



TREATMENT ACTIVITY RECORD (RAT) CATHMEDICAL CARDIOVASCULAR, SA

Last updated 23/03/2026

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Data Controller

- Company Name: **CATHMEDICAL CARDIOVASCULAR, SA**
- Tax ID: A81179772
- Address: C/Duero 37, Local 15, CC El Bosque, 28670 Villaviciosa de Odón, Madrid
- Email: info@cathmedical.com
- Representative of the Data Controller: Alfredo García Vergara

Data Protection Officer (DPO)

- Company: **NOXDATA DIGITAL SOLUTIONS, SL**
- Data Protection Officer: José María Braunstein
- DPO Contact: protecciondedatos@noxdata.es

1. Description of the treatment activity

Legal obligation

This Record of Processing Activities is prepared in compliance with the provisions of Article 30 of Regulation (EU) 2016/679 (GDPR) and Article 31 of Organic Law 3/2018 (LOPDGDD), within the framework of the principle of proactive responsibility.

Data Controller:

Management Body of CATHMEDICAL CARDIOVASCULAR, SA

Description of the treatment activity CATHMEDICAL CARDIOVASCULAR, SA is an entity specialized in the distribution, marketing, installation and maintenance of computerized polygraphy systems and technological equipment intended for medical diagnosis, mainly in the cardiovascular and hospital field.



In the course of its business, the company maintains commercial relationships with hospitals, clinics, healthcare centers, and medical professionals, which involves the processing of personal data of an identifying, professional, financial, and technical nature. Furthermore, in certain technical procedures, the company may have incidental and unintentional access to patient data, requiring the application of enhanced confidentiality and security measures.

Data processing is carried out in a structured manner in computer systems, technical platforms and documentary media, guaranteeing at all times the integrity, availability and confidentiality of the information processed.

Legal basis for processing

GDPR: 6.1.b performance of contracts for the supply, installation and maintenance of medical devices
GDPR: 6.1.c compliance with legal obligations in health, tax, commercial and regulatory matters
GDPR: 6.1.f legitimate interest in improving services, system security and customer service
GDPR: 9.2.h y 9.2.i processing necessary in the health field and security of medical devices, in cases of incidental access
Organic Law 3/2018 on the Protection of Personal Data

Purpose of processing:

Comprehensive management of customer relationships in the healthcare sector; Supply, installation, and maintenance of medical equipment; Technical training for healthcare professionals; Administrative, accounting, and tax management; Compliance with medical device regulations; Quality control and traceability of devices; Guarantee of the security of technological systems

Personal data processed:

Identifying and contact information of professionals and clients; Professional data (position, specialty, workplace); Economic and financial data; Contractual and administrative data; Technical data associated with the use of devices; Incidental access to health data in clinical settings

International Data Transfers:

International data transfers are not routinely carried out. If technological tools are used with providers located outside the European Economic Area, appropriate safeguards will be applied in accordance with Article 46 of the GDPR.

Data retention period

The data will be kept for the duration of the contractual relationship and, once it has ended, for the periods established by the applicable tax, commercial and health regulations, as well as for the time necessary to address possible legal liabilities.

Security measures implemented:

Profile-based access control; Individual user authentication; Encryption of devices and communications; Access and activity logging; Regular backups; Specific protocols for access to healthcare environments; Staff training in confidentiality and data protection; Internal security and information control policies



2. Administration Department

Data Controller:

Administration Department of CATHMEDICAL CARDIOVASCULAR, SA

Description of the processing activity:

The administration department manages all the company's economic, accounting, contractual, and documentary processes, including relationships with clients, suppliers, and public bodies. This processing is essential for the company's operational functioning and compliance with its legal obligations.

Legal basis for processing

GDPR: 6.1.b performance of contracts
GDPR: 6.1.c compliance with legal obligations
GDPR: 6.1.f legitimate organizational interest

Purpose of processing:

Billing and collection management, Payment and supplier control, Contract management, Tax and accounting compliance, Document archiving and control

Personal data processed:

Identification data, Contact data, Bank details, Tax data, Contractual data

International data transfers

are not performed.

Data retention period:

The data will be kept for the legal periods required by tax and commercial regulations.

Security measures implemented:

Restricted access to systems,
Protection of accounting software,
Backups, Document control

3. HR Management

Data Controller:

Human Resources Department

Description of the processing activity:

The processing of data in the field of human resources includes the comprehensive management of the employee life cycle, from the selection processes to the termination of the employment relationship, including compliance with labor and social security obligations.

Legal basis for processing

GDPR: 6.1.b performance of employment contract
GDPR: 6.1.c compliance with legal obligations
GDPR: 9.2.b processing of health data in the workplace

Purpose of processing:

Staff selection, Employment contracting, Payroll management, Occupational risk prevention, Training management



Personal data processed;
Identification data; Employment data; Financial data; Training data; Occupational health data

International data transfers
are not performed.

Erasure period:
During the employment relationship and subsequent legal periods

Security measures implemented:
Restricted access, Custody of files, Confidentiality of personnel, Protection of HR systems

4. Attention to the Rights of Persons

Data Controller:
Regulatory Compliance Area

Description of the processing activity
The company has internal procedures to guarantee the effective exercise of the rights of interested parties, in accordance with the provisions of the GDPR.

Legal basis for processing
under GDPR: 6.1.c compliance with a legal obligation

Purpose of processing:
To process requests for access, rectification, erasure, objection, restriction and portability; to register and document requests; to guarantee compliance with legal deadlines

Personal data processed:
Identifying data, Contact details, Information related to the request

International data transfers
are not performed.

Suppression period of
5 years as evidence of compliance

Security measures implemented:
Request registration, Access control, Documented internal procedures

5. Personal Data Breache Management

Data Controller:
Security and Compliance Area

Description of the processing activity
The company has a specific internal procedure for the management of security incidents that may affect personal data, including their detection, analysis, documentation, notification and resolution.



Legal basis for processing

GDPR: 6.1.c legal obligation GDPR: 32, 33 and 34 security of processing and breach notification

Purpose of processing:

To detect security incidents; to assess the risk to stakeholders; to notify the Spanish Data Protection Agency (AEPD) within the established deadlines
; to inform affected parties when appropriate; and
to implement corrective and preventive measures.

Personal data processed;

Data related to the incident; Data affected; Technical logs; Security evidence

International data transfers
are not performed.

Deletion period

: For the time necessary to comply with legal obligations

Security measures implemented

Incident management protocols Breach logging Access control Corrective actions Risk assessment

Video surveillance management

Data Controller:

Security Area

Description of the treatment activity The company has
video surveillance systems installed in its facilities in order to guarantee the safety of people,
property and infrastructure.

Legal basis for processing GDPR: 6.1.f legitimate interest LOPDGDD
video surveillance regulations

Purpose of processing:

To guarantee security, control access, and prevent incidents

Personal data processed

Images of people Access logs

International data transfers
are not performed.

Deletion period:

Maximum 30 days unless required by law

Security measures implemented:

Restricted access, Secure storage, Systems control, Informative signage



CONCLUSION

CATHMEDICAL CARDIOVASCULAR, SA maintains this Record of Processing Activities as an essential instrument for compliance with the principle of proactive responsibility, guaranteeing the protection of personal data in the development of its activity, especially in the health field, where a reinforced level of security and confidentiality is required.

