

## **Privacy Policy AEXIS MEDICAL**

Thank you for taking the time to read this Privacy Policy which applies to your use of the website <https://www.aaxis-medical.com/>. This Privacy Policy is intended to inform you about the personal data which we collect when you visit and use our website as well as how we use this data. Personal data is data which can be, directly or indirectly, related to you, e.g., name, address, organization, telephone number, and e-mail address.

### **1. The Controller**

The controller pursuant to Article 4 no. 7 of Regulation (EU) no. 679 of 2016 (the General Data Protection Regulation or “GDPR”) in relation to the collection and processing of personal data on this website is Aaxis Medical, Kabbeekvest 67, 3300 Tienen Belgium, tel. 0032 2 613 09 13, [info@aaxis-medical.com](mailto:info@aaxis-medical.com).

You may also contact [privacy@cantelmedical.com](mailto:privacy@cantelmedical.com) if you have any questions. Please note that such emails may be reviewed by Cantel Medical Corp., a U.S. corporation. Cantel Medical Corp. participates in, and has self-certified its adherence to the principles of, the EU – U.S. Privacy Shield Framework.

### **2. Collection, Processing and Use of Personal Data**

If you merely use our website for informational purposes and do not use our contact form or subscribe to our newsletter service, we do not collect personal data that directly identifies you (such as your name or address). However, when you use our website, we collect or use certain online identifiers whose transmission is implicit in the use of Internet communication protocols. These are not collected to be associated with specific persons, but may qualify as personal data as they could, through elaborations and associations with data held by third parties, allow identification of the user. The collection and use of these online identifiers is described in Section 2.1 (Server Log Files) and Section 2.2 (Cookies) below.

The collection and processing of data in connection with our contact form or newsletter service is described in Sections 2.3 (Contact Form) and 2.4 (Newsletters).

Further, when you use certain services on our website, including our newsletter service, we allow certain third parties to collect data from you. For further information, please see Section 3 (Collection and Use of Personal Data by Third Parties).

#### **2.1. Server Log Files**

Each time you visit our website, your browser transfers the following data to our server, which is then stored in so-called log files on our server:

- IP address,
- date and time of access,
- amount of transferred data,
- referrer url (the website which directed you onto our website),

- your browser type and
- your operating system.

We need to collect and store this data in order to be able to deliver our website and its content in a suitable way to you as well as to ensure the stability and security of our website. We generally store the log file data for up to seven days in order to identify technical problems or security incidents (e.g., illegal use of the website, hacker attacks, etc.). If we identify a security incident, we reserve the right to retain the log file data as long as required to pursue our legal claims in connection with it and may also make it available to third parties for that purpose (e.g., investigative authority).

Providing our website and its content to you as well as ensuring the stability and security of our website, including the pursuit of any legal claims, are legitimate interests pursuant to Article 6 para. 1 lit. f) GDPR which allow us to collect and use log file data as described above without your consent.

## **2.2. Cookies**

### **General Information:**

Cookies are small text files that are stored in your browser during your visit of a website. Cookies can have a variety of purposes from technical assistance to tracking of user's behavior and targeting individuals for marketing purposes. Cookies can be stored in your browser for different periods of time, depending on the type of cookie. Most internet browsers automatically accept cookies. However, users have the option to view the cookies in use, delete some or all cookies or completely disable the future storing of cookies. Cookies cannot run a program or transfer viruses or spyware to your computer.

### **Cookies Used on our Website:**

When visiting our website, certain cookies are set and read by our own server when delivering the website / webpage to your browser (so-called "first party cookies").

#### *First Party Cookies:*

We only use so-called session or technical cookies. These cookies are only stored in the temporary memory of your computer and are automatically deleted when you close your browser. They basically provide technical assistance to facilitate your use of our website. Session cookies enable you to switch from one page of the website to another and still be recognized as the same user, e.g., your language setting will remain the same if you switch from one page to another.

For further information on the individual cookies used by us, you may visit the opt-out pages of [Network Advertising Initiative](#), [Digital Advertising Alliance](#) or <http://youonlinechoices.eu>.

No third party cookies are used on our website.

### **Manage and Disable Cookies:**

Most browsers provide settings that prevent the automated placing of cookies on your computer. You can typically find this setting option in your browser under “data protection.” The procedure to manage cookies may differ from browser to browser.

Please note that you might not be able to use all of the features of our website if you block cookies in your browser settings.

### **Legal Basis for the Use of Cookies:**

The cookies used on our website are only technical, first party cookies, and their use is based on legitimate interests pursuant to Art. 6 para. 1 lit. f) GDPR, to enable the use of our website by you.

In any case, you are not under an obligation to accept any cookies and may prohibit the use of cookies by us at any time. For more information on how to manage or disable cookies and, hence, make use of your rights as described above, please refer to the respective sections ("Manage Cookies" and "Disable Cookies") above.

### **2.3. Contact Form**

We provide a contact form on our website. In order to submit a request, you need to fill in, *inter alia*, your name, company/business, e-mail address and, if you wish, telephone number. We use your personal data for the purpose of processing your request and replying to it.

The legal basis for processing your personal data in relation to the contact form is your consent under Article 6 para. 1 lit. a) GDPR. You consent to such processing when you send us a request. Note that you may revoke your consent at any time, but we may still need to store certain personal data included in your correspondence to fulfill a legal obligation or to pursue our legitimate interest as better specified below.

As such personal data is provided to us in the context of an electronic correspondence addressed to us, we will store your personal data until you exercise your right to obtain the erasure of the data; however, we may still be required to store such personal data for at least ten years under article 2262*bis* of the civil code if your request has legal or commercial content or, in any case, as long as we need to pursue or defend legal claims. The legal basis for this storage is respectively the need to fulfill a legal obligation to which we are subject under Article 6 para. 1 lit. c) GDPR and our legitimate interest to pursue or defend claims under Article 6 para. 1 lit. f) GDPR.

### **2.4. Newsletters**

We offer an e-mail newsletter service with information on our products and services. Users will only receive a newsletter if they subscribe to this service and provide the personal data requested by us in connection with the subscription service. To subscribe to the newsletter,

you will only need to provide your e-mail address, with an option to also provide your first and last name.

When you subscribe to the newsletter service, you will receive an e-mail which contains a link to confirm your subscription (so-called double opt-in). When you click on that link, we will store the IP address and other information (e.g., date of subscription and confirmation) for documenting that you have subscribed to the newsletter service.

We use the newsletter service "MailChimp," a cloud based newsletter distribution platform, for newsletter distribution. This service is provided by the Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA ("MailChimp").

Your e-mail address and, if applicable, the other personal data provided in connection with the subscription, are stored on the servers of MailChimp in the U.S. This data is used by MailChimp on our behalf in order to send the newsletters to you and analyze the newsletter distribution. When you open the newsletter, your browser will retrieve a so-called "web-beacon," a pixel-sized file contained in the newsletter, from the MailChimp servers. Thereby, technical information, such as information in relation to your browser, system, IP address and the time of retrieval, is processed. Further, the MailChimp server also collects data as to whether the recipients could open the newsletter, when they opened it and which links they clicked. We exclusively collect this data for statistical purposes and in order to adapt the content of our newsletter to our customers' preferences and provide a better service. We do not create user profiles based on this data.

MailChimp participates in, and has self-certified its adherence with the principles of, the EU-U.S. Privacy Shield Framework. Thus, it has committed itself to respecting the European data protection standards. For details in connection with its participation, please see <https://www.privacyshield.gov/participant?id=a2zt0000000TO6hAAG&status=Active>.

Further, we have entered into a data processing agreement with MailChimp which imposes the obligation upon MailChimp to process the personal data of our subscribers only based on our instructions.

The legal basis for the processing of your personal data in relation to the newsletter service is your consent pursuant to Article 6 para. 1 lit. a) GDPR. The legal basis for the use of the newsletter distribution service provider MailChimp, statistical assessments by us and the logging of the subscription data is Article 6 para. 1 lit. f) GDPR, as we have a legitimate interest in providing a user-friendly and secure newsletter service which serves both our business interests as well as the expectations of our users.

You can withdraw your consent to receive newsletters at any time. Please use the "unsubscribe" link at the end of a newsletter or contact us (see contact details in Section 1 (The Controller) above). Please note that you can also only object to our use of MailChimp. However, in this case, we will not be able to continue providing you with the newsletter.

Your personal data provided in relation to the newsletter will be deleted if you withdraw your consent, unless we need to store it in order to pursue or defend legal claims. The legal basis

for this storage is Article 6 para. 1 lit. f) GDPR, as we have a legitimate interest to pursue or defend claims.

We will only store your personal data for a longer period if and as long as we are under a respective legal obligation (e.g., statutory law, court order or order of an authority, etc.). The legal basis for this storage is Article 6 para. 1 lit. c) GDPR.

### **3. Collection and Use of Personal Data by Third Parties**

When you visit our website, third parties will be able to collect personal data from you as described in this section. Most of such third party service providers will only collect data on our behalf and not for their own business purposes. If data is collected and used for a third party's business purposes, then this will only occur on the basis of a contractual arrangement between us and the respective third party in which we will bind the third party to only use the collected data for the purposes described in the contractual arrangement.

#### **3.1. Service Providers**

Our website does not contain third party cookies.

MailChimp is the service provider providing the newsletter distribution services specified in Section 2.4 (Newsletters) above.

#### **3.2. Links**

When you click on links on our website which direct you to the website of another website provider, this website provider will likely also collect certain data from you, probably at least the data described in Section 2.1 (Server Log Files) above. However, this data is neither collected on our behalf nor otherwise controlled or used by us; therefore, we are neither legally obliged nor able to give you any information on what data will be collected if you click on such a link. Third party websites have their own privacy policies which may be different from ours. We are not liable for any of such third party websites, which you use at your own risk.

#### **4. Transfer of Personal Data / Recipients of Personal Data**

As described above in Section 3 (Collection and Use of Personal Data by Third Parties), we allow certain third parties to collect personal data from you. These third parties may qualify as recipients within the meaning of Art. 4 no. 9 GDPR. If so, we have to inform you about them as part of our information obligation pursuant to Art. 13 para. 1 lit. e) GDPR. For further details regarding these recipients of personal data, please see the information in Section 3 (Collection and Use of Personal Data by Third Parties).

Please note that our processing of your personal data will entail the possibility of certain persons, in particular in the context of our marketing department and IT department, to access your data for the purposes specified in this Privacy Policy.

Personal data may also be shared with our affiliates in accordance with the purposes for which personal data was originally collected or otherwise could be lawfully processed. Our U.S. affiliates participate in, and have self-certified their adherence to, the principles of, the EU – U.S. Privacy Shield Framework.

As mentioned in Section 2.4 (Newsletters) above, we currently use MailChimp as a data processor for the newsletter distribution. For further details, including the legal basis, please refer to the information in Section 2.4 (Newsletters) above.

In general, we will only transfer your personal data to third parties if this is required to perform a contract with you or if we are under a statutory legal obligation or ordered by legally binding order of an authority or court. The legal basis for this transfer of personal data is Art. 6 para. 1 lit. b) and lit. c) GDPR.

Further, we generally reserve the right to use third parties who collect and process personal data on our behalf (e.g., hosting providers or IT service providers). They will only receive the amount of data which is required for the assigned task. Such service providers will usually be contracted as so-called “data processors,” who are only allowed to process data based on our instructions and who will only be contracted if they provide the necessary qualifications set out for a data processor in the GDPR. The legal basis for the use of third parties and the related transfer of personal data may, subject to the circumstances, be Art. 6 para. 1 lit. b) or lit. f) GDPR. As long as we select and use data processors in compliance with the provisions of the GDPR and other applicable data protection law, we deem that we have a legitimate interest for the use of third parties as data processors.

#### **5. Transfer of Personal Data to Third Countries**

In some cases, we transfer, or will transfer, your personal data to countries outside the European Union or the European Economic Area.

As mentioned in Section 2.4 (Newsletters) and Section 4 (Transfer of Personal Data / Recipients of Personal Data), we use MailChimp, based in the U.S., as a data processor for newsletter distribution. For further details, including the legal basis for the transfer of

personal data to the U.S. in connection with our use of MailChimp, please refer to the information in Section 2.4 (Newsletters) above.

## **6. Your Rights**

With the exception of the navigation data specified above, you are free to provide the personal data specified in the contact form or in the form for subscription to the newsletter service. Non-provision of such data may, however, entail the impossibility to proceed with your request.

At any time, you have the right to obtain information concerning your personal data. This includes the right to know whether or not we process personal data concerning you and, if this is the case, to access your personal data. In certain cases, you are entitled to request rectification, erasure or restriction of the processing of your personal data.

Further, in certain cases, including where processing is based on legitimate interests of the data controller, you also have a right to object to the processing of personal data on grounds relating to your particular situation; in this case, we shall no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Where personal data is processed for direct marketing purposes, you always have the right to object at any time to the processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing. Further, you also have the right to data portability.

In case we process personal data based on your consent, e.g., for the contact form and newsletter service, you are entitled to withdraw your consent at any time, as specified in Section 2.3 (Contact Form) and in Section 2.4 (Newsletters). Please bear in mind that such withdrawal of consent only has future effect. It does not render invalid or illegal the processing based on consent before its withdrawal. If you withdraw your consent in relation to communications addressed to us through the contact form, we may still be required to store your personal data as specified in Section 2.3 (Contact Form). If you withdraw your consent in relation to the newsletter service, you will not receive further newsletters.

If you wish to exercise any of these rights in relation to your personal data, please contact [privacy@cantelmedical.com](mailto:privacy@cantelmedical.com). In order for us to fulfill your request, please make sure that we can identify you properly.

You have the right to lodge a complaint with the competent supervisory authority, which are the authorities of the member state of your habitual residence and of the place of the alleged infringement. Your habitual residence is your home country in which you live in permanently or have lived in for a significant period of time. The place of alleged infringement is the place where you think the data protection law has not been complied with.

## **7. Information / Suggestions**

We are happy to be at your disposal for information or suggestions in relation to data protection. Please contact Axis Medical, Kabbeekvest 67, 3300 Tienen Belgium, tel. 0032 2 613 09 13, [info@axis-medical.com](mailto:info@axis-medical.com).