

PRIVACY NOTICE

1 Introduction

The MAK-SYSTEM group (referred to as “MAK-SYSTEM”, “We, “Our” or “Us”) is committed to protecting the privacy and security of Your Personal Data. MAK-SYSTEM is an international group established in a number of jurisdictions around the world through the following affiliated entities:

Location	Entity	Company Address Registration number
UK	MAK-SYSTEM Group Limited UK	1 Bartholomew Lane, London, United Kingdom, EC2N 2AX 12374110
France	MAK-SYSTEM France	229 rue Saint-Honoré F-75001 Paris, B414100453
Spain	Biomed Solutions SL Spain	C/ Monte Esquinza 30 5º - Izquierda (Madrid 28010) Spain, B67186387
Germany	MAK-SYSTEM Deutschland GmbH	Saalgasse 4 D-60311 Frankfurt am Main, HRB37586
North Macedonia	MAK-SYSTEM Software DOOEL Skopje	1 Londonska Street, 1000 Skopje, 6541003
US	MAK-SYSTEM Corp	2720 River Road, Suite 225 Des Plaines Chicago, Il 60018 USA, 2514488
Serbia	MAK-SYSTEM Software DOO Beograd	24 Braća Baruh Street, Belgrade 11000, 20471204

This Privacy Notice applies to You if You are:

- A service user of this website (<https://www.MAK-SYSTEM.com/>);
- A representative of a client, or prospective client, of MAK-SYSTEM;
- An employee, contractor or other associated party contracted by MAK-SYSTEM's clients;
- An employee, contractor or other associated party contracted by MAK-SYSTEM's suppliers; or,
- Any other individual with whom MAK-SYSTEM may conduct commercial operations.

We have developed this Privacy Notice to inform You of the data we collect, what we do with Your information, what we do to keep it secure as well as the rights and choices You have over Your Personal Data. It is important that You read this notice so that You are aware of how and why we are using such information.

We take care to protect the privacy of our service users and the representatives of our clients and suppliers that communicate (online or offline) with us at events, over the phone, and through our websites and social media platforms.

If You are unable to access this Privacy Notice due to a disability or any physical or mental impairment, please contact us and we will arrange to supply You with the information you need in an alternative format that you can access.

MAK-SYSTEM does not sell Personal Data.

2 Definitions

For the purposes of this Privacy Notice:

- **Company** (referred to as either “the Company”, “We”, “Us” or “Our” in this Agreement) refers to MAK-SYSTEM
- **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Country** refers to United Kingdom, where we have our principal seat, unless otherwise stated.
- **Data Controller**, for the purposes of both UK and EU GDPR, refers to the Company as the legal person which alone or jointly with others determines the

purposes and means of the processing of Personal Data. For the purpose of both UK and EU GDPR, the Company is the Data Controller.

- **Data Processor**, for the purposes of both UK and EU GDPR, refers to the Company's Service Providers
- **Data Protection Legislation**, as defined in the **Data Protection** section below.
- **Device** means any device that can access the Service such as a computer, a mobile phone or a digital tablet.
- **Local Legislation**, as defined in the **Local Data Protection Legislation** section below.
- **Personal Data** is any information that relates to an identified or identifiable individual. For the purposes of both UK and EU GDPR, Personal Data means any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the service, to provide the service on behalf of the Company, to perform services related to the service or to assist the Company in analysing how the service is used. For the purpose of both UK and EU GDPR, Service Providers are considered Data Processors.
- **Website** refers to MAK-SYSTEM, accessible from <https://www.MAK-SYSTEM.com/>
- **You** means the individual accessing or using the service, or the Company, or other legal entity on behalf of which such individual is accessing or using the service, as applicable. You can be referred to as the Data Subject or as the User as You are the individual using the service.

3 Data Protection

Throughout this document, we refer to Data Protection Legislation. In the UK, Data Protection Legislation means the Data Protection Act 2018 ('DPA 2018'), United Kingdom General Data Protection Regulation ('UK GDPR'), the Privacy and Electronic Communications (EC Directive) Regulations 2003 ('PECR') and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, it also includes the General Data Protection

Regulation (Regulation (EU) 2016/679) ('EU GDPR'). This includes any replacement legislation coming into effect from time to time.

Depending on your location and the location of the MAK-SYSTEM entity that You have engaged with, additional legislation might also apply. Unless otherwise stated, MAK-SYSTEM will process your Personal Data in accordance with Data Protection Legislation as defined above. For more information on local data protection legislation applicable in the jurisdictions in which we operate, please see the **Local Data Protection Legislation** section below.

MAK-SYSTEM is the Data Controller ('controller') for the Personal Data we process, unless otherwise stated. In certain situations, MAK-SYSTEM may act as the Data Processor where we are processing your information upon the instructions of our clients – in these instances our clients act as the Data Controller.

We are registered with the United Kingdom's Information Commissioner's Office (the ICO) with registration number ZA772734. For more information on regulators which may apply in your jurisdiction, please see the **Local Data Protection Legislation** section below.

We have appointed a Data Protection Officer (DPO) to help us monitor internal compliance, inform and advise on data protection obligations, and act as a point of contact for data subjects and supervisory authorities. For further details on how You can contact our DPO, please see the **Contact Us** section below.

4 The information we collect and when

We will collect the Personal Data outlined below in the course of our communications with You and through the pursuit of MAK-SYSTEM'S commercial interests.

If You are a prospective client, or an employee, contractor or other associated party with MAK-SYSTEM's clients or suppliers, your information may have been previously collected by a third party and shared with MAK-SYSTEM. In such instances, You will have been provided with transparency information from the third party at the point at which MAK-SYSTEM received your information.

We only collect Personal Data that we know we will genuinely use and in accordance with the Data Protection Legislation. The type of Personal Data that we will collect on You, and/or which You voluntarily provide to us on this website or through communication with MAK-SYSTEM, may include some or all of the following:

- **Contact Data:** Such as your name, addresses, telephone numbers or email addresses;
- **Professional Data:** Such as the name of your employer and details regarding your role.
- **Communications Data:** The content of call recordings, emails, messages and other communications You have with with us.
- **Survey Data:** your response to surveys or feedback requests.
- **Online Data:** Such as your IP address, browser information, browsing history, cookies and tracking technologies.

We may, in further dealings with You, extend this Personal Data to include services used, and subscriptions, records of conversations and agreements and transactions, etc (**‘Service Data’**)

You are under no statutory or contractual requirement or obligation to provide us with your Personal Data; however, we may require at least the information above in order for us to deal with You as a prospective client or service user in an efficient and effective manner.

MAK-SYSTEM does not intend to process any Special Category Personal Data or ‘sensitive data’ as a controller – including information regarding ethnicity, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health or sexuality – for the purposes and lawful bases outlined below. However, unsolicited Special Category Personal Data may be received by MAK-SYSTEM in the form of free text comments, emails, support tickets and other such communications. MAK-SYSTEM advises all service users to take care to not provide MAK-SYSTEM with Special Category Personal Data if it is unnecessary to do so. In the event that Special Category Personal Data is received by MAK-SYSTEM and there is no lawful basis to retain that information, it will be securely deleted in line with MAK-SYSTEM’s Retention Schedule.

5 Cookies, Analytics and Tracking Technologies

MAK-SYSTEM uses cookies to distinguish You from other users of our website. This helps to provide You with a good experience when You browse our website and also allows us to improve our site. You can set your cookie preference when You first visit our site via our cookie banner, which also provides You with information on the cookies we use. You can review and change your settings at any time by clicking the cookie icon in the bottom-left corner of our website. Alternatively, You can contact us using the details in our notice and we will action this ourselves.

MAK-SYSTEM uses Google Analytics for tracking and reporting website traffic. This information can be used to gain insight into our website visitors and therefore improve the way our website works. You can find Google's Privacy Policy here:

<https://policies.google.com/privacy?hl=en&gl=uk>.

You can prevent Google Analytics cookies being used by opting out via our cookie banner or via our Cookie Policy. Alternatively, You can opt-out through browser/mobile settings, or use the following browser add-on to opt-out of Google Analytics online: <https://tools.google.com/dlpage/gaoptout>.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

6 How we use your information

We will only use your Personal Data when the law allows us to do so. We will have provided You with our lawful basis for processing your Personal Data at the point the information was initially collected from You (through this notice or an alternative method). We will not store, process or transfer your data unless we have an appropriate lawful reason to do so.

Under Data Protection Legislation, the lawful bases we rely on for processing your information are:

- Your consent. You are able to withdraw your consent at any time. You can do this by contacting our DPO using the contact details provided in the **Contact Us** section below or in some cases through automated channels;
- We have a contractual obligation;
- We have a legal obligation;
- In order to protect the vital interests of You or a third party;
- We have a legitimate interest.

We may use your information for the following purposes:

Processing Activity	Data Types	Lawful Basis
To monitor, provide and maintain our services	Identity, Contact, Professional, Communications, Usage, Service	Legitimate Interest (to provide our services to the organisation to which You work)
To contact You, following your enquiry, reply to any questions, suggestions, issues or complaints, including any Data Subject Requests, You have contacted us about	Identity, Contact, Communications, Professional, Service	Legitimate Interest (to promptly reply to your enquiries)
To negotiate and/or enter into and/or fulfil a contract with You	Identity, Contact, Professional, Service, Communications	Contractual Obligation
To negotiate and/or enter into and/or fulfil a contract with the organisation for which You work.	Identity, Contact, Professional, Service, Communications	Legitimate Interest (to provide our services to the organisation to which You work or engage with your organisation to provide services to us)
To fulfil pre-contractual steps, such as supplier questionnaires, as part of our onboarding process.	Identity, Contact, Communications, Professional	Contractual Obligation or Legitimate Interest (to provide our services to the organisation to which You work or engage with your



Processing Activity	Data Types	Lawful Basis
		organisation to provide services to us)
For statistical analysis and to get feedback from You about our services, websites, and other activities. For example, occasionally we may invite You to review a product or service You've bought or used from us. If we do so, it is possible that we'll use independent research and feedback providers to act on our behalf	Usage, Survey, Identity, Contact	Legitimate Interest (to monitor the quality of, and to help improve, our services)
To power our security measures and services so You can safely access our website and services	All	Legitimate Interest (to ensure that the privacy and security of your data is maintained at all times)
Help us understand more about You as a customer, the products and services You consume, so we can serve You better	Usage, Survey, Communications, Professional, Identity, Service	Legitimate Interest (to monitor the quality of, and to help improve, our services)
Contact You about news and information relating to our services through service messages	Service, Identity, Contact, Communications	Legitimate Interest (to keep You informed of key updates to our services)
To send B2B direct marketing to You about products and services from us where You are classified as a corporate subscriber	Identity, Contact, Communications	Legitimate Interest (to send You content that we will believe will be of interest to You/the organisation to which You work)
To send B2B direct marketing to You about products and services from us where You are a sole trader, partnership or otherwise classified as an individual subscriber	Identity, Contact, Communications	Consent
To generate marketing/analytics from our website using cookies.	Cookies	Consent
Retain accounting information for statutory accountancy retention periods	Service, Identity, Professional, Contact	Legal Obligation



Processing Activity	Data Types	Lawful Basis
To respond to and defend against legal claims	All	Legal Obligation
To share your data with healthcare professionals if You are taken ill or involved in an accident while visiting our office or sites, and are unable to provide your consent.	Identity	Vital Interest

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your Personal Data for an unrelated purpose, we will notify You and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7 Who we might share your information with

We may share your Personal Data with other organisations in the following circumstances:

- From time to time, we may need to share your Personal Data with other MAK-SYSTEM entities or affiliates within the MAK-SYSTEM group (see Introduction section above for more information) for operational purposes;
- If the law or a public authority says we must share the Personal Data;
- If we need to share Personal Data in order to establish, exercise or defend our legal rights – this includes providing Personal Data to others for the purposes of detecting and preventing fraud or other unlawful activities as well reducing credit risk; or
- From time to time, employ the services of other parties for dealing with certain processes necessary for the operation of our services.

We use Service Providers, or Data Processors (trusted third parties) to help us deliver efficient and quality services. Examples of these third parties include, but are not limited to:

- Our customer relationship management (CRM) platform;
- Our finance and accountancy platforms and support functions;
- Our document/project management platforms; and,
- Our communication platforms.

We have Data Processor Agreements in place with our Data Processors. This means that they cannot do anything with your Personal Data unless we have instructed them to do it. They will not share your Personal Data with any organisation apart from us or further sub-processors who must comply with terms no less stringent than those outlined in our own Data Processor Agreement. They will hold your Personal Data securely and retain it for the period we instruct.

8 How long we keep your information for

We retain a record of your Personal Data in order to provide You with a high-quality and consistent service. We will always retain your Personal Data in accordance with the Data Protection Legislation and never retain your information for longer than is necessary. MAK-SYSTEM follows a Retention Schedule which outlines how long MAK-SYSTEM will retain your Personal Data. MAK-SYSTEM considers the retention period to begin from the point at which MAK-SYSTEM last contacted You or otherwise reviewed your record to determine whether it was still active.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means.

In some circumstances, we may anonymise your personal information (so that it can no longer be associated with You).

The table below is provided as guidance only as to how long we may process your data for certain purposes before it is securely deleted in accordance with our internal



policies and procedures. Please note the actual retention period may vary depending on the exact nature of our processing or your jurisdiction. For more information You can contact us via the details in this notice.

Purpose	Retention Period
Processing data in relation to You as a service user of this website	1 year
Processing data in relation to You as a representative of a client, or prospective client, of MAK-SYSTEM	6 years from last contact/termination of relationship
Processing data in relation to You as an employee, contractor or other associated party contracted by MAK-SYSTEM’s clients	6 years from last contact/termination of relationship
Processing data in relation to You as an employee, contractor or other associated party contracted by MAK-SYSTEM’s suppliers	6 years from last contact/termination of relationship
Processing data in relation to You as any other individual with whom MAK-SYSTEM may conduct commercial operations	6 years from last contact/termination of relationship

9 How we keep You updated on our products and services

As a business contact, we will send You relevant news about our services in a number of ways including by email, but only if we have a legitimate interest to do so. Where we do not have a legitimate interest we will not send You marketing communications unless we have asked for your consent.

We make every effort to ensure that we only send such communications to those acting in a business capacity and do not send such materials to consumers via personal email addresses if it is clear they are not acting in such a capacity or have not otherwise provided their consent.

All email communications will have an option to unsubscribe and so if You wish to amend your marketing preferences, You can do so by following the link in the email and updating your preferences. Alternatively, You can contact our DPO using the contact details provided in the **Contact Us** section below.

10 Giving Your reviews and sharing Your thoughts

When using our services, You may be able to share information through social networks like Facebook and Twitter. For example, when You ‘like’, ‘share’ or review our services. When doing this, your Personal Data may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so You are comfortable with how your information is used and shared on them.

Our website may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party’s site. We strongly advise You to review the Privacy Notice of every site You visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

11 Your rights over your information

Your data protection rights are highlighted here. In case You wish to exercise any of the rights described hereunder, You may contact us by contacting the DPO using the contact details provided in the Contact Us section below.

11.1.1 Right to be informed about our collection and use of Personal Data

You have the right to be informed about the collection and use of your Personal Data. We ensure we do this with our internal data protection policies and through our external website Privacy Notice (<https://www.MAK-SYSTEM.com/privacy-policy/>). These are regularly reviewed and updated to ensure these are accurate and reflect our data processing activities.

11.1.2 Right to access your Personal Data

You have the right to access the Personal Data that we hold about You in many circumstances, by making a request. This is sometimes termed a ‘Subject

Access Request'. If we agree that we are obliged to provide Personal Data to You (or someone else on your behalf), we will provide it to You or them free of charge and aim to do so within 1 month from when your identity has been confirmed.

Before we can process your Subject Access Request, we may need to ask You for proof of identity and sufficient information about your interactions with us so that we can locate your Personal Data.

11.1.3 Right to correction of your Personal Data

If any of the Personal Data we hold about You is inaccurate, incomplete or out of date, You may ask us to correct it.

11.1.4 Right to restrict processing

You have the right to ask us to restrict the processing of your Personal Data. For example, this may be because You have issues with the accuracy of the data we hold or the way we have processed your data. The right is not absolute and only applies in certain circumstances.

11.1.5 Right to erasure

You have the right to have Personal Data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

11.1.6 Right to portability

The right to portability gives You the right to receive Personal Data You have provided to a controller in a structured, commonly used and machine readable format. It also gives them You the right to request that a controller transmits this data directly to another controller.

11.1.7 Right to object

You have the right to object to our processing of some or all of the Personal Data that we hold about You. This is an absolute right when we use your data for direct marketing, but may not apply in other circumstances where we have a compelling reason to do so, e.g., a legal obligation.

11.1.8 Rights related to automated decision making

Automated decision-making takes place when an electronic system uses Personal Data to make a decision without human intervention.

At present, MAK-SYSTEM does not intend to make any automated decisions when processing your Personal Data.

You will not be subject to decisions that will have a significant impact on You based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified You.

11.1.9 For more information about your privacy rights

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <https://ico.org.uk/for-the-public>.

You can make a complaint to the ICO or another relevant supervisory authority (those operating in MAK-SYSTEM jurisdictions are identified in the **Local Data Protection Legislation** section below) at any time about the way we use your information. However, we hope that You would consider raising any issue or complaint You have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems You may have.

Californian residents also have the right to non-discrimination, which means You will not receive any discriminatory treatment when You exercise one of your privacy rights. Whilst only a codified right in California, we apply this to all data subjects.

12 What about Personal Data Security?

Data security is of great importance to MAK-SYSTEM. We have put in place appropriate technical and organisational measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We take security measures to protect your information including:

- Limiting access to our buildings and resources to only those that we have determined are entitled to be there (by use of passes, key card access and other related technologies);
- Binding our employees, contractors and other representatives to a contractual duty of confidentiality;
- Managing a data security breach reporting and notification system which allows us to monitor and communicate information on data breaches with You or with the applicable regulator when required to do so by law;

- Implementing access controls to our information technology; and,
- We use appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, websites, mobile apps and offices.

13 International Transfers

Your Personal Data is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to Devices located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. Where this occurs, MAK-SYSTEM will ensure that:

- the security and confidentiality of your Personal Data is secure at all times;
- any Data Controller receiving your Personal Data has entered into an agreement with MAK-SYSTEM which contains standard data protection clauses as required by UK and/or EU GDPR or there is an alternative appropriate safeguard in place governing the transfer; and,
- any Data Processor receiving your Personal Data has entered into an agreement with MAK-SYSTEM which contains the required Data Processor clauses as well as standard data protection clauses as required by UK and/or EU GDPR or there is an alternative appropriate safeguard in place governing the transfer.

Where You are based in the UK or EU and we were required to transfer your Personal Data out of the UK or EU to countries not deemed by the ICO or European Commission (as relevant) to provide an adequate level of Personal Data protection, the transfer will be based on safeguards that allow us to conduct the transfer in accordance with the Data Protection Legislation, such as the specific contracts containing standard data protection clauses approved by the ICO or European Commission (as relevant) providing adequate protection of Personal Data.

14 Local Data Protection Legislation

Unless otherwise stated, Data Protection Legislation as defined in section 3 applies to the processing of your Personal Data. As an entity operating across multiple jurisdictions, additional legislation might also apply to our processing. The following table can be used as a guide to identify the legislation that may apply; however, it should not be treated as an exhaustive list of all legislation that may apply in your jurisdiction.

Location	Data Protection Legislation	Supervisory Authority
<u>UK</u>	Data Protection Act 2018 ('DPA 2018') United Kingdom General Data Protection Regulation ('UK GDPR') Privacy and Electronic Communications (EC Directive) Regulations 2003 ('PECR')	https://ico.org.uk/global/contact-us/
<u>EU</u>	General Data Protection Regulation (Regulation (EU) 2016/679) ('EU GDPR')	
<u>Germany</u>	German Federal Data Protection Act (Bundesdatenschutzgesetz – 'BDSG')	https://www.datenschutzkonferenz-online.de/datenschutzaufsichtsbehoerden.html
<u>France</u>	Act n°78-17 of 6 January 1978 on Data Processing, Data Files and Individual Liberties	https://www.cnil.fr/
<u>Spain</u>	Organic Law 3/2018, of 5 December 2018, on the Protection of Personal Data and Guarantee of Digital Rights ('LOPDGDD') Act of 30 July 2018 on the Protection of Natural Persons	https://www.aepd.es/es



Location	Data Protection Legislation	Supervisory Authority
	with Regard to the Processing of Personal Data	
<u>US</u>	<ul style="list-style-type: none"> - California: California Consumer Privacy Act of 2018 (CCPA); California Privacy Rights Act of 2020 (CPRA) - Virginia: Consumer Data Protection Act (CDPA) - Colorado: Colorado Privacy Act (CPA) - Connecticut: Connecticut Act Concerning Personal Data Privacy and Online Monitoring (CTDPA) - Utah: Consumer Privacy Act (UCPA) - Texas: Texas Data Privacy and Security Act (TDPSA) - Florida: Florida Digital Bill of Rights (FDBR) - Oregon: Oregon Consumer Privacy Act (OCPA) - Montana: Consumer Data Privacy Act (MCDPA) <p>(note: only comprehensive legislation effective by the end of 2024 is included)</p>	See legislation.
<u>Serbia</u>	Law on Protection of Personal Data (Official Gazette of the Republic of Serbia, No. 87/2018)	https://www.poverenik.rs/sr/
<u>North Macedonia</u>	Law on Personal Data Protection (Official Gazette of the Republic of North Macedonia, no. 42/20)	https://www.dzlp.mk/

15 Contact Us

If You would like to exercise one of your rights as set out above, or You have a question or a complaint about this Privacy Notice, the way your Personal Data is processed, please contact our DPO by one of the following means:



MAK-SYSTEM
enabling individuals to save lives

By email: privacy@MAK-SYSTEM.net

By post: **FAO Data Protection Officer**, 1 Bartholomew Lane, London, United Kingdom, EC2N 2AX, 12374110

16 Changes to Our Privacy Notice

Thank You for taking the time to read our Privacy Notice.

We may change this Privacy Notice from time to time (for example, if the law changes). We recommend that You check this Privacy Notice regularly to keep up to date.

This Notice was last updated November 2024.