



## General Privacy Policy of Micrel Medical Devices Group of Companies

Micrel Medical Devices SA, under the distinctive title Micrel, located at 42 Konstantinoupoleos Str,19441, Koropi, Athens, Greece (tel. +30 210-60.32.333), and its affiliated companies<sup>1</sup> (hereinafter referred to as Micrel) maintain the personal data files listed below. This policy sets out the principles applied by Micrel in the processing of this data (categories, legal basis, purpose, retention period, etc.) and aims to inform the data subjects. It is subject to change from time to time.

### 1. Data Protection Officer (DPO)

If you have any questions or would like information, you can contact us by e-mail at [dpo@micrelmed.com](mailto:dpo@micrelmed.com)

### 2. Terms in a legal context

Before we discuss legal issues further, we would first like to introduce the relevant terms:

#### 2.1 EU GDPR (also called GDPR)

The term EU GDPR (hereinafter also “GDPR”) means the General Data Protection Regulation. This is a basic regulation of the European Union that regulates how personal data may be processed. For information, the legal text of the GDPR can be viewed via the following link:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32014L0053>

#### 2.2 Responsible person

“Controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, decides on the purposes and means of processing personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

#### 2.3 Personal data and data subject

“Personal data” means any information relating to an identified or identifiable natural person (hereinafter “data subject”); An identifiable natural person is a natural person who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more special features that express the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

#### 2.4 Processing

“Processing” means any operation or series of operations carried out with or without the aid of automated procedures in connection with personal data, such as the collection, recording, organization, structuring, storage, adaptation or modification, reading, querying, etc Use, disclosure by transmission, distribution or other form of provision, alignment or combination, restriction, deletion or destruction.



## **2.5 Restriction of processing**

“Restriction of processing” means marking stored personal data with the aim of restricting their future processing.

## **2.6 Processor**

“Processor” means a natural or legal person, authority, institution or other body that processes personal data on behalf of the controller.

## **2.7 Recipients**

The “recipient” is a natural or legal person, public authority, agency or other body to which personal data is disclosed, whether or not it is a third party. However, public authorities which may receive personal data in the context of a specific investigative task under Union or Member State law shall not be deemed to be recipients; the processing of these data by the said authorities will be carried out in accordance with the applicable data protection rules in accordance with the purposes of the processing.

## **2.8 Third Party**

“Third party” means a natural or legal person, public authority, agency or other body, other than the data subject, the controller, the processor and the persons authorized to process the personal data under the direct responsibility of the controller or the processor.

## **2.9 Consent**

“Consent” of the data subject means any voluntary, specific, informed and unambiguous expression of the data subject’s wishes, in the form of a statement or other unequivocal affirmative action, by which the data subject indicates that he or she consents to the processing of personal data relating to him or her data is agreed.

## **2.10 Breach of Personal Data Protection**

“Personal data breach” means a breach of security resulting in the destruction, loss or alteration, whether accidental or unlawful, or the unauthorized disclosure of or access to personal data transmitted, stored or otherwise were processed.

## **2.11 Health Information**

“Health data” means personal data relating to the physical or mental health of a natural person, including the provision of healthcare services, and revealing information about their health status.

## **2.12 Companies**

“Enterprise” means a natural or legal person that carries out an economic activity, regardless of its legal form, including partnerships or associations that regularly carry out an economic activity.

## **2.13 Supervisory Authority**



The “supervisory authority” means an independent public body established by a Member State in accordance with Article 51.

### **2.14 Relevant and Reasonable Objection**

“Relevant and reasoned objection” means an objection as to whether or not there has been a breach of this Regulation or whether the proposed action against the controller or processor is in accordance with this Regulation, which objection makes clear the scope of the risks of the draft decision with regard to the fundamental rights and freedoms of data subjects and, where appropriate, the free movement of personal data within the Union.

## **3. Terms in a technical context**

Before we discuss technical issues further, we would first like to introduce the associated terms:

### **3.1 File system**

The “filing system” means any structured collection of personal data that is accessible according to certain criteria, regardless of whether that collection is maintained centrally, decentrally or organized according to functional or geographical criteria.

### **3.2 Cookies**

Cookies are text files that are stored on your device by a website using your browser. These text files can be intended to implement technical issues such as a shopping cart mechanism or to infect your visitor behavior. For this purpose, the text files can be provided with identification features and additional information.

You have the option to prevent the storage of cookies in your device's browser. If cookies are deactivated, there may be technical restrictions on the use of the website.

### **3.3 Server logs**

Server logs are log files that are created by the web server and document access to a website. A variety of information can be collected in a log entry, such as the access time, the browser type, the visitor's IP address, etc.

### **3.4 Referrers**

The referrer refers to the URL that took you to the responsible party's website. For example, the referrer can be read from server logs.

## **4. Rights of the data subject**

The rights of those affected arise from the GDPR as well as from the respective national legal provisions on data protection. If you would like to assert your rights, we ask you to contact our data protection officer using the option described above. Below we would like to point out your rights arising from the GDPR:

### **4.1 Obligation to provide information.**



The data subject has the right to receive information about the personal data stored about the data subject if the data was collected from the data subject or if the data was not collected from the data subject. The same is regulated in Chapters Art. 13 and 14 GDPR.

#### **4.2 Right to information**

The data subject has the right to request confirmation from the controller as to whether personal data concerning him or her is being processed; If this is the case, you have the right to information about this personal data and to further information in accordance with Art. 15 GDPR.

#### **4.3 Right to rectification**

The data subject has the right to immediately request that the person responsible correct incorrect personal data concerning him or her.

Taking into account the purposes of the processing, the data subject has the right to request the completion of incomplete personal data, including by means of a supplementary statement.

#### **4.4 Right to deletion**

The data subject has the right to request that the controller delete personal data concerning him or her immediately, and the controller is obliged to delete personal data immediately if one of the reasons set out in Article 17 of the GDPR applies.

#### **4.5 Right to restrict processing.**

The data subject has the right to request that the person responsible restrict processing if one of the conditions under Article 18 GDPR is met.

#### **4.6 Obligation to notify.**

The controller shall notify all recipients to whom personal data has been disclosed of any correction or deletion of the personal data or a restriction of processing in accordance with Article 16, Article 17 Paragraph 1 and Article 18 GDPR, unless this proves to be the case impossible or involves disproportionate effort.

The controller informs the data subject about these recipients if the data subject requests this.

#### **4.7 Right to data portability**

The data subject has the right to receive the personal data concerning him or her that he or she has provided to a controller in a structured, commonly used and machine-readable format and he or she has the right to transmit these data to another controller without hindrance from the controller to whom the data subject is responsible personal data has been provided.

#### **4.8 Right to object**

The data subject has the right, on grounds relating to his or her particular situation, to object at any time to the processing of personal data concerning him or her based on



Article 6(1)(e) or (f); This also applies to profiling based on these provisions. The controller will no longer process the personal data unless he or she can demonstrate compelling legitimate grounds for the processing that outweigh the interests, rights and freedoms of the data subject, or the processing serves to assert, exercise or defend legal claims.

#### **4.9 Complaint to Supervisory Authority**

According to Art. 77 GDPR, you have the right to complain to a supervisory authority. As a rule, you can contact the supervisory authority at your usual place of residence or work or the headquarters of the person responsible.

Our responsible supervisory authority is:

Hellenic Data Protection Authority (HDPA)  
Kifissias 1-3  
115 23 Athens  
Greece  
T: +30-210 6475600  
F: +30-210 6475628  
Email: [contact@dpa.gr](mailto:contact@dpa.gr)

#### **Information about the person responsible**

The person responsible in accordance with Art. 24 GDPR is listed below:

Micrel Medical Devices SA  
42 Konstantinoupoleos Str.,  
19441, Koropi, Athens, Greece

## **6. Web technologies used**

### **6.1 Encryption of data transmission**

We use appropriate technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

### **6.2 Server logs**

If you use the website for informational purposes only, i.e., if you do not register or otherwise provide us with information, we only collect the personal data that your browser transmits to our server. If you would like to view our website, we collect the following data, which is technically necessary for us to display our website to you and to ensure stability and security (legal basis is Art. 6 Para. 1 Sentence 1 Letter f GDPR):

- Anonymized IP address,
- Date and time of the request,
- Time zone difference to Greenwich Mean Time (GMT),
- Content of the request (specific page),



- Access status/HTTP status code,
- Amount of data transferred,
- Website from which the Request comes (referrer),
- browser,
- operating system and its interface,
- language and version of the browser software.

### **6.3 Cookies**

When you use our website, cookies are stored on your computer. You can configure your browser settings according to your wishes and e.g., B. refuse to accept third-party cookies or all cookies. We would like to point out that you may not be able to use all of the functions of this website.

This website uses the following types of cookies, the scope and functionality of which are explained below:

- Transient cookies,
- Persistent cookies.

#### **6.3.1 Transient cookies**

Transient cookies are automatically deleted when you close the browser. These include, in particular, session cookies. These store a so-called session ID, with which various requests from your browser can be assigned to the shared session. This allows your computer to be recognized when you return to our website. The session cookies are deleted when you log out or close the browser.

#### **6.3.2 Persistent cookies**

Persistent cookies are automatically deleted after a specified period of time, which may vary depending on the cookie. You can delete cookies at any time in your browser's security settings.

### **6.4 Google Analytics**

This website uses Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files that are stored on your computer and that enable your use of the website to be analyzed. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. However, if IP anonymization is activated on this website, your IP address will be shortened beforehand by Google within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide other services related to website and internet usage to the website operator.

You can prevent the storage of cookies by setting your browser software accordingly; However, we would like to point out that in this case you may not be able to use all functions of this website to their full extent. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the



website (including your IP address) and from processing this data by Google by using the browser plug-in available under the following link. Download and install in: <http://tools.google.com/dlpage/gaoptout?hl=de>.

This website uses Google Analytics with the extension “\_anonymizeIp()”. This means that IP addresses are further processed in abbreviated form, which means that any personal connection can be ruled out. If the data collected about you is personally related, this will be excluded immediately, and the personal data will be deleted immediately.

We use Google Analytics to analyze the use of our website and to regularly improve it. We can use the statistics obtained to improve our offering and make it more interesting for you as a user. For the exceptional cases in which personal data is transferred to the USA, Google has submitted to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. The legal basis for the use of Google Analytics is Article 6 Paragraph 1 Sentence 1 Letter f of the GDPR.

Third-party information: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001. User terms and conditions: <http://www.google.com/analytics/terms/de.html>, overview of data protection: <http://www.google.com/intl/de/analytics/learn/privacy.html>, and the data protection declaration: <http://www.google.de/intl/de/policies/privacy>.

## **7. Other online presence**

In addition to our website, we use other online presences and digital channels such as social media to get in touch with our prospects and customers. We list these below.

### **7.1 LinkedIn**

We use LinkedIn (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland) to present our company. LinkedIn's privacy policy can be accessed under the following link: <https://www.linkedin.com/legal/privacy-policy>.

## **8. Contact form**

We use contact forms on our website. The data is processed on the basis of contract fulfillment in accordance with Article 6 (1) (b) GDPR. If your request is not related to an order from us, we may also process your data on the basis of legitimate interest in accordance with Article 6 (1) (f) GDPR.

## **9. Duration of storage**

Unless specifically stated, we store personal data for as long as necessary to fulfill the purposes pursued. If the law prescribes retention periods, we will continue to store the data for evidence, but will not process it in any other way and will delete it after the statutory retention period has expired.

## **10. Disclosure to third parties**

Your personal data will not be transferred to third parties for purposes other than those listed below.



We only pass on your personal data to third parties if:

- You provide your personal data in accordance with Art. 6 Para. 1 S1. lit a. GDPR, you have given your express consent to this,
- the disclosure is necessary in accordance with Article 6 Paragraph 1 Sentence 1 Letter f of the GDPR to assert, exercise or defend legal claims and there is no reason to assume that you have an overriding legitimate interest in not disclosing it of your data,
- in the event that there is a legal obligation for the transfer in accordance with Art. 6 Para. 1 Sentence 1 lit b GDPR is required for the processing of contractual relationships with you.