

# Medicim Online Privacy Policy

**Effective April 11, 2018**

This Online Privacy Notice (“Privacy Policy”) explains how we handle the Personal Data provided to us on websites, mobile sites, mobile applications, and other digital services and products controlled by Medicim NV, Stationstraat 102 b6, Mechelen, B-2800, BELGIUM that link to this Privacy Policy (collectively, “Medicim Sites”). Medicim is the data controller for the processing of Personal Data under applicable law.

This Privacy Notice does not apply to Medicim Sites that do not link to this Privacy Policy or to third-party Web sites to which Medicim Sites may link.

## Types of Information We Collect Online

The types of Personal Data that we may collect while you use the Medicim Sites are described in this section and include both information that you provide to us and information that we collect automatically when you use the Medicim Sites.

For purposes of this Privacy Notice, “**Personal Data**” means information that identifies you or that could reasonably be used to identify you. Examples of Personal Data include name, address, telephone number, and email address.

## Information You Provide

You do not have to register for a service or program to receive much of the information available through Medicim Sites. However, some of our content is available only to registered or identified users and will require you to set up a profile or provide specific information about yourself in order to provide you the service.

## **Personal Data You Provide When Visiting Medicim Sites**

Medicim collects Personal Data that you provide on Medicim Sites, for example, when purchasing a product, to receive marketing products and information, contact Medicim customer service, or respond to Medicim questionnaires or surveys. This could include:

- Contact Information such as your name, address, phone number, or email address
- Registration Information such as your username and password
- Remuneration information when you provide a service to Medicim in your capacity as a healthcare professional
- Employment, education and other background information when you inquire about employment with Medicim
- Payment information (such as banking information, payment card number, expiration date, delivery address, and billing address)

- Content you may provide (for example, when you complete our Online Contact Form or submit other information).

## **Personal Data You Share During Other Interactions with Medicim**

You may contact Medicim to ask questions, discuss your concerns, or report issues regarding our products. If you communicate with or request information from Medicim, you may be prompted to provide your contact information as well as any Personal Data that is relevant to your request.

## **Information That May Be Collected Automatically**

When you use the Medicim Sites, we also may collect certain usage and device information automatically as described below.

### **IP Address**

We may record the Internet Protocol (“IP”) address of your computer or other electronic device when you visit the Medicim Sites. An IP address identifies the electronic device you use to access the Sites, which allows us to maintain communication with your computer as you move about Medicim Sites and to customize content.

### **Cookies and Other Tracking Technologies**

We also collect information about your use of Medicim Sites through tracking technologies such as cookies and web beacons. A “cookie” is a unique numeric code that is transferred to your computer to track your interests and preferences and to recognize you as a return visitor. A “Web beacon” is a transparent graphic image placed on a Web site, e-mail or advertisement that enables the monitoring of things such as user activity and site traffic. These technologies help remember your preferences and allow us to bring you the content and features that are likely to be of greatest interest to you on the basis of “clickstream” data that shows your previous activities on Medicim Sites.

We utilize Google Display Advertising (such as Retargeting with Google Analytics, Google Display Network Impression Reporting, DoubleClick Campaign Manager integration, and Google Analytics Demographics and Interest Reporting) to (1) show you our ads on other websites based on your prior visits to Medicim Sites, and (2) better understand our ad impressions and use of ad services. In connection with the Google Analytics Demographics and Interest Reporting service, we may use data from Google's interest-based advertising or third-party audience data (such as age, gender and interests) with Google Analytics to understand and improve our marketing campaigns and Site content.

Some of our online advertising takes place through Google Display Advertising. As part of this program, we use Google Analytics features such as Retargeting. In connection with that feature and others offered by ad networks, we and the operators of ad networks, including Google, may use third-party cookies (such as the DoubleClick cookie) – and in some cases first-party cookies (such as the Google Analytics cookie) – to inform, optimize and serve ads across the Internet, based on a user's past visits to Medicim Sites. We also may show you ads from some of our affiliated companies when you visit Medicim Sites.

You can opt out of Google Ads by visiting <http://www.google.com/ads/preferences>. If you do not want your data used by Google Analytics, you can install the Google Analytics opt-out browser add-on at the [Google Analytics opt-out page](#).

This Medicim Site is not designed to respond to "do not track" signals received from browsers.

To learn more about cookies and other tracking technologies, including how to disable them, please visit <http://www.allaboutcookies.org/>. Please note that some cookies are essential to the functioning of our Sites and deleting or disabling them will reduce the site's functionality.

## Mobile Tracking

Some Medicim Sites are available either as mobile applications or mobile sites that you can use on your mobile device. If you use a mobile device to access and use the Medicim Sites, we may collect the following mobile-specific information in addition to the other information described above: device or advertising ID, device type, hardware type, media access control ("MAC") address, international mobile equipment identity ("IMEI"), the version of your mobile operating system, the platform used to access or download the Medicim Site (e.g., Apple, Google, Amazon, Windows), location information and usage information about your device and your use of the Medicim Sites.

## Information Collected from Other Sources

We may combine information about you from a visit to one Medicim Site with information about you from visits to other Medicim Sites. We may also combine information about you that is collected through the Medicim Sites with information that we have collected offline, as well as with information provided to us by third parties, such as third-party list providers.

## How We Use Your Information

We use your Personal Data to provide you the product and services you request, communicate with you, improve your experience on the Medicim Sites, generally improve our products and services and for other internal business purposes. These uses may also include the recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data. The Personal Data we collect about you may be stored for five years following the most recent interaction we have had with you, after which point it will be archived only for so long as reasonably necessary for the purposes set out above, in accordance with applicable laws.

## Providing Product and Services You Request

If you choose to purchase a product or receive our services, we use the Personal Data that you provide through Medicim Sites to manage your orders and invoices, to process payments, to respond to your questions, provide you the services you request and offer an optimal customer experience.

## Marketing

You may also receive marketing information from Medicim and related affiliates, such as offers regarding Medicim related products or services, invitations to participate in surveys about our products, or notifications about special promotions. In such cases, we will use your contact and other Personal Data to send you marketing information.

## **Customized User Experiences**

The Personal Data that you provide may be used to create customized offers, information, or services tailored to your interests and preferences. Also, we may use your IP address and the data that we obtain automatically through the use of cookies or similar tracking technologies to make our Medicim Sites easier to use and navigate as well as to personalize the content provided on Medicim Sites by anticipating the information and services that may be of interest to you.

## **Business and Product Improvement**

In order to discover new facts that could help Medicim better understand customer needs and help improve, develop, and evaluate product, services, materials, and programs. Medicim analyzes the information that you have provided. For these purposes Medicim does not use information that can directly identify you.

## **Site Analytics and Improvement**

We may use the information that you provide and the information we collect automatically about your use of the Medicim Sites to monitor user traffic patterns and preferences for site improvement, analytics and optimization.

## **Legal Basis for Processing**

Under European data protection laws, Medicim must have a legal basis to process your Personal Data. The legal basis that applies in a instance will depend on for which of the specific purposes described above Medicim is processing your Personal Data:

- > In certain cases, Medicim may ask for your consent to collect and process your Personal Data. Should you choose to provide your consent, you may later withdraw your consent by contacting us as described in the “Your Privacy Choices” section. Please note that the withdrawal of consent will not affect processing which has already occurred.
- > In other instances, the processing of your Personal Data may be necessary in order to comply with an applicable law or regulation or for the performance of a contract to which you are subject. You may not be able to opt-out of this processing, or your choice to opt-out may impact our ability to perform a contractual obligation otherwise owed to you.
- > In still other instances, Medicim may process your Personal Data based on Medicim’s legitimate interests in communicating with you about our products and services, and about scientific research and educational opportunities. You have the right to opt-out of all such processing of your Personal Data. You may do so by contacting us as described in the “Your Privacy Choices” section.

## **Information We Share**

We only share your Personal Data with third parties as described below. We do not sell or rent Personal Data to third parties for their own marketing purposes.

### **Third-Party Advertising and Online Behavioral Advertising**

You may be provided with online advertisements of Medicim products and services on third-party websites and mobile services that are tailored to you, for example, on the basis of information that you provide to Medicim or a third-party website you are visiting, or of your browsing activity, purchases, or interests. These types of tailored online advertisements may come through several sources, such as the following:

- We may share with our advertising service providers your non-identifying information that we have obtained from cookies and other tracking technologies on our Medicim Sites.
- Some Medicim Sites participate in online behavioral advertising (this is also sometimes called re-target advertising or interest-based advertising). You can identify these sites by the “Advertising Choices” link in the footer. Our advertising network partners may place and use cookies on Medicim Web sites and on other third-party Web sites to collect information about your activities in order to provide you with online advertisements that are based on your interests. When a Medicim online behavioral advertisement is delivered to you, you will see an “Ad Choices” icon. Clicking on the icon or link will take you to a Web site where you can manage or opt out of the use of data about your browsing history that is used for the delivery of online behavioral advertisements. If you opt out, you may still see advertisements online, including advertisements from Medicim that are based on other information (e.g., based on the content of the page being viewed rather than your prior clickstream activity). In some cases, data may still be collected about your browsing activity by these third-party advertisers, but they will not use this data to deliver advertisements that are based on your past online browsing behavior. You can also opt out now by clicking [here](#).
- Some Web browsers may transmit “do-not-track” signals to Web sites with which the browser communicates. As of the Effective Date of this Privacy Notice, an industry standard has not yet been established on how to respond to these signals. Therefore, Medicim does not currently respond to these signals. As discussed above, you can opt-out from advertisers that use your browsing history to deliver online behavioral advertisements by visiting [adchoices](#).

### **Affiliates, Vendors and Suppliers**

We have relationships with suppliers and affiliated companies, who help us operate our business and for whom it may be necessary to have access to your Personal Data in the course of providing services to Medicim. We will not authorize these parties to use your Personal Data for any purpose that is not related to Medicim and its related affiliates business operation, and we do not share Personal Data from countries that require consent, unless appropriate consent has been obtained in advance to sharing with related affiliates. We require them to handle your Personal Data collected in accordance with this Privacy Notice.

## **Co-branded Sites**

We may partner with other companies to provide you with content or services on a joint or “co-branded” basis. At a co-branded site, you will see both the Medicim logo and the logo of the co-branding partner displayed on your screen. You should read the individual privacy policies of our co-branding partners, as they may differ in some respects from ours. Reading these policies will help you to make an informed decision about whether to provide your information to a given site.

## **Product Reports**

If you contact Medicim regarding your experience in using one of our products, we may use the information that you provide in submitting reports to the designated government regulatory authority, as required of us by law.

## **Legal Rights and Obligations**

In certain limited circumstances, Medicim may need to disclose your Personal Data in order to comply with a legal obligation or demand, such as to comply with reporting obligations to our governing regulatory authorities regarding the safety of our products, or in connection with the sale or transfer of one of our product lines or divisions, which includes the services provided through one or more of the Medicim Sites. In such instances, we will take measures to protect your Personal Data to the extent possible. We also reserve the right to use Personal Data to investigate and prosecute users who violate our rules or who engage in behavior that is illegal or harmful to others or to others’ property.

## **Change in Organization**

In the event Medicim decides to reorganize or divest our business through sale, merger, or acquisition, Medicim may share Personal Data about you with actual or prospective purchasers. We will require any actual or prospective purchasers to treat this Personal Data in a manner consistent with this notice.

## **Children Privacy**

Medicim does not knowingly collect or use any Personal Data directly from minors on Medicim Sites. We do not knowingly allow children to order our products, to communicate with us, or to use any of services. If you are a parent and become aware that your child has provided us with information, please contact us using one of the methods specified below, and we will work with you to address this issue.

## **Your Privacy Choices**

You have the right to see and get a copy of Personal Data about you that we maintain as well as to ask us to make corrections to inaccurate or incomplete Personal Data about you. You may have the right to receive data you have provided to us in a machine-readable format and to transmit that data to another

controller. You may also request the erasure of your Personal Data or the restriction of its processing, or object to the processing of Personal Data about you. To seek access to Personal Data about you, to file a concern, complaint, or request for correction, or to opt-out of particular programs, please contact our Privacy Office by clicking on the “Contact Us” link on the Medicim Site you are using, by using the Medicim contact information on the Medicim mobile application you are using, or by emailing us at [privacy@dtxstudio.com](mailto:privacy@dtxstudio.com). You may also send a letter to the following address:

Medicim NV  
Attn: Privacy  
Address Stationstraat 102 b6, Mechelen, B-2800, BELGIUM.

The Belgian Commission for the Protection of the Privacy is responsible for making sure that privacy law is followed in Belgium. For more information about your privacy rights, or if you are not able to resolve a problem directly with us and wish to make a complaint, contact:

Belgian Commission for the Protection of the Privacy  
Rue de la Presse 35  
1000 Brussels;  
Belgium  
[commission@privacycommission.be](mailto:commission@privacycommission.be)  
<https://www.privacycommission.be/en/>

In all communications to Medicim, please include your email address, the Web site address, mobile application, and/or the specific Medicim product to which you provided Personal Data (e.g., Medicim.com), and a detailed explanation of your request. If you would like to delete, amend, or correct your Personal Data and are contacting us by email, please put “Deletion Request” or “Amendment/Correction Request” in the subject line of the email. We will respond to all reasonable requests in a timely manner and may need to further confirm your identity in order to process certain requests.

## **Data Security**

Medicim maintains reasonable technical, administrative and physical controls to secure any Personal Data collected through the Medicim Sites. However, there is always some risk that an unauthorized third party could intercept an Internet transmission, or that someone will find a way to thwart our security systems. We urge you to exercise caution when transmitting Personal Data over the Internet, especially your financial-related information. Medicim cannot guarantee that unauthorized third parties will not gain access to your Personal Data; therefore, when submitting Personal Data to Medicim Sites, you must weigh both the benefits and the risks.

## **Third Party Sites and Social Media Plug-ins**

This Privacy Notice does not apply to Medicim Sites that do not link to this Privacy Notice, or to third-party Web sites to which Medicim Sites may link. Medicim Sites may use social media plug-ins (e.g., the Facebook “Like” button, “Share to Twitter” button) to enable you to easily share information with others. When you visit Medicim Sites, the operator of the social plug-in can place a cookie on your computer or other electronic device that enables that operator to recognize individuals who have previously visited our Site. If you are logged into the social media Web site (e.g., Facebook, Twitter) while browsing on our Medicim Site, the social media plug-in allows that social media Web site to receive information that you have visited our Medicim

Site. The social media plug-in also allows the social media Web site to share information about your activities on our Medicim Site with other users of their social media Web site. These sharing settings are managed by the social media Web site and governed by its privacy policy.

## **Accessing Our Sites Globally**

This site is owned and operated by Medicim in Belgium, but the information you provide will be accessible to our affiliates, vendors, and suppliers in other countries in accordance with this policy. Furthermore, if you are visiting this site from a country other than the United States, your communication with us will necessarily result in the transfer of information across international borders. The level of legal protection for Personal Data is not the same in all countries; however, we will take the security measures described in this Privacy Notice in an effort to keep your information secure. By using this site, you understand that your Personal Data will be stored and processed in the United States and in any country to which we may transfer your information in the course of our business operations.

## **Notice to California Residents**

Subject to certain limits under California Civil Code § 1798.83, California residents may ask us to provide them with (i) a list of certain categories of Personal Data that we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, and (ii) the identity of those third parties. To make this request, California residents may contact us at [privacy@dtstudio.com](mailto:privacy@dtstudio.com).

## **Changes to Our Privacy Policy**

We will only use Personal Data in the manner described in this Privacy Policy in effect when the information was collected from you or as authorized by you. However, and subject to any applicable consent requirements, we reserve the right to change the terms of this Privacy Policy at any time. Any changes to this Privacy Policy will be reflected on this page with a new effective date. Medicim encourages you to review this Privacy Policy regularly for any changes. Any Personal Data collected upon your continued use of Medicim Sites will be handled in accordance with the currently-posted Privacy Policy.