

SECURITY AND PRIVACY DOCUMENTATION

MCARE, ATLAS, OOMPH, NURSECALL, DIGITAL RECEPTION, COMENTIS, DEPENSYS, RESHUB, CENTRIM

Updated: 18 July 2024

PCS has implemented the following technical and organizational security measures to provide the ongoing confidentiality, integrity, availability and resilience of processing systems and services for services branded as mCare (fka Digital Care), Atlas, Oomph, Nursecall, Digital Reception, Comentis, Depensys and ResHub (the "Covered Services"), including protection of Customer Data as defined in the PCS MSA:

1. Confidentiality

PCS has implemented the following technical and organizational security measures to protect the confidentiality of Covered Services, in particular:

- PCS processes all Customer Data on remote server sites owned and operated by industry leading cloud service providers that offer highly sophisticated measures to protect against unauthorized persons gaining access to data processing equipment.
- PCS implements suitable measures to prevent its data processing systems from being used by unauthorized persons. This is accomplished by:
 - automatic time-out of user terminal if left idle, identification and password required to reopen
 - issuing and safeguarding identification codes;
 - letting customers define individual user accounts with permissions across Covered Services.
- PCS's employees entitled to use its data processing systems are only able to access Customer Data within
 the scope of and to the extent covered by their respective access permission (authorization). In particular,
 access rights and levels are based on employee job function and role, using the concepts of least-privilege
 and need-to-know to match access privileges to defined responsibilities. This is accomplished by:
 - limited access to Customer Data to only authorized persons;
 - industry standard encryption.

2. Integrity

PCS has implemented the following technical and organizational security measures to protect the integrity of processing Covered Services, in particular:

- PCS implements suitable measures to prevent Customer Data from being read, copied, altered or deleted by unauthorized parties. This is accomplished by:
 - perform annual penetration tests of PCS Platform;
 - follow a secure development policy of PCS Platform;
 - For Covered Services branded as Digital Care and Atlas: Implement reasonable protection against the current OWASP top 10 (the current biggest 10 threats to web-based solutions) and shall implement reasonable protection against new threats added to the list within reasonable time.
- PCS implements suitable measures to prevent Customer Data from being read, copied, altered or deleted
 by unauthorized parties during the transmission thereof or during the transport of the data media. This is
 accomplished by:
 - use of state-of-the-art firewall and encryption technologies to protect the gateways and pipelines

through which the data travels;

- industry standard encryption; and
- avoiding the storage of Customer Data on portable storage media for transportation purposes and on company issued laptops or other mobile devices.

3. Availability

PCS has implemented the following technical and organizational security measures to protect the availability of Covered Services, in particular:

- PCS designed suitable measures to provide that Customer Data is protected from accidental destruction or loss. This is accomplished by:
 - infrastructure redundancy;
 - policies prohibiting permanent local (work station) storage of Customer Data; and
 - performing regular data back-ups.

4. Resilience

PCS has implemented the following technical and organizational security measures to protect the resilience of Covered Services, in particular:

 PCS designs the components of its platform to be resilient by selecting the best-in-class infrastructure providers with data centres that have daily backups with high uptime and availability.

Return of Customer Data

Within 30 days post contract termination, Customer is able to extract Customer Data submitted to the Covered Services (to the extent such data has not been deleted by Customer) through either export via built in reports or via API. For selected Services, Customer can choose to purchase a read only subscription allowing for data to be retained within the system for as long as required by Customer.

If the reports or API is not available for the applicable Service and within 30 days post contract termination, Customer can request the return of the Customer Data submitted to the Covered Services (to the extent such data has not been deleted by Customer) that will be provided by PCS to Customer in a commonly-used machine-readable format.

Deletion of Customer Data

After termination of all subscriptions associated with an environment, Customer Data submitted to the Covered Services is retained in inactive status within the Covered Services for 30 days, after which it is securely overwritten or deleted from production within 60 days. The Customer Data can be retained as part of the regular database backups for up to 10 years and cannot be deleted individually. This process is subject to applicable legal requirements.

Without limiting the ability for customers to request the return of their Customer Data submitted to the Covered Services, PCS reserves the right to reduce the number of days it retains such data after contract termination. PCS will update this Security documentation in the event of such a change.

Processing of User Account Data

To create and administer user accounts and access the Covered Services, customers must provide information about users ("User Account Data"). User Account Data includes information such as name, username, business address, job title, country/region, phone number, and email. PCS processes User Account Data to provide its customers with the Covered Services; in that case, personal data about users is treated as Customer Data. PCS also processes User Account Data for certain of its own business purposes, such as account administration, invoicing, and licensing compliance, and treats it consistently with the PCS Privacy & Data Protection Statement.