

# Privacy Policy

## 1 Privacy

The protection of your privacy is of great concern to simedis AG (simedis in the following). Please take note of the following data protection specifications.

**2 Scope of application** simedis collects, processes, stores and protects the data of persons who access its website. This Privacy Policy applies to this website and all its applications and features such as contact forms, email, newsletters and chat.

In the event or from the time of conclusion of a contract between you and simedis regarding our products and services, other and/or additional simedis data protection declarations and/or terms of use apply.

## 3 Legal bases

The present data protection principles are based on the Swiss Data Protection Act (DSG) and - if applicable - the European General Data Protection Regulation (GDPR).

## 4 Responsible office at simedis

At simedis, the following person is responsible for all data protection issues: Matijas Cosic, [matijas.cosic@simedis.com](mailto:matijas.cosic@simedis.com)

The EU Data Protection Officer is:  
Rechtsanwalt Rüdiger Bock, LL.M.  
Bahnhofstraße 12,  
78462 Konstanz  
Tel +49 7531 91886-10  
Fax +49 7531 91886-11  
E-Mail: [bock@d-ch-law.com](mailto:bock@d-ch-law.com)

## 5 Use of information

The simedis website can generally be visited without providing any personal data. Non-personal usage data such as the IP address, the browser used, date, time, etc. are evaluated without any connections made to your person.

Visitors to our website can also activate the 'do not track' function on their browser, so that only the log-in is tracked.

Any personal data about you received via our website etc. will be collected and processed strictly in accordance with the relevant laws and regulations and only with your consent as a rule.

## 6 No sharing of personal data

Your personal data will neither be sold nor shared with third parties outside simedis. An exception may include external service providers who process enquiries or - based on your order - order

confirmations on behalf of simedis and process the necessary data. simedis guarantees that all offices that receive data meet the data protection and data security provisions.

### **7 Contact options via the website**

If you contact simedis via our website, the personal data you provide will be stored automatically. Such data transmitted on a voluntary basis will be stored for the purpose of processing or to contact you. This personal data is not shared with third parties.

**8 Routine deletion and blocking of personal data** simedis processes and stores personal data of affected persons only for the period necessary for the purpose of the storage or insofar as this has been provided for by legal requirements the responsible persons is subjected to. If the storage purpose no longer applies or if any statutory storage period expires, the personal data shall be blocked or deleted routinely and in accordance with the statutory provisions.

### **9 Legal bases for processing**

We process personal data in accordance with the Swiss Data Protection Act and - to the extent and insofar as applicable - the GDPR. The legal bases are:

- Consent
- Fulfilment of a contract and implementation of corresponding pre-contractual measures
- safeguarding a legitimate interest of simedis or a third party, in particular our interest in being able to run our website
- legal requirements

### **10 Rights of data subjects**

As a visitor to our website or a person about whom we process personal data, you can confirm whether personal data is being processed by us and, if so, request information about our processing of your personal data, have the processing of your personal data restricted, exercise your right to data transferability - if and to the extent that the GDPR is applicable - correct, delete (right to be forgotten) or block your personal data, revoke consent given and object to the processing of your personal data.

Any person who is the data subject of the processing of personal data has the right to complain to the competent supervisory authority for data protection.

### **11 Links to other websites**

The simedis website may link to other websites for whose content it is not responsible. simedis will notify you via a pop-up window before any other site when you leave our website and the application area of this privacy policy.

### **12 Collection, processing and use of personal data**

#### 12.1 Personal data

Personal data is information about factual or personal circumstances of a specific or determinable person. This includes your name and email address, for example.

#### 12.2 Use of your data for advertisement purposes

In addition to using your data for the implementation of pre-contractual measures and the sending of the newsletter, we also use your data to display personalized advertisement.

#### 12.3 Newsletter

Before sending the newsletter, we will notify you by e-mail and ask you to confirm that you wish to receive our newsletter by clicking on a link in this e-mail. If you wish to no longer receive the newsletter later on, you can unsubscribe at any time. An unsubscribe link is included in every newsletter mailing.

#### 12.4 Bespoke advertisement for you

The information we receive from you helps us to permanently improve the service you experience and to make it more user-friendly and bespoke for you. The information you submit and that is automatically generated is used to create advertisements tailored to you and your interests. To this end, we use existing information such as e-mail receipt and read confirmations, information about computers and connection to the Internet, operating system and platform, your service history, date and time of the website visit, articles, topics and content that you have viewed. We use this information exclusively in an anonymous form. The analysis and evaluation of this information allows us to improve our web pages and our Internet offer, and thereby to also send you custom advertising. That includes advertising that recommends services that might actually interest you. Our goal is to design our advertisement that is more useful and interesting for you. Therefore, the evaluation and analysis of the anonymous data collected from you helps us to avoid sending random advertisement to you. Instead, we send you advertising, such as newsletters, service recommendations, by e-mail or letter advertising, that corresponds to your interests. In this context, we also compare, for example, which of our advertising e-mails you open in order to avoid sending unnecessary e-mails to you.

### **13 Cookies**

This website uses cookies. Cookies are small text files that are stored permanently or temporarily when you visit this website. The purpose of cookies is in particular to analyze the use of this website for statistical purposes and for continuous improvement.

You can deactivate cookies completely or partially at any time in your browser's settings. If cookies are deactivated, you may no longer be able to use all the functions of this website.

#### 13.1 What are cookies?

Cookies are small files that are stored on your data carrier and which contain certain settings and data that is shared with our system via your browser. In general, there are two different types of cookies, so-called session cookies, which are deleted as soon as you close your browser, and temporary/permanent cookies, which are stored on your data carrier for a longer period of time or indefinitely. The storage helps us design our web pages and our offers so they are appropriate

for you and makes it easier for you to use them, for example by saving certain entries so that you do not have to constantly repeat.

### 13.2 Which cookies does simedis use?

Most of the cookies we use are automatically deleted from your hard drive at the end of the browser session (hence session cookies). In addition, we also use cookies that remain on your hard drive. On your next visit, you will automatically be recognized as a returning visitor and your preferred entries and settings are remembered. These temporary or even permanent cookies (service life 1 month to 10 years) are stored on your hard drive and delete themselves after the specified time. In particular, these cookies serve to make our offer more user-friendly, effective and secure. Thanks to these files, it is possible, for example, for you to see information on our website that is specifically tailored to your interests. The sole purpose of these cookies is to adapt our offer to your customer wishes in the best possible way and to make surfing with us as comfortable as possible.

### 13.3 Which data is stored in the cookies?

The cookies used by simedis only store anonymous data. When the cookie is activated, it is assigned an identification number and your personal data cannot be assigned to this identification number. Your name, your IP address or similar data, which would enable an assignment of the cookie to you, are not included in the cookies. Based on cookie technology, we only receive anonymous information, such as which pages of our website have been visited, which services, articles have been viewed, etc.

### 13.4 What is Onsite Targeting?

Data is collected on the simedis website on the basis of cookie technology to optimize our advertising and the entire online offer. These data are not used to identify you personally, but serve only an anonymous evaluation of the website use. Your data will at no time be merged with the personal data stored by us. With this technology, we can present advertisement and/or special offers and services to you whose content is based on the information obtained in connection with the clickstream analysis (for example, advertisement aimed at content based on topics that were viewed in recent days, such as surgical simulators). Our goal is to make our online offer as attractive as possible for you and to present you advertising that corresponds to your fields of interest.

13.5 Are there also third-party cookies? simedis makes use of several advertising partners who help to make the internet offer and our website more interesting for you. Therefore, when you visit the website, cookies from partner companies are also stored on your hard drive. These are temporary/permanent cookies that are automatically deleted after the specified time. These temporary or even permanent cookies (service life 14 days to 10 years) are stored on your hard drive and delete themselves after the specified time. The cookies of our partner companies also only contain pseudonymous, mostly even anonymous data. This includes, for example, data on which products you have viewed, which products have been searched for, etc. Some of our advertising partners also collect information about which pages you have previously visited or

which products you have been interested in, for example, in addition to the web pages, in order to be able to show you the advertising that best reflects your interests. These pseudonymous data will never be merged with your personal data. Their sole purpose is to allow our advertising partners to address you with advertising that may actually be of interest to you.

### 13.6 Re-targeting

Our website uses so-called re-targeting technologies. We use these technologies to make the Internet offer more interesting for you. This technology makes it possible to address Internet users who are already interested in our website and our offers presented, on the websites of our partners with advertising. We are convinced that the display of personalized, interest-related advertisement is generally more interesting for the Internet user than advertising that has no such personal reference. The display of these advertising media on the pages of our partners is made possible by means of cookie technology and an analysis of the previous usage behavior. This form of advertising is completely pseudonymous. No user profiles are merged with your personal data. By using our website, you consent to the use of so-called cookies and to the collection, storage and use of your usage data. Furthermore, your data is stored in cookies beyond the end of the browser session and can be retrieved, for example, on your next visit to the websites. You can revoke this consent at any time with effect for the future by refusing to accept cookies in your browser settings.

### 13.7 How can you prevent the storage of cookies?

You can set your browser to only accept cookies if you agree to this. Should you only wish to accept simedis cookies, but not the cookies of our service providers and partners, you can select the setting in your browser: 'Block third-party cookies'. As a rule, you can use the 'Revoke cookies' button to reject new cookies and switch off cookies that have already been received. We recommend that you always completely log out of shared computers that are set to accept cookies and flash cookies when finished.

## 14 Log files

Each time the simedis website is accessed, usage data is transmitted by the respective Internet browser and stored in log files, the so-called server log files. The stored data records contain the following data: Date and time of access, name of the page accessed, IP address, referrer URL (URL from which you came to the website), the amount of data transferred, as well as product and version information of the browser used. The IP addresses of the users are deleted or anonymized after finishing. In the case of anonymization, the IP addresses are changed in such a way that the individual details about personal or factual circumstances can no longer be assigned to a specific or identifiable person, or can only be assigned with a disproportionately large expenditure of time, money and labor. We evaluate these log file data records in an anonymous form in order to further improve our services and make them more user-friendly, to find and correct errors more quickly and to control server capacities. For example, you can track the time at which the simedis website is particularly popular and provide the corresponding data volume to enable you to access it as quickly as possible. In addition, we can also identify and correct any errors on the simedis website by analyzing the log files.

## **15 Web analysis**

### **15.1 Google Analytics**

Google Analytics is a service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ('Google'). Google Analytics uses cookies, which are text files placed on your computer, to help the website analyze how users use the site. The information collected by the cookie about your use of our website (including your IP address) will generally be transmitted to and stored by Google on servers in the United States. We would like to emphasize that Google Analytics has been extended on our website in such a way as to guarantee the anonymous collection of IP addresses (so-called IP masking). At our request, Google will therefore only record your IP address in a truncated form, which guarantees anonymization and does not allow any conclusions to be drawn about your identity. If IP anonymization is activated on our website, your IP address will be previously truncated by Google within member states of the European Union or in other signatory states to the Agreement on the European Economic Area. The complete IP address is only transmitted to a Google server in the USA and shortened there in exceptional cases. Google will use this information to evaluate your use of our website, to compile reports on website activity for us and to provide us with other services relating to the use of websites and the Internet. The IP address transmitted by your browser as part of Google Analytics is not combined with other data from Google. A transfer of this data by Google to third parties only takes place when required to do so by legal regulations or in the context of order data processing. Under no circumstances will Google combine your data with other data collected by Google. By using this website, you consent to the processing of data about you by Google and the aforementioned manner of data processing and purpose. You may refuse the use of cookies by selecting the appropriate settings on your browser. However please note that if you do this you may not be able to use the full functionality of our website. In addition, you can also prevent Google from collecting the data generated by the cookie and related to your use of this website (including your IP address) and Google from processing this data by downloading and installing the browser plug-in available at the following link

<https://chrome.google.com/webstore/detail/google-analytics-optout/flaojicojecljbmefodhfapmkgchcbnh?hl=en>. Further information about Google Analytics and data protection is provided at <http://tools.google.com/dlpage/gaoptout?hl=de>.

### **15.2 Smartlook**

We also use the smartlook service for an anonymous usage analysis of our website. Further details about smartlook and data protection are provided

at <https://www.smartlook.com/help/datasecurity-legal-info/>

## **16 Social plugins**

Our website uses social plugins ('plugins') from various social networks. With the help of these plugins you can, for example, share content or recommend products. These plugins are activated as a standard on simedis.com. The content of the plugin is transmitted directly from the social network to your browser, which then integrates it into the website. By integrating the plugins, the

social network receives the information that you have called up the corresponding page of our website. If you are logged into the social network, it can assign the visit to your account. If you interact with the plugins, for example by clicking on the Facebook 'Like' button or add a comment, your browser sends the corresponding information directly to the social network and stores it there. Please refer to the privacy policy information of the respective networks or websites to find out more about the purpose and scope of the data collection and the further processing and use of the data by social networks as well as your related rights and setting options for the protection of your privacy. Even if you are not signed into social networks, websites with active social plugins can send data to the networks. An active plugin sets a cookie with an identifier each time the website is retrieved. Since your browser sends this cookie each time you connect to a network server without being asked, the network could in principle use it to create a profile of which web pages the user belonging to the identifier has visited. And it would then also be possible to assign this identifier to a person again later - for example when registering later with the social network. We use the following plugins on our website: Facebook, Twitter and LinkedIn. If you do not want social networks to collect information about you through active plugins, you can select the 'Block third-party cookies' option in your browser settings. The browser will then not send cookies to the server in the case of embedded content of other providers. With this setting, however, functions other than the plugins may no longer work under certain circumstances.

#### 16.1 Facebook

We use plugins from the social network facebook.com, which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ('Facebook'). The link to Facebook's privacy policy can be found here: [Privacy Policy of Facebook](#).

#### 16.2 Twitter

We use plugins of the social network Twitter, which is operated by Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA ('Twitter'). The link to Twitter's privacy policy can be found here: [Privacy Policy of Twitter](#).

#### 16.3 LinkedIn

We use plugins of the social network LinkedIn, which is operated by LinkedIn Ireland U.C.. The link to LinkedIn's privacy policy can be found here: [Privacy Policy of LinkedIn](#).

### **17 Version**

Version 01.04.2019.

We expressly reserve the right to make changes or adjustments at any time.