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|  | Privacy Policy | Date | 24/05/2018 |
| | | Version | 01 |

I. GENERAL

Surgi-Tec NV (the “Company”) is committed to protecting the privacy of its users. This Privacy Policy (“Privacy Policy”) is designed to help you understand what information we gather, how we use it, what we do to protect it, and to assist you in making informed decisions when using our Service. Unless otherwise indicated below, this Privacy Policy applies to any website that references this Privacy Policy, any Company website, as well as any data the Company may collect across partnered and unaffiliated sites.

For purposes of this Agreement, “Service” refers to the Company’s service which can be accessed via our website at www.surgi-tec.com. The terms “we,” “us,” and “our” refer to the Company. “You” refers to you, as a user of our Service.

II. GDPR ADDITIONS

By providing your data on the [contact form](#) on Surgi-Tec’s website, on paper or via e-mail, all entered data is primarily used to optimize the communication between you (the customer) and Surgi-Tec NV. This way, the customer’s service can be optimized and the traceability can be guaranteed. Surgi-Tec NV uses this data to fulfill the purpose of the agreement.

If you agreed to give Surgi-Tec the permission to use your data for service optimization and newsletters, we can/will update you with innovations, publications and other news about our company. Surgi-Tec NV uses this data based on the explicit permission of the user.

If Surgi-Tec NV should provide data to a company outside of the EU, we will ensure that these are companies with GDPR compliant policies. If you feel like your personal data was treated in an incorrect way, you are always allowed to file a complaint to the Privacy Committee. Your additional rights are listed in chapter XIII: “*Additional rights for the user*”.

Surgi-Tec will notify the user when Surgi-Tec intends to further process the personal data for a purpose other than that for which the personal data were collected. Surgi-Tec will provide you with information on that purpose and the necessary extra information, prior to the processing.

III. CONSENT

By accessing our Service, you accept our Privacy Policy and Terms of Use, and you consent to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy. In addition, by using our Service, or services across partnered and unaffiliated sites, you are accepting the policies and practices described in this Privacy Policy. Each time you visit our website, or use the Service, and any time you voluntarily provide us with information, you agree that you are consenting to our collection, use and disclosure of the information that you provide, and you are consenting to receive e-mails or otherwise be contacted, as described in this Privacy Policy. Whether or not you register or create any kind of account with us, this Privacy Policy applies to all users of the website and the Service.

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IV. INFORMATION WE COLLECT

We may collect “Personal Information” about you, this includes information that can be used to personally identify you, such as your name, address, e-mail address and phone number.

V. HOW WE USE AND SHARE INFORMATION

Personal Information:

We do not sell, trade, rent or otherwise share your Personal Information with third parties without your consent. We may share your Personal Information with vendors and other third-party providers who are performing services for your specific order for the Company. In general, the vendors and third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide for the Company. For example, when you provide us with personal information to complete a transaction, place an order, arrange for a delivery, or return a purchase, you consent to our collecting and using such personal information for that specific purpose, including by transmitting such information to our vendors (and their service providers) performing these services for the Company.

However, certain third-party service providers, such as payment processors, have their own privacy policies in respect of the information that we are required to provide to them in order to use their services. For these third-party service providers, we recommend that you read their privacy policies so that you can understand the manner in which your Personal Information will be handled by such providers.

In addition, we may disclose your Personal Information if required to do so by law.

VI. HOW WE PROTECT INFORMATION

We implement reasonable precautions and follow industry best practices in order to protect your Personal Information and ensure that such Personal Information is not accessed, disclosed, altered or destroyed. However, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by breach of such precautions. By using our Service, you acknowledge that you understand and agree to assume these risks.

VII. YOUR RIGHTS REGARDING THE USE OF YOUR PERSONAL INFORMATION

You have the right at any time to prevent us from contacting you for marketing purposes. When we send a promotional communication to a user, the user can opt out of further promotional communications by following the unsubscribe instructions provided in each promotional e-mail. Please note that notwithstanding the promotional preferences you indicate by unsubscribing, we may continue to send you administrative e-mails including, for example, updates to our Privacy Policy.

VIII. LINKS TO OTHER WEBSITES

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by

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those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Service. Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

IX. AGE OF CONSENT

By using the Service, you represent that you are at least 18 years of age.

X. CHANGES TO OUR PRIVACY POLICY

The Company reserves the right to change this Privacy Policy and our Terms of Use at any time. If we decide to change this Privacy Policy, we will post these changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. Any such modifications become effective upon your continued access to and/or use of the Service five (5) days after we first post the changes on the website or otherwise provide you with notice of such modifications. It is your sole responsibility to check this website from time to time to view any such changes to the terms of this Privacy Policy. If you do not agree to any changes, if and when such changes may be made to this Privacy Policy, you must cease access to this website. If you have provided your e-mail address to us, you give us permission to e-mail you for the purpose of notification as described in this Privacy Policy.

XI. MERGER OR ACQUISITION

In the event we undergo a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of our assets may continue to process your Personal Information as set forth in this Privacy Policy. If our information practices change at any time in the future, we will post the policy changes here so that you may opt out of the new information practices. We suggest that you check this Privacy Policy periodically if you are concerned about how your information is used. We will only provide it to a company with GDPR compliant policies.

XII. E-MAIL COMMUNICATIONS & OPTING OUT

We will send you Service-related announcements on occasions when it is necessary to do so. For instance, if our Service is temporarily suspended for maintenance, or a new enhancement is released, which will affect the way you use our Service, we might send you an e-mail. Generally, you may not opt-out of these communications, which are not promotional in nature. Based upon the Personal Information that you provide us, we may communicate with you in response to your inquiries to provide the services you request and to manage your account. We will communicate with you by e-mail or telephone, in accordance with your wishes. We may also use your Personal Information to send you updates and other promotional communications. If you no

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longer wish to receive those e-mail updates, you may opt-out of receiving them by following the instructions included in each update or communication.

XIII. ADDITIONAL RIGHTS FOR THE USER

Surgi-Tec NV and the Client shall be bound to secrecy of all confidential information they have received within the scope of the agreement from the other party. Information shall be considered to be confidential if the other party has indicated so or if the confidential character results from the nature of the information.

If a statutory provision or a judicial decision compels Surgi-Tec NV to convey confidential information to third parties designated by law or by the court and Surgi-Tec NV cannot for that purpose invoke a legal right to refuse to give evidence or such a right acknowledged or allowed by the competent court, Surgi-Tec NV shall not be held to pay damages or compensation and the Client shall not be entitled to demand the dissolution of the agreement on the ground of any damage resulting from said circumstance.

If the client invokes a right, Surgi-Tec NV will respond within one month of receipt of the request. Depending on the complexity of the request, this period can be extended by another 2 months.

The client, of which Surgi-Tec NV holds data, has the right to view certain data and to receive additional information if requested. Surgi-Tec NV can also provide a free copy of the processed personal data within the month (renewable by 2 months).

The client, of which Surgi-Tec NV holds data, has the right to correct incorrect or incomplete personal data. Surgi-Tec NV will inform any recipient, to whom they have provided personal data, of a correction, unless this is impossible or requires a disproportionate amount of effort.

The client, whose data Surgi-Tec NV is tracking, may ask to be 'forgotten' and removed from Surgi-Tec' database. This request for removal can also be refused in a number of cases: traceability of implants, employer's contracts, data needed for legal purposes, Surgi-Tec NV will inform any recipient, to whom Surgi-Tec NV has provided personal data, of a removal, unless this is impossible or requires a disproportionate amount of effort.

In a number of cases the data subject (client) may ask to limit the scope of the processed personal data. Surgi-Tec NV will inform any recipient to whom Surgi-Tec NV have provided personal data of a restriction, unless this is impossible or requires a disproportionate amount of effort. Surgi-Tec NV will try to keep the client's data up to data as much as reasonably possible.

XIV. CONTACT US & WITHDRAWING CONSENT

If you have any questions regarding this Privacy Policy or the practices of this Site, or wish to withdraw your consent for the continued collection, use or disclosure of your Personal Information, please contact us by sending an e-mail to info@surgi-tec.be