



## Corventis Safe Harbor Policy

### Policy Statement

Corventis Inc. is a developer of medical equipment and services to hospitals. Corventis collects patient health, billing and insurance data from individuals. Corventis Inc. ("Corventis") acknowledges the EU's standard for personal data protection. We adhere to the Safe Harbor Agreement concerning the transfer of personal data from the European Union ("EU") to the United States of America, and we follow the Safe Harbor Principles published by the U.S. Department of Commerce ("Principles") with respect to all such data. This statement outlines our general policy and practices for implementing the Principles, including the types of information we gather, how we use it, and the choices affected individuals have regarding our use of, and their ability to correct, that information. It does not include information that pertains to a specific individual, but from which that individual could not reasonably be identified.

### Data Use

Patient data is collected and transmitted to a server for processing. The purpose of this data transmission is to:

- a) Facilitate patient and medical management, and
- b) Assist physicians/health practitioners in the diagnosis and identification of various clinical conditions/events/trends.

In addition, patient data may be transferred to the United States for the purpose of development and improvement of device algorithms.

### Principles

Corventis has adopted the seven Safe Harbor principles of notice, choice, onward transfer (transfer to third parties), access, security, data integrity and enforcement with respect to medical and personal data to be transferred to the U.S. from patients in the EU.

#### Notice

When Corventis collects Personal Information from individuals in the EU, it will inform those individuals about the kinds of Personal Information collected, the purposes for which it collects and uses information about them, how to contact Corventis with any inquires or complaints, the types of third parties to which Corventis may disclose the information, and the choices and means Corventis offers individuals for limiting its use and disclosure. This notice will be provided in clear and conspicuous language when individuals are first asked to provide personal information to Corventis, or as soon thereafter as practicable, but in any event before Corventis uses such information for a purpose other than that for which it was originally collected.

#### Choice

Corventis shall provide Consent forms to the patient to indicate that he/she agrees to provide personally-identifying information, and he/she consents to Corventis' use of that information.

With regard to sensitive information, EU residents are given an affirmative choice whether to disclose the information to a third party or if the information will be used in a manner inconsistent with the purposes for which it has been collected.



### **Onward Transfer (Transfer to Third Parties)**

Corventis reserves the right to employ other organizations or individuals as our subcontractors.

Corventis only transfers personal data to agents who provide the same level of privacy protection as is required by these privacy principles.

### **Security**

Corventis takes reasonable precautions to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

### **Data Integrity**

Corventis processes personal information only in ways compatible with the purpose for which it was collected or subsequently authorized by the individual. To the extent necessary for such purposes, Corventis takes reasonable steps to make sure that personal information is accurate, complete, current, and otherwise reliable with regard to its intended use.

### **Access**

If an individual becomes aware that information maintained about that individual is inaccurate, or if an individual would like to update or review his or her information, the individual may contact Corventis using the contact information below. Corventis will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate. The individual will need to provide sufficient identifying information, such as name, address and birth date. Corventis may request additional identifying information as a security precaution. In addition, Corventis may limit or deny access to personal information where providing such access would be unreasonably burdensome or expensive in the circumstances, or as otherwise permitted by the Safe Harbor Agreement. In some circumstances, Corventis may charge a reasonable fee, where warranted, for access to personal information.

### **Enforcement**

To ensure compliance with these Safe Harbor Principles, Corventis will:

- a. Employ a procedure for verifying that the commitment the company has made to adhere to the Safe Harbor Principles has been implemented. Corventis will verify that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented, and in conformity with the Principles;
- b. Remedy issues arising out of any failure to comply with the Principles. Any person under Corventis control whom Corventis has determined is in violation of the privacy policies will be subject to disciplinary process.

Corventis is subject to the jurisdiction of the US Federal Trade Commission

### **Dispute Resolution**

Any questions or concerns regarding the use or disclosure of personal information should be directed to Corventis at the contact information given below. Corventis will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between Corventis and the complainant, Corventis has agreed to participate in the dispute resolution procedures of the panel established by the European Data Protection Authorities to resolve disputes pursuant to the Safe Harbor Principles.



### Contact Information

Questions or comments regarding this Policy should be submitted to Corventis by mail or phone as follows:

User Assistance Number (US): 1-408-790-9399  
Corventis, Inc.  
1410 Energy Park Drive  
Suite 1  
St. Paul MN 55108  
U. S. A.

EU Authorized Representative Number (Belgium): +32-473-836382  
Corventis, Inc.  
Bloemenlaan 2  
1933 Sterrebeek  
Belgium

Or by e-mail to:

[Safe.harbor@corventis.com](mailto:Safe.harbor@corventis.com)

### Amendment

This Policy may be amended consistent with the requirements of the Safe Harbor Principles. Appropriate public notice will be given concerning such amendments.

### Effective Date

March 1, 2009