

Data privacy policy

Version 1.3

1. Introduction

1.1 General information

The following policy describes the ways in which Ziemer Ophthalmic Systems Ltd, collects, holds and uses information about individual persons, namely current customers, healthcare professionals and potential clients interested in our products and services.

The term "personal data" as used in this Data Privacy Policy means any information relating to an identified or identifiable natural person ('data subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Generally, we will only process personal data as described in this Data Privacy Policy. Nevertheless, we reserve the right, to conduct additional processing to the extent permitted or required by law, or in support of any legal or criminal investigation. Identification of personal data can under certain circumstances also occur when access to our surgical or diagnostic devices is required (i.e. immediate repair process). Under no circumstances this data will be made available to third parties or processed internally.

Ziemer Ophthalmic Systems does neither sell, trade or hand over personal data to third parties.

Ziemer Ophthalmic Systems may periodically change, modify, remove or add or otherwise update this Data Privacy Policy at its discretion without prior notification. However, we will always handle personal information in accordance with the Data Privacy Policy that was in effect at the time of collection. Further information about our Data Privacy Policy or specifically gathered information is available upon request at our designed data protection officer (e-mail: dataprotection@ziemergroup.com); postal address: Ziemer Ophthalmic Systems AG, Data protection, Allmendstrasse 11, CH-2562 Port. Suitable activities are enforced to protect personal data throughout the company and its affiliates or product distribution partners globally.

We will post changes to our Data Privacy Policy on our websites so that visitors are fully informed concerning the types of information gathered and used and under what circumstances this data may be disclosed. Our Data Privacy Policy is located on our homepage and is also available upon request.

1.2 Right of access, correction and objection

Whenever we process personal data, we take reasonable steps to ensure that personal data is kept accurate and up-to date for the purposes for which it was collected. We will provide individuals the ability to obtain the content, to correct and to object to the processing of its personal data if such processing is not reasonably required for a legitimate business purpose or in order to be in compliance with law.

In the case of electronic direct marketing, we will provide a method to opt out of receiving further marketing materials.

The data subject can obtain at any time confirmation as to whether or not personal data concerning him or her is being processed and about the content within the legal framework and information will be provided within four weeks.

Any information about individual personal data can be obtained at our data protection officer, which can be contacted either at dataprotection@ziemergroup.com or via the postal address: Ziemer Ophthalmic

Systems AG, data protection, Allmendstrasse 11, 2562 Port. Requests to delete personal data will be subject to any applicable legal and ethical reporting or document filing or retention obligations.

1.3 Security and confidentiality

In the course of handling personal data, we take the required organizational and technical measures reasonably designed to protect that information from loss, misuse, unauthorized access, disclosure, alteration or destruction.

2. Use of websites

2.1 General terms

Most of our website services do not require any form of registration, allowing visits of the site without telling us personal information. However, some services (i.e. Ziemer's e-learning center, Z-LASIK and Z-Cataract download area) may require providing us with personal data. In these situations, if it is chosen to withhold any personal data requested by us, it may not be possible to gain access to certain parts of the site and for us to respond to questions.

2.2 Non-disclosure of personal data

Ziemer Ophthalmic Systems will not sell, share, or otherwise distribute personal data to third parties except as provided in this Data Privacy Policy. We may disclose personal data to other Ziemer Ophthalmic Systems AG affiliates worldwide that agree to treat it in accordance with this Data Privacy Policy and upon approval of the individual (see chapter 3). Personal data may also be transferred to third parties who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed, such as services delivery, evaluating the usefulness of this website, marketing, data management or technical support. These third parties have contracted with us to only use personal data for the agreed upon purpose, and not to sell your personal information to third parties, and not to disclose it to third parties except as may be required by law, as permitted by us or as stated in this Data Privacy Policy.

Personal Data collected may also be transferred to a third party in the event that the business of this site or a part of it and the customer data connected with it is sold, assigned or transferred, in which case we would require the buyer, assignee or transferee to treat personal data in accordance with this Data Privacy Policy.

2.3 Personal information / Health care content

Ziemer Ophthalmic Systems does not provide medical consultation and will therefore not address any related questions.

We will not knowingly collect, use or disclose Personal Data from a minor under the age of 18 without obtaining prior consent from a person with parental responsibility.

2.4 Cookies and internet tags

We may collect and process information about visits to our websites, such as the pages visited prior to ours and searches performed to find our site. Such information is used by us to help improve the contents of the site and to compile aggregate statistics about individuals using our site for internal, market research purposes. In doing this, we may install "cookies" that collect the domain name of the user, the internet service provider, the operating system, and the date and time of access. A "cookie" is a small piece of information which is sent to the user's browser and stored on the computer's hard drive. Cookies do not damage the computer. Usually, browsers provide a notification when a "cookie" is received and this will enable the user to decide it shall be accepted or not.

Occasionally, we may use internet tags (also known as action tags, single-pixel GIFs, clear GIFs, invisible GIFs and 1-by-1 GIFs) and cookies at this site and may deploy these tags/cookies through a third-party advertising partner or a web analytical service partner which may be located and store the respective information (including the user's IP-address) in a foreign country. These tags/cookies are

placed on both online advertisements that bring users to our sites and on different pages of our sites. We use this technology to measure the visitors' responses to our sites and the effectiveness of our advertising campaigns (including how many times a page is opened and which information is consulted) as well as to evaluate the use of one of our websites.

The third-party partner or the web analytical service partner may be able to collect data about visitors to our and other sites because of these internet tags/cookies, may compose reports regarding the website's activity for us and may provide further services which are related to the use of the website and the internet. They may provide such information to other parties if there is a legal requirement that they do so, or if they hire the other parties to process information on their behalf.

2.5 Google Analytics

We use Google Analytics to rationalize our portfolio of websites by

- a) optimizing traffic to and between our websites, and
- b) integrating and optimizing web pages where appropriate

Google Analytics is a service offered by Google Inc. It generates detailed statistics about a website's traffic and traffic sources and measures conversions and sales. Google Analytics uses "cookies" stored on the user's computer to help analyze how users use our websites. On behalf of us, Google will use the information generated by the cookies for the purpose of evaluating the use of our website, compiling reports on website activity providing us with these reports for analytical purposes.

Google may transfer this information to third parties in case of a statutory obligation or if a third party processes data on behalf of Google. Under no circumstances, Google will combine or associate the IP address of our website visitor with other data stored at Google.

The installation may be prevented or stopped by browser settings. In such case some of our website may not fully provide its functionality. By using our website the user consents to the processing of any personal data Google will collect on the way and for the purpose as described above.

2.6 Links

This Data Privacy Policy applies only to official Ziemer websites and not to websites owned by third parties. We may provide links to other websites which we believe may be of interest to our visitors. We aim to ensure that such websites are of the highest standard. However, due to the nature of the internet, we cannot guarantee the privacy standards of websites to which we link or be responsible for the contents of sites other ours and this Data Privacy Policy is not intended to be applicable to any linked, non-Ziemer site.

3. Exhibitions and Events

Ziemer Ophthalmic Systems will work closely with congress organization to protect personal data according to the congress guidelines.

Personal data captured during exhibitions and events (such as wet lab participation, product demonstrations, symposia visits and requests for further documentation) will be stored in our mailing systems for the purpose of keeping the individual updated with latest information about our products. Our staff on site will point out to that fact during the personal interaction and ask for consent to forward the questions to our local distribution partner. When forwarding mailings the recipient will be able to opt out any time.

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