



EirMed PRIVACY POLICY AGREEMENT

Effective as of 1st December 2020

1. GENERAL PROVISIONS

1.1 This document uses the same terminology and abbreviations as our Terms and Conditions document. This Privacy Policy governs the collection, use and storage of Information and Data obtained from Users through the use of our Platform.

1.2 The Information on Users is divided into personally identifiable and non-personally identifiable Information depending on whether Information can identify the User as a specific person. Information about legal entities does not fall within the scope of Information as defined in our Terms and Conditions and Privacy Policy documents.

1.3 EirMed Ltd. has a position of a 'controller' within the meaning of EU GDPR with regard to Information, and a position of a 'processor' within the meaning of EU GDPR with regard to Data provided by the Users for processing.

2. COLLECTION AND USE OF PERSONALLY IDENTIFIABLE INFORMATION

2.1 When you choose to register on our Site you are required to provide some information as indicated in the registration form. The Information which we require pertains mainly to a legal entity. In case that information provided contains some personally identifiable information pertaining to natural persons or person registers on behalf of a sole proprietorship, partnership, or other business form which does not distinguish between physical and legal person we will collect, store, and use collected information in accordance with our Privacy Policy. Information which we may collect includes:

- first and last name,
- contact e-mail address,
- IP address, and
- physical address.

(A) NAME

2.2 In order to register to use our Services you have to provide your first and last name. EirMed will use this information to create an account for you, to include your name where necessary during the registration process with the European Database on Medical Devices, and to address you whenever we contact you.

(B) EMAIL ADDRESS

2.3 We collect your e-mail address directly from you when you register to use the Services. We collect your email address to comply with our contractual obligation of providing our Services. We will collect your email address in the following cases:

- **When you register an account with us.** We will collect your email address to create and facilitate an account for you and to send you notifications about your account, or if there is a data breach. Account is necessary to access some of our Services and if you do not provide us with your e-mail address for this purpose you will not be able to access these Services.

- **When you contact us.** We will collect your email address whenever you contact us through our email support@eudamed.com. Whenever we collect your email address this way, we will only use it in order to respond to your inquiry.

(C) IP ADDRESS

2.4 We integrate security systems on our Platform to prevent malicious attempts and exploits of the Platform. We scan IP address and ban IP addresses that show malicious signs such as too many password failures, seeking exploits and similar. We process this information in the interest of protecting the integrity of the Site and of the databases connected with it, including database of Information obtained from Users. We use your IP address on a basis of a legitimate interest to maintain the integrity and safety of our databases.

(D) PHYSICAL ADDRESS

2.5 We collect your physical address in order to comply with our contractual obligation. Your physical address is necessary for registration with the European Database on Medical Devices. We also collect your physical address in order to send you the invoices if the invoices are not received by electronic means.

(E) GENERAL

2.6 Some Services will not be available to you if you do not provide requested Information. We may keep records of any questions, complaints or compliments made by you and the response if any. Whenever you contact us, we shall collect any information which you chose to provide. We shall store and use this information only for the purpose of responding to your inquiries. Information contained within the inquiry, free from any personally identifiable Information, will be stored on our servers for the purpose of improving our Services and providing the best customer support possible.

2.7 We do not sell or rent personal Information to any Third-Party. We use collected Information for our internal purposes, as necessary by the nature of the Services, and only in accordance with this Privacy Policy. In some instances, we are obliged to comply with court orders and government requests and provide Information or parts of it to authorized bodies.

2.8 We have implemented security procedures and measures in order to ensure appropriate protection of the Information we process, against any misuse, unauthorized access, disclosure or modification. We will remove any Information about you upon your request no later than twenty four (24) hours after the request has been made.

2.9 We acknowledge that the safety of your Information is one of the highest priorities and therefore only authorized processors have access to your information. Although we take all appropriate measures in respect to keeping your information secure, you understand that no data security measures in the world can offer 100% protection. If we ever find or suspect a personal data breach we will without delay, within seventy-two (72) hours after becoming aware of it, notify the appropriate supervisory authority about the breach and Users where necessary.

2.10 The processing of the information is being performed automatically, without human intervention. However, whenever you contact us through email, the Information within the email will be handled and processed by a real human in order to provide you with the answer to the email.

2.11 Users may request access to, modification and erasure of personal Information and the exercise of the right to object. Such requests are submitted to support@eudamed.com.

3. COLLECTION AND USE OF NON-PERSONALLY IDENTIFIABLE INFORMATION

3.1 The Site collects a series of general data and information when a User or automated system calls up the Site. This general data and information are stored in the server log files. Collected may be (1) the software types and versions used, (2) the operating system used by the accessing system, (3) the date and time of access to the Services, (4) the Internet service provider of the accessing system, and (5) any other similar data and information that may be used in the event of attacks on our information technology systems.

3.2 We collect this information for breach investigation purposes. When using this information, we do not draw any conclusions about the User. Rather, this information is needed to (1) deliver the content of our Site correctly, (2) optimize the content of our Site as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

4. USER DATA

4.1 Users hereby confirm that any User Data which contains, or may contain, personally identifiable information is obtained lawfully, and that Users have a valid legal ground for processing, using, and storing of User Data; or if the legal ground is lacking, that Users have obtained informed consent from the persons whose information is contained within the User Data for processing, using, and storing of such User Data.

4.2 Data is stored on our servers only for the duration necessary for providing the Services. We will maintain records of processing activities for the purpose of demonstrating compliance with EU GDPR.

5. STORAGE AND TRANSFER OF INFORMATION AND DATA

5.1 Information and Data will be stored on secure servers located in EU. We may store or transfer Information and Data to servers located in countries deemed adequate by the European Commission, or in countries which European Commission has not deemed inadequate, provided that such countries implement appropriate and suitable safeguards regarding the security of personal information.

6. CONSENT

6.1 By registering on the Site you agree to have your information handled as described in this Privacy Policy, and you understand that such information is necessary for entering into contractual obligation.

6.2 You may withdraw your consent by deactivating or deleting your account or by informing us through e-mail support@eudamed.com in which case your account will be deleted automatically.

7. COOKIES AND SIMILAR TECHNOLOGIES

7.1 Cookies help us optimize and improve the user experience of the Site by helping us deliver crucial functionalities. The cookies we use may vary over time as we continuously update and improve our Site.

7.2 By visiting the Site we may use cookies to store some non-identifiable Information in your browser regarding your computer or mobile device and your activities in order to help improve the User experience. Users can deny access to cookies through their browser settings.

8. THIRD PARTY WEBSITES, SERVICES, AND COOKIES

8.1 The Site or e-mails may contain links to other external websites that do not fall under our domain. We are not responsible for the privacy practices or the content of such external websites. If you choose to follow such links to external websites, you do so at your risk.

9. CHANGES TO THE PRIVACY POLICY

9.1 We reserve the right to change our Privacy Policy at any time pursuant to notification through available e-mail address. The current version of Privacy Policy is available on the Site, indicating the effective date. You are encouraged to periodically check our Privacy Policy.

10. CONTACT INFORMATION

10.1 If you have any questions regarding our Privacy Policy and how the information is handled, or you wish to access, amend, or update your Information feel free to contact us at support@eudamed.com