

MIRACOR - PRIVACY POLICY

Miracor Medical SA, a public limited company, with registered office at Rue de Bruxelles, 174, 4340 Awans, Belgium, registered with the Belgian Crossroads Bank for Enterprises under number 0678.963.277 (“**MIRACOR**”), is responsible for processing the personal data of visitors of the websites it operates, contact persons and individuals who work for, on behalf of, or are representatives (an “**Individual Representative**”) of business customers, suppliers and subcontractors of MIRACOR or any of its affiliated companies.

This policy explains why and how MIRACOR collects personal information about Individual Representatives (the “**Personal Data**”), what Personal Data is processed, who has access to Personal Data, how MIRACOR protects Personal Data, how long Personal Data is retained, the rights of Individual Representatives and who to contact for further information, in accordance with the applicable regulations, specifically the European General Data Protection Regulation (the “**GDPR**”). This policy is without prejudice to specific provisions set out in any contract entered into between MIRACOR and the applicable customer, supplier or subcontractor.

1 Why MIRACOR processes Personal Data?

MIRACOR keeps and processes Personal Data for administrative, marketing and customer/supplier/subcontractor management purposes, including for the following activities:

- (i) responding to any communication, inquiry or request which an Individual Representative submits to MIRACOR (including via the website);
- (ii) managing relationships and maintaining contact with existing and prospective customers, suppliers and subcontractors;
- (iii) negotiating and executing agreements with customers, suppliers and subcontractors;
- (iv) processing information relating to a proposed or actual purchase or sale of products or services by MIRACOR, including sending statements and invoices;
- (v) customer service purposes, including providing newsletters and marketing communications and/or conducting surveys and market research;
- (vi) improving MIRACOR’s products and/or services; and
- (vii) legal and/or regulatory compliance, including dispute resolution.

2 Legal grounds for processing Personal Data

Personal Data covered by this privacy policy is only processed:

- (i) in order to take steps to enter into and manage the performance of a contract with the applicable customer, supplier or subcontractor;
- (ii) where necessary to comply with a legal or regulatory obligation that MIRACOR is subject to;
- (iii) where processing is necessary for the legitimate interests of MIRACOR and/or a third party; and
- (iv) where the Individual Representatives have provided consent to allow the processing of their Personal Data.

The nature in which MIRACOR and/or a third-party processes Personal Data for legitimate interests is in principle to communicate with Individual Representative(s) from time to time regarding products, services or events offered by MIRACOR or other communications such as research and insights that may be of interest to the relevant business customer, supplier or subcontractor.

3 Categories of Personal Data processed

Personal Data is all personal information relating to an identified or identifiable natural person who is an Individual Representative. For the abovementioned purposes, the processing of Personal Data includes the following categories:

- (i) personal identification data, such as name and address;
- (ii) electronic identification data, such as email address, phone number, IP address and online identifiers/cookies obtained through website use;
- (iii) employment related data, such as job title, related employer and dealings with MIRACOR or the applicable customer, supplier or subcontractor;
- (iv) personal details, such as the date of birth, language, nationality and gender;
- (v) photographs and audio-visual recordings;
- (vi) information on the nature of the interest the Individual Representative has shown in MIRACOR and its projects,
- (vii) participation to events (including family members as the case may be); and
- (viii) survey data.

In addition, to comply with legal and regulatory obligations regarding trade control, anti-money laundering and/or bribery and corruption laws, MIRACOR may carry out screening on potential or existing counter-parties before any contract is entered into and on a periodic basis during the term of the contract. This screening takes place against publicly available or government issued sanctions lists and media sources and would include relevant individuals such as directors, officers and key stakeholders. This data may include Personal Data regarding suspected and actual criminal behaviour, criminal records or proceedings regarding criminal or unlawful behaviour but only for the purposes of ensuring MIRACOR's compliance with legal and regulatory obligations and/or to the extent permitted or required by local law. No automated decision-making results from such screening

4 Where Personal Data comes from

Where an Individual Representative contacts MIRACOR, Personal Data will likely come directly from the individual concerned. MIRACOR may also contact an Individual Representative for prospective purposes if initial contact information has not been obtained directly from such individual, including receiving such information from publicly available sources or any referrals from other customers, suppliers or subcontractors of MIRACOR. During the course of the business relationship, the individual concerned or another representative of the applicable customer, supplier or subcontractor will provide MIRACOR with further information as needed for the management of the business relationship with such customer, supplier or subcontractor. MIRACOR may also receive or generate data relating to an Individual Representative from other customers, suppliers, subcontractors or those to whom such individual communicates by email or other systems.

The Personal Data collected directly or indirectly by MIRACOR is required to fulfil legal requirements and/or to enter into a contract and maintain contact with a customer, supplier or subcontractor for the duration of the business relationship. Failure to provide MIRACOR with required information will negatively affect MIRACOR's ability to communicate with an Individual Representative of a customer, supplier or subcontractor (including the ability to provide any applicable electronic newsletters if Individual Representatives do not wish to share their email address), MIRACOR's ability to enter into a contract with the applicable customer, supplier, subcontractor or continue the performance of a contract once entered into without access to necessary Personal Data.

5 Who has access to Personal Data

For the abovementioned purposes, Personal Data may, on a need-to-know basis, be disclosed to, and possibly even processed by:

- (i) the Individual Representatives themselves or other individuals employed by or representing the applicable customer, supplier or subcontractor;
- (ii) MIRACOR's personnel;
- (iii) authorized third-party agents, service providers, professional advisors and/or subcontractors of MIRACOR; and
- (iv) government, regulatory bodies and/or public authorities where it is necessary to comply with legal or regulatory obligations which MIRACOR is subject to or as permitted by applicable local law

6 Personal Data transferred Internationally

MIRACOR may transfer information about its customers, suppliers or subcontractors for purposes connected with the management of the MIRACOR's business. It may also be necessary in limited circumstances to transfer Personal Data abroad or to an international organisation to process and/or store this information to comply with its legal or contractual requirements. For transfers of data internationally, MIRACOR has implemented appropriate safeguards in line with GDPR requirements.

7 Retention of Personal Data

Personal Data will be retained no longer than necessary for the processing purposes described in this privacy policy. Personal Data provided in respect of a contact of an Individual Representative is retained no longer than a normal sales cycle length. Where a contract is entered into with a customer, supplier or subcontractor, typically (and unless otherwise stated in other related documents for specific categories of data) Personal Data will be retained during the term of the contract as well as following the expiration or termination of the contract for as long as there may be legal liability for which the use of Personal Data may be relevant, taking into consideration the applicable statutory periods of limitation and legal retention obligations. Information may be retained for a shorter period of time where an Individual Representative objects to the processing of his Personal Data and there is no longer a legitimate purpose to retain such information.

8 How Personal Data is protected

MIRACOR has implemented adequate technical and organizational measures to protect Personal Data and keep it as safe and secure as reasonably possible, protecting it against unauthorized, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against other unlawful forms of processing. These security measures have been implemented taking into account the state of the art of the technology, their cost of implementation, the risks presented by the processing and the nature of the Personal Data.

9 What are the individuals' rights and who can they contact?

Individual Representatives who have Personal Data collected and processed have the right at any time to contact MIRACOR to access their Personal Data and request a correction of any incorrect or incomplete information.

Subject to and in accordance with applicable law, individuals may also have the right to:

- (i) request the deletion of their Personal Data;
- (ii) request restrictions or object to the processing of their Personal Data;
- (iii) data portability, allowing the individual to copy or transfer their Personal Data;
- (iv) withdraw their consent at any time where consent was provided to process their Personal Data, provided this will not affect the validity of the processing prior to such withdrawal of consent; and
- (v) receive more information about the safeguards in case of international data transfers.

Individual Representatives also have a right to lodge a complaint with the Belgian Data Protection Authority or another EU supervisory authority if such individual thinks MIRACOR has not acted in line with any applicable data protection laws in respect of dealing with their Personal Data. For any further information about these rights or to make a request is, please send an email to:

office@miracormedical.com

10 Changes

MIRACOR may amend this privacy notice from time to time as needed, notably to comply with changes in any applicable laws, regulations or requirements introduced by data protection authorities.