

Policy No:	103-G
Version No:	5.0
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Integrity Policy General

1. Introduction

- 1.1 This Privacy Policy (the “**Policy**”) describes how Isofol Medical AB (publ), reg. no. 556759-8064 (“**Isofol**”, “**we**”, “**us**” or “**our**”), at the address Arvid Wallgrens Backe 20, 413 46 Gothenburg, Sweden, processes your personal data when you visit and/or use our www.isofolemedical.com (“**Website**”).
- 1.2 When you visit our Website and share personal data with us, we are responsible for the processing of this personal data as described in the Policy in the capacity of data controller. If you would like to know more about our processing of your personal data, you are welcome to contact us through our data protection officer isofol-dpo@ndareg.com.
- 1.3 It is important to us that you feel comfortable with how we process your personal data, and we therefore ask you to read through this Policy, which we may update from time to time. If we make changes to the Policy, the new version will apply from the time it is published on our Website.

2. The scope of this Policy

The Policy covers our processing of personal data collected in relation to your visits and use of our Website.

3. How we collect your personal data

The personal data we process relating to you is collected directly from you or from third party data sources. If you would like to know more about from which third parties we collect your personal data, you are welcome to contact us through our data protection officer isofol-dpo@ndareg.com.

4. How we process your personal data

- 4.1 We only process your personal data to the extent permitted in accordance with applicable data protection legislation. This means that we need to have a legal basis for the purposes of our processing of your personal data, which in our context generally means one of the below legal bases. If you are acting on behalf of someone else, e.g., in the capacity of representative of a company, our processing is carried out with reference to our legitimate interest balanced against your interests or fundamental rights or freedoms, where our legitimate interest is to conclude and perform the contract with the company you represent.
- 4.2 **Performance of legal obligations** – the processing is necessary to fulfil our legal obligations according to law or other statutes that we are subject to, or if we are subject to orders or decisions by courts or authorities, which require us to process your personal data.

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- 4.3 **Legitimate interests** – the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, if they are not overridden by your interests or fundamental rights or freedoms.
- 4.4 **Consent** – the processing is carried out with your prior consent, where we inter alia are responsible for clearly informing you of what processing you consent to and your right to withdraw your consent in relation to our continued processing.
- 4.5 Below, we explain more about the categories of personal data we process, for what purposes we process them and what legal bases we rely on when processing your personal data, including for how long we store your personal data.

What we do and why:	The personal data that we process:
To maintain, facilitate and improve the functions and user experience of our Website, as well as support our work on detecting and counteracting flaws, breaches, and incidents, we will collect statistics and perform analysis of visitor traffic on our Website, as well as perform analysis of other technical information which is generated upon visiting our Website.	<ul style="list-style-type: none"> • IP-address • Other technical information which is generated upon visiting our Website, such as what type of device is used, web browser used, history of visited sites including the time entry (information from used web browser, time zone of the place from which you visited our Website and other information on web traffic).
Our legal basis for processing:	
Legal basis: Our Legitimate Interest to gather information to maintain, facilitate and improve the functionality and security on our Website. Gathering of information through use of cookies or other similar technologies is done on the basis of your consent, except such use which is strictly necessary to the foundational functions of our Website. For more information on how we use cookies and other similar technologies, please see our Cookie Policy.	
How we share and transfer your personal data:	
<ul style="list-style-type: none"> • Authorities (If we are legally obliged to) • Providers of analytic tools (Further specified in our Cookie Policy) <p>Isofol will transfer your personal data to a country outside the European Union (“EU”)/European Economic Area (“EEA”) within the scope of this processing activity. For further information, please see below in Section 7.</p>	
How long we keep your personal data:	
Retention period: We process and keep information on how visitors interact with our Website for a period of maximum fourteen (14) months. In most cases, the collected personal	

data will be aggregated and anonymised at an earlier stage, in connection to us creating statistics.

What we do and why:	The personal data that we process:
To maintain and develop our business relation with you or the company you represent, we will contact and communicate with you in the role as contact person of any of our existing customers, partners, suppliers or business contacts in general.	<ul style="list-style-type: none"> • Name • Contact details, such as email address, phone number, location, and address. • Professional title as well as information about the company you represent. • Information which you provide us when communicating with you.
Our legal basis for processing:	
Legal basis: Our Legitimate Interest to maintain and develop our business relation with you or the company you represent.	
How we share and transfer your personal data:	
<ul style="list-style-type: none"> • Authorities (If we are legally obliged to) • IT Services Providers (Nestil AB) • IT Application Providers (Microsoft 365) • Legal advisors • Regulatory advisors • Financial advisors • HR advisors • IR advisors • Companies within our group <p>Isofol will transfer your personal data to a country outside the EU/EEA within the scope of this processing activity. For further information, please see below in Section 7.</p>	
How long we keep your personal data:	
Retention period: We process and keep your personal data while we have a business relation with you or the company you represent, however for a maximum of 24 months from the time we last were in contact because of our business relation.	

What we do and why:	The personal data that we process:
To provide you with information about our business, and current	<ul style="list-style-type: none"> • Contact details, such as Company name, Contact name and email address.

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activities, we will contact you via email in the role as contact person of any of our potential investors, partners, suppliers or business contacts in general.	
Our legal basis for processing:	
Legal basis: Our Legitimate Interest to market ourselves and our services.	
How we share and transfer your personal data:	
<ul style="list-style-type: none"> • Authorities (If we are legally obliged to) • Provider of press releases and newsletter services <p>Isofol will transfer your personal data to a country outside the EU/EEA within the scope of this processing activity. For further information, please see below in Section 7.</p>	
How long we keep your personal data:	
<p>Retention period: We process and keep your information for a period of twelve (12) months. You can “opt-out” of receiving the marketing messages at any time. A procedure for “opt-out” is included in every marketing message.</p>	

5. Analytic tools

We use Google Analytics, and similar tools (as specified in our Cookie Policy) that enable, among other things, the tracking of your activities when you use our Website. These tools will be used to improve the functions and user experience of our Website, as well as build a profile of your interests and show you relevant adverts on other websites. They are based on uniquely identifying your browser and internet device. More information regarding what specific tools we use, and which data they collect is further specified in our Cookie Policy.

6. Security measures

We have taken measures to ensure that your personal data is handled in a safe way. For example, access to systems where personal data is stored is limited to our employees and service providers who require it in the course of their duties. Such parties are informed of the importance of maintaining security and confidentiality in relation to the personal data we process. 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.

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7. Where we process your personal data

We strive to always process your personal data within the EU or EEA. However, we will transfer your personal data, in accordance with what is stipulated in the tables above, to service providers who, either themselves or by their sub-contractors, are located or have business activities in a country outside the EU or EEA. In such cases, we are responsible for ensuring that the transfer is made in accordance with applicable data protection legislation before it occurs, e.g. 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 adopted and other appropriate measures to safeguard your rights and freedoms.

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

You may access the European Commission's standard contractual clauses at [EUR-Lex - 32021D0914 - EN - EUR-Lex \(europa.eu\)](#).

The countries outside the EU/EEA to which our suppliers currently transfer personal data are: United States.

8. Additional retention period

We may use personal data to handle any customer complaints or defend and/or establish legal claims. We will generally process such personal data for ten (10) years from creation or for the time necessary to fulfill the purpose in the relevant case. This processing of your personal data is based on our legitimate interest of establishing and/or defending legal claims.

9. Your rights

You have rights in relation to us and our processing of your personal data. Below, you will find information about your rights and how you can exercise them.

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

To exercise your rights or request information about them we ask that you contact us, which is most easily done via email: info@isofolmedical.com

9.1 Right of access

You have the right to obtain a confirmation as to whether we process your personal data. If that is the case, you also have the right to receive copies of the personal data concerning you that we process as well as additional information about

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the processing, such as for what purposes the processing occurs, relevant categories of personal data and the recipients of such personal data.

9.2 Right to rectification

You have the right to, without undue delay, have incorrect personal data about you rectified. You may also have the right to have incomplete personal data completed.

9.3 Right to erasure

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

- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- Our processing is based on your consent, and you withdraw your consent to the relevant processing;
- You object to processing that we carry out based on a legitimate interest, and your objection overrides our or another party's legitimate interest of the processing;
- The processed personal data is unlawfully processed;
- The processed personal data must be erased for our compliance with one or more legal obligations.

9.4 Right to restriction

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

- You contest the accuracy of the personal data during a period enabling us to verify the accuracy of such data;
- The processing is unlawful, and you oppose erasure of the personal data and request restriction instead;
- 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;
- You have objected to the processing of the personal data which we carry out based on a legitimate interest, pending the verification whether your objection overrides our or another party's legitimate interest to continue with the processing.

9.5 Right to object

You have a right to object to our processing of your personal data when it is based on our or another party's legitimate interest. If you object, we must demonstrate

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compelling legitimate grounds for the processing which override your interests, rights and freedoms in order to be allowed to continue with our processing.

9.6 Right to data portability

If our processing of your personal data is based on the performance of a contract with you or your consent, you have the right to receive the personal data you have provided us relating to you in an electronic format. You also have the right to have the personal data transferred from us directly to another data controller, where technically feasible.

We ask you to observe that this right to so called data portability does not cover personal data which we process manually.

9.7 Right to withdraw consent

If our processing of your personal data is based on your consent, you always have the right to withdraw your consent at any time. A withdrawal of your consent does not affect the lawfulness of the processing that took place based on the consent before your withdrawal.

10. Complaints with the supervisory authority

In Sweden, the Swedish Authority for Privacy Protection (*Sw. Integritetsskyddsmyndigheten*) is the authority responsible for supervising the application of current data protection legislation. If you believe that we process your personal data in a wrongful manner, we encourage you to contact us so that we can review your concerns. However, you may file a complaint with the Swedish Authority for Privacy Protection at any time.

11. Contact details

If you have any questions about the processing of your personal data or want to exercise any of your rights, please contact us at:

Email: info@isofolmedical.com.

For more detailed information about how we work with personal data and integrity protection, reach out to our DPO at:

Email: isofol-dpo@ndareg.com.