

emeis.com

# PRIVACY POLICY



**This policy informs you of how your personal data is processed by *emeis* as part of its activities, particularly within its facilities and *via* its websites:**

- emeis-group.com
- emeis.com
- emeis.fr
- emeis-cliniques.fr

hereafter “the website”

This policy does not concern the processing of the personal data of employees, patients and residents, which is subject to a separate document.

*emeis* undertakes to collect and process your personal data in compliance with the applicable French and European regulations in terms of respect for privacy, notably the General Data Protection Regulation (GDPR) and the French Data Protection and Civil Liberties Law.

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# 01. Who processes your personal data?

Your personal data is processed by the company *emeis* SA (Nanterre Trade and Companies Register 401 251 566, whose head office is located at 12 rue Jean Jaurès - 92813 Puteaux, France), hereinafter known as “*emeis*”, unless otherwise indicated when the data is collected.



# 02. Which personal data is processed?

*emeis* mainly collects and processes the following categories of personal data:

- **identity data**  
(e.g. surname, first name, e-mail and postal addresses);
- **data on professional situations**  
(e.g. function, CV, diplomas);
- **economic and financial data**  
(e.g. bank details);
- **connection data**  
(e.g. IP address, connection logs).

*emeis* restricts the collection to personal data that is required for the purposes described above and invites you not to transmit sensitive data.





## 03. When is your personal data collected?

The personal data processed is obtained directly from you when you:

- use our Websites;
- visit our facilities;
- apply for a job;
- are a close friend or relative or person of trust of a resident/patient;
- are a supplier or service provider.

Personal data may also be collected indirectly by our partners.

# 04. Why is your personal data processed?

Depending on the situation, *emeis* processes your personal data for the following specific purposes and legal bases:



## Website visitors

When you visit our Websites, the following processing is carried out:

Purpose	Legal basis
Processing of general information requests <i>via</i> forms accessible online	<i>emeis</i> ' legitimate interest in answering your requests
Processing of requests for contact to benefit from services offered by our facilities <i>via</i> forms accessible online	Consent for commercial prospection
Monitoring of Website functioning, audience statistics, internet user browsing trends <i>via</i> cookies	Consent and <i>emeis</i> ' legitimate interest in optimising its Websites
Management of Website security	<i>emeis</i> ' legitimate interest for securing its Websites

## Prospects

The following processing may be carried out on our prospects' data:

Purpose	Legal basis
Creation, update of prospect databases transmitted by our partners	Consent
Conducting of communication and prospection operations, notably by e-mail and telephone	Consent
Conducting of surveys, analyses and studies	<i>emeis'</i> legitimate interest in studying its stakeholders' opinions

## Facility visitors

During visits to our facilities, the following processing may be carried out:

Purpose	Legal basis
Keeping of the visitor register	<i>emeis'</i> legitimate interest in ensuring the security of its facilities
Implementation of video monitoring and video protection systems to ensure the security of the people and equipment within our facilities	<i>emeis'</i> legitimate interest in ensuring the security of its facilities

## Residents' and patients' family, friends, persons of trust

The following processing activities involve the personal data of family, friends and persons of trust of our facilities' residents and patients:

Purpose	Legal basis
Identification of persons of trust, legal representatives and third-party payers for the management of resident and patient files	Legal or contractual requirement depending on the situations
Management of relations with families and friends <i>via</i> our applications	Execution of the contract for users (terms of service) and <i>emeis'</i> legitimate interest in offering services to family and friends
Management of requests for exercising rights	Legal requirement
Conducting of satisfaction surveys, analyses and studies	<i>emeis'</i> legitimate interest in studying its stakeholders' opinions

## Job candidates

The following processing activities involve the personal data of job candidates:

Purpose	Legal basis
Creation and management of the candidate's personal space	Consent
Processing and analysis of applications received	Execution of precontractual measures
Checking of criminal records	Legal requirement or legitimate interest as the case may be
Storing of CVs	Consent

## emeis' service providers or suppliers

The following processing activities involve the personal data of employees of our service providers and suppliers when providing their services:

Purpose	Legal basis
Preparation of contractual documentation with the service providers and suppliers	Execution of precontractual measures
Referencing and update of the service provider and supplier database	emeis' legitimate interest in managing its suppliers
Implementation of services/ supply of services	Execution of the contract
Monitoring of commercial, financial and administrative relations	Legal requirement
Management of disputes	emeis' legitimate interest in safeguarding its rights
Management of risks and compliance with regulations, codes of conduct, ethics & compliance policies and procedures (notably the assessment of compliance by third parties and management of gift and invitation declarations)	Legal requirement or emeis' legitimate interest in ensuring its compliance depending on the processing carried out

## 05. How long is your personal data stored for?

Your data is stored for a period not exceeding the period required for the purpose for which it is processed.



## 06. Who are the recipients of your personal data?

*emeis* transmits your personal data to the following recipients:

- the employees within *emeis*, its subsidiaries and its facilities responsible for processing the personal data indicated above;
- the mediator appointed by *emeis*;
- the people responsible for audits (statutory auditors, accountants, division responsible for internal control and audit);
- the subcontractors contractually related to *emeis* that implement the processing;
- the companies operating as part of legal operations related to *emeis*' corporate life and development.



07.

## Is your data transferred outside of the European Union?

The personal data is only transferred to *emeis*' subcontractors and partners located outside of the European Union if the third country is considered to have suitable protection to allow the transfer or, if this is not the case, the transfer is managed in compliance with the conditions provided by the GDPR.

08.

## What are your rights and how to exercise them?

You have the right of access, the right to rectification, the right to erasure, the right to data portability, the right to restrict processing, the right to object to processing and the right to define specific directives relating to the use of your data after your death. You also have the right to withdraw your consent when the processing of your personal data is based on this legal basis.

These rights may be exercised by contacting *emeis*' Data Protection Officer (DPO):

- ➔ **by post**, at the following address: *emeis*, To the attention of the Data Protection Officer, Data Protection Department, 12 rue Jean Jaurès - CS100032, 92813 Puteaux Cedex, France;
- ➔ **by e-mail** at the following address: [dpo@emeis.com](mailto:dpo@emeis.com).

If, after having contacted us, you consider that your “Data Protection and Civil Liberties” rights have not been complied with, you have the right to file a complaint with the CNIL by post at the following address: 3 Place de Fontenoy - TSA 80715 - 75334 Paris Cedex 07, France.

We inform you of the existence of the “Bloctel” list to refuse cold calling, to which you may subscribe here: [www.bloctel.gouv.fr](http://www.bloctel.gouv.fr)



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France

[www.emeis.com](http://www.emeis.com)