

Updated 2020-Nov-04

Applies for Isofol Medical AB (publ) (corp. id. no 556759-8064). This integrity policy shall apply from the 4th of November 2020.

Introduction

It is important for us to protect your personal integrity and therefore, we process all your information and all personal data in accordance with applicable laws and regulations. We always process personal data and other essential information in a context where we take all appropriate measures in order to hinder unauthorized access, dissemination, changes or deletion thereof.

We may change our integrity policy to reflect changes in our activities, our web pages or services, or applicable law. The latest version of our integrity policy is always available on our web page.

Purpose

The purpose of our integrity policy is to explain how we collect and process your personal data. We also explain your rights and how you may act if you have any comments or wish to communicate a complaint to us. Personal data which are processed in connection with clinical trials are governed by a separate policy.

Goal

Our goal is that you shall feel secure in the knowledge that your personal integrity is respected and protected, and that your personal data is processed in a correct manner. All personal data shall be processed with care and in accordance with applicable law.

What is Personal Data and What is Processing of Personal Data?

Personal data is all information that directly or indirectly (with or without access to other information) may be connected to you, e.g. names, personal identification numbers and IP addresses.

Who is Responsible for the Personal Data We Collect?

Isofol Medical AB (publ) (org nr 556759-8064), Arvid Wallgrens Backe 20, 413 46 GÖTEBORG, is the controller for the personal data which is collected and processed by our company and is responsible for that all such processing is in accordance with applicable legislation.

Why do we Process Your Personal Data?

On isofol.se we collect personal data from you:

- To continually assess and understand how our web site is used to help us improve it.
- To keep you informed of our company's activities via press releases and newsletters.

In the overall course of our business we may also collect information about if you are a representative of a business or institution with which we are doing business. This data

collection may be done through direct interactions or third-party data sources and is necessary for us to conduct business with you or the company you represent.

Which Information is Processed?

Information provided by you

When you visit our web site, we will collect your IP address. Your IP address may also provide additional information about you, such as the location from which you are accessing our web site, and how you have accessed different parts of our web site. This information is used to help us understand how users navigate and interact with our web site to help us improve it.

On our web site we also offer you the possibility to subscribe to relevant news and press releases issued by and related to our company and the progress of our activities. We do this through a form where you may submit your:

- Name,
- Company name,
- Email address, and
- Whether you prefer to receive our information in Swedish or English.

This information is used to provide updates that are relevant to you. As and when you open or interact with an email sent to you as part of your subscription you will also provide information to us about these activities. We may analyse this information to ensure that we are sending you the most appropriate information based on who you are.

The processing of this information is based on your consent and we will stop processing your information should you no longer require news updates from Isofol. By unsubscribing, we will make sure that your personal data is removed from our systems, but we, or our news service provider, will keep a record identifying you to ensure that we do not contact you again.

Information collected directly or from third parties

When you are doing business with Isofol, contact details, including name, address, phone number, email and similar details, may be collected about you. This information is collected when necessary for us to do business with you or the company that you represent.

With Whom May We Share Your Information?

At Isofol we use established web site analytics providers. When you visit our website, we share your IP address with such providers to allow us to analyse the traffic on our website to improve the user experience.

If you choose to sign up to receive information from us, we will share your submitted information with our provider for press releases and newsletters.

If you are a business partner or supplier of Isofol, your contact information may be shared with other suppliers, professional advisors or authorities, as required by law, for us to fulfill any legal requirement placed on our business, or contractual requirement that we may have with you or with the company you represent.

Where Will We Process Your Personal Data?

The primary processing of your personal data is carried out in the EU/EEA. Our data analytics and news partners have presence outside the EEA, including in North America, which means that the processing may involve transferring your personal data outside of the EEA. When we transfer your data outside of the EEA, we will use specific contracts approved by the European Commission.

How Long Do We Store Your Personal Data?

We store your personal data as long as it is necessary in order to fulfil the objectives with the processing or to perform our agreed undertakings towards you, and as long as it is required due to legal requirements of storage.

For web traffic analytics data, we store your user information no longer than 26 months.

For subscribers to our newsletter, we store the personal data as long as the subscription is active.

For business contact details, we store the personal data for as long as we have an active contract with you or the company you represent and for a time period of 24 months thereafter, or for as long as is necessary to fulfilment any legal requirements.

Your Rights to Access, Correction and Deletion

As a Data Subject you have rights to your personal data.

Rights to obtain access to your data

You have the right to request a copy of the record with your personal data and verify the information we have stored about you. Requesting one copy is free of charge.

Right to correction

You have the right to request correction of incorrect or incomplete information about yourself.

Right for deletion or limitation

To the extent our processing of your personal data is based on consent, you have the right to withdraw such consent. You also have the right to request your personal data to be erased or that the processing shall be restricted. We will carry out the erasure of your personal data after such request in a timely manner, should there be no legal or contractual obligations preventing us from doing so.

Cookies and Tracking Techniques

We have integrated Google Analytics, a service to analyse traffic and user behaviours, on our website.

Google Analytics uses cookies. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. Google might transfer the personal information collected via this technical procedure to third parties.

On our behalf, Google will use this information to evaluate your use of the website, compile reports on website activity and to provide further services related to website and internet use

to us. The IP address transferred through your browser to Google Analytics will not be combined with other data held by Google.

You can prevent the storage of cookies by a corresponding setting of your browser software; however, please note that if you do this, you may not be able to use all the features of this website to the fullest extent possible.

In addition, you may prevent the collection of the data generated by the cookie and related to your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout>

This browser add-on informs Google Analytics via JavaScript that no data and information about website visits may be transmitted to Google Analytics.

In addition, a cookie already set by Google Analytics can be deleted at any time via the Internet browser or other software programs.

Further information and Google's applicable privacy regulations can be found at <https://policies.google.com/privacy> and <https://marketingplatform.google.com/about/>. The following link provides a further explanation of Google Analytics <https://marketingplatform.google.com/about/>.

Social Media

Currently, you may follow us on social media such as LinkedIn. On such accounts, we are only responsible for personal data that we publish or can influence the publication of.

How Can You Contact Us in Case You Have Questions about Data Protection?

If you have any questions related to data protection and personal integrity or if you think that we have processed your personal data incorrectly, you may always contact us at info@isofolmedical.com.

Our data protection officer (DPO), NDA Regulatory Service AB, can provide more detailed information about how we work with personal data and integrity protection. To reach our DPO, please send an email to isofol-dpo@ndareg.com.