Processors and Sub-Processors

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The General Data Protection Regulation (GDPR) categorizes companies that handle personal data into two categories:

1) Controllers: These companies collect data directly from the data subjects

- Controllers are responsible for obtaining permission from their patients to collect data
- Controllers are responsible for ensuring data was collected with consent
- Controllers are responsible for correcting data and deleting data upon request of the data subject
    - Tricefy provides controls for clinics to easily correct and delete their data as needed

2) Processors: These companies store, maintain, and process data on behalf of the Controller

- Trice Imaging (Tricefy) is a processor
- The type of processing Tricefy performs varies depending on the needs of each specific customer; they are defined in the business agreement. The most common forms of processing include:
    - Secure cloud storage and archiving
        - Learn more at our security page: www.triceimaging.com/security
    - Anonymization (removal of identifiable information)
    - Patient sharing/links
    - Downloading (as DICOM or as user-friendly formats, such as .jpg)
    - Routing to external systems

Sub-Processors

Trice Imaging cannot do everything alone - we rely on carefully selected companies. These companies are known as **sub-processors**. Tricefy and Trice Imaging may use the following Sub-processors to deliver the Services to you:

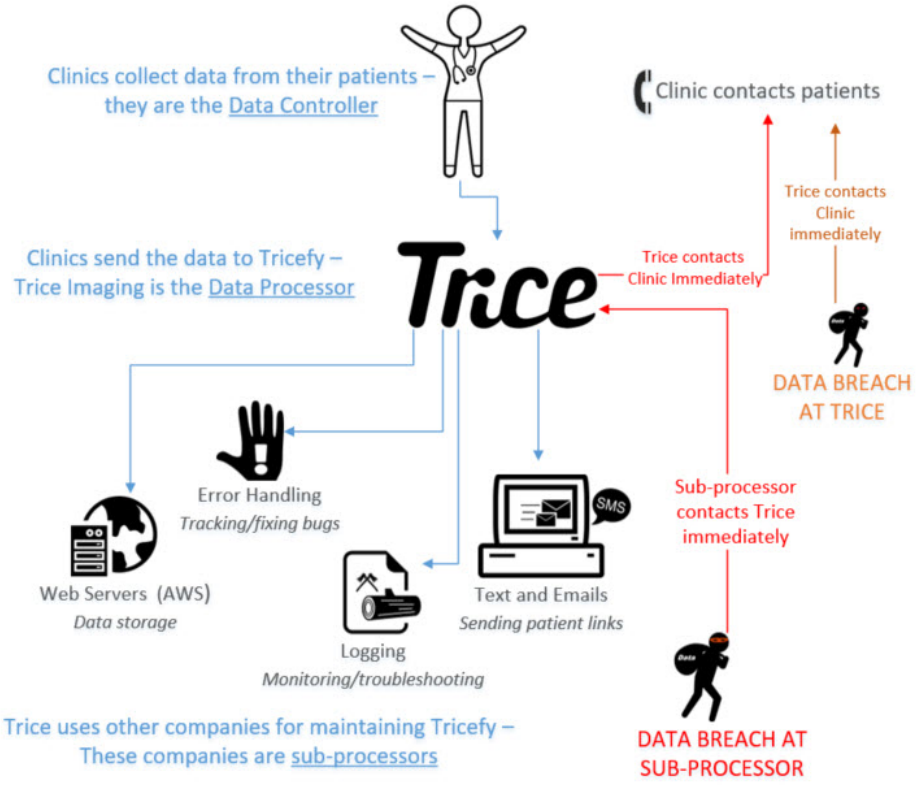
Vendor	Location	Purpose
Amazon Web Services (AWS)	United States	Infrastructure service provider
Twilio	United States	SMS notification provider
Postmark	United States	Email notification provider

Working with Sub-Processors

Trice Imaging has a Data Processing Agreement with each of our sub-processors, just like we have an agreement with every Controller.

In the event of a data breach, our sub-processors are required to notify us without undue delay so that we can inform our customers. By selecting to work with only companies that support GDPR with their high security standards, your data will always be treated with the best care.

Tricefy


Clinics collect data from their patients – they are the Data Controller
Clinic contacts patients
Trice contacts Clinic immediately
Clinics send the data to Tricefy – Trice Imaging is the Data Processor
Trice
Trice contacts Clinic Immediately
DATA BREACH AT TRICE
Error Handling
Tracking/fixing bugs
SMS
Sub-processor contacts Trice immediately
Web Servers (AWS)
Data storage
Logging
Monitoring/troubleshooting
Text and Emails
Sending patient links
Trice uses other companies for maintaining Tricefy – These companies are sub-processors
DATA BREACH AT SUB-PROCESSOR