

# VITROLIFE'S PRIVACY POLICY

## Summary and introduction

Vitrolife Sweden AB ("Vitrolife" or "we") cares about your privacy. Therefore, Vitrolife always strives to protect your personal data in the best possible way and to comply with all applicable laws and regulations for the protection of personal data.

This privacy policy includes information about how Vitrolife process personal data about you as a:

- representative of a customer, potential customer or former customer;
- representative of a supplier or partner;
- subscriber of Vitrolife's marketing, news and information; and
- user of Vitrolife's web and/or webshop (including social media).

In summary, we conduct all our processing of your personal data for the following overall purposes:

- communicate with you as representative of a customer, potential customer, former customer, supplier or partner, including having contact with you to negotiate and close an agreement with the company you represent;
- administrate any agreements with the company you represent;
- communicate offers, news, updates, surveys or product evaluations to you – this *may include profiling* as described below;
- upon request by you as representative of a customer: register and thereafter administrate a webshop user account;
- store any responses you've made to our social media posts; and/or
- comply with any applicable laws and regulations which require processing of your personal data, for example any traceability requirements or accounting and bookkeeping requirement.

Do you want to know more about how we process your personal data? You find a more detailed information about our processing below. Below we give you information about, for example, the legal basis, storage period, purpose of the processing and how you can affect our processing of your personal data.

## Table of contents

Summary and introduction ..... 1

Who is responsible for your personal data? Questions or queries?..... 2

Our processing of your personal data..... 2

When you represent a customer or potential customer ..... 2

When you represent a supplier or partner ..... 6

Marketing and information which you have requested or which we think is relevant for you based on your behavior on our web (profiling) ..... 7

When you make responses in social media .....	8
About our balance of interest assessments .....	8
From who or where do we collect your personal data? .....	8
Who can gain access to your personal data? .....	9
How can you effect our processing of your personal data? .....	9

### Who is responsible for your personal data? Questions or queries?

Vitrolife Sweden AB, Swedish company registration number 556546-6298, with address Box 9080, 400 92 Gothenburg, Sweden, telephone number +46(0)31 7218000, is responsible for the processing of your personal data (the controller).

You are welcome to contact our Data Protection Coordinator by sending an e-mail to [dataprotection@vitrolife.com](mailto:dataprotection@vitrolife.com) if you have any questions or queries regarding our processing of your personal data.

### Our processing of your personal data

Our aim is to be as transparent as possible regarding our processing of your personal data. Therefore, we give you more detailed information in the tables below. In the table, you can read about why we process your personal data (the purposes of processing), what personal data we process, our legal basis for processing your personal data and how long we process your personal data for each purpose.

If any of the stated information changes, we will share our revised privacy policy at our website. We will however inform you about any subsequent substantive or material changes to the policy by contacting you.

### When you represent a customer or potential customer

For what purposes does Vitrolife process your personal data?	What personal data does Vitrolife process?	What is Vitrolife’s legal basis for processing your personal data?	For how long does Vitrolife process your personal data for each purpose?
To <i>contact, and communicate with you</i> who represent a company that we consider a <b>potential customer</b> .	Your name, contact details, company role and company belonging.	Your consent or, if consent has not been collected (for instance when we collect your personal data from the internet), our legitimate interest to contact you in your profession as representative of a	If we rely on your consent for our processing we will process your personal data until we have performed the processing you consented to (which is different depending on the situation).

For what purposes does Vitrolife process your personal data?	What personal data does Vitrolife process?	What is Vitrolife’s legal basis for processing your personal data?	For how long does Vitrolife process your personal data for each purpose?
		company, which we think would be interested in Vitrolife’s products.	If our processing is based on our legitimate interest to do so we will process your personal data until we have processed the personal data for the purpose we collected it for, i.e. for example until we have contacted you or until we have sent an e-mail, invite or other marketing communication to you. However, we do not process your personal data for a period longer than two (2) years from when we collected the data, unless you have given us your consent to process your personal data in order for us to have further contact with you.
<p><i>To negotiate, close and administrate the agreement with the company you represent as well as administrating any orders that you, as a <b>representative of a customer</b>, have placed.</i></p> <p>This also includes, when applicable, processing performed by Vitrolife to <i>comply with legal requirements</i>, for</p>	Your name, contact details and/or company belonging.	<p>Our legitimate interest to administrate the agreement with our customer and handle any order that you as representative of a customer has placed, including naming you as a reference when Vitrolife is invoicing the company you represent.</p> <p>We also process your personal data when it is necessary for compliance with a legal</p>	<p>Until the agreement with the company that you represent has ended, or until you or the company gives us new contact details to another person.</p> <p>If you are named as a reference on our invoices to the customer, we will however process your personal data for this purpose in accordance with the applicable accounting and bookkeeping acts, regulations and/or rules.</p>

For what purposes does Vitrolife process your personal data?	What personal data does Vitrolife process?	What is Vitrolife's legal basis for processing your personal data?	For how long does Vitrolife process your personal data for each purpose?
example to fulfil applicable accounting and bookkeeping acts, regulations and/or traceability requirements.		obligation which Vitrolife is subject to.	Personal data that is processed to comply with legal obligations will also be processed for a longer period if it is required in accordance with applicable laws and regulations, for example applicable traceability requirements.
To handle complaints and/or legal disputes if you are the <b>representative of a customer</b> in a specific case or otherwise involved in complaints and/or legal disputes.	Your name, contact details, company belonging, company role, information you have stated which is relevant within the framework of the complaint and/or legal dispute.	Our legitimate interest to process information about you in order to handle a complaint and/or legal dispute in which you are the representative of a customer as well as any legal requirement to do so.	In order to handle an actual complaint and/or legal dispute your personal data will be stored for as long as the complaint and/or legal dispute claim is ongoing. We will however store your personal data according to legal requirements from when a claim is made for a period of time equivalent to the design and expected life of the device, but in no case less than two (2) years after the product was released from manufacturing.
To create and administer your webshop account as <b>representative of a customer</b> when you have requested us to set up such an account.	Your name, company belonging, e-mail address and password.	Our legitimate interest to create and administer your account in order to give you access to the webshop upon your request as well as making sure that the company you represent	Your account and associated information will be erased in case your account has been inactive for a period of two (2) years or sooner if you chose to delete your account or we receive notice that you are no

For what purposes does Vitrolife process your personal data?	What personal data does Vitrolife process?	What is Vitrolife's legal basis for processing your personal data?	For how long does Vitrolife process your personal data for each purpose?
<p>Before setting up your webshop account we will check whether the company you represent is a Vitrolife customer or not.</p>		<p>is a Vitrolife customer before we do so.</p>	<p>longer a representative of the customer.</p> <p>If the company you represent is not entitled to set up a webshop account, we will process your personal data only until we have notified you that we will not set up a webshop account for you.</p>
<p>If you have placed an order on our <i>webshop</i>, as <b>representative of a customer</b>, we will <i>save and publish information about your order</i> to enable you and your colleagues to see what you previously have purchased.</p>	<p>Your name.</p>	<p>Our legitimate interest to publish information about your order to facilitate the placing of future orders for you and your colleagues.</p>	<p>From when you have placed your order and during the time under which you have a webshop user account. We will erase your information if we receive notice that you are no longer a representative of the customer.</p>
<p>To <i>send news, information, marketing, surveys or product evaluations</i> to you as the <b>representative of a customer or former customer</b>.</p>	<p>Your name, contact details and company belonging.</p>	<p>Our legitimate interest to send you, as representative of a customer or former customer, information about our products, news and information. We will send marketing, news and information that we believe you are interested in as well as surveys and product evaluations, which we have identified you as a relevant receiver of.</p>	<p>For as long as the company you represent is a customer to us and a period of two (2) years thereafter.</p> <p>We will however cease the processing earlier if we receive notice that the customer has a new contact person or if you declare that you no longer want to receive information from us.</p>

## When you represent a supplier or partner

For what purposes does Vitrolife process your personal data?	What personal data does Vitrolife process?	What is Vitrolife's legal basis for processing your personal data?	For how long does Vitrolife process your personal data for each purpose?
<p>To <i>negotiate, close and administrate an agreement</i> between the company you represent (<b>supplier or partner</b>) and Vitrolife.</p>	<p>Your name, contact details, company belonging and company role.</p>	<p>Our legal basis is our legitimate interest to get in contact with you as the representative of our supplier or partner to be able to negotiate and close an agreement with the company you represent.</p>	<p>Until the negotiations are over and/or the agreement is entered into or during the agreement period if your personal data is included in the agreement.</p>
<p>To <i>contact and communicate with you</i> as the representative of our <b>supplier or partner</b> during the duration of the agreement with the company you represent.</p>	<p>Your name, contact details, company belonging and company role.</p>	<p>Our legal basis is our legitimate interest to communicate with you as the representative of our supplier or partner.</p>	<p>For as long as we have an agreement with the company you represent or until we receive notice that the supplier or partner has a new contact person.</p>
<p>To <i>handle complaints and/or legal disputes</i> if you are the representative of the <b>supplier or partner</b> in a specific case or otherwise involved in the complaints and/or legal disputes.</p>	<p>Your name, contact details, company belonging, company role, information you have stated which is relevant within the framework of the complaint and/or legal dispute.</p>	<p>Our legitimate interest is to process information about you in order to handle a complaint and/or legal dispute in which you are the representative of the supplier or partner.</p>	<p>In order to handle an actual complaint and/or legal dispute your personal data will be stored for as long as the complaint and/or legal dispute claim is ongoing.</p>

**Marketing and information which you have requested or which we think is relevant for you based on your behavior on our web (profiling)**

For what purposes does Vitrolife process your personal data?	What personal data does Vitrolife process?	What is Vitrolife’s legal basis for processing your personal data?	For how long does Vitrolife process your personal data for each purpose?
<p>We will send relevant <b>newsletters, blog updates, financial information</b> and/or relevant information to you <b>upon your request</b>.</p>	<p>If you subscribe to news and updates from us we will process your e-mail address and information regarding in which capacity you are subscribing to our news and updates, i.e. if you are a representative of a potential customer or other.</p> <p>If you subscribe to financial information we will process information about your name, company belonging, e-mail address, country and in which capacity you want to subscribe to the information.</p>	<p>Your consent.</p>	<p>We will send news and updates to you until you unsubscribe.</p>
<p>Based on personal data such as what types of content you have consumed on our site or what your expressed interests are, we may assign you a certain persona type. We use such profiles for the purpose of improving the relevance of our marketing and sales</p>	<p>Your name, e-mail address, IP address and information about your behaviour on our website (what you are interested in). We will also process any other information that you provide to us, such as the name of the company you represent.</p>	<p>Our legitimate interest to provide you with relevant content based on the persona we have assigned you.</p>	<p>Two (2) years from your last interaction.</p> <p>We will however cease the processing earlier if you declare that you no longer want to receive information from us.</p>

For what purposes does Vitrolife process your personal data?	What personal data does Vitrolife process?	What is Vitrolife's legal basis for processing your personal data?	For how long does Vitrolife process your personal data for each purpose?
efforts, for example creating and providing more relevant content towards you ( <b>profiling</b> ).			

### When you make responses in social media

For what purposes does Vitrolife process your personal data?	What personal data does Vitrolife process?	What is Vitrolife's legal basis for processing your personal data?	For how long does Vitrolife process your personal data for each purpose?
To store your <b>response</b> to our blog posts or <b>social media</b> posts.	Information that you provide to us when posting comments.	Our legitimate interest to store the response that you voluntarily posted in our social media.	Until you inform us that you want us to remove your comment.

### About our balance of interest assessments

For some purposes, Vitrolife processes your personal data relying on our legitimate interest as legal basis for the processing. When assessing the legal basis we rely on a balance of interests, through which we have determined that our legitimate interest for the processing outweighs your interest and your fundamental right not to have your personal data processed. We have stated what our legitimate interests are in the tables above. You are welcome to contact us if you want to read more about how we have done this assessment. Our contact details are stated in the beginning of this privacy policy.

### From who or where do we collect your personal data?

We collect the personal data that we process about you from you or from the company you represent.

If we believe you are a business lead (i.e. representative of a potential customer), we may collect your personal data from the internet.

## **Who can gain access to your personal data?**

Vitrolife shares your personal data with relevant companies in our company group.

We will transfer your personal data outside the EU/EEA if it is necessary for us to fulfil our part of the agreement with the company you represent. For instance, if you work in a country outside the EU/EEA, we will transfer your personal data to that country.

We may also transfer your personal data outside the EU/EEA to our IT suppliers and distributors that process the personal data on behalf of us as processors. The IT suppliers provide cloud services and perform IT-support and maintenance for us and the purpose of the transfer is for us to receive their assistance.

If your personal data is transferred to a third country, Vitrolife will always take suitable and appropriate safeguards to protect the personal data being processed. This means we will only transfer your personal data outside the EU/EEA where there is a legal basis for doing this.

We use different suppliers depending on for example which country or countries you as a representative of a customer makes a purchase from. For further detailed information about which companies that will gain access to your personal data, you can contact us by using the contact information stated in the beginning of this privacy policy.

## **How can you affect our processing of your personal data?**

According to data protection legislation, you are entitled to a variety of rights regarding our processing of your personal data. You have the right of access, right to rectification and erasure of personal data. You also have the right to require restriction of processing as well as the right to object to the processing. Further, you are entitled to data portability and the right to submit a complaint to a supervisory authority. For a more detailed description of the data protection rights, please see below.

### *Right of access*

In accordance with applicable data protection legislation, you are entitled to the right of access. This means that you have the right to obtain confirmation as to whether or not personal data concerning you is being processed by Vitrolife and, if so, access to the personal data in accordance with the applicable data protection legislation.

### *Right to rectification*

If you believe the information Vitrolife processes about you is incorrect, you can request that Vitrolife corrects it. You have, without undue delay, the right to obtain the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed, including providing a supplementary statement.

### *Right to erasure ('right to be forgotten')*

If you believe that the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, you may ask us to erase your information. You may also ask us to erase your personal data if:

- you withdraw your consent for which the processing is based upon, and where there is no other legal ground for the processing;

- you object to the processing where the legal basis is our legitimate interest, and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in accordance with Union or Member State law to which Vitrolife is subject; or
- the personal data have been collected in relation to the offer of information society services.

Vitrolife will erase your personal data upon such request unless Vitrolife has the right to keep the personal data in accordance with general data protection regulations.

#### *Right to restriction of processing*

You also have the right to ask us to restrict our processing where one of the following applies:

- the accuracy of the personal data is contested by you, for a period enabling Vitrolife to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and requests the restriction of their use instead;
- Vitrolife no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; or
- you have objected to processing pending the verification whether the legitimate grounds of Vitrolife overrides your legitimate grounds.

#### *Right to object*

You have the right to object to the processing of your personal data when the processing is necessary for the purposes of our legitimate interest.

You also have the right to object to our processing of your personal data for marketing purposes, for example when we send marketing to you in the role of your profession. If you object to marketing from us, your personal data will no longer be processed for marketing purposes.

#### *Right to withdraw consent*

At any given time, you have the right to withdraw all or part of a given consent on the processing of personal data when the legal basis for the processing is your consent. Withdrawal of consent may however have no effect on our processing of your personal data for the period prior to the recall.

#### *Right to lodge a complaint to a supervisory authority*

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the EU/EEA member state of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation (the relevant data protection law). In Sweden, the supervisory authority is The Swedish Data Protection Authority.

### *Right to data portability*

You are also entitled to receive personal data concerning you that you have provided to us in a structured, commonly used, machine-readable and interoperable format, and to transmit it to another controller (data-portability). This right will apply when:

- the processing is based on consent or on a contract; and
- the processing is carried out by automated means.

In exercising your right to data portability you have the right to have personal data transmitted directly from Vitrolife to another controller, where technically feasible.

---

*This privacy policy was adopted by Vitrolife on 2018-05-24*