

# dHAL Software Privacy Policy

Effective starting May 25<sup>th</sup>, 2018

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information. This privacy policy is part of our data protection plan for complying with the GDPR Regulation (EU) 2016/679 (General Data Protection Regulation).

## What information we collect about you

#### Information you provide to us

We collect information when you provide it to us to purchase software licenses or to ask for user support.

When you purchase a user's license we collect the following: name, email, billing/shipping address, VAT number (if the address is within the EU), and credit card details (if you opt to pay by credit card).

When you ask for user support we collect whatever information you provide to us in order to help you solve your problem. This typically includes your email address and telephone number.

When you register the software, we collect the registration number that you send to us and the key number that we generate and send back to you to unlock the software. This includes the version of the software that you are using.

## Information from publicly available sources

We collect information from scientific papers published in scientific journals or from university websites, when any of our software is mentioned. Such information includes the paper citation and excerpts of the paper that we can use to promote our products.

#### Information from other sources

We do not collect any other information, either automatically or through other sources.

#### How we use information we collect

The information we collect is used to process transactions with you, to verify that you are a valid registered user and to provide customer support. Your name, email, telephone number and address can be used to contact you in case we need to notify you of any critical software failures and updates.

User feedback and bug reports are logged so that we can improve our products and comply with the quality standards of the EU that are related to medical devices and software.

#### How we share information we collect

We do not share any of the information we collect with third parties, except for the following cases:

#### With your consent

We will share information about you with third parties when you give us explicit consent to do so. For example, we may display personal testimonials of satisfied customers on our website. With your consent, we may post your name alongside the testimonial.

## For legal reasons

We will share personal information if we have a good-faith belief that this is necessary to:

- Meet any applicable law, regulation, legal process, or enforceable governmental request.
- Enforce our agreements, policies and terms of service, including investigation of potential violations.
- Detect, prevent, and protect the security of our products.
- Protect dHAL Software, our users, or the public from harm or illegal activities, as required or permitted by law.

#### How we store the information we collect

All collected information is kept electronically in our computers. Order forms and invoices are kept on file in our offices. We do not transmit any information electronically via the internet.

We restrict access to personal information to selected company personnel who need that information in order to process it.

### How long we keep information

Information related to payment and business transactions is kept for an extended period of time, as required for tax or accounting purposes.

Information you provide to us for user support is kept until the problem is resolved, and for a reasonable time after that, in case the problem needs to be re-examined. A record of your interaction with the user support team is kept for meeting the requirements of the quality management system.

# How to access and control your information

You have the right to request a copy of your information, to object to our use of your information, to request the deletion or restriction of your information, or to request your information in electronic format. You can access these rights by notifying us through email, fax or by regular mail, using the contact information on our website.

Your request and choices may be limited in certain cases: for example, if you ask us to delete information which we are permitted or required to retain by law, such as accounting information.

Please note that if we delete certain information then you may no longer be identified as a registered user and therefore may not be eligible for certain user privileges, such as free updates, new registration keys, special offers and user support.

In case of deletion, we may retain data for limited periods when it needs to be kept for legitimate business or legal purposes.

## If you require additional information

Contact us at:

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Fax: +30-210-6233211

Email: <u>dhal@dhal.com</u>