

BIOTRACEIT PRIVACY POLICY

INTRODUCTION

We are committed to safeguarding the privacy of our website visitors and the users of our medical devices and software applications; in this policy we explain how we will handle your personal data. This privacy policy covers all sites in the biotraceit.com and paintrace.com domains, including but not limited to www.biotraceit.com, paintrace.com, support.biotraceit.com, knowledgebase.biotraceit.com, and shop.biotraceit.com.

This policy applies where we are acting as a data controller with respect to the personal data of our website visitors, and the users of our medical devices and software applications; in other words, where we determine the purposes and means of the processing of that personal data. We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.

Our software systems incorporate email subscription management controls which affect the email communications we send to you. You can access the controls via the link in each relevant email communication that we send to you.

In this policy, "we", "us" and "our" refer to the BioTraceIT Companies. For more information about us, see the "Our Details" section.

HOW WE USE YOUR PERSONAL DATA

We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency, and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analyzing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website, our medical device products, our analytics software applications, and services.

We may process information contained in any enquiry you submit to us regarding products, software, and/or services ("lead and contact data"). The lead and contact data may be processed for the purposes of offering, marketing, and licensing relevant products, software, and/or services or selling product accessories to you and/or your organization. The legal basis for this processing is our legitimate interests, namely the promotion of our business and the sale of our products, software, and/or services.

We may process the data that you provide when licensing our medical device products and software, or purchasing equipment and accessories for those products, for example when you access our software application ("account data"). The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases, providing information to our users about their use of our products, software and/or services, managing our communications with you and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

We may process your personal data provided to us during the use of our support services or professional services ("service data"). The service data may be processed for the purposes of providing our support services and/or professional services, providing information to our users about the use of our products, software and/or services, and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of support for users of our products and software applications.

We may process information that you post for publication on our support forums or elsewhere on our website or through our services ("publication data"). The publication data may be processed for the purposes of enabling such publication, responding to questions that you post, administering our website and providing our services. The legal basis for this processing is our legitimate interests, namely the proper administration of support for users of our products and software applications.

We may process information relating to transactions, including licensing of our medical device products and software, or purchasing equipment and accessories for those products ("transaction data"). The transaction data may include your contact details, your payment details, and the transaction details. The transaction data may be processed for the purpose of supplying access to products, software and/or services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.

We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing depends upon the type of communication in question. In the case of notifications to our users concerning

contractual issues, the legal basis of the processing is our legitimate interest in fulfilling our contractual obligations. In the case of product-related alerts and notifications concerning new releases and product updates, the legal basis is our legitimate interest in informing our users about changes to our medical device products and software. In the case of newsletters, the legal basis is consent.

We may process information contained in or relating to any communication that you send to us ("communications data"). The communications data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The communication data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

In addition to the specific purposes for which we may process your personal data set out in this section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person, or where necessary for the establishment, exercise or defense of legal claims.

Please do not supply any other person's personal data to us unless we prompt you to do so.

PROVIDING YOUR PERSONAL DATA TO OTHERS

We may disclose your personal data to any member of our companies insofar as reasonably necessary for the purposes set out in this policy.

We may disclose any of your personal data to our services providers insofar as reasonably necessary for purposes set out in this policy such as to hosting services providers; communications services providers; support services infrastructure providers; and payment service providers for financial transactions. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments, and dealing with complaints and queries relating to such payments and refunds. You can find information about our payment services providers on our websites.

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice, and managing legal disputes.

In addition to the specific disclosures of personal data set out in this section, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person, or where necessary for the establishment, exercise or defense of legal claims.

RETAINING AND DELETING PERSONAL DATA

This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Subject to the next paragraph, we will usually retain your data for a minimum period of 6 years following collection and a maximum period of 7 years following collection. If you are a user of our medical device products, software and/or services under a contract, then the relevant periods will run from the date of termination of that contract, rather than the date of collection of the personal data.

Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person, or such retention is necessary for the establishment, exercise or defense of legal claims.

SECURITY OF PERSONAL DATA

We will take appropriate technical and organizational precautions to secure your personal data and to prevent the loss, misuse, or alteration of your personal data. You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. You should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our software applications confidential and we will not ask you for your password (except when you log in to our website or software applications).

AMENDMENTS

We may update this policy from time to time by publishing a new version on our website.

YOUR RIGHTS

Your rights that you have under data protection law are complex, and not all of the details have been included in the following. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise, or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any

time. Withdrawal will not affect the lawfulness of processing before the withdrawal. You may exercise any of your rights in relation to your personal data by written notice to us.

THIRD PARTY WEBSITES

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

UPDATING INFORMATION

Please let us know if the personal information that we hold about you needs to be corrected or updated.

ABOUT COOKIES

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

COOKIES THAT WE USE

We use cookies for the following purposes:

- authentication - we use cookies to identify you when you visit our website and as you navigate our website;
- personalization - we use cookies to store information about your preferences and to personalize our website for you;
- security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- analysis - we use cookies to help us to analyze the use and performance of our website and services; and
- cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

COOKIES USED BY OUR SERVICE PROVIDERS

We use Google Analytics to analyze the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

MANAGING COOKIES

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- <https://support.apple.com/kb/Ph51411> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

OUR DETAILS

This website is owned and operated by BioTracelT.

UNITED STATES:

BioTracelT Corporation
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Commack New York 11725 USA

CANADA

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330 North River Road
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You can contact us:

- by post, using the postal address given above;
- using our website contact form;
- by telephone, on the contact number published on our website; or
- by email, using the email address published on our website.