MEDITEL
Preventie & Gezondheid

PRIVACY POLICY

Version #19, June 2026

MEDITEL
Preventie & Gezondheid

TABLE OF CONTENT

1. THE PRIVACY POLICY 2
2. DEFINITIONS 3
3. OBJECTIVE OF REGISTRATION 3
4. PRIVACY OFFICER 3
5. OPERATION OF PERSONAL REGISTRATION 4
   A. Description 4
   B. Functioning 4
   C. Precautions 4
   D. Permission 4
   E. Access to Personal Data 4
   F. Provision of data from a Personal Register 4
6. RIGHT OF THE DATA SUBJECT 5
   G. Notification 5
   H. Provision to third parties 5
   I. Removal of data 5
   J. Exchange of data from a Personal Registration 5
   K. Access to Personal Data 6
   L. Correction of registered Personal Data 6
7. RETENTION PERIOD 6
8. COMPLAINTS 6
9. EXTENSION OF TERMS 7
10. APPLICABILITY OF THE POLICY 7
   M. Duration 7
   N. Changes in the policy 7
   O. Entry into force and versions 7
11. ANNEXES 7
   Annex I: PURPOSE OF REGISTRATION 7
   Annex II: OPERATION OF THE REGISTRATION 7
   Annex III: USERS 8

1. THE PRIVACY POLICY

This policy apply within the institutions or services that are part of Meditel Holding BV and its operating companies, hereinafter referred to as "Meditel". The policy focuses on the protection of privacy in the processing and registration of personal data.
The English version of the privacy policy is a translated copy of the Dutch Privacyreglement. In case of unclarity or contradiction, the Dutch version is considered the source version.

2. DEFINITIONS

If names and concepts in this policy are written in capital letters, they have the following meaning:

A. **Personal Data**
Data that is directly or indirectly traceable to an individual natural person. Unless otherwise stated, Personal Data also means Medical Data.

B. **Medical Data**
Personal data relating directly or indirectly to the physical or mental condition of the Data Subject, collected by a healthcare practitioner in the course of his professional activity.

C. **Personal Registration**
A coherent set of data relating to different persons, including Medical Data.

D. **Providing data from the Personal Registration**
To disclose or make available Personal Data contained in the Personal Registration.

E. **Personal Registration Holder** or **Holder**
The person who controls the Personal Registration and is responsible for compliance with the rules of the Regulations: the Medical Director.

F. **Data Subject**
The person whose Personal Data and / or Medical Data is included in the Personal Registration, or his legal representative.

G. **Debtor**
A business relationship with which Meditel has concluded an agreement to provide services.

H. **Administrator of the Personal Registration**
A person who is responsible for the daily care of a Personal Registration or a part thereof under the responsibility of the Personal Registration Holder.

I. **Processor of the Personal Registration**
The person authorized by the Personal Registration Holder to enter or change data in the Personal Registration.

K. **Privacy Officer**
The person who is authorized by the Holder of Personal Data to supervise the processing of the Personal and Medical Data internally.

Where this document speaks of "he" or "his", it should be read "he or she" or "his or her".

3. OBJECTIVE OF REGISTRATION

The Personal Registration Holder describes the purpose of the registration referred to in Article 2 under C accurately and clearly. This description is laid down in Annex I and forms a whole with this policy.
The Personal Registration Holder will not record more data in the registry than necessary for the objective of the Personal Registration.

4. PRIVACY OFFICER

The Privacy Officer (PO) works at holding level and all companies that fall under it. At the time of writing, the companies are FirstCompany Group, AtHomeFirst, Meditel Holding, Atlas Jeugdhulp, Futura Zorg and the VZW-Group. The PO is approachable for privacy issues.
The PO is responsible for investigating, establishing and reporting the data breach to the Dutch Data Protection Authority and possibly the Data Subject. This is established in an operational instruction which can be found on the intranet for all employees of the Holder. The PO is also responsible for keeping an overview of personal data breach. This overview contains the facts about the breach, the consequences and the corrective measures taken.

5. OPERATION OF PERSONAL REGISTRATION

A. Description

The Holder describes the operation of registration referred to in Article 2 under C. This description is set out in Annex II and forms a whole with this policy.
In this description are mentioned at least:

- the name and place of business for which registration is required
- the Holder and who acts on behalf of the Holder,
- the Administrator (s),
- the possible Processor

B. Functioning

The Holder is responsible for the proper functioning of the Personal Registration. His actions relating to the operation of the Personal Registration and the disclosure of data from that registration are restricted by this Policy. The Holder is liable for any damage resulting from non-compliance with this policy.
The Holder obliges the Processor to comply with this policy. The Processor is responsible for the proper functioning of its managed facilities. He shall take the necessary measures regarding the security of, inter alia, equipment, software and the data with which the Personal Registration is being executed.

C. Precautions

The Holder takes the necessary precautions to ensure the correctness and completeness of the recorded data and ensures that care is taken for the necessary technical and organizational provisions against loss or corruption of the data and against unauthorized access, modification or disclosure thereof. Equal duty rests on the Processor for all or part of the facilities that he has.

D. Permission

The Holder enables the Data Subject to grant permission to the Holder for processing the Personal Data relating to him, prior to processing.

E. Access to Personal Data

Access to Personal Data is limited to the person who has gathered these data, the Holder, the Keeper, the Administrator and the Processor, but only in so far as this is required for management and processing purposes or by law.
Annex III specifies the type of access required for different groups of employees.

F. Provision of data from a Personal Register

Within Meditel, Personal Data may be exchanged insofar as this is necessary for the performance of the duties of:

- those directly involved in the service provision of Meditel.

Outside Meditel, Personal Data may be provided to:

- those directly involved in the current care or assistance of the Data Subject, but only after the Data Subject has given written consent for this and insofar as necessary for the performance of their duties.
- the Data Subject themselves.
- the Debtor, insofar as it concerns data that specifically fall under this assignment.

6. RIGHT OF THE DATA SUBJECT

G. Notification

The Holder will make a general public notice of the existence of the registration and this policy, including the manner in which the policy may be reviewed and obtained, and how further information on this matter can be obtained.

H. Provision to third parties

Personal and Medical Data will not be provided to third parties, except with the prior consent of the Data Subject.

I. Removal of data

The Data Subject shall have the right to request Meditel to destroy his Personal Data. To this end he shall submit a written request to the Personal Registration Holder. This request can only be refused if preservation is required by a statutory provision, or if the retention periods as stipulated in Article **Fout! Verwijzingsbron niet gevonden.** require preservation.
If the request is granted, the relevant data will be destroyed or made anonymous.
The Personal Registration Holder shall inform the Data Subject in writing of his decision within one month.

J. Exchange of data from a Personal Registration

Within Meditel, Personal Data may be exchanged to the extent necessary for the performance of duties by:

- those directly Data Subject in the provision of services to the Data Subject or Debtor.
- persons and organisations whose task is to monitor and supervise the services.

Outside Meditel, Personal data may be provided to:

- those directly Data Subject in the actual medical care of the Data Subject, but only after the Data Subject has given written consent and only to the extent necessary for their duties.
- the Data Subject himself.
- the insurance company that has commissioned collection of personal data, as far as it concerns matters specifically covered by this commissioning.

This article does not cover other data than Personal Data or Medical Data.

K. Access to Personal Data

The Data Subject has the right of access to inspect his Personal Data.
To obtain access, the Data Subject should submit a written request to the Administrator. The requested inspection must take place within one month. If requested, the Administrator will provide the Data Subject with a copy of his Personal Data.

A request to inspect or copy can only be refused if this would violate important interests of others than the Data Subject, including the Holder.
If the Administrator suspects that direct access can cause damage to the Data Subject, or can lead to misinterpretation of the Medical data, the Administrator can recommend that inspection is carried out only under the supervision of a qualified physician or a counsellor of the Data Subject.

L. Correction of registered Personal Data

The Data Subject may request correction, addition or deletion of his Personal Data if these are actually incorrect, for the purpose of the registration incomplete or not are relevant, or when they are in violation of a legal provisions. The Data Subject will submit a written and motivated request to the Holder.
The Holder responds to this request within one month.
The Holder ensures that a decision is effectuated within two weeks and informs the Data Subject of the outcome.

The request of the Data Subject will be refused if the Personal Data are necessary for the performance of a task in the public interest or for compliance with legal requirements imposed on Meditel. The Data Subject is informed of such refusal.

7. RETENTION PERIOD

The Personal Registration Holder determines how long to preserve the Personal Data contained in the records (the "retention period"). Applicable legal requirements are observed.
Based on the Dutch Law on Medical Treatment Agreement, is the retention period in principle 20 years for the medical files, or as much longer as the care of a good care provider[1].

If the legal requirements prescribe other retention periods, the Holder will use that. This is the case with medical examinations; these may only be kept as long as it is necessary for the purpose of the inspection[2]. It is also necessary to look at the circumstances of each case for each case. As a result, the applicable retention periods may deviate from the standard term set out above[3].

If the retention period has expired, the associated Personal Data are removed from the records within one year. Anonymization of data to the effect that such data is not traceable to living individuals is considered to be identical to removal.

8. COMPLAINTS

If the Data Subject is of the opinion that the provisions of this policy are not adhered to, he submits such opinion in writing to the Personal Registration Holder. The Holder responds to the complaint within one month.
If the Data Subject believes that his complaint was not answered, he should contact the Dutch Autoriteit Persoonsgegevens with the request to mediate or to advise in his dispute with the Holder. This must take place within two months of receipt of the Holder's reply, or if the Holder has not replied within the stipulated deadline within two months after the expiry of that period.
This does not affect the possibility of recourse to the court, for which action the same terms apply as for the involvement of the Autoriteit Persoonsgegevens.

---

[1] Article 7: 454 under 3 Dutch Civil Law.

[2] Article 7:464 under 2 sub a Dutch Civil Law.

[3] Directive of The Royal Dutch Medical Association (KNMG) *'Omgaan met medische gegevens'* 2024.

9. EXTENSION OF TERMS

The terms as mentioned in article H, article J, article K and article 8 may be extended for a further two months, if the complexity of the request so requires. The Holder will inform the Data Subject about such extension within one month of receipt of the relevant request.

10. APPLICABILITY OF THE POLICY

M. Duration

This policy is in force for the entire period that Personal Data are registered and stored by Meditel.

N. Changes in the policy

Changes to the policy are made by the Personal Registration Holder. Changes in this policy are in force one month after publication on the website of Meditel.

O. Entry into force and versions

This privacy policy entered into force for the first time on July 1st, 1990.
The eighteenth review was adopted on July 29th, 2025.

11. ANNEXES

Annex I: PURPOSE OF REGISTRATION

1. Insurance reports: Gathering specific Personal and Medical Data on the request of insurance companies in order to carry out insurance procedures.

2. Preventive Medical Examination: Reaching an individual medical advice to improve personal health or to preserve a healthy lifestyle through the gathering of Medical Data.

3. Travel advice: Collecting of Medical Data in order to advise individual travellers on vaccinations and preservation of health during travel.

4. Mandatory medical examinations: On behalf of a Debtor, gathering of Personal and Medical Data in order to assess whether an individual is legally permitted to carry out his functions.

Annex II: OPERATION OF THE REGISTRATION

Name	Meditel Groep B.V., Fascinatio Boulevard 228, 4e etage, 3065 WB Rotterdam
Holder	Meditel Gezondheid
Acting on behalf of Holder	Operational manager
Administrator	Medical and paramedical staff
Processor	Medical and paramedical staff, administrative and / or support staff

Operation:
Administrative staff at the backoffice register Personal Data of a Data Subject in order to make an appointment.

During the execution of this appointment, Medical Data are collected by the medical and paramedical staff. They store these data in a medical file, for which two routes are available:

1. The Medical Data are stored directly into the digital file of the Data Subject.
2. The Medical Data is stored digitally in the Data Subject's account and can be accessed by the Data Subject by logging in to the account.

Annex III: USERS

1. Doctors. They register Personal Data and Medical Data. These data are obtained from questionnaires, anamneses, physical examination and additional measurements.

2. Assistants. They register Personal Data and Medical Data. These data are obtained from questionnaires, biometrics, and additional measurements.

3. Employees of the Business Centre (Bedrijfsbureau) and Functional Manager. They register Personal Data in order to make appointments. They add laboratory results to the client files and compile medical reports to supplement the medical records of the Data Subject or the Debtor on behalf of Doctors and Assistants.

4. Bookkeeper. He bills the costs of the services of Meditel to the Debtor, by using the minimum set of Personal Data required.