

## Policy Statement

Corventis Inc. is a developer of medical equipment and a provider of Cardiac Monitoring Services. Corventis collects patient health, billing and insurance data from individuals. Corventis Inc. ("Corventis") acknowledges the European Union ("EU") standard for personal data protection. We adhere to the Safe Harbor Agreement concerning the transfer of personal data from the EU to the United States of America, and we follow the Safe Harbor Principles published by the U.S. Department of Commerce ("Principles") with respect to all such data. This statement outlines our general policy and practices for implementing the Principles, including the types of information we gather, how we use it, and the choices affected individuals have regarding our use of, and their ability to correct, that information. It does not include information that pertains to a specific individual, but from which that individual could not reasonably be identified.

## Data Use

Patient data is collected and transmitted to a server for processing. The purpose of this data transmission is to:

- a) Facilitate patient and medical management, and
- b) Assist physicians/health practitioners in the diagnosis and identification of various clinical conditions/events/trends.
- c) For the purpose of development and improvement of device algorithms to improve health care services.

## Principles

Corventis has adopted the seven Safe Harbor principles of notice, choice, onward transfer (transfer to third parties), access, security, data integrity and enforcement with respect to medical and personal data to be transferred to the U.S. from patients in the EU.

### Notice

Corventis provides Notice to individuals in the EU and Switzerland by providing this Safe Harbor Policy. This notice documents the purposes, uses and transfers of data obtained. This Notice provides contact information and dispute resolution information. If Corventis intends to use personal information in ways not described by this notice, additional Notice and Choice shall be provided in clear and conspicuous language.

### Choice

A patient is given choice; agrees to provide personally-identifying information; consents to Corventis' use of that information; and consents to third party transfer as described below when the patient decides to apply the Corventis device to their body.

### Onward Transfer (Transfer to Third Parties)

Corventis reserves the right to employ other organizations or individuals as our subcontractors. Corventis only transfers personal data to agents who provide the same level of privacy protection as is required by these privacy principles. Corventis contracts third parties for customer service, billing and development.

### Security

Corventis takes reasonable precautions to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

### Data Integrity

Corventis processes personal information only in ways compatible with the purpose for which it was collected or subsequently authorized by the individual. To the extent necessary for such purposes, Corventis takes reasonable steps to make sure that personal information is accurate, complete, current, and otherwise reliable with regard to its intended use.

**Access**

If an individual becomes aware that information maintained about that individual is inaccurate, or if an individual would like to update or review his or her information, the individual may contact Corventis using the contact information below. Corventis will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate. The individual will need to provide sufficient identifying information, such as name, address and birth date. Corventis may request additional identifying information as a security precaution. In addition, Corventis may limit or deny access to personal information where providing such access would be unreasonably burdensome or expensive in the circumstances, or as otherwise permitted by the Safe Harbor Agreement. In some circumstances, Corventis may charge a reasonable fee, where warranted, for access to personal information.

**Enforcement**

To ensure compliance with these Safe Harbor Principles, Corventis will:

- a. Employ a procedure for verifying that the commitment the company has made to adhere to the Safe Harbor Principles has been implemented. Corventis will verify that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented, and in conformity with the Principles;
- b. Remedy issues arising out of any failure to comply with the Principles. Any person under Corventis control whom Corventis has determined is in violation of the privacy policies will be subject to disciplinary process.

Corventis is subject to the jurisdiction of the US Federal Trade Commission

**Dispute Resolution**

Any questions or concerns regarding the use or disclosure of personal information should be directed to Corventis at the contact information given below. Corventis will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between Corventis and the complainant, Corventis has agreed to participate in the dispute resolution procedures of the panel established by the European Data Protection Authorities to resolve disputes pursuant to the Safe Harbor Principles.

**Contact Information**

Questions or comments regarding this Policy should be submitted to Corventis by mail or phone as follows:

**Corventis, Inc.**  
1410 Energy Park Drive  
Suite 1  
St. Paul MN 55108  
U. S. A.

**Corventis Europe BVBA**  
Ikaroslaan 19  
1930 Zaventem  
Belgium



## Corventis Safe Harbor Policy

P00861-002 Rev A

### Customer Service Numbers:

USA: 1 (877) 247 PiiX (7449)

1 (408) 790-9399

EU: +32-2-720 21 67

Other geographies: if available, refer to your local Corventis Customer Service Number

Or by e-mail to: [Safe.harbor@corventis.com](mailto:Safe.harbor@corventis.com)

### Amendment

This Policy may be amended consistent with the requirements of the Safe Harbor Principles. Appropriate public notice will be given concerning such amendments.

### Effective Date

September 1, 2009