

# Ergomed Online Privacy and Cookies Policy

At ERGOMED, we are strongly committed to protecting your privacy and this Policy explains how we process your personal data within our online information practices. Please note that Ergomed Group Limited, with registered offices at 1 Occam Court, Surrey Research Park, Guildford, Surrey, GU2 7HJ, United Kingdom (hereinafter referred to as 'ERGOMED' and/or 'we'), is a Data Controller of the personal data that we process about you within the scope of this Policy.

This Policy outlines ERGOMED's general policy and practices for complying with international data protection principles. This Policy applies to all personal data of natural persons obtained via our website pages processed together with all offline sources, including sales and marketing activities (as these terms: personal data, data subject, and processing are defined under the EU General Data Protection Regulation (hereinafter referred to as 'GDPR') by ERGOMED. However, ERGOMED's website pages may contain links to websites outside of the company. Linked websites are not under the control of or endorsed by ERGOMED. It is recommended that visitors review the privacy policy of each individually linked website.

This Policy applies to all personal data, whether in electronic, paper, or oral format, of visitors/users of ERGOMED's websites and ERGOMED's job applicants. If you are ERGOMED's employee, contractor, and/or Client, please note that there are separate privacy policies that are regulating details of personal data processing. Relevant documents shall be always shared with you before processing takes place. In addition, please be free to visit our [Privacy Center](#) for more information.

## Why does ERGOMED collect personal data?

Under this Policy, ERGOMED processes personal data for the following purposes:

- to stay in touch with website visitors who contacted us via a website contact form or directly, potential clients, and potential partners for marketing and business development purposes;
- to assess/consider candidates regarding a current and/or future job application (please see below 'Recruiting Software – SmartRecruiters' for additional clarification);
- to ensure ERGOMED's IT systems are secure and robust against unauthorised access;
- for other legitimate interests that are not overruling your rights.

Please note that there may be more than one reason for processing your personal data. Therefore, the legal basis for processing your personal data is:

- the processing is necessary to take steps at your request before entering into a contract;
- that you have given your consent concerning one or more purposes;
- the processing is necessary to pursue a legitimate, primarily business-related, interest.

## What personal data does ERGOMED collect?

ERGOMED endeavours to process personal data only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the data subject. The list below identifies the categories of data subjects that ERGOMED processes under this Policy:

- visitors/users of our webpages;
- business contacts;
- job applicants.

The list below identifies the categories of personal data that ERGOMED collects:

- ICT related personal data (such as IPs, etc.);
- Online activity data, including browsing history, search history, clickstream data, and other information about your interactions with our services, websites, applications, social media pages, and email communications;
- privacy regulations related personal data – consents, privacy rights requests, etc.;
- HR-related personal data for job applicants.

## Human Resource data:

ERGOMED collects personal data of job applicants which are relevant to decide on their potential employment. ERGOMED may also conduct a background check as well as collect the “right to work” documentation as required by law within the recruitment process.

**NOTE:** Please pay attention! ERGOMED is partnering with SmartRecruiters and is using its recruitment software platform. Keep in mind that there are specifics with regards to personal data processed for job seekers using SmartRecruiters’ Recruiting Software as explained below.

## Recruiting Software – SmartRecruiters

ERGOMED is using services provided by SmartRecruiters. SmartRecruiters is a technology services company that provides a recruitment software platform to other businesses. This software helps ERGOMED to publicise its roles, manage its interaction with candidates, assess suitability, and manage the offer process. It is important to note that SmartRecruiters is an external partner and independent Data Controller for this purpose. Therefore, they will process your personal data in a manner differently than elaborated in this Policy. Please follow the link to familiarize yourself with all details of processing by SmartRecruiters:

<https://www.smartrecruiters.com/>

Please be aware that you may be required to set up a personal account (“Candidate Portal”) which allows you to manage different job opportunities and track your applications of several Employers (one of them potentially being ERGOMED). In your Candidate Portal, which is accessible on <https://my.smartrecruiters.com/>, you may register through the email you received after applying, or if your consent was requested. This is operated by SmartRecruiters that is solely responsible for this process. The registration requires your email address and a password. Your profile will be made available and visible to the Employer to which you applied. You will receive job alerts from the Employers to which you applied. Your application information will be collected by SmartRecruiters and be made available to you through the Candidate Portal. SmartRecruiters will never sell, rent, or lease the collected personal data.

Please note that SmartRecruiters will collect the following data from you:

- Data that you input during the application process or job alert creation (such as contact information, experience and education, attachments and answers to screening questions).
- Your IP address and login information (email address and encrypted password) for your Candidate Portal; and
- Cookies, which allow SmartRecruiters to know how their services are accessed and used.

Carefully read the SmartRecruiters Privacy Policy to learn the purpose of the collection of your personal data and how your personal data will be processed by SmartRecruiters. From the ERGOMED perspective, your collected and processed personal data within the recruitment process shall be stored for a period of 12 (twelve) months after collection for the purpose of contacting you regarding similar future roles, unless you are hired and then your data is retained during the course of your employment and applicable retention periods. Therefore, you may be contacted by Ergomed during this time about relevant job vacancies that become available. At any time, you can object to this processing and request deletion of your data if you no longer want to be contacted by ERGOMED in relation to potential job opportunities. However, please note that some of the data might need to be retained due to applicable retention periods, as explained below.

### How personal data will be collected?

Under this Policy, your personal data will be collected as:

- Information you give us – through the online forms (e.g. Contact Us Form) or paper forms, emails, phone calls, application/recruitment process and others.
- Information we collect about you – When you visit our website and receive e-mails from us, we may automatically collect technical information about your equipment, browsing actions and patterns. We may collect this information as a part of log files as well as through the use of cookies or other tracking technologies. For more information, please see section below on Cookies.
- Information we receive about you from other sources – we may possibly receive your personal data from a third party too (for example from a recruitment company).

## The use of the Cookies, Google Analytics & plugins

Cookies are small text files that are placed on your computer, smartphone, or other devices when you access the internet.

On the first place, ERGOMED uses necessary Cookies that are essential for our website operation - without them you would not be able to visit and use our website, so they cannot be disabled.

Furthermore, we use functional/performance Cookies that are making use of our websites easier for you (such as remembering your language preferences on the website, etc.).

ERGOMED uses analytical Cookies for web research and statistics. We want to understand how visitors use our websites, and this helps us to improve the website's content. In that regard, it is important to mention that ERGOMED collects anonymized statistical data only through Google Analytics, such as which sections you have visited and for how long you have been in our environment. This in turn allows optimisation of the content and pages and the marketing programs that drive traffic to the website. Google Analytics does not store any personal information about website visitors but does use persistent Cookies to identify repeat visitors. You may universally opt-out of all Google Analytics tracking used by all websites by visiting the following url – <https://tools.google.com/dlpage/gaoptout>. The information generated by Cookies about your use of the website (including your IP address) will be directly transmitted and stored by Google on servers in the United States. Google will use this information on our behalf for the purpose of keeping track of your use of the website, compiling reports of website activity, and providing other services related to website activity and internet use. Google will not associate your IP address with any other data available to Google. Google may also collect information about domain visitors' use of other websites. For more information about Google Analytics, or to opt out of Google Analytics, please go to: <https://analytics.google.com>

We also use a tool that identifies the business or organisation that website visitors belong to, based on a reverse IP Lookup. We use cookies to process this identification. These Cookies store information about your current web browsing session (pages viewed, time on site, etc.) and the dates and times of previous website visits. This information is used to profile website

corporate visitors, in order to better understand the way in which our website content is viewed by different segments of corporate users.

Finally, we use Cookies for marketing purpose. We may use third parties to serve advertisements on other websites that may be of interest to you, based on information collected about your use of our Sites and other websites. To do so, these companies may place or recognize a unique Cookie on your browser (including through the use of pixel tags and web beacons).

We use Email Marketing Post-Click Tracking Cookies. These Cookies are used to report on the pages that have been viewed by visitors to the site who have followed links from our email marketing campaigns. Data are anonymised for this purpose. This analysis helps us to understand additional content that is viewed by the contacts in our database and therefore allows us to improve and tailor future campaigns to those contact's specific areas of interest.

Finally, we use Beacons/Pixels. On our website and in our e-mails, we use web beacons. When we send emails to Customers, we may track activities such as, if the email is opened, if there was a click on the links and which pages of our website were visited. This allows us to measure the performance of our email campaigns and to improve our Service and website. To do this, we include single pixel, also called web beacons, in emails we send. Web beacons allow us to collect information about when you open the email, your IP address, your browser or email client type, and other similar details. We also include Web Beacons in the emails we deliver for you. We use the data from those Web Beacons to create reports about how your email campaign performed. Reports are also available to us when we send email to you, so we may collect and review that information.

Please note that you can find sharing buttons on our websites (for Facebook, Twitter, etc.). Once you use these buttons you will be linked to the social media websites with their own privacy policies, and they are solely responsible for this kind of processing (they are not our data processors).

Please note that you can edit your Cookies preferences directly when visiting our Website by clicking on the 'Cookie Settings' link within the Cookie banner. In addition to that, you may refuse Cookies by selecting the appropriate settings from your browser. You can control the use of Cookies at the individual browser level. If you elect not to activate the cookie or to later

disable Cookies, you may still visit our Websites, but your ability to use some features or areas of the Websites may be limited. Also, ERGOMED does not recognize automated browser signals regarding tracking mechanisms, which may include 'do not track' instructions. For comprehensive information on how to change your Cookies settings in a wide variety of different web browsers, visit [www.aboutcookies.org](http://www.aboutcookies.org).

## Security measures

ERGOMED uses a variety of security measures (physical, organizational, electronic, and technical) to enhance the security of personal data processing – both internally and on webpages to secure any personal information from loss, misuse, unauthorized access or disclosure, alteration, or destruction. ERGOMED operates in compliance with internal policies and procedures. We put in place appropriate, industry-accepted controls and measures to mitigate and manage the risk, including but not limited to security policy, physical and logical security, access control, firewalls including intrusion prevention system, data encryption, anti-malware scanners, security patching, backups & disaster recovery plans, and staff training.

## Disclosure and Transfer of personal data

ERGOMED shall NOT trade in any way with your personal data. All information collected through our websites will be processed in the company's internal network. In order to provide services explained in this Policy, we use adequate third-parties for processing your personal data (such as IT providers, Software providers, SmartRecruiters, etc.) which have the same level of your personal data security as we do, and with who we executed relevant data processing agreements in order to make sure that you data will be processed in line with highest standards.

We may disclose personal data to our subsidiaries and affiliates within ERGOMED Group based on intragroup Data Processing Agreement. Please note that all companies within the ERGOMED Group have executed the Intercompany Personal Data Processing Agreement and adhere to the ERGOMED Group Personal Data Protection Policy with the purpose to create common policies and procedures for all the ERGOMED Group and to comply with the highest level of data protection compliance while processing and transferring personal within the Group.

The cross-border transfer of personal data to a third country (a country which is neither an EU member nor an EEA member and which do not ensure an adequate level of data protection as per GDPR) will be carried out by ensuring compliance with all the formalities and procedures required by the GDPR, such as the execution of Standard Contractual Clauses, etc.

Please note that Ergomed may disclose your personal data when that is necessary under applicable law, including laws outside your country of residence, in order:

- to comply with legal process (such as court orders, etc.);
- to respond to legitimate requests from public and government authorities including public and government authorities outside your country of residence;
- to enforce or apply our terms of use and other agreements;
- to protect our operations or those of any of our affiliates;
- to allow us to pursue available remedies or limit the damages that we may sustain;
- and to protect the rights, privacy, property, or safety of Ergomed, our employees, our affiliates, our users, or any other person or entity. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

### For how long does ERGOMED store personal data?

In general, we will keep your personal data no longer than is necessary for the purposes for which the personal data is collected and processed, unless the law requires us to hold your personal data for a longer period. We will retain some of your personal data during the statutory (including fiscal) retention periods and limitation periods in order to defend our legitimate interest in relation to potential legal claims.

Please note that you can unsubscribe from marketing communication at any moment. However, when you unsubscribe from our marketing communication, we will keep a record of your email address to ensure that we do not send you marketing emails in future (suppression list). At the end of the retention period, your data will be reviewed and deleted, unless there is a specific legitimate reason for keeping it. You can get more information about retention periods by contacting our DPO, as indicated below.

## What are your privacy rights?

Please note that you have the right to:

- **be informed** – this means that you will be informed if and how ERGOMED is processing your personal data;
- **access**– this means that you have the right to access the personal data ERGOMED keeps/process about you;
- **rectification** – should any data ERGOMED keeps about you be incomplete or inaccurate, you have the right to request ERGOMED to correct it;
- **erasure** – you have the right to ask ERGOMED to erase your personal data from ERGOMED’s systems, when no longer are necessary for the purposes listed under this Policy;
- **restriction of processing**– in certain cases defined in the relevant law, you have the right to request ERGOMED to refrain from processing your personal data;
- **object to processing**– in certain cases defined in the relevant law, you have the right to object to processing of your personal data by ERGOMED;
- **portability**– this means that you have the right to request the transfer of your personal data in a structured, commonly used, and machine-readable format to another party;
- **withdraw the consent given**– this means that you can withdraw your consent (if previously given) at any time. Please note that withdrawal of consent will not affect the lawfulness of any processing based on consent before its withdrawal;
- **not to be subject to the decision based solely on automated processing** – this means that ERGOMED may not make any decision based solely on automated processing. Please note that ERGOMED does not process personal data in this way.

You need to be aware that there are exceptions/limitations to the above rights. For example, access to personal data may be denied in some circumstances if making the information available would reveal personal information about another person or if we are legally prevented from disclosing such information. Also, deletion of some data will not be possible during the applicable retention periods based on equality act, labour and other relevant laws. Furthermore, you have the right to lodge a complaint with Ergomed Lead Supervisory Authority (LSA) or your national data protection authority.

If you wish to exercise your rights, it is required to make a request in writing to the Data Protection Officer. You shall be asked to complete a specific request form available upon written request to the Data Protection Officer. You must properly identify yourself to enable the fulfilling of the right.

### What if you do not want to provide us with your personal data?

Providing appropriate personal data is a precondition for specific services, such as the performance of an executed contract, the possibility to apply successfully for a job, or where there is a legal obligation to process the personal data. Failure to provide specific personal data may affect ERGOMED's ability to enter into a contract with you, to contact you, and/or to proceed with the selection procedure (e.g. job applicant).

### Amendment of this Policy

ERGOMED periodically reviews this Policy in order to make sure that is accurate, up to date and that it contains a comprehensive information about the way how we process your personal data.

We reserve the right to change this Policy from time to time, consistent with the requirements of the privacy regulation and best practices. If we decide to change this Policy, we will announce it by publishing our amended Policy online.

### Contact, questions and further information

ERGOMED appointed the group Data Protection Officer for all ERGOMED group companies. Should you have any questions regarding this Policy or the processing of your personal data, please send an email to [DPO@ergomedgroup.com](mailto:DPO@ergomedgroup.com).

Please note that Lead Supervisory Authority for ERGOMED Group is the U.K. Information Commissioner's Office (ICO). However, given that ERGOMED Group has processing operations within EEA, ERGOMED appointed as EU GDPR Representative for ERGOMED Group - Ergomed istraživanja Zagreb d.o.o. Therefore, If you are located in the EU/EEA, and you would like to

contact us or exercise any privacy right elaborated above, you might directly contact our GDPR Representative office in Zagreb, by sending an email to [GDPRREP@ergomedgroup.com](mailto:GDPRREP@ergomedgroup.com) or via post: Oreškovićeva 20A, 10010 Zagreb, Croatia.