

External Privacy Policy

1. INTRODUCTION

At Simsen Diagnostics AB, we prioritize the safety and security of your personal data. We are transparent about how we collect, use, and store your information. Your personal data is always protected, and our processing practices comply with the General Data Protection Regulation (GDPR), internal policies, and other relevant legal requirements. Given that we handle sensitive personal data on behalf of our customers, we have appointed a Data Protection Officer (DPO) to ensure compliance with applicable rules.

2. RESPONSIBILITY AND CONTACT INFORMATION

Simsen Diagnostics AB is responsible for processing your personal data. If you have any questions or would like to exercise your rights under GDPR, you can reach us through the following contact details:

Postal Address: Pepparedsleden 1, AZ BioVentureHub, 431 83 Mölndal, Sweden

Our Email Address: inbox@simsendiagnosics.com

Our DPO's Email Address: dpo@simsendiagnosics.com

3. PERSONAL DATA AND PERSONAL DATA PROCESSING

"Personal data" includes any information that can directly or indirectly identify an individual. This can range from name and contact details to genomics data and other identifying information linked to a person.

"Personal data processing" refers to any operation performed on personal data, whether automated or manual. This includes, but is not limited to, collection, storage, modification, and sharing.

For a detailed description of the types of personal data we collect, the purposes for which they are used, and the legal basis for processing, please refer to section 9. This section also outlines the recipients of the data and the storage duration for different categories of personal data.

4. SECURITY MEASURES FOR PERSONAL DATA

We take appropriate technical and organizational measures to safeguard your personal data from unauthorized access or misuse. Our security practices include regular system updates, encryption, and data backups. Access to personal data is limited to employees who need it for their job duties, and all staff are trained to maintain the confidentiality and security of the data.

5. SHARING OF PERSONAL DATA

We only share your personal data with the following third parties:

- Service Providers. In certain cases, we work with partners, suppliers, or service providers to process your personal data, such as IT and financial systems providers. We ensure that these processors have adequate technical and organizational security measures in place, and that they process the data strictly according to our instructions.
- Authorities. We may be legally obligated to disclose personal data to public authorities. Additionally, we may share data to establish, exercise, or defend against legal claims.

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6. TRANSFERS OF PERSONAL DATA OUTSIDE THE EU/EEA

We strive to process your personal data within the EU/EEA. When possible, the data will be stored within the EU/EEA. However, some of our service providers may operate outside this region, particularly in the United States. This could involve access to personal data from there even though the data is stored within the EU/EEA. In such cases, we ensure your data is handled securely in accordance with GDPR, with protection equivalent to EU standards. You may contact us for more information about the countries in which our processors operate and the safeguards in place. Contact information can be found in section 2.

7. YOUR RIGHTS REGARDING PERSONAL DATA

We are committed to ensuring that your personal data is processed lawfully. The following is a summary of your rights under the GDPR. If you have questions or wish to exercise any of these rights, please contact us using the details provided in section 2. We will respond to your request within one month, and we may need to verify your identity before proceeding.

- Right of access. You have the right to request information on the data we hold about you, including the purposes of processing, the type of data, recipients, retention periods, and sources.
- Right to rectification. If your data is incorrect or incomplete, you can request that we correct or update it.
- Right to erasure. You have the right to request the deletion of your data. However, exceptions may apply, such as when we are legally required to retain certain data for purposes like accounting, tax compliance, or labour law, or if the data is necessary for defending legal claims.
- Right to data portability: You can request that we transfer your data to another data controller, when technically feasible. This applies to personal data you have provided to us, and only if the processing is based on your consent or is necessary to fulfil a contract.
- Right to restriction of processing. You can request that we restrict the processing of your data if you think the data is incorrect, or if you have objected to our processing on the basis of legitimate interest. In these cases, processing will be restricted while we assess your request.
- Right to object. You have the right to object to certain types of processing, including processing based on legitimate interest and direct marketing. You can unsubscribe from marketing emails at any time. For other processing activities, we will assess whether our legitimate interest outweighs your rights and freedoms.
- Rights related to automated decision-making and profiling. You have the right to know if any automated decision-making processes are applied to your data, and to receive information on the logic and consequences. We do not currently engage in automated decision-making, but will inform you if this changes.
- Right to lodge a complaint. If you have concerns about how we process your data, you can file a complaint with the Swedish Authority for Privacy Protection via the following [link](#).

8. UPDATES TO THE PRIVACY POLICY

We update this privacy policy regularly to reflect changes in our personal data handling practices. Any significant changes will be communicated to you directly when they affect you. The most up-to-date version of this policy can always be found on our website. This policy was last updated on *November 19, 2024*.

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9. OVERVIEW OF HOW WE PROCESS YOUR PERSONAL DATA

If you visit our website

For information on how we handle your data when you visit our website, please see our website policy at: <https://simsendiagnostics.com/website-policy/>

If you are a patient or a research participant of our customers

When we process personal data for genomic analysis, we act as a data processor on behalf of our customers, such as healthcare providers, biopharmaceutical companies, and research institutes. Our customers are the data controllers, and they enter into data processing agreements with us, providing instructions on how to handle your personal data. Therefore, if you have questions about how your personal data is processed when using our products and services, please contact the relevant healthcare provider or research organization.

If you are an employee of our customers or potential customers

Types of Personal Data	Purpose	Legal Ground	Category of Recipients	Storage Period
Communication history, Email address, Email correspondence, Job title, Name, Phone number, Information provided by the person, Content of support cases, Purchase history, Purchaser code, Electronic signature	Ability to perform services. Sending out customer questionnaires to improve service offering after services have been completed.	Agreement	Service providers	Varies depending on the type of data. However, at least as long as stipulated in the agreement, otherwise 1 year, or as long as legally necessary for other purposes such as accounting (7 years). Data will be discarded when obsolete or requested.
Email address, Job title, Name, Communication history, Email correspondence, Information provided by the person	Reaching new customers and growing the business by, for example direct marketing, contacting potential customers through various channels (e.g. Email, LinkedIn, etc.) and sending newsletters.	Legitimate interest	Service providers	You can unsubscribe from our newsletters at any time by clicking on the unsubscribe link in the latest email you received from us. If you do not unsubscribe yourself, we will process your personal data as long as it is necessary to achieve the purpose of the processing.

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Name, Information provided by the person, Service usage	Increase brand awareness, garnering new customers by publishing testimonials, user experience stories etc.	Consent	Service providers	Until consent is withdrawn
Email address, Job title, name, communication history, Email correspondence, information provided by the person, electronic signature, phone number, content of support cases	Ensuring access to supplies required to conduct our business and having contact persons in case of supplier issue (delays, faulty equipment, maintenance etc.). Maintaining product safety (e.g. calibration)	Agreement	Service providers	Varies depending on the type of data. However, at least as long as stipulated in the agreement, otherwise 1 year, or as long as legally necessary for other purposes such as accounting (7 years). Data will be discarded when obsolete or requested.
Bank account number, Name	Bookkeeping	Legal obligation	Service providers, Authorities	Saved for 7 years.