

## Information on the Use of Personal Data

### Preamble

SMT is a global company specializing in medical and cardiology products, dedicated to making advanced medical technologies accessible to people worldwide. This data privacy policy describes how SMT Germany GmbH uses the personal data of its customers, business partners, and suppliers.

We may need to amend or update this privacy policy. For any changes or updates, please refer to our website: [www.smtpl.com](http://www.smtpl.com).

This privacy policy is drafted in accordance with the Federal Data Protection Act (BDSG) and the EU General Data Protection Regulation (GDPR), effective from May 25, 2018, as well as other applicable data protection regulations. The applicable legal provisions in their current version apply to this statement.

This statement concerns the collection, processing, and use of personal data under the BDSG and GDPR. Personal data refers to specific information about the personal or factual circumstances of an identified or identifiable natural person.

### 1. Responsibility for Data Processing

The responsible party as per GDPR is:

#### **SMT Deutschland GmbH**

Elsa-Brandström-Strasse 3  
35510 Butzbach, Germany

For questions regarding the data processing described below or data protection, please contact:

#### **Stefanie Schmidt-Tettenborn**

Phone: +49-641-9756518  
Email: [dpc@smtpl.com](mailto:dpc@smtpl.com)

### 2. What Data We Process and for What Purpose

We process the data provided by you in connection with your contract with SMT Germany GmbH, for instance, to handle warranty cases or complaints. This may also involve sharing contract-related data with external tax advisors for consulting and auditing purposes.

We process your personal data to the extent necessary for the following purposes:

- We maintain ongoing contact with our customers to take orders, deliver products as requested, and sometimes verify sufficient inventory levels.
- We use the personal data of potential customers to establish customer relationships upon request. We may collect contact information from potential customers or medical professionals if they express interest in purchasing our products.
- We communicate with our distribution partners to fulfill agreements, accepting orders and delivering products.
- We may receive personal data from you through offers (RFPs) from potential suppliers. We use this information to evaluate the capabilities and expertise of our suppliers for specific services.
- We maintain communication with our suppliers to fulfill supplier agreements for the procurement of products and services.

For these purposes, we may collect the following data:

- Name
- Contact information (email address, contact number)
- Designation
- Company name

We may use your name and address for customer retention marketing efforts. Your data will not be shared with third parties for advertising purposes. Your phone number and email address will only be used for advertising if you have separately consented. Without further consent, we will no longer use your name and address for advertising after two years unless you have expressed an interest in continuing the customer relationship.

### **3. Legal Basis for Data Processing**

The primary legal basis for processing your data is the GDPR. Under Article 6(1)(b) GDPR, data processing is permitted when necessary to establish or terminate a business relationship.

Additionally, data may be processed based on consent (Article 6(1)(a) GDPR). Processing can also be based on a balance of interests under Article 6(1)(f) GDPR, with the interests related to each processing disclosed separately.

### **4. Duration of Data Storage**

We will retain your personal data for an appropriate duration to fulfill the purposes for which it was collected unless the law permits or requires longer retention. We store your data in compliance with applicable laws and regulations.

### **5. Recipients of Personal Data**

We commit to maintaining the confidentiality of your information and adhering to all legal provisions regarding the sharing and disclosure of personal data. We may disclose information to the following recipients when legally permitted:

- Federal and state ministries and other legal or public institutions, such as the Federal Ministry of Finance.
- Authorities for the prevention and detection of crime.
- Service providers: We use external providers to support or carry out certain financial and IT operations. We only share information if the third party has a legitimate business reason to receive it to perform a service for us. Third parties are required to ensure an adequate level of protection.
- Our professional advisors, such as auditors, accountants, and lawyers.

### **6. Location of Data Processing**

Personal data is always processed on specialized IT systems in our premises.

### **7. International Data Transfer**

Only when necessary, we store some of your personal data on our company data server located in India, managed by our parent company, Sahajanand Medical Technologies Ltd, India. We take appropriate measures to protect your personal data and ensure that your GDPR rights are upheld even if your personal data is transferred abroad.

## **8. Protecting Your Personal Data**

We implement appropriate technical and organizational measures to ensure the confidentiality and integrity of your personal data, protecting it against accidental or unlawful destruction, accidental loss, unauthorized alteration, disclosure or access, misuse, and any other unlawful form of processing. Our security practices comply with data protection laws and internal company policies.

We also train our employees on our privacy policies and procedures and allow access to personal data only to authorized employees on a need-to-know basis to perform their duties.

## **9. Data Protection Rights**

You have the right to obtain information about your personal data (Article 15 GDPR). You may also request the correction of inaccurate data (Article 16 GDPR). Additionally, under certain conditions, you have the right to delete data (Article 17 GDPR), restrict data processing (Article 18 GDPR), and request data portability (Article 20 GDPR). You have the right to revoke your consent for future processing (Article 7(3) GDPR). You also have the right to object in cases where processing is based on legitimate interest (Article 21 GDPR).

You have the right to file a complaint with the responsible data protection supervisory authority if you believe that the processing of your personal data is unlawful (Article 77(1) GDPR).

The contact details of our supervisory authority are:

### **Hessian Commissioner for Data Protection and Freedom of Information**

Prof. Dr. Alexander Roßnagel

Gustav-Stresemann-Ring 1

65189 Wiesbaden, Germany

Email: [poststelle@datenschutz.hessen.de](mailto:poststelle@datenschutz.hessen.de)

Phone: +49 611 1408 - 0

Fax: +49 611 1408 - 900

## **10. Automated Decision-Making**

Automated decision-making, including profiling, as per Article 22(1) and (4) GDPR, does not occur.