



# Data Privacy Policy

## Omnidoc

Updated on April 1st, 2025

**Ensuring the security and confidentiality of the personal data of the platform's users (healthcare practitioners) and their patients is an absolute priority for Omnidoc.**

Accordingly, Omnidoc undertakes to protect the privacy and process the personal data of visitors to its website accessible at <https://omnidoc.de/> (hereinafter the "**Site**"), of Users of its Omnidoc eConsult platform (healthcare practitioners) accessible at <https://app.omnidoc.de/login> (hereinafter the "**Platform**") and their patients, in compliance with applicable legal requirements and in particular French Regulation no. 2016/679 of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter the "**General Data Protection Regulation**" or "**GDPR**") and/or any other provisions arising from applicable national legislation, in particular French Law no. 78-17 of January 6, 1978, known as the Loi Informatique et Libertés (together the "**Applicable Regulations**").

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## 1. WHO IS THIS POLICY FOR?

The purpose of this Personal Data Protection Policy (hereinafter the "**Policy**") is to inform data subjects of the manner in which Omnidoc processes and protects the personal data it collects in its capacity as data controller.

The terms "**you**", "**your**", "**yours**" refer to all persons concerned by this Policy and whose personal data are processed by Omnidoc, namely:

- People who visit the Site without having a User account and/or contact us via the Forms present on the Site, via the [kontakt@omnidoc.de](mailto:kontakt@omnidoc.de) email address and more generally by any other means (hereinafter "**Prospect**");
- Healthcare practitioners who have a User account on the Platform (hereinafter "**User**");
- Persons applying for a position with Omnidoc (hereinafter "**Candidate**").

**This Policy does not apply to patients whose personal data is processed via the Omnidoc Platform.** If you are a patient of a healthcare practitioner who has used the Omnidoc Platform as part of an eConsult, please contact your healthcare practitioner for information on the data processing implemented with your data.

In addition, Users are informed that the processing of patients' personal data implemented as part of the management of eConsult networks and/or the management of eConsult procedures for which Omnidoc acts as a data processor is governed, depending on the contractual relationship that binds you to Omnidoc, within Agreement on the Data Processing Agreement or the Platform General Terms and Conditions of Use. For more information on the measures implemented by Omnidoc to protect and manage patients' personal health data, please refer to these documents.

## 2. WHO IS RESPONSIBLE FOR PROCESSING ?

Omnidoc, a French Société par Actions Simplifiée (simplified joint stock company), registered in the Paris Commercial Court under the number 847 506 144, having its registered office at 9 rue des Colonnes 75002 Paris (hereinafter referred to as "Omnidoc").

"**Omnidoc**", "**we**", "**us**", "**our**") is the controller of the processing of personal data that is implemented by means of the data collected and processed under the conditions mentioned in Article 3 of this Policy.

## 3. WHY IS YOUR DATA PROCESSED AND ON WHAT LEGAL BASIS ?

### 3.1. DATA THAT YOU COMMUNICATE DIRECTLY TO US AS PROSPECTS AND/OR CANDIDATE

In the table below, depending on your status (Prospect or Candidate), you will find the uses made of your data, i.e. the purposes of processing, as well as the legal basis justifying such processing in accordance with the Applicable Regulations and the length of time your data will be kept in this context

Why is your data processed?	What data is processed?	How long is your data stored?	What is the legal basis for processing your data?
<b>For Prospects</b>			
To communicate with you when you send us a request for information by e-mail to the following address <a href="mailto:kontakt@omnidoc.de">kontakt@omnidoc.de</a>	<ul style="list-style-type: none"> <li>- email address</li> <li>- any information you voluntarily provide in the body of your message, such as your name first name; telephone number; position; company; message content</li> </ul>	For 3 years from the last contact with you	Execution of pre-contractual measures
To manage your registration and participation in our software demonstrations and training/webinars	<ul style="list-style-type: none"> <li>- email address</li> <li>- phone</li> <li>- full name</li> <li>- company and function</li> <li>- training or webinar registration.</li> </ul>	Same as above	Performance of contract or pre-contractual measures
<ul style="list-style-type: none"> <li>+ Unless object, send you commercial communications and/or our newsletter</li> <li>+ Manage your subscription and/or unsubscription to our commercial communications and/or newsletter</li> </ul>	<ul style="list-style-type: none"> <li>- email address</li> <li>- full name</li> <li>- subscription and/or unsubscription newsletter and commercial communications</li> </ul>	Same as above	Omnidoc's legitimate interests, in particular its commercial interests. Such processing contributes to the promotion and improvement of Omnidoc's services and benefits both Omnidoc and the Prospect (which thus benefits from services free of charge) without infringing the Prospect fundamental rights.
<b>For candidates</b>			
<ul style="list-style-type: none"> <li>+ Review your application to enable us to decide whether your profile is suitable for the position you have applied for, or for any other position.</li> <li>+ Manage the recruitment process, including arranging and conducting interviews and deciding on your application</li> </ul>	<ul style="list-style-type: none"> <li>- name</li> <li>- first name</li> <li>- email address</li> <li>- postal address</li> <li>- telephone number</li> <li>- CV and educational background</li> <li>- career path</li> <li>- cover letter</li> <li>- centers of interest</li> <li>- any information we collect during interviews related to the recruitment process</li> <li>- any information you provide voluntarily as part of the recruitment process</li> </ul>	<ul style="list-style-type: none"> <li>- Candidate data is kept for the duration of the recruitment process.</li> <li>- Data on candidates who have been interviewed but not recruited can be archived for 6 years from the end of the recruitment process</li> </ul>	Execution of pre-contractual measures

Please note that where the processing of your personal data is based on Omnidoc's legitimate interest, we study and assess the potential impact (positive and negative) of such processing on you and your interests, rights and freedoms. For information on how Omnidoc assesses its legitimate interest please contact us [contact\\_rgpd@omnidoc.fr](mailto:contact_rgpd@omnidoc.fr)

### 3.2. DATA RELATING TO VISITORS TO THE SITE

Omnidoc has chosen to limit as far as possible the processing of data relating to visitors to its Site.

Thus, no cookies or other non-strictly necessary tracers (cookies or tracers for targeted advertising and/or social network sharing buttons) are used on the Site.

Omnidoc does, however, use technologies that enable it to measure the audience for its Site, in order to produce anonymous browsing statistics and thus improve its Site and its content based on the analyses carried out.

Lastly, certain technical information is essential to enable you to access the Site and its functionalities (display adapted to your terminal screen; load balancing which enables faster loading of Site pages and smoother browsing), as well as to connection or display errors.

The technical information used in this context is: IP address, information relating to your terminal (computer, tablet or smartphone) and your web browser, date and time of connection (start and end of connection). This information is automatically detected and collected by the site host. It is stored by the latter for a maximum period of one (1) year before being deleted.

The collection and use of this data is based on the performance of the contract between you and Omnidoc and the legal obligations of the host.

### 3.3. DATA RELATING TO USERS OF THE OMNIDOC PLATFORM

If you are a healthcare practitioner and you have a User account, your personal data is collected by Omnidoc in various ways:

- directly to you when you create your User account and/or use the Platform;
- from healthcare establishment and/or professional organization in which you practice, which has sent us your personal data so that we can create your User account;
- from potential sources used to check that you are a healthcare practitioner duly authorized to carry out eConsult procedures;
- from other Users, healthcare practitioners, who send us your contact details to invite you to connect to the Platform so that we can initiate an EConsult procedure with you.

In the table below, you will find the uses made of your data by Omnidoc, i.e. the purposes of processing, as well as the legal basis justifying such processing in accordance with the Applicable Regulations:

Why is your data processed?	What data is processed? (* Data required to be collected)	How long is your data stored?	Legal basis for processing your data?
<b>Managing and using user accounts</b>			
+ User account creation management + Identity check of the health practitioners + User account management and use including the two-factor authentication process	+ Identification data*: first and last names, login and associated passwords + Profile picture + Bio + Logs* (actions, browser, IP address, OS, etc.) + Email and phone number + Profession and specialties + Place of work + Potential professional healthcare	+ In active base: for the duration of the contractual relationship + In intermediate archive base : the data that may prove useful as part of a dispute are retained for 5 years from the	Contract performance

	<ul style="list-style-type: none"> <li>+ identification november</li> <li>+ Identity document</li> <li>+ Other requirement parameters (being discoverable by other healthcare practitioners, being solicitable by other healthcare practitioners, accepting requests from non-physician healthcare practitioners)</li> <li>+ Message and date absence</li> <li>+ Patient software used</li> </ul>	end of the relationship contractual	
<ul style="list-style-type: none"> <li>+ Creation and management of a search engine for Omidoc users</li> <li>+ Management of profile files for all Platform Users</li> </ul>	<ul style="list-style-type: none"> <li>+ Identification data*: surname, first name</li> <li>+ Profession</li> <li>+ Profile picture</li> <li>+ Bio</li> <li>+ Potential professional healthcare identification number</li> <li>+ Locations</li> <li>+ Network Member</li> </ul>	Same as above	Contract performance
Manage user contacts: subscribed networks and favorite users	<ul style="list-style-type: none"> <li>+ Identification data*: surname, first name</li> <li>+ Profession</li> <li>+ Profile picture</li> <li>+ Bio</li> <li>+ Potential professional healthcare identification number</li> <li>+ Locations</li> <li>+ Network Member</li> </ul>	Same as above	Contract performance
<b>Management of contractual relations and marketing operations</b>			
Manage your subscription and/or unsubscription to our commercial communications and/or newsletter	<ul style="list-style-type: none"> <li>+ Email address</li> <li>+ Full name</li> <li>+ Newsletter subscription and/or unsubscription</li> </ul>	For 3 years from the last contact with you	Omidoc's legitimate interests, in particular its commercial interests. Indeed, such processing contributes to the promotion and improvement of its services by Omidoc and benefits both the User (who thus benefits free services) and Omidoc without infringing the interests, rights and fundamental freedoms of the User.
Manage your participation in our demonstrations and training/webinars	<ul style="list-style-type: none"> <li>+ Email address</li> <li>+ Full name</li> <li>+ Newsletter subscription and/or unsubscription</li> <li>+ Training or webinar registration</li> </ul>	Same as above	Contract performance
<b>Enhancing the Omidoc platform and the services it provides</b>			
+ Analysis of how Users use the Platform	<ul style="list-style-type: none"> <li>+ Last name, first name of the Referring and Consulting User</li> </ul>	For the duration of the contractual	Legitimate interest

+ Based on this analysis, improve the Platform and create/improve the services provided	<ul style="list-style-type: none"> <li>+ Logs (actions, browser, IP address, OS, etc.)</li> <li>+ Metadata related to eConsult: date and time of eConsult initiation; eConsult status (In progress, completed); eConsult end date; procedure code</li> <li>+ User category (individual user or member of network)</li> </ul> <p><b>No health data associated with the eConsult procedure, nor any patient data, is processed or analyzed in this context.</b></p>	relationship	
Conduct optional surveys on the Platform and the services provided by Omnidoc for the purpose of improving the Platform and creating/improving the services provided	<ul style="list-style-type: none"> <li>+ Identification data*: surname, first name,</li> <li>+ Contact details: e-mail, telephone number</li> <li>+ Profession/Specialty</li> <li>+ Testimonials collected on the operation of the Platform, the services provided and/or any other questions asked by Omnidoc in this context.</li> </ul> <p><b>No health data associated with the eConsult procedure, nor any patient data, is processed or analyzed in this context.</b></p>	For 3 years from the last contact with you	Legitimate interest
<b>Compilation of statistics and analysis of care pathways</b>			
Analysis of metadata linked to eConsult procedures to produce statistics on the care pathway	<ul style="list-style-type: none"> <li>+ Surname, first name of the Referring and Consulting User</li> <li>+ Logs (actions, browser, IP address, OS, etc.)</li> <li>+ Metadata related to eConsult: date and time of eConsult initiation; eConsult status (In progress, Completed); eConsult end date; procedure code</li> <li>+ User category (individual user or member of a network)</li> <li>+ Location</li> </ul> <p><b>No health data associated with the eConsult procedure, nor any patient data, is processed or analyzed in this context.</b></p>	For 3 years from the last contact with you	Legitimate interest

#### 4. HOW DO YOU ENSURE THE SECURITY OF YOUR DATA ?

Omnidoc undertakes to take all technical and organizational measures to ensure the protection and security of personal data, in particular against loss, alteration, distribution or unlawful use.

Omnidoc ensures that such measures are in place for all operations carried out in connection with its processing operations, in particular the collection, storage and hosting of data.

In this respect, Omnidoc also ensures that the third parties it uses (technical service providers and suppliers) comply with this requirement to protect your personal data by implementing appropriate measures, in accordance with Applicable Regulations.

## 5. WHO DO WE SHARE YOUR DATA WITH? WHO CAN ACCESS YOUR DATA ?

Your personal data is only accessible internally to employees who need access to the data for the purposes mentioned in the table above in Article 3.

Your personal data may also be accessed or processed by third parties, when strictly necessary for the purposes mentioned above, in the following contexts:

- your personal data may be accessed and/or processed by companies that perform services on our behalf as data processors within the meaning of the Applicable Regulations:
  - service providers providing hosting and maintenance services for the Site and Platform. In this respect, it is specified that in order to comply with the provisions of the French Public Health Code concerning the processing of personal health data, Omnidoc uses a Health Data Host benefiting from the appropriate certification to host the Platform ("HDS"),
  - providers of hosting and maintenance services for software processing your data (CRM, emailing and SMS routing tools, analysis/statistics tools).

These service providers process your personal data on Omnidoc's instructions and on Omnidoc's behalf. Omnidoc ensures through contractual clauses that these service providers take all reasonable and appropriate organizational and technical security measures to prevent disclosure, use, alteration, accidental loss or destruction of your personal data and that they only have access to and process your personal data to the extent necessary to perform their services.

- in order to comply with current legislation, Omnidoc may disclose personal data where it is legally authorized or required to do so in order to comply with applicable law or any legal process (including requests from authorities and courts), to respond to any request or claim or to protect the rights, property or safety of Omnidoc, its employees or the general public.
- In the event of a merger, acquisition or sale of all or part of Omnidoc's assets, your personal data may be made accessible to third parties. In this respect, it is however specified that no personal health data will be communicated and/or made accessible.

## 6. DATA TRANSFERS OUTSIDE EUROPEAN UNION

The Site is hosted in France and Europe on the servers of a third-party service provider.

Your personal data is processed by Omnidoc using various softwares and applications, depending on the purpose of the processing. These software applications are hosted on secure servers in Europe under conditions that comply with applicable regulations.

Omnidoc requires these service providers to take, in accordance with Applicable Regulations, all organizational and technical measures to ensure an adequate level of protection of your personal data.

However, some of your personal data may be or are transferred outside the European Union in connection with the purposes of Processing set out above. For each transfer, Omnidoc implements appropriate safeguards to ensure an adequate level of protection within the meaning of Articles 45 et seq. of the GDPR. Depending on the type of data

transfer, the Recipient and its location, the transfer is governed by an adequacy decision from the European Commission, the signing of standard contractual clauses following the model approved by the European Commission (a copy of the model used for the signature these clauses is available at the following : [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?uri=CELEX%3A32021D0914&locale=fr](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?uri=CELEX%3A32021D0914&locale=fr)) or the use of a Recipient with Binding Corporate Rules.

## 7. WHAT ARE YOUR RIGHTS ?

Please note that no personal health data is transferred outside the European Union.

In accordance with the Applicable Regulations, you have the following rights with respect to your personal data:

- **Right to information:** you have the right to obtain clear, transparent, comprehensible and easily accessible information on how we use your personal data and on your rights. This is why we provide you with the information in this Policy.
- **Right of access:** you have the right to access the personal data we hold about you (provided that the request is not manifestly unfounded or excessive, in particular because of its repetitive nature), and to obtain a copy of it. If you wish to access the data we hold about you, please contact us using the details below.
- **Right of rectification:** you have the right to request that your personal data be rectified if it is inaccurate or out of date and/or that it be completed if it is incomplete (provided that the request is not manifestly unfounded or excessive, in particular due to its repetitive nature). If you wish to modify your personal data, please contact us using the details below.
- **Right to object to** the processing of your personal data where it is based on Omnidoc's legitimate interests (to determine the processing operations to which this right applies, please refer to the table in Article 3 of this Policy): you may at any time object to the processing of your personal data on grounds relating to your particular situation, unless Omnidoc has compelling legitimate grounds for processing such data which override your interests, rights and freedoms, or where such data is necessary for the establishment, exercise or defence of legal claims. If you wish to exercise your right to object or obtain further information on how to exercise this right, please contact us using the details below.
- **Right to erasure:** In certain cases, you have the right to have your personal data erased or deleted. This is not an absolute right, as we may be obliged to retain your personal data for legal or legitimate reasons. If you would like us to delete your data, please contact us using the details below.
- **Right to limitation:** this right means that the processing of your data by us will be limited, so that we may retain the data but may not use or process it. This right applies in specific circumstances:
  - If you contest the accuracy of the personal data processed. The processing is then limited for a period of time allowing Omnidoc to verify the accuracy of the personal data;
  - In cases where you object to the deletion of personal data and request instead that their use be restricted;
  - In cases where you object to the deletion of personal data and request instead that their use be restricted;
  - In the event that Omnidoc no longer requires your personal data for the purposes of processing, but such data is still necessary for the establishment, exercise or defence of legal claims;
  - In cases where you have objected to processing based on the legitimate interests pursued by Omnidoc, during the verification as to whether or not the legitimate grounds pursued by Omnidoc prevail over those of the data subject.

If you wish to request the restriction of processing, please contact us using the details below.



- **Right to portability:** you have the right to receive the personal data concerning you that you have provided to us and that we hold about you, in a structured, commonly used and machine-readable format. This applies only to data that you have provided directly or indirectly, and only where processing is based on your consent or the performance of a contract and is carried out using automated processes. We invite you to consult the list of legal bases for our processing of personal data (see article 3 of this Policy) to find out whether our processing is based on a contract or on consent. To exercise your right to data portability or obtain further information, please contact us using the details below.
- **Right to object to direct marketing:** you may, at any time, unsubscribe or object to receiving commercial prospecting messages from Omnidoc. Simply click on the link in the footer of the communications you receive from Omnidoc or send a message to the contact details below.
- **the right to give us specific instructions** about what to do with your data after your death, and
- **Right to lodge a complaint with a supervisory authority**, with the CNIL in France (3, place de Fontenoy, 75007 Paris) or with any other competent authority (contact details available at the following address: [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080)) to contest Omnidoc's personal data protection and privacy practices.

If you wish to exercise any of these rights and/or if you have any questions about these rights, you can contact Omnidoc at the following address: [contact\\_rgpd@omnidoc.fr](mailto:contact_rgpd@omnidoc.fr)

## 8. MODIFICATION OF THIS POLICY

Omnidoc may update this Policy at any time to adapt it to any new features of the Site, Platform and/or new processing operations related to our service offerings. In this case, the date of the Policy update will be updated and will indicate the day on which the modifications were made. It is your responsibility to check for any updates to this Policy posted on the Site.

If Omnidoc makes substantial changes to this Policy, you will be notified by any means, including subsequent connection to the Platform and/or by email.

## 9. HOW TO CONTACT US

Aware of the importance of data protection, Omnidoc has appointed a Data Protection Officer who can be contacted at the following address

In general, if you have any questions or comments about this Policy, or our use of your personal data, you can contact us at the following address:

### **Omnidoc**

9 rue des Colonnes, 75002 Paris

[contact\\_rgpd@omnidoc.fr](mailto:contact_rgpd@omnidoc.fr)