

# Te?ted Oy Privacy Policy

Effective starting: May 25, 2018

## What this policy covers

Your privacy is important to us, and so is being transparent about how we collect, use, and share information about you. This policy is intended to help you understand:

- What information we collect about you
- How we use information we collect
- How we share information we collect
- How we store and secure information we collect
- How to access and control your information
- How we transfer information we collect internationally
- Other important privacy information

This Privacy Policy covers the information we collect about you when you use our products or services, or otherwise interact with us (for example, by attending our events), unless a different policy is displayed. Te?ted, we and us refers to Te?ted Oy. We offer a wide range of products, including IVD test kits and accessory IVD software to support the use of our test kits. We refer to all of these products, together with our other services and websites as "Services" in this policy.

This policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. If you do not agree with this policy, do not access or use our Services or interact with any other aspect of our business.

Where we provide the Services under contract with an organization (for example your employer) that organization controls the information processed by the Services. For more information, please see Notice to End Users below.

## **What information we collect about you**

We collect information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below.

### **Information you provide to us**

We collect information about you when you input it into the Services or otherwise provide it directly to us.

**Account and Profile Information:** We collect information about you when you are registered as client for user account of our Service (e.g. Tickplex® Analyze), when your profile is created or modified.

For example, you provide your contact information and, in some cases, billing information when you are registered as client for the Services.

Content you provide through our websites: The Services also include our websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, sweepstakes, activities or events.

Information you provide through our support channels: The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you designate yourself as a client contact, open a contact link, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

Payment Information: We collect certain payment and billing information when you register for certain paid Services. For example, we ask you to designate a billing representative, including name and contact information, upon registration. You might also provide payment information for reimbursement reasons, such as bank details, which we collect via e-mail.

Information we collect automatically when you use the Services: We collect information about you when you use our Services, including browsing our websites and taking certain actions within the Services.

Your use of the Services: We keep track of certain information about you when you visit and interact with any of our Services. This information may include the features you use; the links you click on; the type, size and filenames of attachments you upload to the Services; frequently used search terms; and how you interact with others on the Services.

Device and Connection Information: We may collect information about your computer, phone, tablet, or other devices you use to access the Services to make our Services fully functional in your system. This device information includes your connection type and settings when you install, access, update, or use our Services when applicable.

We may also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers, and crash data. How much of this information we collect depends on the type and settings of the device you use to access the Services. Your Server and data center Service administrators can disable collection of this information via the administrator settings or prevent this information from being shared with us by blocking transmission at the local network level.

Cookies and Other Tracking Technologies: our third-party partners, such as our advertising and analytics partners, may use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices. For more information, please see our Cookies and Tracking Notice, which includes information on how to control or opt out of these cookies and tracking technologies.

## Information we receive from other sources

We receive information about you from other Service users, from third-party services and from our business and channel partners.

**Other users of the Services:** Other users of our Services may provide information about you when they submit content through the Services. For example, you may be mentioned in a complaint or service request opened by someone else in your organization. We also receive your email address from other Service users when they provide it in order to invite you to the Services or for customer support services. Similarly, an administrator or may provide your contact information when they designate you as the purchasing, billing, customer support, technical or sales contact on your company's account.

**Other services you link to your account:** We receive information about you when you or your administrator integrate or link a third-party service with our Services. For example, if you create an account or log into the Services using your Google credentials, we receive your name and email address as permitted by your Google profile settings in order to authenticate you. You or your administrator may also integrate our Services with other services you use, such as to allow you to access, store, share and edit certain content from a third-party through our Services. For example, you may authorize our Services to access, display and store files from a third-party document-sharing service within the Services interface. Or you may authorize our Services to connect with a third-party calendaring service so that your meetings and connections are available to you through the Services. You may authorize our Services to sync a contact list or address book so that you can easily connect with those contacts within the Services or invite them to collaborate with you on our Services. The information we receive when you link or integrate our Services with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.

**Te?ted Partners:** We work with a network of global partners who provide consulting, implementation, training and other services around our products. Some of these partners also help us to market and promote our products, generate leads for us, and resell our products. We receive information from these partners, such as billing information, billing and technical contact information, company name, what Te?ted products you have purchased or may be interested in, evaluation information you have provided, what events you have attended, and what country you are in.

**Other Partners:** We receive information about you and your activities on and off the Services from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with, our Services and online advertisements.

## How we use information we collect

How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

**To provide the Services and personalize your experience:** We use information about you to provide the Services to you, including to process transactions with you, authenticate you when you log in, provide customer support, and operate and maintain the Services.

For research and development: We are always looking for ways to make our Services smarter, faster, secure, integrated, and useful to you. We use collective learnings about how people use our Services and feedback provided directly to us through our web Services and post-marketing surveillance activities.

To communicate with you about the Services: We use your contact information to send transactional communications via email and within the Services, including confirming your purchases, reminding you of subscription expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages.

We also send you communications as you onboard to a particular Service to help you become more proficient in using that Service. These communications are part of the Services and in most cases you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.

To market, promote and drive engagement with the Services: We use your contact information and information about how you use the Services to send promotional communications that may be of specific interest to you. These communications are aimed at driving engagement and maximizing what you get out of the Services, including information about new features, survey requests, newsletters, and events we think may be of interest to you. We also communicate with you about new product offers, promotions and contests. You can control whether you receive these communications as described below under "Opt-out of communications."

Customer support: We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services.

For safety and security: We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

To protect our legitimate business interests and legal rights: Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

With your consent: We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.

## **Legal bases for processing for EEA data subjects:**

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests; You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

## **How we share information we collect**

We manufacture IVD test and accessory software, and we want them to work well for you. This means sharing information through the Services and with certain third parties. We share information we collect about you in the ways discussed below, including in connection with possible business transfers, but we are not in the business of selling information about you to advertisers or other third parties.

### **Sharing with other Service users**

When you use the Services, we share certain information about you with other Service users.

**Managed accounts and administrators:** If you register or access the Services using an computer, tablet or phone that is owned by your employer or organization, certain information about you including your name and contact information may become accessible to that organization's administrator. If you are an administrator for a particular site or group of users within the Services, we may share your contact information with current users in your organization, for the purpose of facilitating Service-related requests.

**Community Forums:** Our websites may offer publicly accessible blogs and social media forums (e.g. company Facebook and Twitter). You should be aware that any information you provide on these websites - including profile information associated with the account you use to post the information - may be read, collected, and used by any member of the public who accesses these websites. Your posts and certain profile information may remain even after you terminate your account. We urge you to consider the sensitivity of any information you input into these Services. To request removal of your information from publicly accessible websites operated by us, please contact us as provided below. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to and why.

### **Sharing with third parties**

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Services.

**Service Providers:** We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.

**Te?ted Partners:** We work with third parties who provide consulting, sales, and technical services to deliver and implement customer solutions around the Services. We may share your information with these third parties in connection with their services, such as to assist with billing, to provide localized support, and to provide customizations. We may also share information with these third parties where you have agreed to that sharing.

**Links to Third Party Sites:** The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.

**Third-Party Widgets:** Some of our Services may contain widgets and social media features, such as the Twitter "tweet" button. These widgets and features collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy policy of the company providing it.

**With your consent:** We share information about you with third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.

**Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:** In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect Te?ted, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

### **Sharing with affiliated companies**

We share information we collect with affiliated companies and, in some cases, with prospective affiliates. Affiliated companies are companies owned or operated by us. The protections of this privacy policy apply to the information we share in these circumstances.

**Business Transfers:** We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You will be notified via email and/or a prominent notice on the Services if a transaction takes place, as well as any choices you may have regarding your information.

## **How we store and secure information we collect**

### **Information storage and security**

We use data hosting service providers in Finland to host the information we collect, and we use technical measures to secure your data.

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

If you use our Services, responsibility for securing storage and access to the information you put into the Services rests with you and not Te?ted.

### **How long we keep information**

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

**Customer account information:** We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you.

**Managed accounts:** If the Services are made available to you through an organization (e.g., your employer), we retain your information as long as required by the administrator of your account. For more information, see "Managed accounts and administrators" above.

**Marketing information:** If you have elected to receive marketing e-mails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

### **How to access and control your information**

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations.

#### **Your Choices:**

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format.

Below, we describe the tools and processes for making these requests. Where the Services are administered for you by an administrator (see "Notice to End Users" below), you may need to contact your administrator to assist with your requests first. For all other requests, you may contact us as provided in the Contact Us section below to request assistance.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

**Access and update your information:** Our Services give you the ability to access and update certain information about you from within the Service. For example, you can access your profile information from your account and update your profile information within your profile settings and modify content.

**Deactivate your client account:** If you no longer wish to use our Services please contact Te?ted support. Please be aware that deactivating your account does not automatically delete your information like contact information and other information we have legal right or your permission.

**Delete your information:** In order to delete your information partially or whole, please contact Te?ted support.

Please note, however, that we may need to retain certain information for regulation-based record keeping purposes, to complete transactions or to comply with our legal obligations.

**Request that we stop using your information:** In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time.

You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable).

If you object to information about you being shared with a third-party app you accessed through links or social media widgets through our web Services, please disable the app or contact third party service administrator in control of that app to do so.

**Opt-out of communications:** You may opt out of receiving promotional communications from us by contacting us as provided below to have your contact information removed from our promotional e-mail list or registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services when applicable.

## **How we transfer information we collect internationally**

### **International transfers of information we collect**

We collect information globally and primarily that information in the Finland. We transfer, process and store your information outside of your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the Services. Whenever we transfer your information, we take steps to protect it.

**International transfers to third parties:** Some of the third parties described in this privacy policy, which provide services to us under contract, are based in other countries that may not have equivalent privacy and data protection laws to the country in which you reside.

When we share information of data subjects in the European Economic Area or Switzerland, we make use of the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, European Commission-approved standard contractual data protection clauses, binding corporate rules for transfers to data processors, or other appropriate legal mechanisms to safeguard the transfer. Please see our Privacy Shield Notice below.

## Privacy Shield Notice

Te?ted Oy participate in and comply with the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks and the Privacy Shield Principles regarding the collection, use, and retention of information about you that is transferred from the European Union or Switzerland (as applicable) to the U.S. We ensure that the Privacy Shield Principles apply to all information about you that is subject to this privacy policy and is received from the European Union, the European Economic Area, and Switzerland.

Under the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, we are responsible for the processing of information about you we receive from the EU and Switzerland and onward transfers to a third party acting as an agent on our behalf. We comply with the Privacy Shield Principles for such onward transfers and remain liable in accordance with the Privacy Shield Principles if third-party agents that we engage to process such information about you on our behalf do so in a manner inconsistent with the Privacy Shield Principles, unless we prove that we are not responsible for the event giving rise to the damage.

To learn more about the Privacy Shield Program please visit [www.privacyshield.gov](http://www.privacyshield.gov).

We encourage you to contact us as provided below should you have a Privacy Shield-related (or general privacy-related) complaint. You may also contact your local data protection authority within the European Economic Area or Switzerland (as applicable) for unresolved complaints.

## Other important privacy information

### Notice to End Users

Our products are intended mostly for use by organizations. Where the Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to that organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

Administrators are able to:

- require you to reset your account password;
- restrict, suspend or terminate your access to the Services;
- access information in and about your account;
- access or retain information stored as part of your account;

In some cases, administrators can also:

- restrict, suspend or terminate your account access;
- change the email address associated with your account;
- change your information, including profile information;
- restrict your ability to edit, restrict, modify or delete information

Please contact your organization or refer to your administrator's organizational policies for more information.

## **Our policy towards children**

The Services are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact support services.

## **Changes to our Privacy Policy**

We may change this privacy policy from time to time. If the changes are significant, we will provide a more prominent notice by adding a notice on the Services homepages, login screens, or by sending you an e-mail notification. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Services and deactivate your account(s), as outlined above.

## **Contact Us**

Your information is controlled by Te?ted Oy. If you have questions or concerns about how your information is handled, please direct your inquiry to Te?ted Oy customer support.

Te?ted Oy

Mattilanniemi 6

40100 Jyväskylä

info@teztet.com

www.teztet.com

+358503519520