

Privacy statement

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Introduction

CarePay processes your personal data carefully, securely and confidentially. It is important to us that you have confidence in our organisation with regard to the processing of personal data. This privacy statement is intended for the website visitors of CarePay as well as service users of the CarePay platform. It provides information about the processing of personal data through this website as well as personal data related to our service and products on the CarePay platform. More information on the processing of personal data related to our service and products on the CarePay platform can also be found in our terms of service [\[link\]](#). The rules on the protection of your privacy are laid down in the General Data Protection Regulation. CarePay acts within the framework of this law.

What is personal data?

Personal data are all data that can be traced back to a person. Examples include your name, address, telephone number and account number. Sometimes we pseudonymize your personal information, so that it is no longer directly traceable to you as a person. This is the case, for example, with the IP address that we use pseudonymously for the analysis of web statistics.

Which Data Protection Principles have we adopted?

CarePay has adopted the following principles in accordance of the GDPR to govern its collection, use, retention, transfer, disclosure and destruction of Personal Data:

Principle 1: Fair and Transparent processing of Data

Personal Data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject. CarePay shall;

- Ensure the Data Subject is aware of what processing shall occur (transparency)
- The Processing shall match the description given to the Data Subject (fairness)
- Data shall only be processed for one of the purposes specified

Principle 2: Purpose Limitation

Personal Data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. CarePay shall specify exactly what the Personal Data collected shall be used for and limit the processing of that Personal Data to only what is necessary to meet the specified purpose.

Principle 3: Data minimization

Personal data should be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Principle 4: Accuracy

Personal Data shall be accurate and kept up to date. CarePay shall have in place processes for identifying and addressing out-of-date, incorrect and redundant data.

Principle 5: Storage Limitation

Personal data will not be stored for longer than the purposes of the processing of data require.

Principle 6: Integrity & Confidentiality

Personal Data shall be processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful Processing, and against accidental loss, destruction or damage. CarePay shall use appropriate technical and organizational measures to ensure the integrity and confidentiality of Personal Data is maintained at all times.

Principle 7: Accountability

CarePay is responsible for ensuring that the principles (outlined above) are met for all personal Data for which it is responsible, and demonstrating compliance with international and national regulations.

The Data Protection Officer is responsible for informing and advising the organisation and the employees about the GDPR, monitoring compliance with the GDPR, assisting with Data Protection Impact Assessments (DPIA's) and acting as point of contact for the respective national Data Protection Authority.

What personal data do we process when providing our services and products?

In order to provide you the services and products CarePay collects the following data on individuals:

Registration data:

To create a CarePay account you need to provide data including name, date of birth, gender, mobile number, National ID number and password. If you have dependents on your account you will also need to provide their names and dates of birth. This is to ensure that CarePay has sufficient information to undertake its duties within the contract, and to fulfil its legal obligations regarding the Know Your Customer (KYC) responsibilities.

Service and product data

In addition to the registration data and in order to provide our service and products CarePay collects data on savings, loans and financial transactions undertaken through the CarePay platform. We also need to collect this data in order to fulfil CarePay's role in the management of financial transactions.

In order to provide (and improve) the services and related hereto including administration of the account, customer support, customer communication, access to healthcare services, and managing and processing healthcare claims and payment thereof.

CarePay also collects data on diagnoses entered by healthcare providers and billed items through the CarePay platform in order to undertake the claims management role offered by the CarePay platform.

Other products may be operated on CarePay, for example financial services products (such as loans), commercial insurance products, corporate insurances or funds, or social insurance offerings. In that case CarePay may need to share your personal information with the vendor of the product.

Additional data:

CarePay further collects feedback provided to customer surveys in order to improve services that its customers receive.

To enable trusted third party partners to use your personal data for research and marketing purposes, under controls designed to protect your privacy, CarePay needs your prior consent. This consent can be revoked at any time. CarePay asks for your consent in a separate form and way.

By making use of CAREPAY, you are aware that CarePay sends you communication messages using SMS, telephone, email and other means to inform You regularly on other products and services offered by CarePay and CarePay's partners including but not limited to promotions, vouchers, participation in surveys such as customer satisfaction surveys and other services for example subscription to healthcare applications. Participation or subscription to the aforementioned products and services shall be on a voluntary basis and subject to separate terms and conditions. You reserve the right to opt-out of CarePay's commercial communication messages. To opt out you can call the customer support center on telephone numbers found on the website www.carepay.com.

Who is the data controller for the processing of personal data?

CarePay is the data controller for the processing of personal data on its website as well the processing of personal data related to our service and products on the CarePay platform.

CarePay International B.V.
Paasheuvelweg 25
1105BP Amsterdam
The Netherlands
privacy@carepay.com

+31 20 33 43 343

CarePay is the data controller for the processing of personal data related to our service and products on the CarePay platform. Your personal data will be treated confidentially and will only be processed for the purpose for which it is necessary, CarePay shall not share your personal information without your consent to third parties or unauthorized persons, except to act on your behalf or request, as required by law or when necessary for the operation of CarePay and fulfilment of its services.

Where necessary, we share the data with our processors and other joint controllers of the data processing (as discussed above). Furthermore, CarePay is sometimes obliged to provide personal data pursuant to legal obligations. Think, for example, of public investigation services. We will only do this if there is a legal obligation to do so, otherwise we will not.

Where other products are operated on the platform, for example commercial insurance products, corporate insurances or funds, or social insurance offerings, CarePay may need to share your personal information with the vendor of the product, who may act as a joint controller for the processing of this data. More information is on the processing of personal data related to our service and products on the CarePay platform can be found in our terms of service [link].

CarePay has engaged various processors and subprocessors for the processing of personal data on its website:

- Webflow: this is our hosting party. Webflow has for this service also some subprocessors enabled, see the separate section on webflow.
- Google Analytics: we place this party's cookies on our website, see the separate section on Google Analytics.
- YouTube: we place a video from YouTube on our website, see the separate section on YouTube.

Will we share information of the dependent with the principal member?

CarePay may share dependent's information with the principal member (being the person named as the main applicant on the application for membership), only in relation to the costs of treatment and services received, claims paid, and the amount of any deductible used. CarePay will not share dependent's information regarding medical diagnoses, medical treatment and services received or any medical history unless specifically requested by the dependent.

How long will we retain your personal data regarding the service provided?

CarePay may retain your personal data for a period of up to seven (7) years or as may be required by any law or regulation.

How do we protect your data?

We apply various technical and organisational measures to ensure that the personal data cannot be misused or otherwise end up in the hands of the wrong person or organisation. Examples of these measures are the use of encryption and the training of our employees and volunteers in the field of privacy. We ensure that, if we forward your personal data to other organisations such as the processors or joint controllers, these organisations apply the same standards.

Use of personal data by third parties when visiting the website

Google Analytics

Using Google Analytics, we collect the following personal data from you:

- Pseudonymised IP address (this is an IP address where the last octet has been deleted);
- Location information;
- Details of the device you use to visit our website (such as MAC address and operating system used).

We use this personal information for the purpose of analysing website traffic on the website. It is important for us to know whether our website can be visited properly, and on which pages website

visitors click. Since it is not important for us to know exactly who the website visitor is, it is possible to perform these analyses with pseudonymised, aggregated personal data. In this way, we limit the impact on the privacy of personal data, so that our legitimate business interests can prevail.

The legal basis we use to process personal data is the legitimate interest of CarePay. This basis is possible because we have taken some measures to mitigate the impact on the privacy of the website user. These measures are based on the guidelines of the Personal Data Protection Authority, the supervisory authority of the Netherlands. It concerns the following measures:

- We have concluded a processing agreement with Google;
- We have masked the last octet of the IP address;
- We have made sure that we do not share the data we collect from our website visitors with Google;
- We do not use any other Google services in combination with Google Analytics cookies;
- Finally, we offer website visitors the opportunity to object to the use of these cookies as soon as they visit the website page. The website visitor can do this by not accepting the analytical cookies.

The personal data we collect and analyze for this purpose are stored for a period of 14 months.

YouTube

We include Youtube videos on our website. Google collects personal data from visitors on pages that contain these videos. That's why we only show these videos to visitors who have given consent to the processing of their personal data. Google collects data about the browsing and viewing behavior of its users for the following purposes:

- Storing preferences in the 'NID'-cookie;
- Security purposes- Functional processing needed to provide the Youtube service;
- Collecting online behavioural data to provide personalised advertisements;
- Analytical purposes to optimise the Youtube services.

For more information about the processing of personal data by Google, please see <https://policies.google.com/technologies/types>.

Webflow

We use the hosting services of Webflow for our website. This means that the personal data collected on our website is automatically also stored on the servers of Webflow.

This means that Webflow is a processor of ours and therefore we have made arrangements with this party in a processor agreement.

The personal data processed by Webflow are equal to the personal data under the paragraph of Google Analytics and YouTube.

The purpose of processing this personal data by Webflow is to use the expertise of this party for building a website and managing it. To use this expertise it is necessary that they store the personal data on their servers.

The legal basis for processing personal data via Webflow is the legitimate interest of CarePay. The business interest of CarePay in this case is to be able to outsource the hosting to a skilled and experienced party since CarePay does not have its own web servers. The impact this has on the protection of personal data is largely mitigated by the measures mentioned in the sections of Google Analytics and YouTube. In addition, we have agreements with Webflow on the protection of personal data. Therefore, the business interest of CarePay may prevail over the interest of the website visitor.

The retention period of the personal data is equal to that mentioned in the paragraphs of Google Analytics and YouTube. We have ensured that Webflow also uses these periods.

Webflow is an American party and uses some subprocessors. Because the processing of personal data takes place outside the European Economic Area, the GDPR requires that measures are taken to ensure an adequate level of security. Webflow has done this by joining the Privacy Shield. The Privacy Shield has been approved by the European Commission and requires that the organisation

implements the basic principles regarding privacy. For more information about the Privacy Shield programme and to view our certification, please visit <https://www.privacyshield.gov/>. Webflow also provides information about this at: <https://webflow.com/legal/eu-privacy-policy>.

CarePay is aware that Privacy Shield is currently under discussion as a method to adequately safeguard privacy. That is why CarePay keeps a close eye on developments so that it can anticipate them if necessary.

Existence of automated individual decision-making on the website

CarePay does not use automated individual decision making on its website, as this is not necessary for our services. This means that CarePay does not do profiling through its website.

If the website user chooses to accept Google's cookies for YouTube, this party may use profiling. CarePay has little insight into Google's own goals when placing these cookies. Since CarePay allows cookies on its website, it is partly responsible for this part of the processing of personal data. That is why we ask explicit permission for this. CarePay itself does not use the information collected via the tracking cookies for YouTube. The reason why these cookies are placed is that we cannot prevent this from happening when we want to show a video via YouTube.

What rights do you have on the basis of the processing of personal data?

CarePay considers it important that the customer is able to properly exercise his rights under the law. That is why it is very easy to contact us via the website, among other things. Under the heading 'contact' you will find all information about this. You can use the following rights:

- The right of access: you have the right to see which personal data we process about you;
- The right of rectification: if the personal data we process from you are not correct, you have the right to have them adjusted;
- The right of erasure: if we no longer need your personal data for the purpose for which they were provided to us, you have the right to ask us to delete them. There are a number of exceptions to this, such as our obligation to retain certain data, for example for the tax authorities;
- The right of restriction: During the period that we are in the process of determining whether your data should be rectified, determining the unlawfulness of data processing, determining whether data should be deleted or whether you have objected to the processing, you have the right to request the Restriction of Processing;
- The right of data portability: at your request, we must transfer any personal data we hold about you to you or any other organisation of your choice. You can only exercise this right if the data is processed on the basis of consent or agreement;
- The right to object: if we process data on grounds of legitimate interest or public interest, it is possible to object and a balancing of interests will follow. In the case of direct marketing, you always have the right to object.

If you cannot find a solution or if you would like additional information about invoking your rights, please send an e-mail to privacy@carepay.com or call the telephone number +31 20 33 43 343.

Who is the Data Protection Officer?

At CarePay we consider it important that the protection of personal data is properly guaranteed. We have arranged this by, among other things, employing a Data Protection Officer who supervises compliance with the GDPR. The Data Protection Officer is Bas Bekenkamp and can be reached via the e-mail address privacy@carepay.com or the telephone number +31 20 33 43 343.

Filing a complaint with the competent authority

CarePay finds it important to have satisfied customers. Even though we do everything we can to achieve this, it is possible that you as a customer are not satisfied. It is possible to file a complaint with the supervisory authority, when it comes to the protection of personal data. This can be done via: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>.

How can you contact us?

If you have any questions, a complaint or a remark, please contact us via privacy@carepay.com.

CarePay reserves the right to change this privacy statement. If the change is related to a modification in the processing of personal data, we will inform the website visitor separately in an adequate manner.