

## **Data protection on the BlueWind website**

### **Data protection**

Welcome to the BlueWind Website. We appreciate your interest in our company. Protection of the personal data you entrust to us is a priority for us, and we want you to feel safe and secure when you visit our website or use our online offers.

It is important to us that you are fully informed about the personal data that we collect when you use our online offers and services, and are familiar with how we use them.

Wherever BlueWind processes personal data, such processing is carried out for the purposes defined in this data privacy statement.

### **Processing of personal data**

#### **Visiting our website**

We record and save your computer's IP address in order to send the contents of our website visited by you to your computer (e.g. texts, pictures, and files provided for downloading, etc.) (cf. Art. 6 (1) lit. b GDPR). We also process these data to identify and pursue any misuse. Legal basis in this case is Art. 6 (1) lit. f GDPR. In this context, our legitimate interest in data processing is to ensure the due functioning of our website and the business transacted via the Website.

#### **Other purposes**

We also process personal data that you provide voluntarily, e.g. when you make an inquiry or online appointment, or when you order information material or newsletters. Legal basis in this case is Art. 6 (1) lit. b GDPR. The data processed by us in this context include the data of customers, distributors, suppliers to the extent necessary for the purposes specified within the scope of this data privacy statement.

In as far as we process your data as described above for the purpose of accepting and processing your inquiry, appointment, or (newsletter) order, you are contractually bound to make these data available to us. We are unable to process your request without the data.

Where you have given your consent to the processing of personal data (cf. Art. 6 (1) lit. a GDPR), you can withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of processing based on consent up to the time of withdrawal of consent.

## **Transfer to third parties**

We may transfer your data to the relevant supplier or distributor where it is processed to deliver the service and support you requested.

This means that information may also be processed by other entities. However, such processing is limited to the extent required for the purposes defined in this data privacy statement or to which the other legal entity acting as a service provider / processor has to follow the instructions given by the controller.

These service providers / processors are bound by instructions. Given this, they are subject to our requirements, which include processing of your data exclusively in line with our instructions and in compliance with the applicable Data Protection Act. In particular, they are contractually bound to treat your data with strict confidentiality, and are not permitted to process data for other purposes than the ones agreed.

Data transfer to the data processor is effected on the basis of Art. 28 (1) GDPR.

We will not sell your data to third parties or otherwise share them for commercial purposes.

Beyond the above, we will transfer your personal data to prosecution authorities and, if applicable, damaged third parties without your explicit consent where this is necessary for clarifying illegal use of our services or for legal prosecution. However, such a transfer will only take place if there is concrete evidence of illegal conduct or misuse. Transfer of your data may also take place where this contributes to enforcing the conditions of use or other agreements. We are also under legal obligation to provide information to certain public bodies on request. These comprise prosecution authorities, authorities prosecuting offences punishable by a fine, and financial authorities.

The transfer of these data is based on our legitimate interest in fighting misuse, prosecuting criminal acts, and securing, asserting, and enforcing claims unless our interests are overridden by your rights and interests in the protection of your personal data, Art. 6 (1) lit. f GDPR.

## **Intended data transfer to third countries**

At present, data transfer to third countries is not planned. Otherwise we will establish the required legal conditions. In particular, you will be informed of the respective recipients or categories of recipients of the personal data in line with the legal requirements.

## Security

BlueWind takes appropriate technical and organizational measures to protect any personal data you provide to BlueWind from accidental or intentional manipulation, loss, destruction, or access by unauthorized parties. This also applies to any external services purchased. We verify the effectiveness of our data protection measures and continuously improve them in line with technological development.

## Cookies

For a user-friendly website experience and to tailor the operations of our website to your needs, some areas of our website may use cookies. A cookie is a small file that is stored locally on your computer when you visit a website. When you revisit the website on the same device, the cookie will indicate, for example, that you are a repeat visitor. Cookies also allow us to analyze the use of our website. They do not include any personal data and cannot identify you on third-party websites—including those of analytics providers.

We use the following types of cookies:

- Essential/necessary cookies  
These cookies are essential for the functioning of our website. This includes, for example, issue of anonymous session IDs to summarize multiple queries to a web server, or ensuring fault-free functioning of registrations and orders.
- Functionality cookies  
These cookies help us to save your chosen settings or support other functions when you are navigating our website. They allow us, for example, to remember your preferred settings for your next visit or save your login data for certain areas of our Website.
- Targeting/Third Party Cookies  
These cookies are for analytical purposes and are anonymized and analyzed by third parties.

### **Standard periods for deletion of data:**

Legislation has defined numerous data storage periods and obligations. At the end of these periods, the relevant data will be routinely deleted. Data that are not affected by the above storage periods and obligations are deleted or anonymized as soon as the purposes defined in this data privacy statement no longer apply. Unless this data privacy statement includes other deviating provisions for data storage, we will store any data we collect for as long as they are required for the above purposes for which they were collected.

## **Other data use and deletion of data**

Any further processing or use of your personal data will generally only be carried out to the extent permitted on the basis of a legal regulation or where you have consented to data processing or data use. In the case of further processing for other purposes than the ones for which the data were originally collected, we will inform you about these other services and provide you with all other significant information before further processing.

Rights concerning the processing of personal data.

### **Right of access**

On request, you have the right to obtain information from us about the personal data concerning you and processed by us, to the extent defined in Art. 15 GDPR. You can send your request either by mail or email to the addresses given below.

### **Right to rectification**

You have the right to require us to rectify any inaccurate personal data concerning you without undue delay (Art. 16 GDPR). For this purpose, please contact the address given below.

### **Right to deletion**

Where the legal reasons defined in Art. 17 GDPR apply, you have the right to immediate deletion (“right to be forgotten”) of personal data concerning you. These legal reasons include: the personal data are no longer necessary for the purposes for which they were processed, or you withdraw your consent, and there are no other legal grounds for processing; the data subject objects to the processing (and there are no overriding legitimate grounds for processing—does not apply to objections to direct advertising). To assert your above right, please contact the contact address given below.

### **Right to restriction of processing**

If the criteria defined in Art. 18 GDPR are fulfilled, you have the right to restriction of processing as established in the above article of the GDPR. According to this article, restriction of processing may be called for in particular if processing is unlawful and the data subject opposes deletion of the personal data and requests the restriction of their use instead, or if the data subject has objected to processing according to Art. 21 (1) GDPR as long as it is unclear whether our legitimate interest overrides the interest of the data subject. To assert your above right, please contact the contact address given below.

### **Right to data portability**

You have the right to data portability as defined in Art. 20 GDPR. This means you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format, and have the right to transmit those data to another controller, such as another service provider. Prerequisite is that processing is based on consent or a contract, and is carried out using automated means. To assert your above right, please contact the contact address given below.

### **Right to object**

You have the right to object at any time under Art. 21 GDPR to processing of personal data concerning you which is based on Art 6 (1) lit. e or f GDPR, on grounds relating to your particular situation. We will desist from processing your personal data unless we can demonstrate compelling legitimate grounds for processing which override your interests, rights, and freedoms, or unless processing is for the establishment, exercise, or defense of legal claims. To assert your above right, please contact the contact address given below.

### **Right to file a complaint with a supervisory authority**

If you think that processing of personal data concerning you and carried out by us is unlawful or impermissible, please contact us.

Please address any questions regarding the processing of your personal data, requests for information, applications, or complaints directly to our data protection officer, who will be happy to be of service

If you wish to make use of your right to information on the personal data we process on your behalf, you may contact us in the following contact details

BlueWind Medical

PO Box 4101

4614002 Herzeliya, IL

Tel.: +972-74-7218900

FAX: +972-74-7218999

E-Mail: [info@bluewindmedical.com](mailto:info@bluewindmedical.com)

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## **Amendment of this data privacy statement**

In case an update requires an adaptation of this Privacy Policy, we therefore reserve the right to amend the current Privacy Policy. The current version is dated November 19, 2018