

# 1928 Diagnostics Privacy Policy for Business Contacts

## 1. Introduction

This Privacy Policy (the “**Policy**”) describes how 1928diagnostics AB, reg. no 556963-0824, at the address Entreprenörsstråket 10, 431 53 Mölndal, Sweden, and its subsidiaries (“**1928 Diagnostics**”, “**we**”, “**us**” or “**our**”) process personal data of visitors and users of our website and our business contacts.

We safeguard your personal integrity. It is therefore important for us to protect your personal data and ensure that our processing of your personal data is correct and lawful. This Policy will help you understand what kind of personal data we collect and how it is used, as well as your rights as a data subject.

We may sometimes need to make updates or changes to this Policy. If we do so, we will inform you in an appropriate manner. You can always find the latest version of this Policy on our website [www.1928diagnostics.com](http://www.1928diagnostics.com).

We ask that you read this Policy carefully and familiarize yourself with its content. If you have any questions, please contact us at the address above or at [info@1928diagnostics.com](mailto:info@1928diagnostics.com).

## 2. How we collect your personal data

We collect your personal data when you visit and use our website, sign up for newsletters or in any other way provide us with your personal data, including if we come in contact with you personally, or if we receive your personal data from third parties such as the company you represent or our partners.

## 3. How we process your personal data

In this section, we describe how we process your personal data, our lawful basis for the processing and for how long we store the data.

### 3.1 To create, maintain and develop potential business relationships

We process personal data to create and thereafter maintain and develop business relationships with potential customers, partners and other business contacts (including for example consultants, potential investors, research and development contacts and suppliers).

If you are or represent a potential customer, partner or other business contact and we come into contact with you personally (e.g. at conferences, fairs, other personal meetings or otherwise), by e-mail or other means of communication or through third parties, we may process your personal data as follows.

Purpose	Processing	Categories of personal data
<ul style="list-style-type: none"> <li>– To be able to contact you for the purpose of creating, maintaining and developing our business relationship with you or the company you represent.</li> </ul>	<ul style="list-style-type: none"> <li>– Storage of personal data in our business systems and back-up systems.</li> <li>– Communication with you.</li> </ul>	<ul style="list-style-type: none"> <li>– Name.</li> <li>– Contact details (such as e-mail address, telephone number, location and business address).</li> <li>– Professional role/title.</li> <li>– Information regarding the company you represent.</li> <li>– Information that you otherwise provide us in connection with us communicating with you.</li> </ul>
<p><b>Lawful basis:</b> Legitimate interest: The processing is necessary to fulfil our legitimate interest of creating and thereafter maintaining and developing a business relationship with you or the company you represent.</p>		
<p><b>Storage period:</b> We store your personal data for a period of six (6) months after collecting it unless a business relationship is established between us and you or the company you represent during this time, meaning that we will continue our processing of your personal data in accordance with section 3.2 below.</p>		

### 3.2 To maintain and develop existing business relationships

We process personal data to maintain and develop business relationships with existing customers, partners and other business contacts (including for example consultants, potential investors, research and development contacts and suppliers).

If you are or represent a customer, partner or other business contact of ours we process your personal data as follows.

Purpose	Processing	Categories of personal data
<ul style="list-style-type: none"> <li>–To be able to contact you in your capacity as representative of our customer, partner or other business contact.</li> <li>–To provide our services, administrate</li> </ul>	<ul style="list-style-type: none"> <li>– Storage of personal data, including communication and documentation, in our business and back-up systems.</li> <li>– Communication with you.</li> </ul>	<ul style="list-style-type: none"> <li>– Name.</li> <li>– Contact details (such as e-mail address, telephone number, location and business address).</li> <li>– Professional role/title.</li> <li>– Information regarding the company you represent.</li> </ul>

orders, user accounts and billing.		<ul style="list-style-type: none"> <li>– Information that you otherwise provide us in connection with us communicating with you.</li> <li>– Account details, including username/userID and password.</li> </ul>
<p><b>Lawful basis:</b> Legitimate interest. The processing is necessary to fulfil our legitimate interest of maintaining and developing our business relationship with you or the company you represent.</p>		
<p><b>Storage period:</b> As long as necessary for the purposes above during the time you have a user account with us or we have an ongoing business relationship with you or the company you represent, however, for a maximum of two (2) years from the last time we were in contact with each other due to our business relationship. We erase or anonymize your data when it is no longer necessary or adequate, for example if our business relationship with you or the company you represent ends or if you delete your user account. Your personal data may also be stored by us for other legitimate purposes, such as fulfilling our legal obligations or exercising legal claims, see section 3.5 below.</p>		

### 3.3 To administer the conclusion and performance of contracts

We process personal data to administer the conclusion and performance of contracts between us.

If you are or represent a customer, partner or other business contact of ours we process your personal data as follows.

Purpose	Processing	Categories of personal data
<ul style="list-style-type: none"> <li>– Administration and communication in order to conclude or perform contracts between us and you, or the company you represent.</li> </ul> <p>This includes, among other things, invoicing and regular handling, following up and documentation of matters relating to contracts.</p>	<ul style="list-style-type: none"> <li>– Storage of personal data, including communication and documentation, in our business and back-up systems.</li> <li>– Invoicing as well as the usual handling, follow-up and documentation of contract-related issues.</li> </ul>	<ul style="list-style-type: none"> <li>– Name.</li> <li>– Contact details (such as e-mail address, telephone number, location and business address).</li> <li>– Professional role/title.</li> <li>– Information regarding the company you represent.</li> <li>– Account details, including username/userID and password.</li> </ul>

**Lawful basis:** The processing is necessary to conclude and perform a contract with you.

**Storage period:** As long as necessary for the purposes above during the time you have a user account with us or we have an ongoing business relationship with you or the company you represent, however, for a maximum of two (2) years from the last time we were in contact with each other due to our business relationship. We erase or anonymize your data when it is no longer necessary or adequate, for example if our business relationship with you or the company you represent ends or if you delete your user account. Your personal data may also be stored by us for other legitimate purposes, such as fulfilling our legal obligations or exercising legal claims, see section 3.5 below.

### 3.4 To evaluate, develop and improve our website

If you visit our [website](#), we collect and process information generated by your visit to analyze and produce statistical information regarding our web traffic in order to evaluate, develop and improve our website and web-based communication.

Purpose	Processing	Categories of personal data
– To evaluate, develop and improve our website and web-based communication.	– Analysis and production of statistics regarding our web traffic and the use of our website.	– Browser information. – IP-address. – Time zone from where you visited our web site. – Other website traffic data.
<b>Lawful basis:</b> Legitimate interest. The processing is necessary to fulfil our legitimate interest to evaluate, develop and improve our website and web-based communication. We collect information using cookies with your consent, except such use which is strictly necessary for you to be able to use our website in a purposeful manner.		
<b>Storage period:</b> As long as necessary for the purposes above, however not longer than for a time period of three (3) months. In most cases, the collected personal data is converted into aggregate data (anonymized data) within a shorter period of time, in connection with our production of statistical information.		

### 3.5 To comply with legal obligations or to exercise legal claims

We may process your personal data to comply with legal obligations set out in law or other legal statutes, or as decided by a court or other authorities, in order to comply with legal obligations that we are subject to. These requirements may be related to matters such as bookkeeping, tax administration or money laundering legislation.

We may also process your personal data if the processing is necessary for the establishment, exercise or defense of our legal claims.

### **3.6 To send you newsletters and other marketing messages**

We process your name and email address to send you newsletters if you have opted in (registered) for such letters. You may opt-out (unregister) from further messages at any time by using the un-subscription link provided in every message.

Our processing of personal data for the purpose of sending you newsletters is based on the explicit consent that you provide when you sign up for our newsletter and marketing messages.

We store your data for this purpose as long as you subscribe to our newsletters.

If you opt-out (unregister) from further messages from us, we will delete your personal data and erase it unless necessary for other purposes covered by this Policy (please note that we will continue to process your email address in order to mark it as blocked from further messages from us).

## **4. How we share your personal data**

The personal data that we collect is shared with the following types of third parties:

- a) **Service providers:** We may use third party service providers to manage some aspects of our business operations, including the processing or handling of personal data. We may share personal data with such third parties with regard to IT systems and other administrative functions, such as marketing and communication services and accounting services. When we use such service providers or work together with other third parties we typically enter into data processing agreements, or make other relevant arrangements, to ensure that your personal data is processed in accordance with this Policy only.
- b) **Authorities:** We may share your personal data to public authorities such as the police or tax authorities when it is required by applicable law or regulation or in order to exercise or defence legal claims during a legal process.
- c) **Sale or transfer of business or assets:** Any information we have about you may be transferred or disclosed to a purchaser or prospective purchaser in the event of a sale, assignment, or other transfer of all or a portion of our business or assets. Should such a transfer occur, we will use reasonable efforts to ensure that the transferee uses your information in a manner that is consistent with this Policy.

## **5. Where we process your personal data**

We strive to always process your personal data within the EU and EEA. However, we may transfer your personal data to service providers who, either themselves or by their sub-contractors, are located in or have business activities in a country outside the EU or EEA. In the event of such transfer, it will be made in accordance with applicable data protection legislation, for example by ensuring that the country in which the recipient is located ensures an adequate level of data protection according to the European Commission, or by ensuring appropriate

safeguards based on the use of standard contractual clauses that the European Commission has issued ensuring suitable measures to safeguard your rights and freedoms.

You may access a list of the countries that the European Commission has decided provide an adequate level of data protection at [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm).

You may access the European Commission's standard contractual clauses at <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>.

## **6. Security measures**

We have taken a number of security measures to ensure that the personal data we store is secure. For example, access to areas where personal data is stored is limited to our employees and service providers who require it in the course of their duties and who are informed of the importance of maintaining the security and confidentiality of the personal data we keep. We maintain appropriate safeguards and security standards to protect your personal data against unauthorized access, disclosure or misuse. We also monitor our systems to discover vulnerabilities in order to protect your personal data.

## **7. Your rights**

### **7.1 Introduction**

In this section we describe your rights as a data subject under applicable data protection legislation. You are welcome to email us at [info@1928diagnostics.com](mailto:info@1928diagnostics.com) to exercise your rights or if you have any questions or comments regarding our processing of your personal data or this Policy. We will respond within a reasonable period of time upon verification of your identity.

We ask you to note that your rights apply to the extent that follows from applicable data protection legislation and that there may be exceptions to the rights where applicable. We also ask you to note that we may need more information from you in order to e.g. confirm your identity before proceeding with your request to exercise your rights.

### **7.2 Right of access and rectification**

You have the right to information regarding which of your personal data we process and to access such personal data. You also have the right to rectify the personal data we process concerning you, should it be incorrect or incomplete considering the purpose for which your personal data is processed.

### **7.3 Right to erasure**

You have the right to obtain that we erase your personal data without undue delay in the following circumstances:

- a) the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;

- b) you withdraw your consent on which the processing is based (if applicable) and there is no other legal ground for the processing;
- c) you object to our processing of personal data and we do not have any overriding legitimate grounds for the processing;
- d) the processed personal data is unlawfully processed; or
- e) the processed personal data has to be erased for our compliance with one or more legal obligations.

We may deny your request if we are prevented from erasing your personal data by requirements set out in applicable laws and regulations (e.g. in relation to accounting and tax legislation) or if it is needed for the establishment, exercise or defence of legal claims. If we are prevented to meet your request to erase your personal data, we will instead restrict our continued processing of your personal data to the extent possible for us to do so.

#### **7.4 Right to restriction**

You have the right to obtain that we restrict the processing of your personal data in the following circumstances:

- a) you contest the accuracy of the personal data during a period enabling us to verify the accuracy of such data;
- b) the processing is unlawful and you oppose erasure of the personal data and request restriction instead;
- c) the personal data is no longer needed for the purposes of the processing, but is necessary for you for the establishment, exercise or defense of legal claims;
- d) you have objected to the processing of the personal data, pending the verification whether our legitimate grounds for our processing override your interests, rights and freedoms.

If your personal data has been restricted in accordance with this section they may, with exception of storage, only be processed for the establishment, exercise or defense of legal claims, or for the protection of the rights of a third party or for reasons of important public interest according to EU or EU member state legislation.

#### **7.5 Right to object**

You have the general right to object to our processing of your personal data when it is based on our legitimate interest. If you object and we believe that we may still process your personal data, we must demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims.

#### **7.6 Right to data portability**

If your personal data has been provided by you and our processing of your personal data is based on your consent or on the performance of a contract with

you, you have the right to receive the personal data in a structured, commonly used and machine-readable format, provided that the personal data requested concerns yourself and our processing of your personal data is carried out by automated means (personal data that we only process manually is thus not covered by this right). In such circumstances, you also have the right to transfer your personal data to another party without hindrance from our side. Where technically feasible, you also have the right to obtain that your personal data is transferred directly from us to another data controller.

#### **7.7 Right to withdraw consent**

Your personal data will not be processed for purposes related to direct marketing if you oppose such processing. Please note that the lawfulness of any processing based on your consent before its withdrawal is not affected by the withdrawal.

#### **7.8 Right to file a complaint**

In Sweden, the Swedish Data Protection Authority (*Sw. Datainspektionen*) is the authority responsible for monitoring the application of current data protection legislation. You may at any time file a complaint with *Datainspektionen* if you believe that our processing is performed in breach of applicable data protection legislation. Please note that you are also always welcome to contact us in such event.

### **8. The use of cookies**

We use cookies on our website to enhance your website experience and to improve our website and services. You have the option to change the settings in your browser for the use of cookies. You have, for instance, the ability to adjust your settings to block all cookies or delete them when you close your web browser. For more information on how we use cookies, please see our website.

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