

## Privacy Policy

### Flen Health Privacy Policy

Flen Health SA values the personal information you provide to us and we wouldn't want to use it in a way that you won't expect. This Privacy Notice explains how we protect your privacy and how you can control how we use your personal information. If you want to change the way in which we use your data or if you have a question about how your personal information is used please contact us using the methods below:

Email: [Privacy@flenhealth.com](mailto:Privacy@flenhealth.com)

Phone: +352 2634 06 27 1

Postal address:

29, rue Henri Koch

L-4354 Esch sur Alzette / Luxembourg

### The information you provide to us

When you provide your information to us directly via our website, over the phone or face to face we only ask you to supply information that we need in order to provide the service you have requested.

We will normally ask you to provide us with:

- Your name
- Your contact details including:
- Your Job Title
- The organisation you work for
- A work-related e-mail address
- A work-related telephone number

However, if you do business with us we may also ask for further information about you or your company including finance details.

### Information provided to us via cookies

Our web site uses cookies which you can disable using your browser options. Cookies are small data text files that are sent from a server computer during a browsing session. Cookies are typically stored on your computer's hard drive and are used by web sites to simulate a continuous connection to that site. We only use cookies that are essential to the operation of the site or to provide a basic level of



understanding about how our visitors interact with the site. We do not use third party advertising or social media cookies, we respect "do not track" and we de-personalise our tracking with Google. The use of cookies automatically identifies your browser to our computers whenever you interact with our site. You should note that if you do disable cookies, you may not be able to access all the services on our web-pages.

#### How we use your data

We use your personal information in a number of ways to:

- provide you with the service or information you've requested
- enable you to take part in our online assessments and surveys
- keep you informed and updated on relevant products you may be interested in
- improve our websites and the range of services and products we provide
- provide you with useful information about data news, events and conferences
- administer your account

#### Who we share your data with

We do not share or sell your data to any other company without your prior consent other than those processors we use for our business operations who process your data under our control:

- Salesforce.com for our sales operations
- Register NV who provide website hosting
- Barracuda Networks, Inc. who provide our email anti-spam system hosting
- Google LLC who provide website tracking and statistical services
- SAGE Group for our financial operations
- Vivaldi Software who provide Quality Management Software

In all cases the servers where your personal data is stored and processed are located in the European Economic Area.

Under some circumstances we may be required to disclose or share your information without your consent, for example if we are required to by the police, the courts or for other legal reasons.



#### How we keep your personal information safe

We take our obligations to keep your personal data safe and secure very seriously. We have a Disaster Recovery Plan in place with the best practice standard for information security.

Within Flen Health, access to your personal information is strictly controlled on a 'need to know' basis. Staff members are only allowed access to your personal data if they have been sufficiently trained in data handling. We have specific technical controls in place to restrict access and these are monitored regularly.

#### How long we keep your personal information

We keep your personal information in line with our data retention policy. This means that we will remove data which have been collected directly from you through our systems if we haven't had any marketing response or direct contact with you for more than 36 months (this period typifies the maximum length of time that a contract could be in negotiation with us).

In certain circumstances we have a statutory obligation to keep your personal information for a set period of time for example financial information (normally 10 years) for financial auditing purposes or ISO 13485 related Quality Management Auditing purposes.

#### How you can find out about the information we hold about you

You have the right to request a copy of the information that we hold about you.

If you would like a copy of some or all of your personal information, please email or write to us using the contact details in this policy.

We will get in contact to verify your identity and If we do hold information about you we will:

- give you a description of it
- tell you why we are holding it
- tell you who it could be shared with
- let you have a concise and clear copy of the information
- Our legal basis for processing your personal information



Much of our processing will be under the basis of “contractual obligation” in other words we need and use your personal information for providing the services you have contracted with us to provide.

However, when we are communicating with you regarding products and services you may be interested in receiving from us in the future our basis for processing is our “legitimate interest” as we are communicating with you in the context of your corporate activity and identity and not in relation to your private life. You will always be able to instantly unsubscribe from such messages using the E-Mail link provided within the e-mail.

#### Asking us to suppress or remove your personal information

Should you wish to not receive information from us in future then you can quickly action this by clicking the unsubscribe link you will find on our marketing e-mails or by sending your details to [privacy@flenhealth.com](mailto:privacy@flenhealth.com) and we will quickly suppress your data.

Should you further wish us to remove your information entirely (and assuming we have no other obligation to keep it) then please let us know and we will do this.

#### What to do if you have a complaint

If you have a complaint please contact us at [Privacy@flenhealth.com](mailto:Privacy@flenhealth.com) who will deal with your request promptly.

If you are still not satisfied with the way your complaint was handled, you can refer your complaint to the:

Commission for the Protection of Privacy Commission Nationale pour la Protection des Données  
1, avenue du Rock’n’Roll  
L-4361 Esch-sur-Alzette  
Tel. +352 2610 60 1  
Fax +352 2610 60 29  
e-mail: [info@cnpd.lu](mailto:info@cnpd.lu)  
Website: <http://www.cnpd.lu>

#### Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on xx/5/2018

Our office is registered at 29, rue Henri Koch L-4354 Esch sur Alzette Luxembourg  
Our VAT number is LU 25 75 46 69.

