

Guarantee Representations Table - Mapping of health data transfers to a country outside the European Economic Area (EEA)

1. Introduction

In application of the [new certification framework for Health Data Host \(HDS\) published by the Agence du Numérique en Santé \(ANS\)](#), the purpose of this document is to provide Withings Customers benefiting from HDS-certified hosting of their personal health data with greater transparency regarding the scope of services covered by the HDS certification. It allows Withings Customers to be aware of the different actors Withings relies on to deliver its service. Thus, this representation allows our Customers to know the location of personal data, Withings' subcontractors, and transfers to countries outside the European Economic Area.

2. Specific Information on the HDS Scope

2.1. Description of Withings' HDS activities

HDS Activity	Activity Label
Activity 1	Provision and maintenance in operational condition of physical sites allowing the hosting of the material infrastructure of the information system used for the processing of health data
Activity 2	Provision and maintenance in operational condition of the material infrastructure of the information system used for the processing of health data
Activity 3	Provision and maintenance in operational condition of the virtual infrastructure of the information system used for the processing of 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 third countries outside the EEA	Risk of data access imposed by extra-European legislation
Withings SAS 2, rue Maurice Hartmann 92130 Issy les Moulinaux	Yes	No	Activities 1 to 6	No	No

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

3.1. Hosting Providers

Company Name	Data Location	Legal Guarantees in Case of Transfer	HDS Certified	Hosting Activities in which the subcontract or is involved	SecNum Cloud 3.2 Qualified	Access to data from third countries outside the EEA	Risk of data access imposed by extra-European legislation
BSO 4, avenue Pablo Picasso 92000 Nanterre	France	Not applicable	Yes	Activities 1 and 2	No	No	No

3.2. Backup

Company Name	Data Location	Legal Guarantees in Case of Transfer	HDS Certified	Hosting Activities in which the subcontract or is involved	SecNum Cloud 3.2 Qualified	Access to data from third countries outside the EEA	Risk of data access imposed by extra-European legislation
Google Cloud Storage (GCS) GORDON HOUSE DUBLIN 4 BARROW STREET DUBLIN IRELAND	European Union	Standard Contractual Clauses of the European Commission. Backups are encrypted before being sent to GCS and the encryption key is kept by Withings	Yes	Activities 1 to 6	No	Yes	Yes; United States

3.3. Customer Support

Company Name	Data Location	Legal Guarantees in Case of Transfer	HDS Certified	Hosting Activities in which the subcontract or is involved	SecNum Cloud 3.2 Qualified	Access to data from third countries outside the EEA	Risk of data access imposed by extra-European legislation
ZenDesk Inc. 81 Fremont, San Francisco, California U.S.	European Union	Standard Contractual Clauses of the European Commission	Yes	Activities 3 to 6	No	Yes	Yes, United States

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

Company Name	Data Location	Legal Guarantees in Case of Transfer	HDS Certified	Hosting Activities in which the subcontract or is involved	SecNum Cloud 3.2 Qualified	Access to data from third countries outside the EEA	Risk of data access imposed by extra-European legislation
Telus International Services Limited Voxpro HousePoint VillageEast Wall Road Dublin 1 Ireland	Manila	Standard Contractual Clauses of the European Commission	No	No	No	Yes	Yes, Philippines

5. HDS Specifics - List of extra-European regulations

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

COUNTRY	EXTRA-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 "The Anti-Terrorism Act of 2020" (ATA) * Anti-Wiretapping Act (R.A. 4200) * Cybercrime Prevention Act (R.A. No. 10175)
