

Vingmed Privacy Policy

1. General

This policy on processing of personal data (Privacy Policy) describes how Vingmed collects and processes information about you.

The personal data policy applies to personal data that you provide to us or that we may collect via Vingmed's websites.

Vingmed is the data controller for your information. All inquiries to Vingmed can be made via the contact information mentioned in section 7.

2. What personal data do we collect and for what purposes?

To our customers

Vingmed's customer base is in the healthcare sector.

We process the information that you provide to us, and which is necessary for us to fulfill our responsibility as a supplier of medical devices and pharmaceuticals in an efficient and safe manner. The information may be provided to us by e.g. e-mail, telephone or via our website. The information may also reach us via third parties.

When you purchase a product, training or service by sending us an order or communicating with us via e.g. e-mail, telephone, etc., we collect the information you provide yourself, such as name, workplace and address, work telephone number and email.

The purpose of processing information is to be able to deliver goods and services to you and your company and otherwise fulfill our agreement with you as a customer, including to be able to administer your rights to complaint. Information about your purchases is also processed to comply with legal requirements, including bookkeeping, accounting, and traceability of the product.

Information about which products you buy and possibly return is stored in our ERP-system and for the sake of statutory traceability, this information will not be deleted,

If we register information about you in our CRM system (Customer Relationship Management) or Customer portal if applicable, you will be informed accordingly. The information we have stored about you is only accessible to employees of Vingmed and will be deleted or anonymized five years after we no longer have you as a customer or 5 years after ongoing dialogue has ended. We only register general information. If you have consented to receive newsletters and the like, this can be withdrawn at any time. If necessary, contact us (see contact information in section 7).

In some cases, we can deliver products directly to a private individual's home. This is done after a funding from a municipality or order from a hospital. In such cases, we store name, address, telephone number, CPR number (CPR-number is a Civil Registration Number and storing of CPR-number is only applicable in Denmark) and which products we have delivered. Where applicable the CPR number is stored to make unique identification in connection with billing and communication with your municipality or hospital. The legal basis for this processing is the Danish Data Protection Act §11 (3).

The information collected will not be used for profiling.

Surveys

From time to time, we may invite you to participate in a survey to determine the level of customer satisfaction or identify potential areas for improvement. We may send you a specific invitation to participate in such a survey based on our legitimate interest in conducting the survey. You can opt out of receiving this type of communication anytime.

The personal information collected for the survey may include your name, email address, telephone number, survey results and any text messages that you have written in the survey.

The business purpose and legitimate interest of collecting your data is to be able to respond to any survey feedback from you, that is:

- If you have pointed out a problem that we need to solve
- To gain further insight into the experience you have described
- To inform you about actions we can take internally to resolve your issue or improve your experience

The legal basis for the processing of personal data is Article 6(1)(b), (c) & (f) of the General Data Protection Regulation.

Reporting of Adverse Events

We will always receive reports of Adverse Events in anonymized form with a case-id No. to identify the report. However, since any personal data including such case-id are considered person sensitive data, we will handle these reports accordingly and will always forward such reports to relevant recipients by encrypted email.

To our suppliers

When you communicate with us, e.g., via e-mail or via our website, we collect the information you provide yourself, e.g., name, company, company address, work telephone number and e-mail.

The information is stored partly in our ERP-system and insofar as you are a supplier of medical equipment or pharmaceuticals for resale, your information will normally also be stored in our supplier portal and if applicable in our CRM system, you will be informed accordingly.

The purpose of the data processing is so that we can fulfill our contractual obligations and agreements with your company.

From time to time, we may invite you to participate in a survey for due diligence purposes.

3. Recipients of personal data

Information about your name, address, e-mail, telephone number as well as any order number and specific delivery requests is passed on to logistics partners responsible for the delivery of goods to you.

Your information may also be disclosed to third parties if this is necessary for us to fulfil our obligations in connection with product recalls, corrective actions, or adverse events. In this context, the third party will only be the manufacturer of the equipment or national competent authority.

Personal data is stored on servers operated by our IT suppliers. We have data processing agreements with all our IT suppliers to ensure that personal data is protected in accordance with the General Data Protection Regulation.

The stored personal data is protected by firewalls. Individual passwords are required to access our IT systems. All information is stored within the EU/EEA.

Cookies on our Website

We may use cookies and other internet identifiers to enable the implementation of online services and improve the overall user experience on our website. Cookies are small text files that our website sends to the user's internet browser. They serve various purposes, including but not limited to:

a. Necessary Cookies: These cookies are necessary for the basic functionality of our website, enabling the user to navigate around the website and use its core features.

b. Analytics Cookies: These cookies collect information about how visitors use our website. They help us understand which pages are visited the most, how users interact with our content, and allow us to make data-driven improvements to our services.

c. Preference Cookies: Preference cookies store user-specific settings, such as language preferences and customizations, to improve the user's experience.

d. Marketing Cookies: Some cookies may be used for marketing and advertising purposes, which allow us to deliver tailored content and advertisements based on the interests of the user.

The cookies used on our website may either belong to and be operated by Vingmed or third-party suppliers. Third-party cookies are used for specific functions, analytics, and marketing.

Users of our online services can give or revoke their consent to the use of cookies through their browser settings. Disabling cookies may affect the user's ability to access certain features of our website.

4. Legal basis

The legal basis for us to process your personal data is the agreement/contract/order, cf. Article 6(1)(b) of the General Data Protection Regulation and/or legislation cf. GDPR Article 6(1)(c) of the General Data Protection Regulation and/or for us to pursue a legitimate interest. The legitimate interest justifying the processing is the marketing of products and/or services.

5. Security

We have implemented appropriate technical and organizational security measures against personal data being accidentally or illegally destroyed, lost, altered, or impaired, as well as coming to the knowledge of unauthorized persons or being misused.

6. Your rights

In connection with the registration of your information and contact history, you have the following rights:

- Right of access to the data we have registered about you, cf. Art. 15 of the Regulation
- Right to have data corrected or erased, cf. Articles 16 & 17 of the Regulation

·Right to object to our processing of your data, cf. Art. 21 of the Regulation.

You can read more about your rights here:

Denmark	www.datatilsynet.dk
Norway	www.datatilsynet.no
Sweden	www.imys.se
Finland	www.tietosuoja.fi/

7. Contact information

Vingmed is the data controller for your personal data.

If you have any questions or wish to make use of the rights above, please contact:

Vingmed A/S Birkerød Kongevej 150B 3460 Birkerød Denmark Tel. + 45 45 82 33 66 E-mail: persondata@vingmed.dk Website: www.vingmed.dk	Vingmed AS Solbråveien 13 1383 Asker Norway Tel: +47 67580680 E-mail: personvern@vingmed-as.no Website: www.vingmed-as.no
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