cloud Services (article 6(1)(f) GDPR). If you do not provide us these personal data, you will not be able to use the Cloud Services.

##### *Usage data*

We also process information about how you access and use the Cloud Services (“Usage Data”). This processing of personal data is necessary for the purposes of the legitimate interest pursued by us to administer and improve the Cloud Services (article 6(1)(f) GDPR).

#### **With whom do we share your personal data?**

The processing of personal data as referred to in this privacy statement may, at the instruction and on behalf of your institution, be carried out (in part) by external service providers such as IT service providers or mobile app providers, through which you may also have access to certain services related to the Cloud Services. Johnson & Johnson has entered into appropriate data processing agreements with such third parties, in protection of your interests.

#### **How long do we retain your personal data?**

We retain your personal data no longer than necessary for the purposes for which the personal data are processed. The retention period may differ for each individual purpose and as your Institution specifies.

If you have created an account, we retain your personal data for the purposes of your registration until you delete your account.

We may retain your personal data longer if that is dictated by a statutory retention obligation or if that is necessary to protect our rights, for example in case of a (potential) legal dispute.

### **Security and location of processing**

We have implemented appropriate technical and organizational measures to secure your personal data. Our systems and software are secured in order to prevent unauthorized parties inside and outside our organization from gaining access to your personal data. Access to your personal data is limited to persons who require this access for the purposes of the performance of their work.

Johnson & Johnson may transfer your personal data to various geographic locations, including countries located inside and outside of the European Economic Area. To the extent your personal data is transferred to third countries we have put appropriate contractual and other measures in place to protect your personal data when it is transferred. You may obtain a copy of these measures by contacting Johnson & Johnson's Data Protection Officer responsible for your country or region, if applicable, at [emeaprivacy@its.jnj.com](mailto:emeaprivacy@its.jnj.com).

Personal Data is transferred to:

Siemens GmbH (DPA/EU Standard Contractual Clauses), hosted in the Netherlands

Visible Patient S.A.S. (DPA/EU Standard Contractual Clauses), hosted in France

C3i EOOD (DPA/EU Standard Contractual Clauses), hosted in Bulgaria

### **What are your rights and how do you contact us to exercise them?**

You have certain rights in connection with your personal data.

If you would like to review, correct, update, restrict, object to the processing or delete personal data, or if you would like to receive an electronic copy of the personal data you have provided, you should contact your institution, or us by e-mail to [support@ethiconvisiblepatient.com](mailto:support@ethiconvisiblepatient.com), or our EU Representative at [MD\\_EU@its.jnj.com](mailto:MD_EU@its.jnj.com). We may request additional proof of your identity in order to be sure that your request pertains to your personal data. This is in the interests of the protection of your privacy.

You are at all times entitled to submit a complaint to a competent data protection authority if you believe that we are not processing your personal data in accordance with the GDPR.

For such authorities and their contact information, please visit: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## Digital Solutions

### EMEA General Privacy Policy – Countries outside of EU/EEA

#### General

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We may amend this privacy statement at any time. Notification of changes to this privacy statement will be posted on: [www.visiblepatient.jnjmedicaldevices.com](http://www.visiblepatient.jnjmedicaldevices.com). This privacy statement was last updated on 8 March 2021.

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##### *Registration*

Institution has created an account to use our Cloud Services on your behalf. Johnson & Johnson receives your contact information which includes, but is not limited to: full name, email address, phone number, institution name and mailing address, that you enter in the registration form. We use this information to confirm your registration and enable you to make use of the Cloud Services. If you do not provide us these personal data, you will not be able to use the Cloud Services.

##### *Usage data*

We also process information about how you access and use the Cloud Services ("Usage Data").

#### With whom do we share your personal data?

The processing of personal data as referred to in this privacy statement may, at the instruction and on behalf of your institution, be carried out (in part) by external service providers such as IT service providers or mobile app providers, through which you may also have access to certain services related to the Cloud Services. Johnson & Johnson has entered into appropriate data processing agreements with such third parties, in protection of your interests.

#### How long do we retain your personal data?

We retain your personal data no longer than necessary for the purposes for which the personal data are processed. The retention period may differ for each individual purpose and as your Institution specifies.

If you have created an account, we retain your personal data for the purposes of your registration until you delete your account.

We may retain your personal data longer if that is dictated by a statutory retention obligation or if that is necessary to protect our rights, for example in case of a (potential) legal dispute.

### **Security and location of processing**

We have implemented appropriate technical and organizational measures to secure your personal data. Our systems and software are secured in order to prevent unauthorized parties inside and outside our organization from gaining access to your personal data. Access to your personal data is limited to persons who require this access for the purposes of the performance of their work.

Johnson & Johnson may transfer your personal data to various geographic locations outside of your country of residence, To the extent your personal data is transferred to third countries we have put appropriate contractual and other measures in place to protect your personal data when it is transferred. You may obtain a copy of these measures by contacting Johnson & Johnson's Data Protection Officer responsible for your country or region, if applicable, at [emeaprivacy@its.jnj.com](mailto:emeaprivacy@its.jnj.com).

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### **What are your rights and how do you contact us to exercise them?**

You have certain rights in connection with your personal data.

If you would like to review, correct, update, restrict, object to the processing or delete personal data, or if you would like to receive an electronic copy of the personal data you have provided, you should contact your institution, or us by e-mail to [support@ethiconvisiblepatient.com](mailto:support@ethiconvisiblepatient.com). We may request additional proof of your identity in order to be sure that your request pertains to your personal data. This is in the interests of the protection of your privacy.

You may, if applicable, be entitled to submit a complaint to a competent data protection authority.

Please click below for contact information for such authorities.

**UK:** <https://ico.org.uk/>

**Switzerland:** <https://www.edoeb.admin.ch/>

**Israel:** <https://ppa@justice.gov.il/>