



Subcontracting & transfers HDS guarantees

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The purpose of this document is to present the location of personal data, subcontractors and transfers, if any, from NANOCODE for its product easylience®

Compagny name	Role as part of the HDS hosting service	HDS certified	SecNumCloud qualified	HDS activities concerned	Access to data from countries outside the European Economic Area	Risk of data access imposed by non-European legislation
Nanocode SAS CESSON-SEVIGNE FRANCE	Host	YES	NO	Activities 1 to 5 <i>(see description on next slide)</i>	NO	NO

NANOCODE SAS is a French software publisher based at : 1137 Av Champs Blancs à Cesson-Sévigné (35510).

The 6 HDS activities :

HDS activities	Activitie label	Within the scope of the HDS NANOCODE certification ?
Activity 1	Physical infrastructure provision <i>Providing premises for the physical hosting of hardware used to process health data.</i>	YES
Activity 2	Hardware hosting and maintenance <i>Ensuring availability, integrity, and maintenance of physical hardware.</i>	YES
Activity 3	Platform management <i>Managing and operating the technical platform (virtualisation, operating systems, etc.).</i>	YES
Activity 4	Application hosting <i>Hosting and maintaining health applications.</i>	YES
Activity 5	Health data administration <i>Managing access, backup, and restoration of health data.</i>	YES
Activity 6	Supervision of the information system's security <i>Monitoring, alerting, and incident management for systems processing health data.</i>	NON

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OVHcloud SAS DC 1 - ROUBAIX FRANCE DC 2 - GRAVELINES FRANCE DC 3 - STRASBOURG FRANCE	Subcontractor (Datacenters)	YES	YES	Activities 1 to 2 <i>(see description on previous slide)</i>	NO**	NO
TWILIO* CALIFORNIE USA	Subcontractor Telecommunications (SMS, vocal)	NO	NO	Activity 5	YES	YES

*Unless the customer is using TWILIO in a manner contrary to our Terms and Conditions, no health data will be transmitted via TWILIO.

Reminder of the GTCU: The User undertakes not to disseminate Personal Health Data via the Communication Service (SMS, voice messages) and more generally to be vigilant about entering and disseminating Personal Data and/or Health Data via the Platform.

** no access to data from outside the European Economic Area

NANOCODE implements technical, organisational and contractual measures to limit the risk of unauthorised access to its customers' data. These measures are set out in a Security Assurance Plan.

The table below lists the extra-European laws in force and likely to apply in the context of an HDS service.

Contry	extra-European laws
USA Via TWILIO	<ul style="list-style-type: none"> ▪ The USA Patriot Act (Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism) ▪ Foreign Intelligence Surveillance Act Section 702 (FISA) ▪ Clarifying Lawful Overseas Use of Data Act (Cloud Act)

It is important to note that :

- TWILIO uses Irish infrastructure to send European SMS messages
- The data is in transit only (no permanent storage)
- Standard contractual clauses are in force between NANOCODE and TWILIO(as at 31/03/2025) TWILIO falls within the scope of the EU-US Data Privacy Framework (DPF):

U-U.S. Data Privacy Framework - DPF: this framework concerns American companies that have voluntarily signed up to it and undertaken to comply with data protection principles aligned with European requirements. The United States is not generally covered by a general adequacy decision under Article 45 of the GDPR. However, there are specific mechanisms for transferring personal data between the European Union (EU) and the United States in compliance with the GDPR.

COMMISSION EXECUTIVE DECISION (EU) 2023/1795 of 10 July 2023 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate protection of personal data provided by the EU-US Data Protection Framework.

A residual risk of unauthorised access to PHI remains following analysis of extra-European regulations: the transmission of personal health data information via the telecommunications service currently in place in the solution (SMS alerts and notifications) in the event that the user does not comply with our GTC.