**Healio** **Community** **– Privacy Policy**

This Privacy Policy is edited by PNS & WSS Incorporated, dba Healio (Healio), a wholly owned subsidiary of The Wyanoke Group, having its registered office at 6900 Grove Road, Thorofare, NJ 08086.The Data Controller offers a platform, Healio Community, a gated daily destination for health care professionals, (hereafter, the “**Platform**”) to its users which have subscribed on the Platform and as such have a user account (hereafter, the “**Users**”). The Platform is available at the following url address: https://community.healio.com.

The Data Controller uses a solution called “Hivebrite,” which enables the import and export of user lists and data, the management of content and events, the organization of emailing campaigns, and opportunity research and sharing.

In this regard, the Data Controller collects and processes Users’ personal data in accordance with the Privacy and Cookie policy.

The Data Controller is particularly aware and sensitive with regard to the respect of its Users’ privacy and personal data protection. The Data Controller commits to ensure the compliance of the processing it carries out as data controller in accordance with the Data Protection Law.

Data Protection Law refers to the General Data Protection Regulation (EU Regulation n°2016/679) dated April 27, 2016, for individuals within the European Union, known as the 'GDPR.' Additionally, we adhere to all applicable United States state privacy laws, including the California Consumer Privacy Act (CCPA), the Virginia Consumer Data Protection Act (VCDPA), and other relevant state laws that govern data privacy and protection.

The Data Controller has put in place an appropriate privacy and cookie policy to be fully transparent on how the personal data of Users are processed within the use of the Platform and services provided.

This privacy policy is intended for the Users of the Platform of the Data Controller.

Data Controller is not established in the European Union and has designated a representative: privacy@wyanokegroup.com.

Date of last update: 09/27/2024.

1. **COLLECTED PERSONAL DATA**

**1.1 When subscribing on the Platform**

When subscribing to the Platform, the User is informed that its following personal data is collected for the purpose of creating a user account:

Mandatory data:

* First name
* Last name
* Email address
* Zip/Postal Code
* Profession
* NPI (if applicable)

Optional data:

* Year of medical school graduation
* Specialty.

The User is informed that it is not possible to access the Platform without providing the mandatory data strictly necessary to create an account and authenticate the User.

**1.2 During the use of the Platform**

The User may validly publish, at its own initiative, any content on the Platform which shall be kept by the Company:

* Posts on discussion boards, forums and within groups
* Events, including webinars, “Ask Me Anythings” and other group events
* Mentorship profile and application letters
* News

The User is aware that when using the Platform, the User may decide to provide “sensitive data” within the meaning of Data Protection Law; for example, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation, etc. By providing such sensitive data, the User agrees to their processing by the Platform in the conditions set forth in this Privacy Policy.

1. **THE PURPOSE OF THE DATA PROCESSING**

The Data Controller and its subcontractors process personal data that are freely transferred by the User when accessing the services proposed by the Platform for the following purpose:

|  |  |
| --- | --- |
| **Purpose** | **Legal basis** |
| *Creation and management of a user account* | The data subject has given consent to the processing of his or her personal data for access to and interaction with the platform |
| *Providing the User with all functionalities of the Platform, meaning:*   * *Sending invitations for events organized by Data Controller or other Users, if the User has accepted to receive such invitations;* * *Sending offers, including job offers and/or mentorship pairings, from the Data Controller or its partners if the User has accepted receive such offers;* * *Inviting the User to events organized by the Platform;* * *Providing the opportunity to pair with a mentor or mentee;* * *Providing the opportunity to connect with other members using private messaging.* * *Content personalization* |
| *Management of data subjects’ rights according to the Personal Data Legislation* |
| *Storage of User personal data* |
| *Management of prospection operations:*   * *Sending email prospect campaigns in Healio Community and/or its commercial partners* * *Sending newsletters in Healio Community and/or its commercial partners* |
| *Making statistics in order:*   * *to improve the quality of the services proposed by the Platform;* * *improve the usage functionalities of the Platform;* |
| *Making statistics regarding the effective use of the Platform* |
| *Making statistics regarding the different levels of activity on the Platform.* |

1. **DATA RETENTION PERIOD**

The Data Controller informs the User that the personal data related to the User Account is retained only during the length of the User’s subscription on the Platform.

Following the termination of said subscription, the data collected upon the subscription as well as the content published by the User on the Platform shall be deleted after a period of 30 days.

1. **DATA TRANSFERS**

The Users’ data are stored in the European Economic Area (EEA) by the Data Controller, and its trusted service providers. However, depending on the processing, the Users’ data may also be transferred in a country outside the EEA, to Healio’s data server in the United States.

When transferring data outside the EEA, the Data Controller ensures that the data are transferred in a secured manner and with respect to the Data Protection Law. When the country where the data are transferred does not have a protection comparable to that of the EU, the Data Controller uses “appropriate or suitable safeguards.”

When the service providers to whom personal data are transferred are located in the United States, these transfers are governed by the standard data protection clauses adopted by the Commission.

Users can contact the Data Protection Officer at the following address: privacy@wyanokegroup.com.

1. **COMMITMENT OF THE DATA CONTROLLER**

The Data Controller commits to process Users’ personal data in compliance the Data Protection Law and undertake to, notably, respect the following principles:

* Process Users’ personal data lawfully, fairly, and in a transparent manner;
* Only collect and process the Users’ data for the strict purpose as described under article 2 of the present privacy policy;
* Ensure that the personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
* Make the best effort to ensure that the personal data processed are accurate and, if necessary, kept up to date, and take all reasonable steps to ensure that personal data that are inaccurate, regarding the purposes for which they are processed, are erased or rectified without delay;
* Keep personal Users’ data for no longer than is necessary for the purposes for which they are processed;
* Put in place all necessary technical and organizational appropriate measures in order to ensure the security, confidentiality, integrity, availability and the resilience of the process systems and services;
* Limit the access to the Users’ data to the persons duly authorized to this effect;
* Guarantee to the Users their rights under the Data Protection Law in relation to the processing of their data and make the best efforts to satisfy any request, where this is possible.

1. **EXERCISE OF THE USERS’ RIGHTS**

The User is duly informed that it disposes at any time, depending on the legal basis of the processing, a right to access, to rectification, to erasure, to restriction of processing, to data portability and to object.

When processing is based on Users’ consent, the right to withdraw consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

The User can exercise its rights by sending an email to privacy@wyanokegroup.com or by mail at the following address: 6900 Grove Road, Thorofare, NJ 08086, USA, provided that the User justifies his/her identity.

In addition, in the event the User considers that its rights have not been respected, the User of which the personal data are collected can lodge a complaint before the competent supervisory authority. For any additional information, you can review your rights on the websites of the competent authorities.

The competent supervisory authorities are listed on the following website:

<http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm>.

1. **COOKIES**

The Data Controller informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on its terminal such as cookies whenever the User navigates on the Platform subject to the conditions described in the Data Controller Cookie Policy: <https://www.healio.com/privacy-policy>

1. **RECIPIENT AND PERSONS AUTHORIZED TO ACCESS THE USERS’ DATA**

Only **authorized persons working for the Data Controller**, can access your personal data. The Data Controller makes its best effort to ensure that these groups of people remain as small as possible and maintain the confidentiality and security of Users’ personal data.

The Data Controller also uses **trusted service providers** to carry out a set of operations on its behalf for hosting. The Data Controller can also use service providers in the tech industry and editors of specific tools integrated in the Platform for technical purposes.

The Data Controller only provides service providers with the information they need to perform the service and ask them not to use your personal data for any other purpose. The Data Controller does its best to ensure that all these trusted service providers only process the personal data on our documented instructions and provide sufficient guarantees, in particular in terms of confidentiality, expert knowledge, reliability and resources, to implement technical and organizational measures that will meet the requirements of the applicable legislation, including for the security of processing.

The Data Controller may be required to disclose or share your personal data to comply with a legal obligation, or to enforce or apply our terms of use/sale or any other conditions you have accepted; or to protect the rights, safety or property of Healio, its customers or employees.

List of the main service providers:

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| --- | --- | --- |
| **Service Provider** | **Service** | **You can consult the privacy policy by clicking on the following link:** |
| KIT UNITED  44 rue la fayette  75009 Paris  France | HIVEBRITE solution | https://hivebrite.com/privacy-policy |
| Google Cloud Platform  Gordon House, 4 Barrow St,  Dublin, Ireland | Hosting of all data and content produced/provided by the User, as well as images, profile pictures and backups | https://cloud.google.com/security/privacy/ |
| Amazon AWS  38 Avenue John F. Kennedy,  L-1855, Luxembourg | <https://aws.amazon.com/compliance/gdpr-center/> |
| Sentry  132 Hawthorne Street  San Francisco, CA 94107  USA | Production and storage of error logs enabling our developers to correct the code | https://sentry.io/privacy/ |
| Sendgrid  375 Beale Street, Suite 300,  San Francisco, CA 94105  USA | Sending of emails from the Platform | https://api.sendgrid.com/privacy.html |
| Hivebrite, Inc.  16 Nassau St,  New York, NY 10038,  USA | Customer support for the Platform | https://hivebrite.com/privacy-policy |