

Eldon Biologicals A/S Privacy Policy

Effective as of May 25, 2018

- [1 Introduction](#)
- [2 About this Policy](#)
- [3 Your rights and your preferences: Giving you choice and control](#)
- [4 How do we collect your personal data?](#)
- [5 What personal data do we collect from you?](#)
- [6 What do we use your personal data for?](#)
- [7 Sharing and storing your personal data](#)
- [8 Data retention and deletion](#)
- [9 Transfer to other countries](#)
- [10 Links](#)
- [11 Keeping your data safe](#)
- [12 Changes to this Privacy Policy](#)
- [13 How to contact us](#)

1. Introduction

At Eldon Biologicals A/S, we want to give you the best possible experience to ensure that you enjoy our service today, tomorrow, and in the future.

As a medical device company that develops, produces and sells medical device products globally, Eldon Biologicals A/S collects various personal data. We take personal data privacy and security seriously and are committed to complying with all applicable personal data protection laws.

Your privacy and the security of your personal data are, and will always be, important to us. Therefore, we wish to explain which kind of data and how/why we collect, store, and use your personal data. We also explain the choices you have when and you choose to share your personal data with us.

That is our objective, and this Privacy Policy (“Policy”) will explain exactly what we mean in further detail below.

2. About this Policy

This Policy sets out the essential details relating to your personal data relationship with Eldon Biologicals A/S. The Policy applies to all Eldon Biologicals services and any associated services

From time to time, we may develop new or offer additional services. If the introduction of these new or additional services results in any change to the way we collect or process your personal data we will provide you with more information and additional terms or policies. Unless stated otherwise when we introduce these new or additional services, they will be subject to this Policy.

The aim of this Policy is to:

1. Ensure that you understand what personal data we collect about you, the reasons why we collect and use it, and how we store it;
2. Explain the way we use the personal data that you share with us in order to facilitate our contact, sales/distribution and collaboration with you; and
3. Explain your rights and choices in relation to the personal data we collect and process about you and how we will protect your privacy.

We hope this helps you to understand our privacy commitments to you. For further clarification of the terms used in this Policy please contact us eldoncard@eldoncard.com. For information on how to contact us if you ever have any questions or concerns, then please see the '[How to Contact Us](#)' [section 13](#) below. Alternatively, if you do not agree with the content of this Policy, then please remember it is your choice whether you want to use the Eldon Service.

3. Your rights and your preferences: Giving you choice and control

You may be aware that a new European Union law, called the General Data Protection Regulation or "GDPR" gives certain rights to individuals in relation to their personal data. Accordingly, we have implemented additional transparency to help users take advantage of those rights. As available and except as limited under applicable law, the rights afforded to individuals are:

- Right of Access - the right to be informed of and request access to the personal data we process about you;
- Right to Rectification - the right to request that we amend or update your personal data where it is inaccurate or incomplete;
- Right to Erasure - the right to request that we delete your personal data;
- Right to Restrict - the right to request that we temporarily or permanently stop processing all or some of your personal data;
- Right to Object -
 - the right, at any time, to object to us processing your personal data on grounds relating to your particular situation;
 - the right to object to your personal data being processed for direct marketing purposes;
- Right to Data Portability - the right to request a copy of your personal data in electronic format and the right to transmit that personal data for use in another party's service; and
- Right not to be subject to Automated Decision-making - the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

In order to enable you to exercise these rights with ease and to record your preferences in relation to how Eldon Biologicals uses your personal data, we provide you with information's concerning the following:

- **Privacy Settings** - The categories of personal data we process about you, how you can find out more information about how Eldon Biologicals uses your personal data and what your rights are; and,
- **Notification Settings** – By contacting us you can choose which communications you will receive from us. We have no publicly of your personal data.

If you have any questions about your privacy, your rights, or how to exercise them, please contact our Data Protection Officer using eldoncard@eldoncard.com. We will respond to your request within a reasonable period of time upon verification of your identity.

If you are unhappy with the way we are using your personal data you can also contact and are free to lodge a complaint with the Danish Data Protection Authority (Datatilsynet, Borgergade 28, 5., 1300 København K.) or your local Data Protection Authority.

4. How do we collect your personal data?

We collect your personal data in the following ways:

1. **When you sign up to be a Distributor** - when you sign up we collect certain company/personal data so you can order our products and services such as company name, delivery address, payment terms, strategy, QA experience, sales experience of Medical Devices etc. , your company email address, (Notice remember not to use a private email), country.

Data from your signed copy of the returned document Q5403 – “Information on new distributors”

2. **Personal data collected that enables us to handle your queries and complaints** - from time to time, you may also provide us with additional personal data or give us your permission to collect additional personal data e.g. to provide you with answers concerning your query or complaint. As described further, you will always have the option to change your mind and withdraw your consent at any time.

Personal data to be used for handling queries and complaints:

- Customer Identification (name, address, e-mail).
 - Product name.
 - Date of question.
 - LOT-number, tracking (TR) other relevant identification concerning the product.
 - Your input (can contain information about blood type, your picture of the EldonCard if a picture is enclosed in the e-mail send by you (the customer) or distributor.
 - Declaration/information from customer if there has been an incident.
 - Signatures.
3. **When you are our supplier or an employee at our Supplier** - when you are our supplier or an employee at our supplier, we collect certain company/personal data so we can order or purchase your products and services. We typically collect data through direct contact with our supplier. Data may also be gathered in the form of a supplier contract or during announced/unannounced auditing of our suppliers.

We may process the following categories of personal data about suppliers:

Ordinary personal data:

- a) Identification details, such as name, surname, and maiden name;
- b) Contact details such as work address, company/delivery address, telephone and e-mail address (Notice remember not to use a private email);
- c) Professional details such as job titles, job function, professional experience, current or previous employer(s).

We also gather a variety of company details, such as sales statistics, payment terms, and company strategy, which are typically not regarded as personal data.

4. **From third parties** – when the distributor send us information concerning your queries and/or complaints. We will receive personal data about you in order to provide you with answers. We will use this personal data when our Distributor has your consent.

5. What personal data do we collect from you?

We have set out in the tables below the categories of personal data that we collect and use about you:

Personal data collected when your company sign up to be a Distributor, when you submit queries/complaints, when you are our supplier or an employee at our supplier, and personal data collected through third parties.

Categories of personal data	Description of category
General Personal data from customers (a physical persons, who is employed in a company or organisation, or in some rare situations, a private person; who has bought our products or services; or who has requested for a quotation, or who has submitted a query or complaint regarding our products or services; or who has visited our websites.	General/ordinary personal data – see 4.1 This data is typically collected by e-mail or collected upon our document Q5403 – “information on new distributors” (Filled in by you or the distributor)
Personal data collected with your permission that enables us to provide you with answer to queries or complaints or otherwise enables us to handle complaints and other legal obligations, such as book keeping.	Personal data collected when you are submitting queries or complaints, or when we receive queries or complaints from third parties - see 4.2 and 4.4.
General Personal data from suppliers (a physical persons, who is employed in a company or organisation, or in some rare situations, a private person; who supply Eldon Biologicals with products, services or solutions; or who has visited our websites.	General personal data collected collaborating or interacting with our suppliers - see 4.3

6. What do we use your personal data for?

When you use or interact with Eldon Biologicals or a Distributor of EldonCards we will primarily use the information to provide you with your requested service, or to provide you answers to a query or a complaint:

Categories of personal data	Legal basis for the processing and use
General Personal data from customers (a physical persons, who is employed in a company or organisation, or in some rare situations, a private person; who has bought our products or services; or who has requested for a quotation, or who has submitted a query or complaint regarding our products or services; or who has visited our websites.	We may process your personal data on the following legal bases: Processing or use of personal data is necessary for the purposes of the legitimate interests pursued by Eldon Biologicals A/S. We have a substantial interest in ensuring that the companies (e.g. distributors or suppliers with whom we collaborate) have the right people in key positions and that we are able to contact key persons at our suppliers, distributors or in some situations private persons who has submitted queries or complaints. Also, we have a significant interest in ensuring our compliance with certain contractual and legal obligations.

<p>Personal data collected with your permission that enables us to provide you with answer to queries or complaints or otherwise enables us to handle complaints and other legal obligations, such as bookkeeping.</p>	<p>We may process or use your personal data on the following legal bases: Necessary for Eldon Biologicals to comply with a legal obligation, such as the bookkeeping rules or the rules regarding the manufacture, distribution and sales of medical device and its' regulation (e.g. to ensure product traceability, complaint handling and post-market surveillance).</p>
<p>General Personal data from suppliers (a physical persons, who is employed in a company or organisation, or in some rare situations, a private person; who supply Eldon Biologicals with products, services or solutions; or who has visited our websites.</p>	<p>We may process or use your personal data on the following legal bases: Necessary for the performance of the contract between you and Eldon Biologicals A/S. Necessary for the pursuit of legitimate purposes of Eldon Biologicals A/S, namely managing and contacting our use of consultants and suppliers etc.</p>

7. Sharing and storing your personal data

We have set out the categories of recipients of the personal data collected or generated through your contact with Eldon Biologicals or purchase of Eldon Biologicals A/S's products and services.

Publicly available information

No personal data will be publicly available.

Information we store (both digital and non-digital personal data)

Categories of recipients	Reason for sharing
<p>Financial institutions</p>	<p>We use financial institutes that enable bank transactions to/from Eldon Biologicals. They will follow the GDPR standards for security.</p>
<p>Technical Service Providers</p>	<p>We use technical service providers, which may operate the technical infrastructure that we need to in order to provide our products, in particular providers which host, store, manage, and maintain our application, its content and the data we process and use. They will follow the GDPR standards for security.</p>
<p>Shipping companies</p>	<p>We use courier delivery services companies, which need some personal data for shipping of products to our customers or shipping to Eldon Biologicals A/S. They will follow the GDPR standards for security.</p>

8. Data retention and deletion

We keep your personal data only as long as necessary to provide you with the Eldon Biologicals Service and for safety requirements, such as questions concerning a blood type determination question, complying with our legal obligations, and resolving disputes. We keep some of your personal data for as long as you are a distributor and necessary for compliance with regulatory requirements.

If you request, we will delete or anonymise your personal data so that it no longer identifies you, unless, we are legally allowed or required to maintain certain personal data, including situations such as the following:

- If there is an unresolved issue relating a complaint/question, such as a blood type determination question we will retain the necessary personal data until the issue is resolved and as long as the QA system requires.
- Where we are required to retain the personal data for our legal, tax, audit, and accounting obligations, we will retain the necessary personal data for the period required by applicable law; and/or,
- Where necessary for our legitimate business interests such as fraud prevention or to maintain the security of our users.

Generally, we will retain personal data processed for this purpose for minimum 5 years after our last interaction with you in order to be able to contact you concerning possible changes in contracts with distributors, important changes or observations concerning our products, to contact you regarding post-market surveillance, or to gather information, which is used to improve the quality of our products or due to legal obligation. In some situations we have a legitimate interest in retaining the information for a shorter or longer period of time.

Generally, we will retain personal data processed for the purpose of complaint handling for up to 7 years after our last interaction with you in order to be able to contact you concerning the complaint and important changes or observations concerning the product that you purchased.

9. Transfer to other countries

We share some of your personal information with suppliers that Eldon Biologicals A/S work with to assist our company (mainly financial institutions, technical service providers and courier delivery services companies).

Eldon Biologicals do not subcontract processing to, or transfer to, or store your personal data at, third parties located in countries outside the EU.

For further details of the security measures we use to protect your personal data, please contact us eldoncard@eldoncard.com.

10. Links

We display advertisements or links to our distributors' websites, and we link to third-party websites/material (e.g. videos on www.youtube.com).

11. Keeping your personal data safe

We at Eldon Biologicals A/S are committed to protecting our users' personal data. We implement appropriate technical and organisational measures to help protect the security of your personal data; however, please note that no system is ever completely secure. We have implemented various policies, encryption, access, and retention policies to guard against unauthorised access and unnecessary retention of personal data in our systems. We will only keep personal information which is adequate relevant and not excessive.

12. Changes to this Privacy Policy

We may occasionally make changes to this Policy.

When we make material changes to this Policy, we'll provide you with prominent notice as appropriate under the circumstances, e.g., by displaying a prominent notice on www.eldoncard.com or by sending you an email.

Please, therefore, make sure you read any such notice carefully.

13. How to contact us

Thank you for reading our Privacy Policy. If you have any questions about this Policy, please contact our Data Protection Officer by using the eldoncard@eldoncard.com or by writing to us at the following address:

Eldon Biologicals A/S
Sandtoften 10
2820 Gentofte

Denmark