

Guarantees Representation Table - Mapping of health data transfers to countries outside the European Economic Area (EEA)

1. Introduction

Pursuant to the [new Health Data Hosting \(HDS\) certification framework published by the French Digital Health Agency \(Agence du Numérique en Santé - ANS\)](#), the purpose of this document is to provide Withings Clients whose personal health data is hosted under HDS certification with greater transparency regarding the scope of the services covered by the HDS certification. It enables Withings Clients to know the various parties on which Withings relies to deliver its service. This representation thus allows our Clients to know where personal data is located, who Withings' subcontractors are, and which transfers are made to countries outside the European Economic Area.

2. HDS-specific information

2.1. Description of Withings' HDS activities

HDS Activity	Activity description
Activity 1	Provision and maintenance in operational condition of the physical sites used to host the hardware infrastructure of the information system used for processing health data
Activity 2	Provision and maintenance in operational condition of the hardware infrastructure of the information system used for processing health data
Activity 3	Provision and maintenance in operational condition of the virtual infrastructure of the information system used for processing health data
Activity 4	Provision and maintenance in operational condition of the application hosting platform of the information system
Activity 5	Administration and operation of the information system containing health data
Activity 6	Backup of health data

2.2. Information relating to Withings as a health data host

Company name	HDS certified	SecNum Cloud 3.2 qualified	Hosting activities in which Withings is involved	Access to health data from countries outside the EEA	Risk of data access imposed by non-European legislation
Withings SAS 2, rue Maurice Hartmann 92130 Issy les Moulineaux	Yes	No	Activities 1 to 6	No	No

3. Information relating to Withings' subcontractors as a health data host

a. Hosting providers

Company name	Data location	Legal safeguards in case of transfer	HDS certified	Hosting activities in which the subcontractor is involved	SecNum Cloud 3.2 qualified	Access to data from countries outside the EEA	Risk of data access imposed by non-European legislation
BSO 4, avenue Pablo Picasso 92000 Nanterre	France	Not applicable	Yes	Activities 1 and 2	No	No	No

b. Backup

For this processing of personal data, the health data associated with the Client's account and necessary for the purpose below are transmitted to our partner Google Cloud Storage.

This transfer enables Withings to outsource the backup of its Clients' personal data in order to offer them a level of service that meets the most demanding security standards.

Company name	Data location	Legal safeguards in case of transfer	HDS certified	Hosting activities in which the subcontractor is involved	SecNum Cloud 3.2 qualified	Access to data from countries outside the EEA	Risk of data access imposed by non-European legislation
Google Cloud Storage (GCS) GORDON HOUSE BARROW STREET DUBLIN 4 IRELAND	European Union	European Commission Standard Contractual Clauses. Backups are encrypted before being sent to GCS and the encryption key is retained by Withings	Yes	Activities 1 to 6	No	Yes	Yes; United States

c. Customer Support

For this processing of personal data, the health data associated with the Client's account and necessary for the purpose below are transmitted to our partner ZenDesk.

The purpose of this transfer is to enable Withings Clients to receive assistance with any difficulty they may encounter when using Withings Products.

Company name	Data location	Legal safeguards in case of transfer	HDS certified	Hosting activities in which the subcontractor is involved	SecNum Cloud 3.2 qualified	Access to data from countries outside the EEA	Risk of data access imposed by non-European legislation
ZenDesk Inc. 81 Fremont, San Francisco, California, U.S.	European Union	European Commission Standard Contractual Clauses	Yes	Activities 3 to 6	No	Yes	Yes, United States

4. Information relating to WITHINGS' subcontractors with remote access to health data

For this processing of personal data, the health data associated with the Client's account and necessary for the purpose below are transmitted via remote access to our partner Telus. No personal data is stored by these subcontractors.

The purpose of this transfer is to enable Withings Clients to receive assistance with any difficulty they may encounter when using Withings Products.

Company name	Data location	Legal safeguards in case of transfer	HDS certified	Hosting activities in which the subcontractor is involved	SecNum Cloud 3.2 qualified	Access to data from countries outside the EEA	Risk of data access imposed by non-European legislation
Telus International Services Limited Voxpro House Point Village East Wall Road Dublin 1 Ireland	Manila	European Commission Standard Contractual Clauses	N/A	N/A	No	Yes	Yes, Philippines

5. HDS specifics - List of regulations with extra-European reach

The table below lists the main laws with extra-European reach currently in force that may apply in the context of an HDS service.

COUNTRY	NON-EUROPEAN LAWS
United States	- Executive Order 12333 - Foreign Intelligence Surveillance Act Section 702 (FISA)
Philippines	- The Philippine Constitution of 1987 - Republic Act (R.A.) No. 11479 or "The Anti-Terrorism Act of 2020" (ATA) - Anti-Wiretapping Act (R.A. 4200) - Cybercrime Prevention Act (R.A. No. 10175)