

1. Background

This privacy policy describes how Senzime AB, corporate registration number 556565-5734, collects, uses, discloses, stores and otherwise processes personal data.

This Privacy Policy describes what information is collected, how personal data are processed and for what purposes the Company might use the personal data. This Privacy Policy also describes your rights and how you can contact us about the use of your personal data.

Senzime is responsible for processing your personal data in accordance with applicable data protection legislation.

2. Purpose

The purpose of this policy is to ensure that the processing of personal data is carried out in accordance with the European Regulations (EU) 2016/679 (Data Protection Regulation or GDPR) and other data protection legislation and protection of personal data.

3. Responsibility

Senzime is responsible for processing personal data in accordance with applicable data protection legislation.

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4. Definitions

Personal data – any information relating to an identified or identifiable person, whereby an identifiable person is a person who can be directly or indirectly identified, such as a name, an identification number, a geographic location, or factors specific to the physical person’s physical, physiological, genetic, mental, economic, cultural or social identity.

Registered person – The physical person who can be directly or indirectly identified by the personal data, i.e., the person whose data are processed.

Processing – measure or combination of measures relating to personal data or registration of personal data, regardless of whether they are automated or not, such as collection, registration, organizing, structuring, storing, processing or modifying, developing, reading, using, transferring, dissemination or provision otherwise, restriction, erasure or destruction.

Special category of personal data (sensitive staff data) – personal data that reveal racial or ethnic origin, political views, religious or philosophical beliefs or membership of trade unions and the treatment of genetic data, biometric data to unequivocally identify a person, health or data on a physical person’s sex or sexual orientation.

Personal data incident– a security incident leading to accidental or illegal destruction, loss or change or to unauthorized disclosure of or unauthorized access to the personal data transferred, stored or otherwise processed.

5. Collection and Processing of personal data

Senzime collects and processes the Personal Data entered in the contact form on the company’s website. The information we collect, and process include:

Contact information such as name, email address and telephone number and any other personal data provided to us. This is referred to as “Contact Information.”

Technical data, which may include URL, IP address, unique device ID, network and computer performance, browser type, language, identifying information and operating system. This is referred to as “Technical Data.”

Senzime collects contact information that is necessary to communicate with you in your role as a representative of a company. Senzime collects and processes information about you if you represent a company that is a customer, supplier, contractor or otherwise partner of ours, as well as a potential customer, supplier, contractor or otherwise partner of ours. The information we collect, and process may include contact information such as name, address, title, company, email address and telephone number.

Senzime collects Personal Data when recruiting new employees. We collect Personal Data that you provide to us during the recruitment process. Personal Data included in a job application is contact information (name, address, email address and telephone number), CV (including previous work experience and education), and photograph and personal registration number.

6. Senzime collects Personal Data relating to you for the following reasons:

Marketing and sales opportunities: Senzime distributing newsletters, press release, invitations to events and collaboration offers. The legitimate interest of Senzime is to be able to market itself and its services.

Contact you as a representative for a customer, supplier, contractor or otherwise partner of ours. The legitimate interest of Senzime is to contact you as a representative to manage the relationship with the company that you represent.

To process job applications: the legitimate interests of Senzime is to be able to secure that its employees have sufficient and optimal education and experience

To fulfil legal requirements

Legal obligation: Senzime may process your Personal Data for the purpose of complying with safety standards and other statutory requirements, based on the legal ground that this is necessary for compliance with a legal obligation to which Senzime is subject.

Senzime have the following register for personal data:

List	Purpose	Responsible
Distributor list	Commercial and regulatory. To be able to inform about new products, new materials and follow up on sales	Marketing
Training matrix	Ensure correct training	Regulatory
Employee relative list	Included in the crisis management documentation	HR/CEO
Send list from the Web	Distribute news and press releases	Marketing
Supplier and distributor list	Regulatory requirement according to MDR/ISO 13485	Operations
Questionnaire respondent list	Regulatory requirement for PMCF purposes	Regulatory

Senzime also have a personal data assistant agreement with IT, Accounting and pension and endowment insurance suppliers.

6.1 Medical data

The EMG data measured and monitored by the Tetragraph are not *Personal Data* as stipulated by GDPR per se. The device itself does not associate the measurements with any information that can be used to identify the patient directly or indirectly. The data stored and presented can only be associated to a patient by the fact that it is physically connected to that said (and presumably identified) patient during the procedure. The data stored on the Tetragraph is a time sequence recording of the same data that is graphically displayed on the device in real-time during use.

The Tetragraph is a sensor with recording capabilities but without intrinsic means for personal identification.

The Tetragraph can be connected to a monitor system that, by itself or by integration to a journal system, store EMG data that can be associated to a particular patient by name, identification data or other means. In this context the data collected by the Tetragraph becomes *Personal Data* per definition and the Journal system or Recording system is doing the *Processing*. Hence, the Recording system and/or Journal system is transforming the sensor data into *Personal data*. These systems are not provided by Sensime.

7. Storage time of Personal data

Your Personal Data is stored only for as long as there is a need to keep the data in order to fulfil the purposes for which the data were collected, in accordance with this Privacy Policy. The Personal Data will be deleted or anonymized if the purpose of collection and use of Personal Data have been achieved.

8. Personal data sharing

Senzime will not sell, trade or lease your Personal Data to third parties. However, Sensime may share Personal Data with our trusted subcontractors (including Internet service providers). They may need access to the Personal Data in their assignment to us, but they will not be allowed to use the Personal Data for any other purpose.

Personal Data may be disclosed by Sensime in order to comply with legal requirements or other requirements from official authorities, in order to safeguard Sensime's legal interests or to detect, prevent, or draw attention to, frauds or other safety or technical threats.

9. Protection of personal data

Senzime has employed a wide array of security measures to help protect Personal Data against unauthorized access, modification and deletion.

Senzime protects Personal Data using reasonable safeguards to prevent loss, misuse, unauthorized access, disclosure, alteration, and destruction. These measures include data encryption and firewalls.

10. Access and withdrawal of consent of personal data

You are always entitled to access your Personal Data for viewing, and to request that we correct or update your Personal Data. Furthermore, you have the right to demand that we erase your Personal Data (unless the Personal Data must be saved for another purpose, for example to fulfil legal obligations).

Under certain circumstances, you may request that Senzime restrict the use of your Personal Data. You also have the right to have your Personal Data resubmitted to you, in a structured and accessible format, for transfer to another user/processor.

If you wish to exercise any of the above-mentioned rights or if you have any questions regarding Personal Data held by us or about this online Privacy Policy, please do not hesitate to contact us.

Should you be dissatisfied with our processing of your Personal Data, please let us know, and we will do our best to meet your expectations. Data integrity is very important to us, and we always strive to protect and secure your Personal Data in the best possible way. Should we however, in your opinion, fail in our attempts, please note that you are also entitled to lodge a complaint with the Swedish Data Protection Authority (Sw. Datainspektionen/ Integritetsskyddsmyndigheten), or such other authority as may be determined in the future.

11. Changes to this privacy policy

Senzime may, at any time, make amendments to this Privacy Policy. Senzime will publish the amended version on our website.

12. Cookies

Our website requires the use of cookies to work as intended. A cookie is a small file that a website transfers to your computer's hard disk, allowing our server to remember specific information about your session.

As a first-time visitor to our website, you will be asked for approval for us to store cookies on your computer. You can later delete these cookies by clearing your browser cache. You can block cookies if you like, either all cookies, or only those from specific websites.

13. How to contact us

Do not hesitate to contact us if you have any questions about this Privacy Policy, the processing of your Personal Data or if you would like to obtain information about any stored Personal Data about you.

You can contact us at: Senzime AB, Ulls väg 41 , 756 51 Uppsala, Sweden, or by email info@senzime.com.