

1 Purpose

De Soutter Medical acts as a “Data Processor”, which means we are responsible for processing personal information about you on behalf of your hospital or healthcare provider.

You are receiving this privacy notice because your procedure will use the Celito system. This notice explains:

- How and why your personal data will be used
- How and why it may be shared
- How long it will usually be retained

It also provides you with certain information that must be provided under the UK Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

We may amend this Notice from time to time and will inform you in advance of the effective date of any material changes that we intend to implement.

2 Identity of the Data Processor

De Soutter Medical Limited (“**DSM**”), is a manufacturer of surgical instruments, including the Celito System, which enables surgeons to create patient specific guides for orthopaedic procedures.

DSM acts as the data processor for this activity and is responsible for processing your personal data. Although the group comprises multiple companies, DSM is the entity that performs processing on behalf of the entire group. Therefore, DSM is accountable for all processing activities carried out by the following group companies:

De Soutter Medical Limited, Registered in England and Wales under company number 03164365, Registered office: Halton Brook Business Park, Aston Clinton, HP22 5WF

Zethon Limited, Registered in England and Wales under company number 02973862, Registered office: Halton Brook Business Park, Aston Clinton, HP22 5WF

3 How is your personal information sourced?

The personal data that we process about you has been provided by the hospital or healthcare provider carrying out your procedure.

4 Information we hold about you

In connection with the support we provide the hospital or healthcare provider, we will collect, store, and use the following categories of personal information about you as set out in the table below.

Categories of Personal Data	Purpose of Processing	Lawful Basis	Special Condition*
Patient ID, Full Name, Date of Birth, Gender, Clinician, DICOM CT Scan File, Series Description, Study ID, Time, Description, Series I, Surgeon, Guide Impression, pixel data of the CT Scan NHS number, date when scan was taken, address where scan was taken, data and time where scan was taken,	The Celito System is intended for use by a professional surgeon during orthopaedic procedures to intra-operatively create a patient-specific guide (PSG) according to the surgeon's plan. The PSG enables the insertion of a guide-wire or the creation of a pilot hole, which can then be used as an aid for positioning other surgical instruments or devices	Responsibility for ensuring there is a lawful basis in place for processing personal data is with the Data Controller. The below is the general approach taken by healthcare providers in the UK and is to be used as a reference point only if needed: • Data Controllers in the public sector, such as NHS organisations may use GDPR, Article 6.1.(e), task carried out in the public interest. • Data Controllers in the private sector, such as private healthcare providers may use GDPR Article 6.1.(b) performance of a contract, or (f) legitimate interest.	Responsibility for ensuring there is a condition in place for processing special category data is with the Data Controller. The below is the general approach taken by healthcare providers in the UK: Necessary for the provision of health or social care or treatment or management of health systems/services under law or contract with a health professional.

N.B. We may need to process data as necessary in connection with any legal claims or prospective legal claims. (Schedule 1, Part 3, paragraph 33 of DPA.)

5 Data sharing: intra-group and third-party recipients

To deliver our services effectively, we sometimes need to share your personal information with trusted third parties. Specifically, we share your data with our sub-processors, AWS, Infinitt, and SECTRAIEP. These partners help facilitate the secure transfer of files between your hospital and De Soutter Medical, as well as support the online processing of your data.

6 Data Security and Breach Notification

We have implemented robust security measures to protect your personal information from accidental loss, unauthorised access, misuse, alteration, or disclosure. Access to your personal data is strictly limited to employees who need it to ensure the effective use of the Celito system.

These employees will only process your information according to instructions and are bound by a duty of confidentiality.

We also have procedures in place to respond to any suspected data security breaches. If a breach occurs and we are legally required to do so, we will notify the relevant hospitals and healthcare providers, the Information Commissioner's Office, and you.

7 Data Retention

How long will you use my information for?

We will keep your personal information for as long as necessary to support your care and to meet our legal and contractual obligations. The exact retention period depends on the type of information, the system used, and dependent on the retention requirements agreed with your hospital or healthcare provider.

Once the relevant retention period expires, your data is securely deleted in line with strict retention schedules.

Use of anonymised data

In some cases, diagnostic images may be anonymised and used for research purposes to help us improve our services. Once anonymised, this information can no longer be linked back to you, but it will still be handled responsibly and protected to high standards.

If you have any questions about how long your information is kept, you can contact your hospital's Data Protection Officer for further details.

8. Your Rights Regarding your Personal Information

Under data protection law, you have certain rights in relation to your personal information. These rights may apply in specific circumstances and include the following:

Right of Access: You can request a copy of the personal information we hold about you and check that we are processing it lawfully.

Right to Correction: You can ask us to correct any incomplete or inaccurate information we hold about you.

Right to Erasure: You can ask us to delete or remove your personal information where there is no good reason for us to continue processing it. You may also request erasure if you have objected to our processing (see below).

Right to Object: You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party), if there is something about your particular situation which makes you want to object.

Right to Restrict Processing: You can ask us to suspend the processing of your personal information, for example, if you want us to confirm its accuracy or the reason for processing it.

Right to Data Portability: You can request the transfer of your personal information to another party.

Right to Complain: If you are concerned about how your personal information is being handled by De Soutter Medical, you have the right to make a complaint to our Data Protection Officer. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Note: If you wish to review, verify, correct, request erasure, object to the processing, or request the transfer of your personal information, please contact the Data Protection Officer (DPO) for your hospital or healthcare provider in the first instance.

8 Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO via advice@dpocentre.com

9 Document History

Version	Date	Amended By	Owner	Description of Change
2	12.2025	R Mannix	DPO	Updated throughout