

## PRIVACY STATEMENT FACEWIZZ

### 1. The parties

In this Privacy Statement, the following terms are defined as stated below:

'Facewizz', ORTHOFACE R&D GCV, with its registered office at Latemstraat 113, 9830 SINT-MARTENS-LATEM (Belgium), listed under company number 0458.423.582, web: [www.facewizz.com](http://www.facewizz.com).

'User', 'you': every natural person (B2C) or legal entity (B2B) (for the provisions in the Privacy Act that apply to legal entities) in a contractual relationship, of whatever nature, with Facewizz via its online platform.

'Products': the object of one or several (electronic) agreements (including, but not limited to, Software).

'Privacy Act': the act of 8 December 1992 to protect privacy in relation to the processing of personal details.

### 2. What are my details used for?

Facewizz attaches great value to the protection of your privacy and your personal details. Facewizz only uses your details in accordance with the Act of 8 December 1992 to protect privacy, and other relevant prevailing statutory regulations.

We can use your personal details to provide you with informative news items about new Products or Software, changes to existing functionalities, events related to the operations of Facewizz, events of partners of Facewizz, job-related information and vacancies, the operations and services of Facewizz and/or its partners, recruitment of staff, important news, etc. Your details may be forwarded to third parties or partners for informative or publicity purposes. Facewizz has taken all possible legal and technical precautions to prevent unauthorised use and access. It can therefore never be held liable for identity theft, data theft or IT crimes. In the event its IT systems are hacked, it will immediately take all possible measures to reduce damage, loss and/or theft to a minimum.

### **3. Who is Facewizz?**

Facewizz: Soft tissue target planning using 3D analysis. The face is subject to analysis in 2 specific ways: the profile view and the frontal view. Reducing the anatomy to 2 dimensions via radiographs, photographs, or monitor-screen views of CB-CT imaging, enables facial assessment on a flat surface. 2D photos or cephalometry captured at actual size must then be correlated with 3D clinical anthropometry.

3D orthognathic surgery software also plans faces in a 2D represented profile and frontal view. Patients do not request an holographic representation of the planned result! They are pleased with a simulation of the predicted result on the profile photograph (sometimes frontal photograph). Surgeon's are pleased with a program that can quickly show effects of jaw rotations or chin segment repositionings on the soft tissue target line, specially on changes in chin and lip portion. This is exactly what Facewizz offers.

Privacy is crucial to Facewizz. We feel it is important to provide you with as much information as possible. This Privacy Statement therefore releases Facewizz of any further notification in documents, websites or campaign sites, etc. When using the website you will be reminded of the legal section, which this Privacy Statement forms an integral part of.

### **4. Which personal details are collected?**

For the application of the Privacy Act, 'personal details' are taken to mean all information relating to an identifiable natural person. Identifiable is taken to mean any person who can be directly (or indirectly) identified by means of an ID number or an element that characterises his physical, physiological, psychic, economic, cultural or social identity.

Each person is entitled to protection of his fundamental rights and freedoms, particularly protection of his privacy. Facewizz recognises this right and makes great efforts to convert this right practically and online. Privacy legislation applies only to (the full or partial) computerised processing of personal details, or manual processing when the personal details are written to a file.

Personal details must be processed fairly and lawfully, they must be obtained for a certain, explicitly described and justified purpose, they must be sufficient, relevant and not excessive, they must be accurate and come in a form that makes it possible to identify the person involved.

Facewizz complies with the conditions set out above. Personal details are processed for informative and technical purposes. The purposes are explicitly described under item 2. The details are sufficient and not excessive. The following details are requested (\* = compulsory):

First Name\*, Surname\*, E-mail\* (newsletter signup form).

## **5. Who is responsible for data processing?**

The "party responsible for processing" is taken to mean the natural person or legal entity that determines the purpose and resources for processing on his own or with others.

Facewizz acts as the party responsible for processing. It defines the purpose (item 2) and the legal and technical resources for processing. It does not however process the details itself, that is done by the actual processor.

## **6. Who is the actual processor?**

"Processor" is taken to mean the natural person or legal entity that processes personal details on the instructions of the party responsible for processing, with the exclusion of persons who, under the direct control of the party responsible for processing, are authorised to process the details.

There are three different actual processors, each handling a share of the total Facewizz-concept:

### Application:

Hansei BVBA, Priester Poppestraat 59 2640 MORTSEL, RPR BE 0810.495.871.

### Website:

Sumo Coders BVBA, Kerkstraat 108 9050 GENT, RPR BE 0829.564.289.

### Hosting:

Sumo Coders BVBA, Kerkstraat 108 9050 GENT, RPR BE 0829.564.289.

(reseller of HostBots VOF, Steenvoordestraat 157, B-9070 DESTELBERGEN, RPR BE 0872.023.466)

The actual processors are responsible for the correct performance of the technical online portal of Facewizz. The party responsible for processing does not accept any liability for lost or corrupted data, identity theft, data theft, viruses or Trojan horses, SQL injections or other attacks on IT systems or online cloud portals. The relevant actual processor autonomously selects the technically most suitable application for data processing, and does this on the basis of its professional expertise. The party responsible for processing cannot be expected to have that same expertise and know-how.

The relevant processors offers sufficient safeguards with regard to the technical and organisational security measures in connection with the processing to be carried out, and as such complies with Section 16, subsection 1 of the Privacy Act.

## 7. What are my rights?

The party responsible for processing and/or the actual processor must provide the User with at least the following information, no later than the moment at which the data is collected:

- Name and address of the party responsible for processing: see items 1 and 5.
- Name and address of the actual processor: see item 6.
- Purposes of processing: see item 2.
- The right to object, on request and free of charge, to the intended processing of his personal details, if the details are processed with the purpose of direct marketing:

Facewizz collects or processes identity details with the primary goal of its portal performing well in technical terms. In addition to [contact requests](#), requests for subscriptions too cannot be processed without having to complete a contact or other relevant [signup form](#). The collected details can be used for marketing purposes once the technical and practical sides have been completed, but the User can object to this at all times. Objection can be made by e-mail ([privacy@facewizz.com](mailto:privacy@facewizz.com)) or registered letter. Facewizz therefore complies with the provision set out above.

- Other, additional information, particularly: the right to access to and correction of his personal details:

You always have a legal right to fully or partially supplement, correct or remove your personal details. Facewizz undertakes to follow up your request within 15 working days. To that end, you can send a written request by post (see item 1) or by sending an email to [privacy@facewizz.com](mailto:privacy@facewizz.com).

When proving your identity, you are entitled to obtain the necessary information about the processing of your personal details when you ask for it.

Incorrect or incomplete details can be corrected in writing (by post or by sending an e-mail to [privacy@facewizz.com](mailto:privacy@facewizz.com)).

## 8. Are my details used outside the EU?

Facewizz is a Belgian company. Nevertheless, it is possible that details may be processed in and transferred to countries outside the European Union. By virtue of Section 21 of the Privacy Act, personal details may only be passed to countries that guarantee a similar, suitable level of protection and that observe the same or similar provisions of the Privacy Act. The country, duration of transfer and storage, nature of the details and exact purposes are all criteria that must be examined for each individual case.

Facewizz guarantees that it does not process details to or store them in countries that cannot offer the same guarantees, except:

- when the person involved has given his explicit consent;
- when the transfer is required for the execution of the agreement (between the User and Facewizz);
- when the transfer is required for the conclusion or execution of an agreement concluded or to be concluded between the party responsible for processing and a third party, in the interest of the User;
- when the transfer is required or compulsory by law (major general interest or right);
- When the transfer is made from a public register intended to inform the public.

### **9. Are cookies used?**

When visiting the Facewizz website, details are only collected for statistic purposes. These details are the IP address, probable location, time and pages visited. When you visit the Facewizz website, you agree with these details being collected for the statistic purposes set out above.

Facewizz uses cookies to simplify a visit to the website and to be able to offer the best possible user experience. The full details about the use of cookies on the Facewizz website can be found in the Cookie Statement.