

Privacy Notice for Suppliers:

What we do with your data.

(Applicable to all Suppliers of Novocam Medical Innovations)

Contents

- 1 CHANGE HISTORY 2
- 2 WHO AND WHAT IS THIS NOTICE FOR? 2
- 3 WHO CONTROLS SUPPLIER PERSONAL DATA?..... 2
- 4 WHAT PERSONAL DATA DO WE COLLECT FROM YOU AND WHY? 2
- 5 WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA? 3
- 6 HOW LONG IS PERSONAL DATA KEPT? 3
- 7 WHERE DOES YOUR PERSONAL DATA COME FROM? 4
- 8 WHO DO WE SHARE YOUR PERSONAL DATA WITH? 4
- 9 WHAT ARE YOUR RIGHTS REGARDING PERSONAL DATA? 5
- 10 WHAT IF YOU CHOOSE NOT TO GIVE US YOUR PERSONAL DATA?..... 6
- 11 WHAT PRIVACY AND SECURITY MEASURES DOES NMI TAKE? 6
- 12 UPDATES TO THIS NOTICE 6
- 13 QUESTIONS OR CONCERNS? 6

1 CHANGE HISTORY

Last Date & Status	Role	Reviewer	Description of Change
2022-07-11 - Published	Quality Manager	K. Happonen	Posted on website Privacy Policy as a link to PDF.

2 WHO AND WHAT IS THIS NOTICE FOR?

This notice applies to the personal data of natural persons working for Novocam Medical Innovations Oy (NMI) suppliers or acting as agent or representative of suppliers (“**you**”, “**your**”).

Suppliers are understood as any third party that provides goods or services to NMI (such as a consultant, contractor, advisor or vendor). Board members under a non-employee status are also considered as suppliers.

This notice explains what types of personal data is gathered from our suppliers, how the personal data is used, and with whom the personal data is shared. It also sets out our suppliers’ rights in relation to personal data.

3 WHO CONTROLS SUPPLIER PERSONAL DATA?

Novocam Medical Innovations (Pasilanraito 5, 00240 Helsinki, Finland) is registered under number 2429513-0. NMI is a data controller of supplier personal data and is responsible as data controller under GDPR.

NMI uses sub-contractors for processing of payroll, finance, sales and marketing activity. These sub-contractors are jointly responsible as data controllers and data processors. All sub-contractors are expected to follow the NMI GDPR privacy policy.

4 WHAT PERSONAL DATA DO WE COLLECT FROM YOU AND WHY?

NMI primarily processes supplier personal data to approve, manage, and administer a contractual agreement between NMI and its supplier. The personal data is used, for example, to organize our sourcing activities, issue purchase orders, process payments, perform accounting, manage our contract or review the services or products you supply us with.

In addition, NMI processes personal data to meet legal obligations (such as record keeping obligations, screening duties of board members), as well as to manage our risks and operations (e.g. prevent and detect security threats, exercise or defend legal claims).

More details are provided in the table below:

Purposes of the Processing	Types of Personal Data
Administration and reporting	Business card details including name, title, company, mailing address, and telephone numbers. IT and telephone System and applications Transactions reporting
Sourcing	Business card details Professional / Educational background Rates / prices CVs
Contract management Payment of Invoices	Business card details Agreement Management of supplier relationship Criminal record Financial status Invoice details Contact persons in case of emergency
Assessment of supplier performance	Business card details Information/surveys on performance of supplier
Access and security management	Business card details Photography, security cameras, etc. Recorded material on building and IT access logs

5 WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

NMI normally only processes personal data where:

- It is necessary to enter into a contract or carry out a contract with the entity you represent;
- It is necessary to comply with our legal obligations, e.g. taxes, human resources;
- It is in our legitimate business interests e.g. building security if you visit our office, or to protect our IT infrastructure.

6 HOW LONG IS PERSONAL DATA KEPT?

As a general rule, NMI keeps personal data as long as it has a relationship with the supplier you represent or work for. After a contractual relationship ends NMI must keep it for a period of 6-10 years (to answer any contractual liability issues following the statutory period of limitations set by the Finnish Acts for accounting, human resources, etc.).

User log ins and passwords are kept for 3 months after the work relationship ends.

The building security and access logs are kept for a minimum of 30 days.

7 WHERE DOES YOUR PERSONAL DATA COME FROM?

The personal data NMI collects from you come from the following sources:

a) Personal data you give us when you:

- send us personal data on forms and e-forms, such as your name, signature, address, telephone number, tax identification number, etc.;
- provide us personal data necessary to enter into a contract, such as your name, address, professional phone number and e-mail address, function and/or position held within our supplier's organisation; or
- provide us personal data during your interactions during the contract with NMI.

b) Information we receive from other sources such as:

- background information from third party providers;
- our employees or business relationships, such as feedback on you we receive from other contractors or our employees;
- publicly available sources to confirm signatory powers; or
- details on your intervention in meetings (i.e. through meeting minutes).

8 WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Transfer within NMI or to third parties

- We may transfer personal data only to other NMI affiliated entities (e.g. brand companies), which are or will be involved in receiving services from our suppliers. We take precautions to allow access to personal data only to those staff members who have a legitimate business need for access and with a contractual prohibition of using the personal data for any other purpose.
- NMI may provide your personal data to any competent law enforcement body, regulatory, government agency, court or other third party such as but not limited to, the police, the financial supervisory authorities, the tax and social security agencies, as well as courts, where we believe disclosure is necessary (i) as a matter of applicable law or regulation, or (ii) to exercise, establish or defend our legal rights.
- We may disclose your personal data to our third-party vendors, service providers and partners who provide data processing services to us (e.g. IT platform management or support services, infrastructure and application services, data analytics, security agents), or who otherwise process personal data for purposes that are described in this privacy notice or notified to you when we collect your personal data.
- We may also disclose your personal data with our auditors, advisors, legal representatives, and similar agents in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the personal data for any other purpose.

b) International personal data transfers

Our company and supply chain operate around the world. This means that we may process personal data outside the European Economic Area (EEA). However, we have taken appropriate safeguards to require that your personal data will remain protected in accordance with this notice. These include limiting the data sent between our supply chain partners to basic contact information for logistics and payments, and implementing non-disclosure agreements with some parties.

9 WHAT ARE YOUR RIGHTS REGARDING PERSONAL DATA?

As a data subject, you have the right...	and NMI ensures this by...
to obtain information on the processing of your personal data	Publishing privacy notices on the futudent.com website for both users and suppliers. We strive to answer your data questions with transparency.
of access to your data	Contact NMI support@futudent.com to access the personal data NMI holds about you.
to rectification of your data	If your personal data is incorrect, please notify your NMI contact or support@futudent.com with a request for correction. NMI will ask all data processors (ie, financial institutions or logistics companies) to correct the data.
to the erasure of your data and to be forgotten	If you would like your personal data erased, and if NMI has no legal reason to continue to hold and process it, please send a request to support@futudent.com.
to restrict the processing of your data	If you would like to restrict how NMI processes your personal data and to only hold/store it, and if the data is not required for legal reasons (ie, contracts), you may ask for a restriction of data at support@futudent.com .
to data portability	Some data is held by NMI in a machine readable format, such as a comma separated values (CSV) file for newsletters. You may request information about how your data is stored for transfer. Data transfer is only performed with data subject consent, and to sub-contractors who comply with GDPR requirements.
to object to the processing of your data	If you wish to object to NMI processing your personal data, send a message to support@futudent.com . This includes the right to opt out of newsletters by clicking unsubscribe or deleting user accounts.
not to be subject to a decision based solely on automated processing.	NMI does not make decisions or do profiling using automated processing of your data.

Note: Not all of these rights can be exercised in all situations, depending on factors such as the basis for the processing of personal data.

10 WHAT IF YOU CHOOSE NOT TO GIVE US YOUR PERSONAL DATA?

Certain personal data is required to enter into a contract or pursue business relations between NMI and its suppliers. If you do not wish to give us the basic data needed for the contract, we will not be able to enter in to that contract or pursue a contractual relationship.

11 WHAT PRIVACY AND SECURITY MEASURES DOES NMI TAKE?

Training. All employees are trained in the basics of data privacy and take all measures to control your data. This includes the secure use of mobile phones, tablets and laptop devices.

Secure operating environments. Secure operating environments are only accessible to NMI employees and sub-contractors on a need-to-know basis. Financial and Human Resource data are more strictly controlled.

Authentication to IT environments and secure premises. All staff and subcontractors are requires to use ID / Passwords to IT systems, and the NMI offices are locked with traceable keys and codes.

12 UPDATES TO THIS NOTICE

NMI may update this notice from time to time in response to changing legal, technical or business developments. You can see the change log on the cover page for details of the changes made. Please consider the version available online as the latest available version:

<https://www.futudent.com/contact/about/privacy-policy>

13 QUESTIONS OR CONCERNS?

Contact us at:

Novocam Medical Innovations Oy (Ltd)
Pasilanraitio 5B
Helsinki 00240
Finland

support@futudent.com

E-mail Subject: Data Privacy Information and Requests