

TRIAGE360 PRIVACY POLICY

1. Who we are

- 1.1. Triage360 ("Triage360", "Us", "We") is a cloud-based platform for medical professionals to digitally manage patient information, appointments, and other administrative tasks. The system processes and stores healthcare data to support clinical operations and practice management functions..
- 1.2. We gather and process your personal data in accordance with this Privacy Policy and in compliance with the relevant data protection regulation and laws. This Privacy Policy provides you with the necessary information regarding your rights and our obligations, and explains how, why and when We process your personal data.
- 1.3. This policy does not apply to patients directly, as Triage360 does not offer access to patients. However, healthcare organizations that use Triage360 may process patient data through the platform, as described below.
- 1.4. Each organisation using Triage360 is the 'Data Controller'. We recognise our obligations as a 'Data Processor' in terms of the applicable data protection laws, namely the General Data Protection (EU) Regulation 2016/679, as supplemented by the Data Protection Act, Chapter 586 of the Laws of Malta, together with any other applicable laws.
- 1.5. We are committed to processing your personal data lawfully, fairly and transparently. Furthermore, We shall process your personal data for the reasons specified in this Privacy Policy and ultimately We will not process your information for any other reasons.
- 1.6. If you have any questions about how We protect your personal data, please e-mail us on dataprotection@triage360.com.mt

2. Information We Collect

- 2.1. We collect and process your personal data to meet our legal and statutory obligations and to provide you with our services. We will never collect any unnecessary personal data from you and We do not process your information in any way, other than as specified in this Privacy Policy.
- 2.2. The personal data which We collect about you through this website is provided by yourself when you make use of our website.
- 2.3. The information we collect when you make use of our website includes:
 - 2.3.1. Your e-mail address;
 - 2.3.2. Your name and surname;

2.3.3. Your contact number;

2.3.4. Your role within the organisation;

2.3.5. Login times;

2.3.6. Actions taken within the system;

2.3.7. System logs;

2.3.8. Triage360 stores patient data only as submitted by your organisation. This may include names, contact details, medical records, clinical notes, appointment data, and other sensitive health information

2.4. We take your privacy very seriously and We will only retain your data for as long as is necessary and for the purposes specified in this Policy. We will use the personal data referred to above in order to provide the services including:

2.4.1. To authenticate users and enable access to the Platform;

2.4.2. To manage your account and provide support;

2.4.3. To maintain audit logs and support clinical traceability;

2.4.4. To improve system reliability, performance, and security; and

2.4.5. To notify you of system updates, incidents, or administrative changes.

2.5. We process user data to provide the services described in our Terms & Conditions, where required to comply with applicable laws or regulatory requests and for legitimate interests such as updating the system, ensuring security and supporting user operations.

2.6. We process patient data strictly on behalf of the organisation (Data Controller), based on their own legal basis in terms of Article 9(2)(h) of the GDPR or if they obtained consent from patients to collect data for use for reasons outside the scope of Article 9(2)(h) of the GDPR. We shall not be held liable for any misuse, incorrect or inaccurate information, failure by the organisation to obtain consent for the collection of data for use outside the scope of Article 9(2)(h) of the GDPR or any other form of unlawful use of data collected by You in terms of clause 2.3.8 above.

2.7. Where we have your consent, We will send you any offers and other promotional material via e-mail and/or text messages from time to time. You can opt out from receiving these offers and other promotional material from Us at any time.

2.8. We will send you the relative confirmations and reminder via e-mail and/or text messages.

2.9. We value the importance of your privacy and We do not disclose, share or sell your data without your consent, unless required to do so by law. All patient data remains isolated to the organisation and is never shared across organisations.

3. Sharing and Disclosing of your Personal Data

- 3.1. We do not share your personal data without your consent, other than for the purposes specified in this Privacy Policy or where there is a legal requirement to do so. Triage360 uses third-parties to provide its services and carry out its business functions. Where We rely on processors and sub-processors, any of the processors acting on our behalf shall only process your data in accordance with instructions provided by Us, and will fully adhere to the relevant data protection laws and any other appropriate confidentiality and security measures. In other words, We do not share or disclose any of your personal information other than for the purposes specified in this Privacy Policy or where there is a legal requirement.
- 3.2. When We share your personal data with the data processors, We do so with an understanding with the other entities that the personal data is to be used only for the purposes stated in this Privacy Policy.

4. Information about your rights

- 4.1. As a data subject, you enjoy several rights relating to your personal data, namely:
- 4.1.1. The right to be informed: You have the right to be told in a clear, transparent, intelligible and easily accessible manner how your personal data is being used. From our end, We communicate on this point specifically through this Privacy Policy.
 - 4.1.2. The Right of Access: You have the right to access the personal data We collect on you, including:
 - 4.1.2.1. The purposes of the processing;
 - 4.1.2.2. The categories of the personal data concerned;
 - 4.1.2.3. The recipients to whom the personal data has/will be disclosed;
 - 4.1.2.4. Where possible, the envisaged period for which the data will be stored;
 - 4.1.2.5. Where the personal data is not collected directly from you, any available information regarding the disclosing source;
 - 4.1.3. The Right to Rectification: You have the right to request Us to rectify any personal data We hold on you if you believe that such data is incomplete or inaccurate. If there is a valid reason for not rectifying such data, you will be notified accordingly;
 - 4.1.4. The Right to Erasure: You have the right to request Us to delete your personal data. However, please note that this right is not absolute. In some cases, We may be justified to keep personal data to the extent that processing of such is

necessary (for example, in order to comply with a legal obligation or for the establishment, exercise or defence of legal claims).

4.1.5. The Right to Restrict Processing: You have the right to request that We restrict some of the ways We process your personal data.

4.1.6. The Right to Object: Where the legal basis for processing your personal data is our legitimate interest, you have the right to object to our use of your personal information.

4.1.7. The Right to Data Portability: You have the right to receive the personal data concerning yourself which you have provided in a structured, legible and readable format.

4.1.8. The Right to Refuse Automated Decision Making: You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

4.2. In the event that you wish to exercise any of the above rights, We may ask you to verify your identity prior to acting upon the request in order to ensure that your data is kept secure and protected.

5. Transfers Outside the European Union

5.1. Personal data in the European Union is protected by the General Data Protection (EU) Regulation 2016/679 ('GDPR') but some countries may not necessarily have the same high standard of protection for your personal data. Sometimes We may have to share your data with third party processors or sub-processors which are based outside of the EU, however, when We do so, We will ensure that such is done in line with the applicable provisions of the GDPR.

6. How Long We Keep your Data

6.1. We will only retain and store your personal data which is laid down in this Privacy Policy for as long as is necessary. We keep your personal data for a minimum period of five (5) year periods after which time it will be destroyed. Nonetheless, longer periods could apply on the basis of retaining personal data strictly for as long as is necessary by Us.

7. Safeguarding Measures

7.1. We value your personal data and will process it for the purposes intended to provide our services and carry out our business functions, or if required to do so by law. We will implement every appropriate technical and organisational measure in order to ensure that our processing will comply with the relevant data protection laws, rules and regulations and to protect your rights as data subject.

8. Lodging a Complaint

8.1. We only process your personal data in compliance with this Privacy Policy and in accordance with the relevant data protection laws and regulation. If however, you wish to raise a complaint regarding the processing of your personal data, you have the right to lodge a complaint with ourselves so that we may attempt to rectify the situation, or with the national supervisory authority should you require.

Triage360's contact:

Fantine, Apt 6,
Triq Ċensu Costa,
Birkirkara, Malta

Supervisory Authority's contact:

Office of the Information and Data Protection Commissioner,
Level 2, Airways House,
High Street, Sliema,
SLM 1549,
Malta