

Document Title:	GDPR Policy		
Document Number:	QUAL0140		
Approved By:	Michele Thiel	Approved Date:	9/6/ 18

1.0 Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2.0 Responsibilities

- 2.1 The Data Protection Officer (DPO) is responsible for ensuring that this notice is made available to data subjects prior to Daavlin collecting/processing their personal data.
- 2.2 All Staff of Daavlin who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3.0 Privacy Notice

- 3.1 **Who are we?**
Daavlin is a manufacturer and distributor of medical devices, with its primary business location in Bryan, OH, USA. We serve over 70 countries and have been in business since 1981 as a leading provider of phototherapy products to hospitals, doctors, and individual patients.

Our Data Protection Officer (DPO) can be contacted directly here:

- mthiel@daavlin.com
- 419 633-3348

The personal data we would like to collect from you is:

Personal data type:	Source
IP addresses	Website logs
Clinician vs Home Patient preference cookie	Website pop-up to deliver selected content
Complaint/contact forms	Fillable website forms

The personal data we collect will be used for the following purposes:

- Enabling localization features and reducing time spent in future visits dealing with popups
- Analyzing web traffic
- Addressing user complaints and potential regulatory requirements resulting from them

Our legal basis for processing for the personal data:

- We are a highly regulated manufacturer of Class IIa devices, and are required to record analyze and process complaints, from whatever mechanism we receive them.
- Anonymized website traffic data is essential to smooth operations and allocations of resources.

3.2 **Consent**

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Daavlin to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting Daavlin at the below contact information.

Disclosure

Daavlin will not pass on your personal data to third parties, with the exception of when compelled by valid regulatory or court orders to do so.

3.3 **Retention period**

Daavlin will process personal data for 180 days and will store the personal data for 2 years (as we are required to maintain any information potentially relating to device complaints for at least that long).

3.4 **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organization.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Daavlin refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

3.5 **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Daavlin (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Daavlin's data protection representatives Data Protection Officer (DPO).

The details for each of these contacts are:

	Supervisory authority contact details	Data Protection Officer (DPO) contact details
Contact Name:	Mr Giovanni BUTTARELLI	Ms. Michele Thiel
Address line 1:	Rue Wiertz 60	PO Box 626
Address line 2:	1047 Bruxelles/Brussel	Bryan, OH 43506 US
Address line 3:	Office: Rue Montoyer 63, 6th floor	Office: 205 W. Bement St.
Email:	edps@edps.europa.eu	mthiel@daavlin.com
Telephone:	+32 2 283 19 00	1 419 633-3348

4.0 Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

How we use your information

This privacy notice tells you how we, Daavlin, will collect and use your personal data for customizing your experience on our websites, responding to your customer inquiries, and in the case that you opt in, for marketing purposes.

Why does Daavlin need to collect and store personal data?

In order for us to provide you with web content, and to answer inquiries, we need to collect personal data. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Daavlin would contact you for additional consent.

Will Daavlin share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Daavlin in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to only to provide services you request When they no

longer need your data to fulfil this service, they will dispose of the details in line with Daavlin's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise. Note that our website may feature links to external websites, such as Facebook, LinkedIn, Instagram and the like, and when you click on them, you will fall under those organization's privacy policies.

How will Daavlin use the personal data it collects about me?

Daavlin will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. Daavlin is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Daavlin contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

Can I find out the personal data that the organization holds about me?

Daavlin at your request, can confirm what information we hold about you and how it is processed. If Daavlin does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organization that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Daavlin or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organization, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Daavlin accepts the following forms of ID when information on your personal data is requested: Passport, driving licence, birth certificate, or utility bill from the past 90 days.

Contact details of the Data Protection Officer (DPO):

Data Protection Officer (DPO) contact details	
Contact Name:	Ms. Michele Thiel
Address line 1:	PO Box 626
Address line 2:	Bryan, OH 43506 USA
Email:	Mthiel@daavlin.com
Telephone:	4193-3348

5.0 Document Owner and Approval

The Data Protection Officer (DPO) is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the *Daavlin website*.

6.0 Revision History

Page(s)	Revision History	Revision	Effective Date
All	Initial Release	0	9/6/18