

## Website Privacy Policy

The Website is owned by Sunrise SA (together with its affiliated company, “**Sunrise**” or “**us**” or “**we**”), whose head office is located at 5101 Namur, Chaussée de Marche 598/02, Belgium VAT (BE) 0632 607 373 RLE Liège, Namur ([www.hellosunrise.com](http://www.hellosunrise.com)).

We may come into possession of your Personal data (“**Personal data**” or “**Personal information**”) as a result of your utilisation of our Website. This Privacy Policy (“**Privacy Policy**”) describes how we handle, process, and make available your Personal data.

### 1. Role and responsibilities

Certain data protection laws and regulations, such as the EU General Data Protection Regulation (“**GDPR**”) and the California Consumer Privacy Act (“**CCPA**”), typically distinguish between two main roles for parties processing Personal data: the “**Data Controller**” (or under the CCPA, “business”), who determines the purposes and means of processing; and the “**Data Processor**” (or under the CCPA, “service provider”), who processes the data on behalf of the Data Controller.

We act as Data Controller when processing your Personal data in the meaning of the GDPR and any applicable national act and/or decree implementing it, as well as any other applicable data protection legislation (together, the “**Applicable Law**”).

### 2. Use of your Personal data

#### 2.1 **Personal data processed and its purposes**

We may collect and process the following Personal data about you in accordance with this Privacy Policy:

<b>Type of Personal data</b>	<b>Purposes</b>	<b>Legal basis</b>
Your first name, last name, honorific, email address, phone number, address, company name, job function	Notifying you about significant changes to this Privacy Policy	Your consent
	Deliver marketing communication such as newsletter, brochure,...	Your consent
	Send you the requested content  Interact further with you for marketing purpose	Your consent
Contact data, such as your name, surname, address, e-mail address, delivery address, telephone number	Payment of and delivering your product	Necessity for the performance of the (purchasing) contract concluded with you
	Invoicing purposes  Accounting purposes  (only outside US)	Legal obligation to retain your personal information for accounting purposes

	Post-market surveillance and vigilance purposes	<p>Legal obligation to collect and evaluate clinical data such as feedback from users, side-effects or data on misuse / off-label use of our products.</p> <p>Legal obligation to analyse complaints and reports regarding our products and, where applicable, to report incidents or serious incidents to a competent authority.</p>
Your bank details  (only outside US)	Payment of our product	Necessity for the performance of the (purchasing) contract concluded with you
	Accounting purposes	Legal obligation for accounting purposes
E-mails or telephonic exchange between you and Sunrise	<p>Archiving purposes</p> <p>Improving our services</p> <p>Managing/Resolving any dispute</p> <p>Supporting your interaction with us</p>	<p>Our legitimate interests to keep a record of our exchanges, in order to improve our services and manage/resolve any dispute between us</p> <p>To the extent it includes health-related data it is processed with your consent.</p>
	Post-market surveillance and vigilance purposes	<p>Legal obligation to collect and evaluate clinical data such as feedback from users, side-effects or data on misuse / off-label use of our products.</p> <p>Legal obligation to analyse complaints and reports regarding our products and, where applicable, to report incidents or serious incidents to a competent authority.</p>
Details of your visits to our Website and the materials / information that you access	<p>Improving our services</p> <p>Giving you a personalised experience</p>	Your consent (via cookies)

	Analysing and identifying the regularity of the use of this Website  Designing products and services for your use	
Browser and operating system data (including IP address)	Ensuring the correct establishment of the connection  Ensuring comfortable use of the Website, ensuring that the content of this Website is presented in the most effective manner for you and your computer or electronic device  Assessing the security and stability of the system	Legitimate interests of Sunrise to provide access to our Website and information about our services

You acknowledge providing us with accurate, complete, and updated registration information.

Failure to provide us with your Personal data when the provision of Personal data is a statutory or contractual requirement will have the consequence that you will not be able to purchase our products and use our services. Indeed, in those cases the provision of such Personal data is mandatory for the use of our services and products.

## 2.2 Your rights related to your Personal data

You have the following rights:

- The right to access your Personal data;
- The right to obtain rectification of your Personal data if and to the extent you can prove such data is inaccurate;
- The right to obtain the deletion of your Personal data if the conditions of the Applicable laws are met;
- The right to oppose to the processing of your Personal data for reasons relating to your personal situation and/or request its restriction when we process your Personal data on the basis of our legitimate interests;
- The right to oppose the processing of your Personal data for direct marketing purposes;
- The right to receive a copy of your Personal data in a structured, commonly used, and machine-readable format (“data portability”).

You also have the right to withdraw your consent for the processing of your Personal data at any time provided that conditions of the Applicable Law are met. You however acknowledge that any processing carried out prior to such withdrawal will not affect the lawfulness of the processing based on your consent before the withdrawal.

You can exercise the aforementioned rights by contacting our Data Protection Officer (DPO) at the following address: [DPO@hellosunrise.com](mailto:DPO@hellosunrise.com).

If your requests are manifestly unfounded or excessive, for example because of their repetitive character, we may however either (i) charge a reasonable fee taking into account the administrative

costs incurred in providing the information, proceeding with or taking the action you requested or (ii) refuse to respond to such request.

If you deem it appropriate, you also have the right to file a complaint regarding our use of your Personal data with the competent supervisory authority.

### **2.3 Recipients and transfer of your Personal data**

We may disclose your Personal data to our affiliates, agents and (sub)contractors (including to parties located outside the European Economic Area – “**EEA**”) for the purposes stated above. We will however not share your Personal data to any other third parties, unless legally obliged by law, such as by court order or otherwise requested by you.

Any transfer of Personal data to a country outside of the EEA will be made in accordance with Applicable Law and appropriate and suitable safeguards will be taken, such as the conclusions of standard contractual clauses. You have the right to obtain a copy of the appropriate and suitable safeguards taken by contacting us at the following address: [DPO@hellosunrise.com](mailto:DPO@hellosunrise.com).

### **2.4 Personal data storage**

We will store your Personal data on our databases and retain them for as long as needed in order to provide you the services requested or to answer queries or resolve issues with us, except for your Personal data about details of your visits to our Website and the materials / information that you access on our Website, which will be stored in accordance with the periods described in our [Cookies Policy](#).

After this time period, your Personal data are deleted from our databases, except if we are required by law to store them for a longer period. For instance, your Personal data collected for accounting purposes shall be retained for 10 years and those collected for regulatory compliance (including vigilance) purposes shall be retained for 10 years after the last device has been placed on the market, as per our legal obligation to do so.

### **2.5 Personal data security**

We take the appropriate technical and organizational measures in order to ensure a level of security adapted to the risks and to avoid, as far as possible, any unauthorized destruction, loss, alteration, communication or unauthorized access to your Personal data.

## **3. Changes to this Privacy Policy**

We retain the right to update, change and delete any part of this Privacy Policy at any time. We recommend you to check this Privacy Policy on a regular basis. If you consent, you will be notified directly if we decide to modify substantially this Privacy Policy.