

## Privacy Policy

### Overview

SomnoMed® is an impartial, private-sector global medical device manufacturer. Our products and services are officially regulated worldwide and certified by international certification organizations. This means SomnoMed® is inspected by competent authorities, and we align our working methods with recognized regulations and standard requirements. Where these regulations and standards don't apply, SomnoMed® defines its own guidelines.

The data controller within the meaning of the EU General Data Protection Regulation (GDPR) and other national data protection laws is:

SomnoMed Finland Oy  
Aleksis Kiventie 30  
65300 Vasa sal 2

Telephone: +358 40 5448117

E-mail: [info@somnomed.com](mailto:info@somnomed.com)

Web: [http://somaccount.somnomed.com/fi\\_en/](http://somaccount.somnomed.com/fi_en/)

Commercial register number: 3274337-8

Data Protection Officer : [EUDataProtection@somnomed.com](mailto:EUDataProtection@somnomed.com)

### 1. General information on data processing and lawful bases

- This privacy policy contains information about the type, scope, and purpose of the processing of personal data by the responsible body.
- The terms used, such as “personal data” and “processing”, are defined in Article 4 of the General Data Protection Regulation (GDPR) (hereinafter “general data protection regulation”).
- SomnoMed shall obligate its employees and cooperation partners accordingly to comply with the general data protection regulation and local laws.
- For any questions and notifications regarding data protection and the general data protection regulation, please contact the SomnoMed® Data Protection Officer via email at [EUDataProtection@somnomed.com](mailto:EUDataProtection@somnomed.com) or via post to SomnoMed’s mail address provided above.

### 2. Processing Personal Data / Collection of general information

By accessing and our website, SomnoMed processes and collects the personal data, which is being transmitted to our Server by your browser.

Every time you access this webshop, we or the website provider automatically collect that information. This data is also known as server log files and the processing is technically necessary for you to access the website.

The following data will be processed also if you visit our website without logging in, registering or otherwise filling in input fields on the website: website name, file, date, data volume, web browser and version, operating system, IP domain name, referrer URL (the page where you accessed our website from) and your IP address.

The processing is technically necessary to enable the use of our website (Art. 6 para.1 lit b) GDPR). The data will be deleted at the end of your visit to our website, unless individual data is further processed for one of the purposes listed below. In addition, we use anonymized information for statistical purposes to help us optimize our website and technology.

We take organizational, contractual, and technical security measures on the highest standard in order to ensure that the provisions of the Data Protection Regulation and further data protections laws are complied with and to protect the data processed by us against accidental or intentional manipulation, loss, destruction, or access by unauthorized persons.

## **2.1. Visiting our website with registration**

You have the option to register on our website by creating a user account. Registration allows you to complete the order process on our website more quickly and easily. As part of the registration process, we process your first and last name, your email address and a password of your choice. The processing serves the execution and fulfillment of the user contract (Art. 6 para. 1 lit b) GDPR). Your data will remain stored by us as long as your user account remains active. You have the option of deleting your user account yourself. Unless we are legally obliged to retain the data, it will also be deleted.

## **3. Ordering in our online shop**

**3.1.** When an order is placed in our online store, we collect the following data from the customer: name, address, date of birth, telephone number, gender and e-mail address. We need this data to process the purchase contract, dispatch the goods, issue invoices and for returns management. The processing of this data is necessary for the fulfillment of the purchase contract concluded via our online store (Art. 6 para. 1 lit b) GDPR. We delete this data as soon as it is no longer required for the above-mentioned purposes and there are no longer any legal obligations to retain it. In the latter case, we will not delete the data, but will block it from any further processing.

**3.2.** We process your payment information for the purpose of payment processing when you purchase a product via our website. Depending on the payment method you choose, we may forward this payment information to third parties (e.g., to the credit card provider in the case of credit card payments). Our webshop includes content and services from other providers.

If our customers use third-party payment services (e.g., PayPal, Klarna, Stripe or Swish), the terms and conditions and privacy policies of the relevant third-party providers apply, which are additionally also available to on the relevant websites or transaction applications.

The following payment methods can be selected when placing an order:

a) When paying via PayPal, credit card via PayPal, direct debit via PayPal, "purchase on account" or "payment by installments" via PayPal, we pass on your payment data to PayPal (Europe) S.a.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg (hereinafter "PayPal"), as part of the payment processing. This data processing is necessary for the performance or fulfillment of the contract (Art. 6 para. 1 b GDPR). The data will only be passed on to the extent that this is necessary for payment processing. PayPal reserves the right to carry out a credit check for the payment methods credit card via PayPal, direct debit via PayPal or - if offered - "purchase on account" or "installment payment" via PayPal. For this purpose, your payment data may be passed on to credit agencies in accordance with Art. 6 para. 1 lit. f) GDPR on the basis of PayPal's legitimate interest in determining your solvency. PayPal uses the result of the credit check with regard to the statistical probability of non-payment for the purpose of deciding on the provision of the respective payment method. The credit report may contain probability values (so-called score values). If score values are included in the result of the credit report, they are based

on a scientifically recognized mathematical-statistical procedure. The calculation of the score values includes, but is not limited to, address data. You can object to this processing of your data at any time by sending a message to PayPal. However, PayPal may still be entitled to process your personal data if this is necessary for contractual payment processing. Further data protection information, including information on the credit agencies used, can be found in PayPal's privacy policy:

<https://www.paypal.com/de/webapps/mpp/ua/privacy-full>

b) When paying via Klarna, an Instant bank transfer and purchase on account in cooperation with Klarna is offered as additional payment option. The payment options are offered as part of Klarna Checkout. Further information and the terms of use for Klarna Checkout can be found here: <https://www.klarna.com/fi/ehdot/>

General information about Klarna can be found here: <https://www.klarna.com/fi/>  
Your personal data will be treated by Klarna in accordance with the applicable data protection regulations and in accordance with the information in Klarna's privacy policy: <https://www.klarna.com/fi/yksityisyys-ja-turvallisuus/>

c) If you choose to pay by credit card, we use a secure third-party provider in cooperation with Stripe to process credit card transactions. We do not store or collect your credit card details directly. This information is shared: Purchase data of the user (name, surname, card details, country)

General information about Stripe can be found here: <https://stripe.com/en-fi>


The privacy policy of Stripe: <https://stripe.com/privacy>

d) If you choose to pay by Swish, a mobile payment method used in Sweden that allows you to transfer money easily, quickly and securely. To use Swish, you just need to download the Swish app on your mobile and register with your bank account and phone number.

General information about Swish can be found here: <https://www.swish.nu/>

### **3.4. Data transfer to third parties in the context of order processing**

As part of the order processing, we use the services of local shipping partners in order to be able to process the order properly and ship it to you.

In order to fulfill the contract and perform the shipping, we provide the partners with your name and the recipient's address, your e-mail address, customer reference number, the name of the invoice recipient and the invoice address. The partners  obliged to use this data only for the purpose described above and in accordance with our instructions. For B2B transactions, customers generally submit their pick-up requests using this URL: <https://www.posti.fi/fi/yrityksille/paketit-ja-logistiikka/kaikki-palvelut/noutotilaus>

### **3.5. Sharing data with third parties and third-party providers**

Data will only be shared with third parties if we have a lawful basis to do so. We only share user data with third parties on the basis of Article 6 para.1 lit b) GDPR for contractual purposes or based on legitimate interests in accordance with Article 6 para.1 lit.f) GDPR to ensure the economic and effective operation of our business.

If we use subcontractors to provide our services, we take appropriate legal precautions as well as appropriate technical and organizational measures to ensure personal data is protected in accordance with the relevant legal requirements.

If content, tools, or other resources of other providers (hereinafter referred to together as "third-party providers") are used within the framework of this privacy policy and whose registered office is located in a third country, data may be transferred to the countries in which the third-party providers are located. Third countries are those where the GDPR does not directly apply, i.e. generally countries outside the EU or European Economic Area. Data is only transferred to third countries if there is either an adequate level of data protection, user consent or another lawful basis.

## 4. Collection of personal data

The personal data of users processed within the framework of the contract includes inventory data (e.g. names and addresses of customers/patients), contract data (e.g., services used, names of employees, and payment information), usage data (e.g., the websites visited and interest in our products), and content data (e.g. contact form entries).

The term "user" covers all categories of persons affected by data processing. These include our business partners, customers, patients, interested parties, and other visitors to our website. The terms used, such as "user", are to be understood as gender-neutral.

## 5. Newsletter

We offer a newsletter service on our website. If you would like to receive the newsletter offered on the website, you can subscribe to it using the field provided for this purpose on our website. We will then send you a confirmation link by e-mail, which you must click on to activate the newsletter service. By clicking on it, you confirm that you are the owner of the e-mail address provided and at the same time declare that you agree to receive the newsletter. The data is processed exclusively on the basis of your consent (Art. 6 lit. 1 lit. a GDPR). You can revoke your consent to the storage of the data, the e-mail address and its use for sending the newsletter at any time. The data you provide us with for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter and deleted after you unsubscribe from the newsletter. Data stored by us for other purposes (e.g. e-mail addresses for the members' area) remain unaffected by this. You can unsubscribe from the newsletter at any time, either by sending a message to [marketingeurope@somnomed.com](mailto:marketingeurope@somnomed.com) or by clicking on the link provided in the newsletter. After unsubscribing, we will delete your e-mail address unless you have expressly consented to further use of the data or we reserve the right to use data beyond this, which is permitted by law and about which we inform you in this declaration.

Distributor: The newsletter is distributed by Marketo, hereinafter referred to as "distributor". The distributor's privacy policy can be viewed here: <https://www.adobe.com/privacy/policy.html>.

This transfer takes place in accordance with Art. 6. para. 1 lit. f) GDPR and serves our legitimate interest in the use of an effective, secure and user-friendly newsletter system. Please note that your data is usually transferred to Marketo's server and is stored there.

## 6. Cookies

We use cookies on our website. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

### We use cookies to:

Understand and save user's preferences for future visits.

Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Look at your browser's Help Menu to learn how to modify your cookies settings.

If you turn cookies off, some features on our website will be disabled. However, you will still be able to place orders.

### **Third-party disclosure**

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information unless we provide you with advanced notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential. We may also release information when its release is appropriate to comply with the law, enforce our site policies, or protect our or others' rights, property or safety.

### **Third-party links**

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

### **Google Analytics**

On the basis of your consent according to Article 6 para. 1 lit.a) GDPR, we use Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google uses cookies. The information generated by the cookie about how a user uses the website is usually sent to a Google server in the USA and stored there.

Google will use this information on our behalf to evaluate how a user uses the webshop, to compile reports on the activities on the webshop, and to provide us with other services related to the use of the webshop and internet. Pseudonymous profiles of users can be created from the processed data.

We only use Google Analytics if IP anonymization is enabled. This means that the user IP address is shortened by Google within EU member states or in other states that are contracting parties to the European Economic Area (EEA) Agreement. Only in exceptional cases is the full IP address sent to a Google server in the USA and shortened there.

The IP address sent by the user's browser is not combined with other Google data. Users can prevent cookies from being stored by adjusting their browser settings accordingly. Users can also prevent Google from collecting the data generated by the cookie and relating to their use of the website and from processing this data by downloading and installing the browser plug-in available at: <http://tools.google.com/dlpage/gaoptout?hl=en>.

Further information on Google's use of data, settings, and objection options can be found at: [www.google.com/intl/de/policies/privacy/partners](http://www.google.com/intl/de/policies/privacy/partners) ("How Google uses information from sites or apps that use our services"), [www.google.com/policies/technologies/ads](http://www.google.com/policies/technologies/ads) ("How Google uses cookies in advertising"), and [www.google.com/settings/ads](http://www.google.com/settings/ads) ("Ad personalization settings").

## 7. Your rights as a data subject

### Data subject rights

You can assert your rights to us at any time by sending a letter to the address given in sections above or by sending an e-mail to the e-mail address given above. Please understand that we do not process inquiries about personal data by telephone, as it is generally not possible to establish the identity of the caller with sufficient certainty.

You can assert your right of access (Art. 15 GDPR), right to rectification (Art. 16 GDPR), right to erasure (Art. 17 GDPR) and right to restriction of processing, i.e. blocking for certain purposes (Art. 18 GDPR) against us at any time if the respective legal requirements are met.

### Right to object

Users may object to the future processing of their personal data in accordance with legal regulations at any time. In particular, an objection may be made against processing for direct marketing purposes.

### Withdrawal of consent

You have the right to withdraw your consent to data processing at any time. The legality of the data processing operations that have already taken place up to the revocation remains unaffected by the revocation.

### Data Security and Security Measures

We are protecting your privacy and treat your private information confidential, use appropriate and modern security measures to protect your data from loss, misuse and alteration. Only authorized employees have access to personal data. We do everything in our power to prevent a breach of your rights or a risk to your personal data.

### Changes to the privacy policy

We reserve the right to amend the privacy policy to adapt it to a change in the legal situation or in the event of changes to the service and data processing. However, this only applies with regard to declarations on data processing. If user consent is required or parts of the privacy policy contain provisions on the contractual relationship with users, changes will only be made with the consent of users.