

## **Privacy Statement by VascoMed GmbH („VASCOMED“)**

The privacy and protection of your personal data is a very important concern for VASCOMED. We would like to inform you which of your personal details are collected and used, the rights you have, as well as which configuration options this offers you. We process your data in compliance with applicable privacy laws, in particular the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (Bundesdatenschutzgesetz, BDSG).

This Privacy Statement provides you with a summary of the main tasks for which we process your data. You will also find additional Privacy Statements on other products and services under other sections or individual products.

### **Data controller and point of contact for data processing**

The data controller in accordance with Article 4 para. 7 GDPR is  
VascoMed GmbH  
Hertzallee 1, 79589 Binzen, Germany  
info@vascomed.com

If you have general questions about data privacy at VASCOMED, you can contact our Data Protection Officer. The Data Protection Officer can be reached at [datenschutz@vascomed.com](mailto:datenschutz@vascomed.com) or via our mailing address with the addition "der Datenschutzbeauftragte" (English: "Data Protection Officer").

### **Your rights**

You can exercise the following rights at any time:

- To request information about categories of your processed data, purposes of the processing, possible recipients and envisaged period for which the personal data will be stored (Article 15 GDPR)
- To withdraw consent given at any time and with effect for the future (Article 7 para. 3 GDPR)
- To object to data processing which is performed based on a legitimate interest, on grounds relating to your particular situation (Article 21 GDPR)
- To request the rectification or completion of inaccurate or incomplete data (Article 16 GDPR)
- To request the erasure of data in certain cases – particularly in the case in which data are no longer needed for the intended purpose or are unlawfully processed, or you withdraw your consent in accordance with Article 7 para. 3 GDPR or have objected to data processing in accordance with Article 21 GDPR (Article 17 GDPR)
- To request the restriction of data processing under certain conditions, provided deletion is not possible or the deletion obligation is disputable (Article 18 GDPR)
- To receive the data you provided to us in a conventional machine-readable format and, if you wish, to request that such data be transmitted to third parties/controllers (right to data portability in accordance with Article 20 GDPR)

In addition, you have the right to file a complaint with the data protection supervisory authorities in accordance with Article 77 of the GDPR. The supervisory authority responsible for us is:

Landesbeauftragter für Datenschutz und Informationsfreiheit Baden-Württemberg  
Königstrasse 10a, 70173 Stuttgart, Deutschland  
Phone: +49 (0)711 61 55 41-0  
Fax: +49 (0)711 61 55 41-15  
E-Mail: poststelle@lfdi.bwl.de

## **1. Data processing during use of the VASCOMED websites**

### **a. Browser data**

If you visit the VASCOMED websites, we collect the data transmitted from your browser to our server. Depending on the browser used and its settings, these are usually the following data:

- IP address
- Date and time of the inquiry
- Information about the time zone your browser uses
- Address of the requested page (URL)
- The respectively transmitted amount of data
- Operating system
- Name, language and version of the browser software
- Manufacturer and type of the device on which the browser is used

We generally use these data only where this is required to provide a functioning website and to show our contents and services.

We use these data for the following purposes:

- Enable access to and visit of the VASCOMED website
- Detect, eliminate, and prevent errors, malfunctions, and possible misuse

The legal basis for the processing of these data is Section 25, para. 2(2) of the Telecommunications Telemedia Data Protection Act (Telekommunikation-Telemedien-Datenschutzgesetz - TTDSG) and also our legitimate interest in accordance with Article 6 para. 1(f) GDPR.

No data will be passed on to third parties.

Data will be deleted once they are no longer needed for the above-mentioned purposes within the scope of the legal basis upon which they were retained, normally when the browser session is exited but at the latest within one month.

### **b. Cookies**

We use cookies on the VASCOMED websites. Cookies are small text files or comparable storage technologies which are stored by your browser on your terminal device and allow your browser to be recognized.

We use "session" cookies (temporary or transient cookies) and "persistent" cookies.

**Session cookies** are only stored during your usage of our websites. These cookies are needed for transactions (such as logging into a user account) and are valid in each case until the end of the browser session. This means that, depending on your browser's type and settings, the cookies are automatically removed after the end of the session or after the tab or browser is exited unless you have configured your browser settings differently. The session cookies we use contain only a session ID.

**Persistent cookies** are stored for future sessions on your computer to recognize visitors returning to the websites after a long period and to be able to offer them the products or services they require. Persistent cookies are permanently stored on your terminal device and are not deleted when the website is exited or the browser is closed. Persistent cookies can only be removed manually.

### **What are cookies used for?**

- **Strictly necessary cookies**

Strictly necessary cookies are used to make a website usable by enabling basic functions such as site navigation and access to secure areas of the website (shopping cart cookies, cookies for logins, cookies for storage of country/language selection, cookies for using cookie consent tools). The website cannot work properly without these cookies. These cookies cannot be disabled.

You can configure your browser to block these cookies or inform you of these cookies. If you do, some parts of the website may not work.

- **Functional cookies**

Functional cookies allow additional features and personalization to be offered such as videos and live chat.

If you do not permit these cookies, some or all of these features may not work properly.

- **Analytical cookies**

Analytical cookies are used by us or third parties for tracking and analyzing user behavior, delivering user-based content or for marketing purposes. This means we can show website contents that are appropriate to the target group and improve website content and functionality.

If you do not permit these cookies you may not experience user-based contents or targeted offers on other websites, for example.

The legal basis for storage of cookies, device identifiers and similar tracking technologies or for the storage of information on the end user's terminal equipment and access to this information is the European ePrivacy Directive in conjunction with the TTDSG.

Please note that the legal basis for processing the personal data collected in this context then stems from the GDPR (Art. 6 para. 1 sentence 1 GDPR). The relevant legal basis according to the GDPR in each specific case of processing of personal data can be found below in the table on the cookie or tracking technologies used by us.

The primary legal basis for the storage of information on the end user's terminal equipment—in particular, for the storage of cookies—is your consent, Section 25 para. 1(1) TTDSG. By visiting our website, you give us your consent—which, of course, does not have to be given—and you can revoke it at any time in the Cookie Settings.

According to Section 25 para. 2(2) TTDSG, consent is not required if the storage of information on the end user's terminal equipment or the access to the information already stored on the end user's terminal equipment is absolutely necessary for the provider of a telemedia service in order to be able to provide a telemedia service expressly requested by the user. You can see in the Cookie Settings which cookies are to be considered absolutely necessary (often also referred to as "technically necessary cookies") and therefore fall under the exceptions to Section 25 para. 2 of the TTDSG and hence do not require consent.

**You can view and edit how cookies are set or accessed at any time under "Cookie Settings". However, disabling cookies may limit the websites' functionality (e.g., login to certain sections).**

If you opt out (for example, by disabling a cookie that you have previously confirmed), a persistent cookie will be installed by us to allow an opt-out (disabling) of cookies to be recognized and considered during future visits to our websites.

Opt-out cookies prevent the future recording of your data when visiting this website from a particular terminal device or browser and a specific domain. However, to prevent recording on different devices, the opt-out must be performed on each device/browser used.

Service providers employed by us may also use cookies, especially for web analysis, conversion tracking, and re-marketing.

You can find an overview of the cookies used on our websites here:

[https://biotronik.cdn.mediamid.com/cdn\\_bio\\_doc/bio37338/120462/bio37338.pdf](https://biotronik.cdn.mediamid.com/cdn_bio_doc/bio37338/120462/bio37338.pdf)

## **2. Data processing in relation to newsletters or invitations to surveys**

If you subscribe to a newsletter or consent to participate in a survey, we will use your contact details (e.g., e-mail, first name) to send the newsletter or contact you as part of surveys.

These data are processed in order to inform you about our products and services and to obtain information about the usability and user-friendliness of our products.

The legal basis for the processing of such data is provided by the consent you have granted in accordance with Article 6 para. 1(a) GDPR, and our legitimate interest in accordance

with Article 6 para. 1(f) GDPR in marketing activities and exchanging experiences with our customers.

No data will be passed on to third parties; however, in some cases we contract service providers who process data on our behalf or we might pass data on to affiliated companies in case they are responsible for processing newsletters or invitations.

We will retain your data until you unsubscribe or notify us that you no longer wish to receive newsletters or no longer wish to be included in surveys. Your e-mail address is then retained for up to three years for consent verification purposes.

### **3. Data processing during user tests**

We conduct user tests and surveys on our products and services. Participation is always voluntary.

We process the data in relation to which you have provided written consent such as, for example, your name, age, gender, device usage, photographs etc.

We use these data for product improvement and product development, to ensure product safety and quality and to meet the requirements of DIN EN 62366 (Usability Evaluation).

The legal basis for this is provided by the consent you have granted in accordance with Article 6 para. 1(a) and Article 9 para. 2(a) GDPR.

No data will be passed on to third parties; however, in some cases we contract service providers who process data on our behalf or might pass data on to affiliated companies in case they are responsible for the tests.

We will retain your data until you notify us that you no longer wish to participate in user tests. Your e-mail address is then retained for up to three years for consent verification purposes. Other data may also be retained where legal obligations prevent them from being deleted (for example, quality assurance requirements).

### **4. Data processing during events**

The personal data we process during events or your participation in programs, workshops etc. include but are not limited to:

- Contact information, including but not limited to first name and surname, title (where applicable), address, telephone number (where applicable), e-mail address
- Information about the company or institution you work for
- Information about your professional position
- Date of birth and place of birth, where applicable

We will normally collect these data directly from you. In certain cases we will obtain personal data about you from the company or institution you work for to allow us to invite you to one of our events.

We will use your contact details (name, mailing address, e-mail address) to send invitations to our events that match your interests and to send relevant materials (such as the

program) by mail or e-mail in advance of the event. The legal basis is provided by Article 6 para. 1(f) GDPR based on our legitimate interest in adequately communicating our company strategy and entrepreneurial actions which also comprise public events and retaining rapporteurs.

**If you no longer wish to receive invitations to our events, you can object to the use of your data for these purposes by sending an e-mail stating your objection to [info@vascomed.com](mailto:info@vascomed.com) at any time. We shall then immediately stop sending invitations to our events.**

If you participate in an event arranged by us, we shall process your data set out above to conduct the event and to allow you to participate. This also includes recording, where applicable, your name, information about your company or institution and your current professional position in a list of participants which is provided to the other participants in the event (in some cases also in electronic format), or possibly providing the event moderators with your data (name, information about your company or institution) for the purpose of conducting the event. We shall also use these data to send you event-related materials compiled after the event (such as conference documents). We may also disclose your data to cooperating institutions or affiliated companies where this is required to conduct the event and to allow you to participate, for example an external guest management company. The legal basis for this data processing is as set out in Art. 6 para. 1(b) GDPR.

We shall retain your contact details for the purpose of sending invitations until you withdraw object in order to exercise our legitimate mutual interest in communication or information. We shall retain your objection for a period of 3 years for evidential purposes.

## **5. Photographs and video recordings during events**

We process image, video and voice recordings to provide Live-Stream or „Video-on-demand“ for training purposes or for persons unable to attend the event.

The legal basis is the consent you have granted in accordance with Article 6 para. 1(a) GDPR.

In addition, photographs and/or videos are regularly taken at our events, some of which are published on our homepage, on our social media channels, in external or internal reports or VASCOMED newsletters. Metadata such as the location and time of the recording and location are automatically stored in the digital cameras alongside the photographs and video recordings. The legal basis for publishing the photographs and video recordings is as set out in §§ 22, 23 of the German Art Copyright Act (KUG) and usually the consent you have granted in accordance with Article 6 para. 1(a) GDPR.

In certain cases the legal basis for producing and storing photographs and video recordings can also be provided by Article 6 para. 1(f) GDPR based on our legitimate interest in reporting on the event.

**Where we process your data based on a particular interest, you have the right in accordance with Article 21 para. 1 GDPR, to object, on grounds relating to your particular situation, at any time to the production and storage of your photographs and video recordings with future effect by sending an e-mail containing your objection to [info@vascomed.com](mailto:info@vascomed.com).**

**Where we use these data based on the consent you have granted, you may withdraw your consent at any time with future effect by sending an e-mail stating your withdrawal to [info@vascomed.com](mailto:info@vascomed.com).**

We hereby expressly advise you that external reporters may be present at some events who also create photographs and videos. However, since we have no control over the photographs and videos created by the external reporters or how they use them, we cannot provide any information about the purpose and scope of the processing of your data by those external rapporteurs.

The photographs and video recordings (and metadata) of you stored on the basis of Article 6 para. 1(a) GDPR shall be retained until you withdraw your consent.

The photographs and video recordings (and metadata) of you stored on the basis of Article 6 para. 1(f) GDPR shall be retained until you lodge a legitimate objection against such retention in accordance with Article 21 para. 1 GDPR, unless there are overriding legitimate grounds for the processing as set out in Article 21 para. 1 sentence 2 GDPR.

Where data are disclosed to contracted processors under our instruction, this shall be subject to the scope and periods required to render the services.

## **6. Data processing relating to video surveillance**

We use video cameras for surveillance purposes in appropriately signed areas of the company premises.

Data processing is conducted for the purpose of building security, exercising householder rights, protecting company property and to prevent and investigate criminal offenses on the basis of Article 6 para. 1(f) GDPR based on our legitimate interests.

Where recording takes place, video data shall be stored for a maximum of seven days and then deleted. Data shall only be stored for longer periods where this is required in specific cases to press legal claims or prosecute criminal offenses.

Video data shall only be transmitted to third parties (such as the police) if required to investigate criminal offenses.

## **7. Data processing during inquiries**

If you contact us, e.g., via e-mail, phone, or contact form on the VASCOMED websites, we will use the data you shared with us to process your inquiry.

In order to provide you with the right information or check that you are properly authorized, we will normally need the following information:

- E-mail address
- Name
- Country
- Address, if necessary
- Device serial number, if necessary
- Other data provided, if necessary

Your data are processed on various legal bases depending on the content of your inquiry:

- contractual queries: Article 6 para. 1(b) GDPR
- legal obligations: Article 6 para. 1(c) or Article 9 para. 2(i) GDPR (e.g. provision of technical manuals or product information)
- legitimate interest: Article 6 para. 1(f) GDPR
- where consent has been granted: Article 6 para. 1(a) or Article 9 para. 2(a) GDPR

No data will be passed on to third parties; however, in some cases we contract service providers who process data on our behalf or we might pass data on to affiliated companies in case they are responsible for processing your request.

After your data are transmitted they shall be deleted immediately once they are no longer required for the purposes set out above and within 3 years, provided that there are no other legal obligations to retain data.

## **8. Registration for using products and services**

You have the option of registering or logging in for certain products or services—for example, on our website, platforms, databases or other applications—in order to be able to use the respective applications/services. During the registration or login process, we usually collect the following information:

- Name
- E-mail address
- Contact and profile data
- Usage data
- Other data provided, if necessary

The legal basis for the processing of this data is the fulfillment of our contractual obligations under Article 6 para. 1(b) GDPR and your consent under Article 6 para. 1(a) GDPR.

No data will be passed on to third parties; however, in some cases we contract service providers who process data on our behalf or we might pass data on to affiliated companies in case they are responsible for processing your request.

After your data are transmitted, they shall be deleted immediately once they are no longer required for the purposes set out above and within 3 years, provided that there are no other legal obligations to retain data.

## **9. Data processing in connection with the Medical Device Law Implementation Act (MPDG)**

In the event of complaints, we are obliged to inspect medical devices and assess them for potential risks. In some cases, this also applies to products used by patients that are in their possession.

To carry out the technical investigations in such cases and to be able to provide you with photographic documentation as well as an investigation report upon request, the following personal data, in particular, will be passed on to us and processed by us—in some cases, with the assistance of our sales companies that are authorized to receive such data:

- Name
- Address
- Date of birth
- Explantation data
- Data of your child or the person under your care, if necessary

This personal data is only processed for the necessary technical inspection of the products. The legal basis for the data processing is your consent to the release for investigation purposes within the meaning of Section 72 para. 6 of the Medical Device Law Implementation Act (Medizinprodukte-recht-Durchführungsgesetz - MPDG).

## **10. Other data processing**

Where we process data for purposes other than those listed in this Privacy Statement, you will find more specific Privacy Statements under the relevant sections or for individual products.

### **Place of data processing**

Your data will in general be processed in Germany. If, by way of exception, your data are processed outside of the European Union (so-called third countries), this will happen provided you have given your express consent for this or this is necessary for us to provide services to you or this is provided for by law (Article 49 GDPR). Moreover, your data are processed in third countries only to the extent that it is ensured through certain measures that an appropriate level of data protection exists for this (Article 44 et seq. GDPR).

### **Encryption of the data transmission**

To ensure the confidentiality of your data also during transmission, we use state-of-the-art encryption methods, such as HTTPS/TLS.

Last update: May 12, 2022

## **STATE-SPECIFIC PRIVACY NOTICES**

### **BRAZIL**

This Brazil Privacy Notice applies to personal data processing activities under Brazilian Data Protection Law (Lei Geral de Proteção de Dados Pessoais, LGPD) law and supplements our Privacy Statement.

#### **Data controller and point of contact for data processing**

The data controller in accordance with Article 5, clause VI LGPD is

VascoMed GmbH  
Hertzallee 1, 79589 Binzen, Germany  
info@vascomed.com

If you have general questions about data privacy at VASCOMED, you can contact our Data Protection Department. The Data Protection Department can be reached at [datenschutz@vascomed.com](mailto:datenschutz@vascomed.com)

#### **Your rights**

You can exercise the following rights at any time:

- To confirm the existence of processing activities of your data
- To Request, in accordance with article 18 LGPD:
  - a. Information about categories of your processed data, purposes of the processing, possible recipients and envisaged period for which the personal data will be stored
  - b. Rectification or completion of inaccurate or incomplete data
  - c. Block, erasure or anonymization of no longer needed data processing are unlawfully processed or not needed for the intended purpose, in accordance with the law
  - d. Transfer of the data to third parties/controllers (right to data portability), made in written in accordance with current law
  - e. information of the possibility to not consent with the data processing and its consequence if you decide not to consent with the data processing
- To withdraw consent given at any time and with effect for the future
- To file a complaint with the data protection supervisory: Agência Nacional de Proteção de Dados – ANPD

#### **Legal basis under LGPD (in addition to Privacy Statement/GDPR)**

Your data are processed on various legal bases depending on the data processing activity and the purpose:

- contractual performance and queries: Article 7, clause V LGPD

- performance of legal obligations: Article 7, clause II and/or Article 11, clause II (b) LGPD
- legitimate interest: Article 7, clause IX LGPD
- where consent has been granted: Article 7, clause I and/or Article 11, clause I LGPD

Any international data transfer is made in accordance with the requirements of Article 33 LGPD.

## **USA/CALIFORNIA**

This notice for California residents supplements the information contained in our Privacy Statement and applies solely to residents of the State of California. We adopt this Supplemental Notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Supplemental Notice. Under the California Consumer Privacy Act ("CCPA"), you have certain rights in relation to some of your personal data, including the right to certain disclosures and explanations of rights. This section explains your rights under California law.

### **CALIFORNIA CONSUMER PRIVACY ACT OF 2018**

#### **Categories of Personal Information We Collect**

BIORONIK collects personal information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household ("personal information"). We may have collected the following categories of personal information from consumers through our services within the twelve (12) months preceding the effective date of this Privacy Statement:

#### **Personal Information Category**

- Identifiers such as
  - Name
  - Email address
  - Postal address
  - Phone number
  - IP address
  - Browser data, traffic data, location data, logs
  - Device and usage data
  - Gender
  - Place/date of birth
  - Age
  - Professional position
  - Photos/video recordings
  - Information provided during queries of any type etc.

**"Personal information" under the California Consumer Privacy Act does not include information that is**

- **publicly available from government records,**
- **de-identified or aggregated consumer information,**
- **health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data, or**
- **certain personal or financial information covered under certain sector-specific privacy laws.**

#### **Categories of Sources of Personal Information**

We obtain the categories of personal information listed above from the following categories of sources:

- directly from consumers' interactions with us, including with our devices, services, applications, representatives, websites, newsletter subscriptions, events, meetings or other queries

### **Use or Disclosure of Personal Information**

In the past 12 months, we have used or disclosed the personal information we collect for our operational purposes and for one or more of the following business purposes:

- To provide services and products to consumers
- To respond to consumer requests
- To improve and personalize consumer access to and experience, for example, by telling consumers about new features, products, or services that may be of interest to them
- To develop records, including records of consumers' personal information
- To contact consumers about new features, products, or services that may be of interest to them, including information about products and services
- To analyze how people use our products and services and to research, develop, and improve programs, products, services and content
- To create a set of data that has only non-personal or de-identified information. In this case, we would remove your personal identifiers (your name, email address, etc.) and treat it like other non-personal or de-identified information.
- For activities to monitor and maintain the quality or safety of our products and services
- For activities described to consumers when collecting their personal information or as otherwise permitted under CCPA
- To detect and protect against security incidents and deceptive, malicious or fraudulent activity
- To ensure our products and services function as intended, including debugging, repairing and troubleshooting activities
- To comply with a law or regulation, court order or other legal process

For more detailed information regarding the purposes of our data processing activities please also refer to Para 1 et seq. in the main Privacy Statement above.

### **Children Under the Age of 13**

The VASCOMED websites are not intended for children under 13 years of age. No one under age 13 may provide any information to or on the websites. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our websites or through any of its features/registers, any of the interactive or public comment features of our websites, or provide any information about yourself to us, including your name, address, telephone number, or email address. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under age 13, please contact us at [datenschutz@vascomed.com](mailto:datenschutz@vascomed.com).

## How We Share Personal Information

VASCOMED will not share consumers' personal information with an unrelated third party without permission, except as described below.

In the ordinary course of business, we will share some personal information with companies that we hire to perform services or functions on our behalf. In all cases in which we share consumers' personal information with a third party, we will only allow them to keep, disclose, or use consumers' information to provide the services we asked them to provide.

We may share personal information with any member of our corporate group, including parent companies, subsidiaries, and affiliates, for purposes that are consistent with those identified in this Privacy Statement.

We may be required to release consumers' personal information in response to a court order, subpoena, search warrant, law or regulation. We may cooperate with law enforcement authorities in investigating and prosecuting users who violate our rules or engage in behavior which is harmful to other users or illegal. In addition, we may keep, disclose and use consumers' personal information in order to comply with U.S. and other governmental guidance, directions, regulations and laws.

## Categories of Personal Information We Sell

We do not sell personal information of California consumers.

This does not include disclosures that are not a "sale" under the CCPA, including when

- consumers instruct us to disclose their personal information,
- a consumer instructs us to interact with a third party that does not sell that information,
- we use or share consumers' personal information pursuant to a written contract with a service provider that is necessary to perform a business purpose, where our contract prevents the provider from using, keeping or disclosing consumers' personal information for any purpose other than the reason supplied in the contract, or
- consumers' personal information is transferred as part of a transaction in which the third party assumes control of all or part of our business.

## Rights under California Law

- 1. Right to Access.** If you are a California consumer, you have the right to ask us to send you the following information up to two times in a twelve-month period:

- The categories of personal data we have collected about you.
- The categories of sources from which we collected the personal data.
- Our business or commercial purpose for collecting personal data.
- The categories of third parties with whom we share personal data.
- What categories of personal data we disclose about you for business purposes.
- What categories of personal data we sell or exchange for consideration about you.

- The specific pieces of personal information we have collected about you.

**2. Right to Delete.** If you are a California consumer, you have the right to ask us to delete the personal data about you we have collected. We may deny the request if the information is necessary to:

- complete a transaction, including providing a requested or reasonably anticipated good or service, or fulfill a contract between the consumer and VASCOMED;
- detect and protect against security incidents, malicious, deceptive, fraudulent, or illegal activity, or take against those responsible for such activity;
- debug to identify and repair errors impairing intended functionality;
- exercise free speech or another right provided for by law;
- comply with the California Electronic Communications Privacy Act;
- engage in research in the public interest adhering to applicable ethics and privacy laws where the consumer has provided informed consent;
- enable solely internal uses reasonably aligned with the consumer's expectations based on the consumer's relationship with VASCOMED;
- comply with a legal obligation; or
- otherwise use the information internally in a lawful manner compatible with the context in which the consumer provided the information.

**3. Right to Opt-out.** If a business sells personal information to third parties, California consumers have the right, at any time, to opt out of the sale or disclosure of their personal information to third parties. VASCOMED does not sell personal information to third parties.

**Right to non-discrimination.** The CCPA grants California consumers the right not to be discriminated against for exercising your privacy rights. If you exercise your privacy rights, we will not discriminate against you, for example, by denying you access to our online services or charging you different rates or prices for the same online services, unless that difference is reasonably related to the value provided by your data.

### **Submitting a Request or Inquiry**

If you are a California resident and you want to submit a request or inquiry to us regarding your California rights, you or your authorized agent can contact us at [datenschutz@vascomed.com](mailto:datenschutz@vascomed.com) or use the contact form on our website. You do not have to create an account with us to submit a request.

Your request will be confirmed within ten days of receipt and we will respond within 45 days. If we need more than 45 days, we will notify you that your request is being delayed.

We can only respond to your request if it is verifiable. This means we are obligated to take reasonable steps to verify your identity or your authorized agent's authority and your right to access the information you request. We may ask for additional information that will help us do so. We will only use that additional information in the verification process, and not for any other purpose.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## **UK**

If you are a resident of the UK, you may direct your questions or concerns to the UK Information Commissioner's Office: <https://ico.org.uk/global/contact-us/>