

This is a translation of the original Privacy Policy in German. In case of any discrepancy between this translation and the original, said original German version shall prevail.

## I. General Provisions

This Privacy Policy shall inform about the type, scope, and purpose of the collection and use of personal data by Viollier AG and the entities belonging to Viollier Group (hereinafter collectively referred to as "**Viollier**" and not deemed to fall under the term "**Third Parties**" under this Privacy Policy) in the context of the business of Viollier and, in particular with respect to the services and offers of Viollier. In addition, the General Terms and Conditions ("**GT&C**") and Electronical Terms of Use ("**e-terms**") of Viollier in their respective current versions shall be applicable.

Viollier complies with the terms of the Federal Act on Data Protection ("**DPA**") and the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

Viollier is certified in accordance with the internationally recognized 'Good Priv@cy®' seal of quality in data protection. This certification is a protected guarantee mark of the Swiss Association for Quality and Management Systems 'SQS' ([www.sqs.ch](http://www.sqs.ch)) and ensures secure handling of personal data as well as the effective fulfilment of the data protection legislation and the contractual requirements, including suitable information security. Every year, an audit, and every three years, a recertification takes place in order to guarantee the standard. Viollier is also certified in accordance with IQNet ([www.iqnet-certification.com](http://www.iqnet-certification.com)), a worldwide certification network and partner of SQS.

All employees who have access to confidential data or information are subject to an obligation of secrecy. They either are subject to professional secrecy due to their professional position (e.g. patient / physician confidentiality in accordance with Art. 321 of the Criminal Code) or must sign a confidentiality agreement regarding data and information. The obligation of secrecy also applies to external employees, engaged third parties and visitors of Viollier. These persons must sign a confidentiality declaration prior to visiting Viollier.

Except for applicant data (cf. Section II. 3. below), any personal data is stored by Viollier in electronic form on its own servers located in Switzerland. A transfer of personal data abroad will occur only to the extent that it is necessary for providing the services and if the data protection standard of the respective country corresponds to the data protection standard of Switzerland. If the data protection provisions are not equivalent, Viollier will obtain the consent from the person(s) concerned.

Every person has the right to be informed, to correct incorrect personal data, to block and to delete personal data, provided, however, that no retention period imposed by law is applicable or the personal data is mandatory for fulfilling a contract.

Viollier disposes of an internal data protection officer (DPO) in accordance with Article 11a(5)(e) DPA, who has been registered with the Federal Data Protection Commissioner (FDPC). The data collections of Viollier are therefore not registered with the FDPC. For questions, changes, revocations, and deletions, please contact the DPO directly:

Viollier AG	<a href="mailto:datschutz@viollier.ch">datschutz@viollier.ch</a>
Data protection officer	T +41 61 486 11 11
Hagmattstrasse 14	F +41 61 482 00 30
4123 Allschwil	

## II. Processing of Personal Data by Viollier in the Context of its Offerings, the Provision of its Services and the Job Application Process.

### 1. Patient data

Patient data is data which is needed by Viollier for providing services in the laboratory medicine area or data of patients, which is being transferred to Viollier by a doctor using the v-box®. Usually, the following patient data is being collected: last name, first name, sex, date of birth, address, language, insurances, addressee of the invoice and identification number of the patient, AHV / UVG number, treating physician, analyses, results, as well as, in case the v-box® is being used, analyses and results which have been generated by point of care diagnostics. The treating physicians, hospitals and clinics ensure that the affected patient is adequately informed and has given his free and express consent to the processing of data by Viollier for providing the requested services or for the transfer of his patient data in case of an intended use of the v-box®.

**Purpose.** Viollier uses the patient data for the processing of the contracts.

**Transfer.** Viollier may pass on patient data within the group if it serves the execution of the services. A transfer of data to third parties is in principle excluded unless the patient has consented, a transfer is required by law or it is required for fulfilling the services or contract. The treating physicians, hospitals and clinics ensure that they obtain the patient's explicit consent to transfer in advance.

**Storage.** If not agreed differently in writing, all results, order forms and investigational materials will be stored for as long as required for providing the services by Viollier, but at least as long as required by law. Subject to the right of the patient to require deletion of his personal data, all results may be stored for as long as medically reasonable in view of any service that may have to be rendered in future. After the patient's death all data can be used to a limited extent for scientific purposes.

### 2. Customer Data

Customer data is data which is required by Viollier for the processing of contracts. Usually, the following data is being collected: archive number, last name, first name, address, telephone number and language. The data may vary depending on the services requested.

**Purpose.** Viollier uses the customer data only for the processing of the contracts. As certain customer data is also patient data, such data will be processed in accordance with the principles for patient data.

**Transfer.** Viollier may pass on customer data within the group if it serves the execution of the services. A transfer of data to third parties is in principle excluded unless the customer has consented, a transfer is required by law or it is required for fulfilling the services or contract.

**Storage.** Customer data is stored for as long as it is required for executing contractual obligations and providing services in the future. If customer data is also patient data, the retention rules for patient data apply.

### 3. Applicant Data

Applicant data is data needed by Viollier for a complete job application and its processing. Usually, the following data is being collected irrespective of whether the application occurs by registering online or by other means: last name, first name, address, language, e-mail address, password, information from the CV and additional documents (e.g. diploma).

**Purpose.** Viollier uses the applicant data for the recruiting process. In principle, applicant data is not used any further. However, Viollier reserves the right to consider also other positions open at that time. Otherwise, the data will not be used for any other purpose.

**Storage.** The application platform is being provided and operated by a third party service provider. The applicant data will be stored on the service provider's own servers which are located in Switzerland. Upon starting a position, applicant data or, if needed, an abstract thereof is filed in the personnel file. If the applicant applied for a specific position or submitted an application spontaneously, but received a negative decision, Viollier reserves the right to assign the application to its applicant pool. The applicant shall receive a notification in any case. If the applicant does not agree or is no longer interested, the applicant may delete his / her own personal data at any time. If the application is assigned to the applicant pool, the data is in principle stored for 12 months and is deleted thereafter. Notification regarding the deletion of data does not occur. Every time the applicant changes the data, the deletion cycle will be interrupted and will start anew. With regard to the use of digital data of applicants by the third party service provider, Viollier refers to the privacy policy of the third party service provider.

**Transfer.** A transfer of applicant data to third parties is in principle not permitted except for storage purposes and if the involvement of external specialists should be required.

#### 4. User Data, Cookies, Google Tools, Links, Social Plugins

User data is data needed by Viollier from users to ensure flawless access and operation of e-offers. Viollier collects data about every access. They vary depending on the service requested. In particular, Viollier collects user data for the onetime registration (for clear identification) for e-services (i.e., usually, last name, first name, address, e-mail address and archive number), or with every access to viollier.ch or an e-service (i.e., usually, the name of the website, file, date, time, transferred data volume, notification of successful request, browser type and version, operating system, referrer URL, IP-address and requesting provider) and with every transfer of data if the v-box® is used. The terms "e-offer" and "e-service(s)" are defined in the e-terms.

**Purpose.** User data is being processed, stored and used to the extent required for the use and operation of the e-offers. When e-offers are being used, the access (date/time) and the related user data are stored in a protocol. Viollier reserves the right to check user data subsequently if an unlawful use is suspected based on tangible indications.

**Transfer.** Viollier may pass on user data within the group if it serves the execution of the services. A transfer of data to third parties is in principle excluded unless the customer has consented, a transfer is required by law or it is required for the performing of the service.

**Storage.** User data, to the extent that it is not customer data, is stored as long as required for executing e-offers, i.e. until a user has expressed his intent to give up using the e-offers. As a matter of principle, Viollier does not store user data of visitors of viollier.ch.

**Cookies.** If the user accesses e-offers, one or more cookies are stored on his computer. A cookie is a text file that is stored on the computer of the user and allows for analyses of the utilization of the website. The information generated by the cookie regarding the utilization of this website (including the IP address) is usually transmitted to a server and stored there.

By means of the cookies, Viollier improves the comfort and quality of the e-offers by storing user settings, for example. Utilizing e-offers is also possible without cookies. In their browser, users can deactivate the storing of cookies, restrict it to certain websites or configure their browser in such a way that the browser notifies them before a cookie is stored. Cookies can be deleted from the hard drive of the computer at any time via the data protection feature of the browser. In this case, the functions and user experience of the e-offers can be limited.

**Embedding of Links and Services of Third Parties.** Within the e-offers, services of third parties are offered, such as videos on YouTube, map data of Google Maps, graphics. This always results in these providers perceiving the IP address of the user. Viollier makes every effort to only use services whose respective providers only use the IP address for delivering contents. Viollier does not assume any responsibility for the collection and handling of personal data by these third parties. Depending on the embedding of third party services, the respective data protection provisions of these third party service providers are applicable.

**Google Analytics.** Viollier utilizes Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses cookies and stores outside the Member States of the EU/EFTA. Google uses this information to analyze the utilization of the website for Viollier and to prepare reports regarding website activities and internet usage. In addition, Google transmits this information, according to its own statements, to third parties, if required by law or if third parties process this data on behalf of Google. The IP address transmitted by the browser within the scope of Google Analytics is not merged with other data by Google. Users can prevent the storing of cookies (cf. above). In addition, the users can prevent the collection of data generated by the cookie and relating to their using the website (incl. IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>

**Social Plugins.** Plug-ins of social networks that are exclusively operated by Facebook (Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA) and Twitter (Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA) can be identified by the respective logo of the respective social network. When calling a website into which one or more of the plug-ins mentioned are integrated, the browser establishes a direct connection with the servers of the social network. The button is transmitted to the browser directly by the social networks and is embedded into the website by the browser. By embedding the buttons, the social networks receive the information that the respective website was visited. If the user is logged into the social network at the time of his visit, the social networks can associate the visit with the account of the user. If the button is clicked, the respective information is transmitted directly to the social network by the browser and stored there. The purpose and scope of the collection of data, the further processing and utilization of the data by social networks as well as the associated rights of the user and the setting options for the protection of the privacy of the user can be taken from the data protection provisions of Facebook and Twitter. The user can prevent the collection of data of the websites visited by social networks by logging out prior to visiting the website.

\*\*\*\*\*