



General Privacy Policy of Micrel Medical Devices Group of Companies

Micrel Medical Devices SA, under the distinctive title Micrel, located at 42 Konstantinoupoleos Str, 19441, Koropi, Athens, Greece (tel. +30 210-60.32.333), and its affiliated companies¹ (hereinafter referred to as Micrel) maintain the personal data files listed below.

This policy sets out the principles applied by Micrel in the processing of this data (categories, legal basis, purpose, retention period, etc.) and aims to inform the data subjects. It is subject to change from time to time.

What is personal data?

Any information relating to an identified or identifiable natural person ("Data subject").

Processing

Any act or series of acts carried out, with or without the use of automated means, on personal data or on sets of personal data, from their collection, storage, deletion or destruction, or their anonymisation.

Data Processing Activities of Micrel

Micrel processes personal data and special categories of personal data for the following two general purposes of processing:

- I. Internal Management and Function**
- II. Customer Services**

These categories are further analysed to the following processing activities:

I. Internal Management and Function

a. Personnel Management

- i. **Legal basis of processing:** Performance of a contract to which data subject is a party or Legitimate business interests of Micrel and the other party (contract preparation and execution, compliance with legal obligations, etc.)
- ii. **Data categories:**
 - **Personal Data** of employees (e.g. name, surname, father's name, mother's name, SSN, Police ID card number, TIN, postal address, telephone, CVs and copies of diplomas, work related data).
 - **Special categories of personal data** of employees, e.g. employees' health data (vaccinations) and work accidents.
- iii. **Data sources:** Data subjects themselves
- iv. **Retention period:** 10 years or as long required by the course of the business interaction, whichever is later
- v. **Data recipients:** Public authorities (e.g. Social Security Organisation, Labour Inspectorate)

b. Financial Management

¹ Micrel Medical Devices France SASU, Micrel Medical Devices Nordics AB, Micrel Medical Devices Deutschland GmbH, Micrel Medical Devices Danmark ApS

- i. **Legal basis of processing:** Performance of a contract to which data subject is a party or Legitimate business interests of Micrel and the other party (contract preparation and execution, compliance with legal obligations, etc.)
 - ii. **Data categories:**
 - **Personal Data** of Micrel's accountants and employees.
 - **Special categories of personal data** of employees (e.g. health data for sick leaves).
 - iii. **Data sources:** Data subjects themselves
 - iv. **Retention period:** 10 years or as long required by the course of the business interaction, whichever is later
 - v. **Data recipients:** Micrel's external accountants, banks
- c. *Business Development*
- i. **Legal basis of processing:** Performance of a contract to which data subject is a party or Consent
 - ii. **Data categories:**
 - **Personal Data** of business contacts, incl. education, professional qualifications, job related information, and experience with Micrel products or similar.
 - **Special categories of personal data:** --
 - iii. **Data sources:** Data subjects themselves
 - iv. **Retention period:** 10 years or as long required by the course of the business interaction, whichever is later
 - v. **Data recipients:** Micrel Group companies

II. Customer Services

a. *Patients Monitoring Service*

- i. **Legal basis of processing:** Legitimate business interests of Micrel and the other party (contract with healthcare provider) or Consent
- ii. **Data categories:**
 - **Personal Data** of patients, of health care professionals, of users of patients' portal, of sales/distributors' sales staff, and of Micrelcare users, as well as activity Logs of access/ actions of users related to a patient therapy.
 - **Special categories of personal data** - Patients' health data related to the type of treatment (pain management, chemotherapies), and treatment information (e.g. start date, prescriptions, administered medications, infusion data, etc.).
- iii. **Data sources:** Healthcare providers
- iv. **Retention period:** As long as required by the course of the business interaction according to the contract and agreed terms and conditions
- v. **Data recipients:** Micrelcare platform hosting provider

b. *Sales Management and Customer Support*

- i. **Legal basis of processing:** Performance of a contract to which data subject is a party or Legitimate business interests of Micrel and the other party (contract execution, compliance with legal obligations, etc.) or consent
- ii. **Data categories:**
 - **Personal Data** of patients, of representatives of patients, of healthcare



professionals, of supervising healthcare professionals, of pharmacists, of purchasers, of distributors, of Micrel's employees, of Micrel's sales persons and of Micrel's business partners.

- **Special categories of personal data**, e.g. the description of medical diagnosis, the patients' illness category and the patient's affiliation (e.g. Chairperson of a specific patients' association).
- iii. **Data sources:** Data subjects themselves or Healthcare providers
- iv. **Retention period:** 10 years or as long as required by the course of the business interaction, whichever is later
- v. **Data recipients:** According to the terms of the contract or the consent

Data Protection Officer (DPO)

You can contact our Data Protection Officer by e-mail at dpo@micrelmed.com

Destruction of the physical file of applications

The physical file containing all applications submitted to Micrel is kept in full security and is destroyed after 10 years, unless legally valid business reasons require its further retention.

Exercise of data subjects' rights

You have the following rights:

- a. To know which of your personal data Micrel maintains and processes, their origins, the purposes for which they are processed, and the period of their retention by file or as a whole (right of access).
- b. Request the correction and/or supplementation of your personal data so that it is complete and accurate (right to rectification). In this case, you must provide all necessary documents to show the need for correction or completion.
- c. Request restriction of processing of your data (right to restriction of processing).
- d. Refuse and/or object to any further processing of your personal data held by Micrel (right to object).
- e. Request the deletion of your personal data from the files kept by Micrel (right to erasure or "right to be forgotten").
- f. Request to transfer your personal data to any other processor of your choice in accordance with the terms of the General Data Protection Regulation (2016/679) (right to data portability).

In connection with the exercise of these rights, please note the following:

- Micrel has in any event the right to refuse your request to restrict the processing or erasure of your personal data if the request is not sufficiently substantiated, if the processing or retention of the data is necessary in accordance with the law and for the establishment, exercising or supporting its legitimate rights. However, in any event, if you wish, Micrel may cease the transfer of your data to all recipients of its files, henceforth transmitting the relevant indication (prohibition of transfer).
 - The exercise of these rights acts for the future and does not concern data processing already performed.
- g. File a complaint with the national Data Protection Authority, e.g. for Greece Hellenic Data Protection Authority (www.dpa.gr), if you believe that your rights are being infringed in any way (right to file a complaint with the Authority).

For the exercise of your rights, the Customer Service Office operates on weekdays from 09:00 to

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16:00). On weekdays between 09:00 and 16:00 you may also reach a call centre at +302106032333. In addition, you may write to the Company to the above address of the Company or electronically to the e-mail address info@micrelmed.com, while useful information on the exercise of the above rights is provided on the website of Micrel <http://www.micrelmed.com/>

Micrel will respond to your request within thirty (30) days of its submission except in exceptional circumstances, in which case the above deadline may be extended for up to sixty (60) additional days if deemed necessary, taking into account the complexity of the request and/or the number of requests. In any event, Micrel will inform you of any extension of the deadline as per above.

Privacy

Micrel is committed to preserving the privacy and protection of personally identifiable information as required in relevant legislation and regulation in order to preserve its competitive edge, cash-flow, profitability, legal, regulatory and contractual compliance and commercial image.

- a. Micrel is committed to compliance with all national and international legislation related with personal data protection.
- b. Personal data is classified as [Confidential].
- c. Micrel's privacy policy applies to all personal data processed by the company.
- d. Micrel has implemented and constantly upgrades specific organizational, operational and technical measures to protect personal information.
- e. All staff involved in handling personal information understand their responsibilities for following good data protection practices.
- f. Training in data protection is provided to all staff.
- g. New employees as well as casual staff are informed on the corporate requirements for personal data protection, prior to assuming their duties.
- h. Micrel includes requirements for personal data protection in all contracts with employees, casual staff, external collaborators, other legal entities (suppliers, partners, clients, subsidiaries).
- i. The use of electronic Micrel services (e.g. Micrelcare) is allowed only after agreement to specific terms of use, which include provisions for personal data protection and processing.
- j. Micrel respects and adheres to the principles relating to processing of personal data set forth by the EU General Data Protection Regulation (EU Regulation 2016/679) and the applicable national Data Protection Laws and Regulations, which require that personal data shall be:
 - a. processed lawfully, fairly and in a transparent manner in relation to the data subject;
 - b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
 - c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - d. accurate and, where necessary, kept up to date;
 - e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
 - f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
 - g. Micrel processes personal data in accordance with the rights of data subjects under the EU General Data Protection Regulation 2016/679.

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