

PRIVACY NOTICE

For Business Partners, Suppliers, Vendors & External Consultants

Vitrolife Group

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Quick Summary — What You Need to Know

This notice explains how Vitrolife Group handles your personal data when you interact with us as a business partner, supplier, vendor or external consultant. Here are the key points:

- **Who collects your data:** The Vitrolife Group affiliate you work with.
- **What data:** Mainly your business contact details, company role and information needed to manage our working relationship.
- **Why:** To manage contracts, communicate with you, comply with legal obligations, and ensure supply chain security.
- **How long:** Generally for the length of our relationship and thereafter for the period required by applicable laws and for legal compliance purposes.
- **Your rights:** You can access, correct, delete or object to use of your data — details in Section 7.
- **Contact:** dataprotection@vitrolife.com

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1. Purpose of This Notice

Vitrolife AB and its affiliates ("Vitrolife Group", "we", "us" or "our") care about your privacy. We are a multinational life science company with a global presence, and we are committed to protecting the personal data of all individuals we work with — including our business partners, customers, prospects, suppliers, vendors, distributors and external consultants.

This privacy notice applies specifically to **individuals acting in a business capacity** on behalf of companies that have or may have a business relationship with Vitrolife Group. This includes:

- Representatives of current or prospective customers
- Suppliers and sub-suppliers of goods or services
- Distributors and resellers
- Vendors providing professional or technical services
- External consultants and independent contractors
- Representatives of business partners and alliance partners
- Visitors to our websites acting in a professional capacity

Important: We only process personal data about you in your **business role**. We do not seek to process personal data about you in your capacity as a private individual or consumer. Please do not provide us with personal data of a private nature unless we explicitly request (such as dietary information during our events). Should we receive such data, we will inform you and erase it promptly.

This notice explains what personal data we collect, why we collect it, how long we keep it, who we share it with, and what rights you have. We have designed it to be as clear and plain-language as possible.

2. Who Is Responsible for Your Personal Data?

The Vitrolife Group company that you interact with is the **data controller** responsible for your personal data. Depending on your relationship with us, the relevant controller is the Vitrolife Group affiliate you work with directly.

For the avoidance of doubt:

- **Website visitors (Vitrolife/Vitrolife Group domains):** Vitrolife Sweden AB
- **Website visitors (Igenomix domains):** Igenomix S.L.U.
- **Suppliers and vendors:** The Vitrolife Group entity that entered or is entering into a supply or service agreement with your company

A full list of Vitrolife Group affiliates and their contact details is available at: [Contact us | Vitrolife Group](#)

Throughout this notice, we use "Affiliate", "we", "us" or "our" to refer to the relevant Vitrolife Group company acting as controller.

If you have any questions about how we handle your data, or wish to exercise any of your privacy rights, please contact our **Data Protection Officer (DPO)**:

Email: dataprotection@vitrolife.com

3. What Personal Data Do We Collect?

We collect your personal data from several sources:

- **Directly from you:** When you fill in a form on our website, sign or negotiate a contract, hand over a business card, attend one of our events, or contact us directly.
- **From your employer:** When your employer provides us with your details as their representative for the purposes of a business relationship.
- **From publicly available sources:** Such as your company's website, LinkedIn, or professional directories, where you have chosen to make your information publicly accessible.
- **Automatically:** When you visit our websites or interact with our emails (see Section 4.6 for details).

Categories of personal data we may process:

- **Identity & contact details:** Full name, job title, company name, business email address, work phone number, business address, country where you work.

- **Account credentials:** Username and password if you create a portal or webshop account.
- **Financial & procurement data:** Bank account details, payment information, VAT/tax registration numbers, procurement categories — for suppliers and vendors.
- **Due diligence data:** Information processed as part of supplier onboarding, compliance screening (sanctions, anti-bribery), and trade compliance checks.
- **Contractual information:** Details contained in or related to contracts, purchase orders, and agreements between our companies.
- **Event data:** Registration details, dietary preferences (if applicable), travel information for events you attend.
- **Preferences and interactions:** Your preferences about our products/services and events, your enquiries and feedback.
- **Website behaviour & technical data:** IP address, browser type, pages visited, and cookie data (see Section 4.6).
- **Email engagement data:** Information about how you interact with emails we send, including open times, approximate location (region or city), device type, and links clicked — collected via tracking pixels and encoded URL strings (see Section 4.6).

Sensitive personal data: We do not seek to collect sensitive personal data (e.g., health data, religious beliefs). The only exception is if you attend a physical event and voluntarily share dietary preferences, which we treat with appropriate care. We will only process sensitive data where legally required, with your explicit consent, or where you have clearly made it public.

4. Why Do We Process Your Data? (Purposes & Legal Bases)

The table below describes each processing activity, the legal basis we rely on, the data involved, and how long we keep it.

4.1 Customer & Prospect Management

To interact with you as a representative of a prospect (potential customer)

Data controller	The Affiliate you are in contact with
Purpose	To contact and communicate with you on behalf of a company we consider a potential customer for our products and services.
Legal basis	Your consent, or — where consent has not been collected (e.g. when we found your details through professional sources online) — our legitimate interest to contact you in your professional capacity as a representative of a company likely to benefit from our products or services.
Data categories	Name, business contact details, company name, job title
Retention	Up to 2 years from when we collected your data, unless you consent to longer contact or we have a legal obligation to retain.
Recipients	Other Vitrolife Group affiliates (where necessary); data processors used to fulfil the purpose.

To interact with you as a representative of an existing customer

Data controller	The Affiliate you are in contact with
Purpose	To manage our commercial relationship, handle orders, administer contracts, issue invoices, manage complaints and any disputes.
Legal basis	Legitimate interest (to manage the customer relationship); performance of a contract; legal obligation (e.g. accounting, traceability, medical device regulations).
Data categories	Name, business contact details, company name, job title, order history, information relevant to complaints or disputes.
Retention	For the duration of the customer relationship plus up to 10 years for accounting and legal compliance (varies by jurisdiction). Dispute-related data retained until applicable limitation periods expire.

Recipients	Other Vitrolife Group affiliates (where necessary); data processors; professional advisors; legal authorities where required.
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Webshop account (vitrolife.com)

Data controller	Vitrolife Sweden AB
Purpose	To create and manage your webshop account upon request, verify eligibility, and facilitate ordering.
Legal basis	Legitimate interest to administer your account and ensure only authorised representatives can access the webshop.
Data categories	Name, company name, country, email address, password (encrypted), order history.
Retention	Account deleted after 2 years of inactivity, or earlier if you request deletion or we are notified you are no longer a representative of the customer.
Recipients	Other Vitrolife Group affiliates (where necessary); data processors.

4.2 Supplier, Vendor & External Consultant Management

This section applies to representatives of companies that **supply goods or services to Vitrolife Group**, including vendors, sub-contractors, distributors supplying to us, and external consultants.

Supplier/vendor onboarding and due diligence

Data controller	The Vitrolife Group affiliate entering into the supply relationship
Purpose	To onboard you as a supplier or vendor, conduct required compliance checks (including sanctions screening, anti-bribery/corruption checks, trade compliance verification), and assess suitability.
Legal basis	Legal obligation (compliance with sanctions, export control, anti-bribery laws); legitimate interest in ensuring the integrity of our supply chain.
Data categories	Name, business contact details, job title, company name; information gathered during compliance screening.
Retention	For the duration of the supply relationship plus up to 10 years for compliance and audit purposes (varies by jurisdiction and applicable law).
Recipients	Trade compliance services; legal and professional advisors; regulatory authorities where required; other Vitrolife Group affiliates.

Contract management and administration

Data controller	The Vitrolife Group affiliate that entered into the contract
Purpose	To negotiate, execute, administer and manage supply contracts, purchase orders, service agreements, and consultancy agreements. To process invoices and payments. To handle any disputes or claims.
Legal basis	Performance of a contract; legitimate interest; legal obligation (accounting, bookkeeping, traceability requirements).

Data categories	Name, business contact details, job title, company name, bank/payment details (for payment processing), contractual correspondence, invoices.
Retention	For the duration of the contractual relationship plus up to 10 years for accounting and legal compliance purposes. Dispute data retained until limitation periods expire.
Recipients	Other Vitrolife Group affiliates; data processors; payment service providers; accounting and legal advisors; regulatory authorities where required.

Performance management and auditing

Data controller	The relevant Vitrolife Group affiliate
Purpose	To evaluate supplier/vendor performance, conduct audits, manage quality assurance, and ensure compliance with Vitrolife Group's supplier standards and applicable regulations.
Legal basis	Legitimate interest in maintaining supply chain quality and compliance; legal obligation (medical device regulatory requirements).
Data categories	Name, business contact details, job title; performance data; audit records and findings.
Retention	For the duration of the relationship plus up to 10 years for audit and regulatory purposes.
Recipients	Auditing bodies; regulatory authorities; other Vitrolife Group affiliates.

4.3 Marketing Communications

Commercial communications to former and existing customers

Data controller	Vitrolife Sweden AB (global sales and marketing)
Purpose	To send you relevant news, product updates, market studies, event invitations and other commercial communications.
Legal basis	Legitimate interest to communicate with representatives of existing and former customers about our products and services. Where required by local law (e.g. for certain email marketing), we rely on your consent.
Data categories	Name, business contact details, company name, engagement data (email interaction data).
Retention	For the duration of the customer relationship plus 2 years, unless you unsubscribe or we have a legal obligation to retain. We stop marketing communications immediately upon change of preferences.
Recipients	Other Vitrolife Group affiliates; marketing platform providers (data processors); LinkedIn (for matched audience advertising — see 4.3.3).

Marketing to prospects who have expressed interest

Data controller	Vitrolife Sweden AB (global sales and marketing)
Purpose	To send personalised information, marketing materials, event invitations and product/service evaluations to you because you or your organisation have expressed interest in our offerings.
Legal basis	Your consent, or our legitimate interest to keep you informed about relevant products and services where you have clearly shown professional interest.
Data categories	Name, business contact details, company name, engagement data.
Retention	Up to 2 years from your last interaction with us. We delete data sooner if you change your preferences.
Recipients	Other Vitrolife Group affiliates; marketing platform providers.

Profiling for marketing relevance

Data controller	Vitrolife Sweden AB (global sales and marketing)
Purpose	To assign you a professional persona type based on content you have viewed or interests you have expressed, in order to make our marketing more relevant to you.
Legal basis	Your consent.
Data categories	Name, business contact details, website behaviour, engagement data.
Retention	Up to 2 years from your last interaction. Deleted immediately upon withdrawal of consent.
Recipients	Other Vitrolife Group affiliates; marketing platform providers.

Your right to object: You have the right to object at any time to use of your data for direct marketing, including profiling. To unsubscribe/change your preferences, click the "change your preferences" link in any of our emails, or contact us at dataprotection@vitrolife.com.

Marketing and targeted advertising (third-party platforms)

Data controller	Vitrolife Sweden AB
Purpose	To display targeted advertisements or content to you on third-party platforms such as LinkedIn, using your professional contact details to create "matched audiences".
Legal basis	Legitimate interest in promoting our products to current and prospective business customers. We have conducted a balancing test to ensure this does not override your rights.
Data categories	Hashed or pseudonymised email address; professional identifiers shared with the advertising platform.
Retention	Until you object or withdraw consent. We remove your data from advertising audiences promptly upon request.

Recipients	Advertising platforms (e.g. LinkedIn) acting as independent controllers or joint controllers under their own privacy terms.
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4.4 Events (Webinars, Workshops & E-Learning)

Webinars and virtual events

Data controller	The Affiliate sponsoring the event
Purpose	To register your attendance, deliver the event, record participation, obtain feedback, and share follow-up materials (e.g. slide decks, recordings).
Legal basis	Legitimate interest (provision of the event, regulatory compliance, service improvement).
Data categories	Name, company name, email address, phone number, questions or comments submitted during the event, engagement data.
Retention	Up to 2 years from your last event attendance.
Recipients	Other Vitrolife Group affiliates; event platform providers; third-party webinar tools.

Workshops and physical events

Data controller	The Affiliate sponsoring the event
Purpose	To invite, register and manage your attendance; arrange logistics (travel, accommodation, catering); and — if applicable — manage your participation as a speaker.
Legal basis	Legitimate interest (a, c); contractual necessity (b). For sensitive data (dietary/health preferences), your explicit consent.
Data categories	Name, company name, email address, phone address; travel/hotel details; dietary preferences (if provided, treated as sensitive data with your consent); photograph (if you speak or participate visibly); engagement data.
Retention	Up to 2 years from last event attendance; speaker promotion materials kept for up to 1 year after the event; dietary/sensitive data deleted promptly after the event.
Recipients	Other Vitrolife Group affiliates; travel/hotel providers; event venues; catering companies.

E-learning activities

Data controller	The Affiliate sponsoring the activity
Purpose	To provide you with access to e-learning content, track your progress, and deliver personalised learning content based on your profile.
Legal basis	Your consent; legitimate interest (delivering personalised content).
Data categories	Name, email address, IP address, e-learning progress and test results, feedback, company name, behaviour within the e-learning platform, engagement data.
Retention	Deleted after 3 years of continuous inactivity, or immediately upon withdrawal of consent.
Recipients	Other Vitrolife Group affiliates; e-learning platform providers.

4.5 Social Media Responses

Data controller	The Affiliate managing the social media platform
Purpose	To store and manage comments and responses you voluntarily post on our social media pages or blog posts.
Legal basis	Legitimate interest in managing our online presence and engaging with our professional community.
Data categories	Information you provide when posting a comment (name, profile visible on the platform, comment content).
Retention	Until you request removal or the post is deleted.
Recipients	The relevant social media platform (acting as independent controller); other Vitrolife Group affiliates.

4.6 Website Visits & Cookies

Data controller	Vitrolife Sweden AB (for Vitrolife/Vitrolife Group domains); Igenomix S.L.U. (for Igenomix domains)
Purpose	To operate and secure our websites, remember your settings, generate website analytics, and (with your consent) target our marketing. To track interactions between our emails and our website where you are a subscriber.
Legal basis	Strictly necessary cookies: legitimate interest. All other cookies: your consent. Please see our Cookie Policy on the relevant website for full details.
Data categories	IP address, browser type, pages visited, duration of visit, approximate location (region or city), device type and operating system; email engagement data (see below).
Retention	Depends on the specific cookie. Please refer to the Cookie Policy on the relevant website.
Recipients	Third-party analytics and advertising providers (as data processors or independent controllers, depending on their role).

Email engagement tracking: When we send you marketing or informational emails, we may use the following technologies to understand how you interact with them:

- **Tracking pixels:** Small image files embedded in emails. They tell us when you opened the email, your IP address, device type, and approximate location. You can disable this by turning off automatic image loading in your email client.
- **Encoded URL strings:** Identifiers added to links in emails. These do not use device-based technologies like cookies, but allow us to see which links you clicked.
- **Subscription key:** A unique identifier linked to you in our marketing system, allowing us to recognise your interactions consistently without using your email address as the main identifier.

4.7 Sharing Data Within Vitrolife Group

Data controller	Vitrolife Sweden AB (global sales and marketing)
Purpose	Centralised data management; ensuring a consistent experience across Vitrolife Group brands; cross-selling relevant products and services; legal and trade compliance.
Legal basis	Legitimate interest in operating efficiently as a global group and offering seamless service.

Data categories	Name, business contact details, company name, job title, interaction history with Vitrolife Group.
Retention	Up to 2 years from when the data was collected, unless longer retention is required by law or you have consented.
Recipients	Other Vitrolife Group affiliates — a full list is available at the contact page linked in Section 2.

4.8 Security, Fraud Prevention & Legal Compliance

Data controller	The relevant Vitrolife Group affiliate
Purpose	To protect our systems, data and business against security incidents, unauthorised access, fraud and criminal activity. To establish, exercise or defend legal claims.
Legal basis	Legitimate interest (security); legal obligation (reporting, regulatory compliance); legal claims.
Data categories	Contact details; access logs; correspondence; any data relevant to a security incident or legal matter.
Retention	Until the security incident or legal matter is resolved, plus applicable limitation periods.
Recipients	Law enforcement; regulatory authorities; legal advisors; cybersecurity providers.

5. Who Can Access Your Personal Data?

We share your personal data only where necessary and always with appropriate safeguards in place. Recipients may include:

- Other companies within Vitrolife Group, for legitimate business and operational purposes.
- Data processors we engage (e.g. CRM providers, IT platforms, marketing tools, e-learning platforms) — these process data only on our documented instructions.
- Trade compliance and sanctions screening services.
- Governmental, legal and regulatory authorities, where required by law or to protect our rights.
- Accountants, auditors, lawyers and other professional advisors, subject to strict confidentiality obligations.
- Payment service providers, logistics companies and other third-party vendors involved in fulfilling our contracts.
- Advertising platforms such as LinkedIn (for matched audience advertising — see Section 4.3.3).
- Relevant parties in the event of a business sale, merger or restructuring.

Processors: Any third party that processes data on our behalf is bound by a data processing agreement ensuring they act only on our instructions and maintain appropriate security measures.

Independent controllers: Where third parties process data for their own purposes, they act as independent controllers and are responsible for their own compliance. We only share the minimum data necessary.

5.1 International Data Transfers

As a global group, your personal data may be transferred to, and processed in, countries outside your country of residence, including countries outside the European Economic Area (EEA).

For EU/EEA residents: Any transfer of personal data outside the EEA is subject to EU data protection law. We implement appropriate safeguards, including:

- EU Standard Contractual Clauses (SCCs) with receiving entities
- Adequacy decisions by the European Commission (where applicable)
- Binding Corporate Rules (BCRs) (where applicable)

For non-EU/EEA residents: Transfers between countries are governed by applicable local law. We apply appropriate protections in all cases.

All Vitrolife Group affiliates are required to comply with applicable data protection requirements regardless of location.

6. How Long Do We Keep Your Data?

We keep your personal data only for as long as necessary to fulfil the purpose for which it was collected, or as required by law. Our general retention principles are:

- **Customer/prospect relationships:** Up to 2 years after the end of the relationship or last contact, unless legal requirements mandate longer retention.
- **Supplier/vendor contracts and invoices:** Up to 10 years after the end of the contract for accounting, tax and legal compliance purposes.
- **Due diligence and compliance records:** Up to 10 years, or as required by applicable sanctions, export control or anti-bribery laws.
- **Legal claims:** For as long as relevant statutory limitation periods apply.
- **Marketing data:** Up to 2 years from last interaction, or until you unsubscribe (whichever is earlier).
- **Event data:** Up to 2 years from last event attendance; sensitive data (e.g. dietary) not stored after the event.
- **Website/cookie data:** As specified in the relevant Cookie Policy.

Where possible, we anonymise or pseudonymise data that we need to retain beyond the applicable retention period.

7. Your Privacy Rights

Depending on where you are located, you have a number of rights regarding your personal data. Most of these rights apply regardless of geography, though the scope and enforcement mechanisms may differ. Here is a plain-language summary:

Your Right	What This Means
Right to be informed	You have the right to know how and why we process your personal data — which is the purpose of this notice.
Right of access	You can ask us what personal data we hold about you, and obtain a copy of it.
Right to rectification	If you believe your data is inaccurate or incomplete, you can ask us to correct it.
Right to erasure ("right to be forgotten")	You can ask us to delete your data. We will comply where legally possible, taking into account our legal obligations and legitimate interests in retaining certain records.
Right to restrict processing	You can ask us to pause processing your data in certain circumstances, e.g. while you contest its accuracy or while we assess an objection you have raised.
Right to object	You can object to processing based on legitimate interest (including direct marketing and profiling). Once you object to marketing, we will stop immediately.
Right to data portability	Where processing is automated and based on consent or contract, you can ask us to provide your data in a machine-readable format, and in some cases to transfer it directly to another controller.
Right not to be subject to automated decisions	You have the right not to be subject to decisions made solely by automated means (including profiling) that significantly affect you, unless an exception applies.
Right to withdraw consent	Where we rely on consent, you can withdraw it at any time. This does not affect the lawfulness of any processing carried out before withdrawal.
Right to complain	You have the right to lodge a complaint with the relevant data protection supervisory authority. For EU residents, find your authority at: edpb.europa.eu/about-edpb/about-edpb/members_en

How to exercise your rights: Contact us at dataprotection@vitrolife.com or through the contact details of the relevant Affiliate. We will respond within the legally required timeframe (usually within 1 month for GDPR requests). We may ask you to verify your identity before processing your request.

Please note that in some circumstances we may not be obliged to comply with your request, for example where retention is legally required. We will always explain our reasoning in such cases.

8. How Do We Protect Your Data?

We implement robust technical and organisational security measures to protect your personal data from loss, unauthorised access, disclosure, alteration or destruction. These include access controls, encryption, security monitoring, staff training, and contractual obligations on all third parties who handle data on our behalf.

If you have any security concerns or believe your data has been compromised, please contact us at dataprotection@vitrolife.com immediately.

9. Contact & Updates

Data Protection Officer: dataprotection@vitrolife.com

Vitrolife Group affiliate contacts: [Contact us](#) | [Vitrolife Group](#)

Updates to this notice: We may update this privacy notice from time to time to reflect changes in our processing activities or applicable law. The current version will always be available on our websites. We will notify you of material changes where we have your contact details.

ADDENDUM A - European Union / EEA Supplement (GDPR)

Applies to: Data subjects resident in the EU or EEA, and to all processing by Vitrolife Group affiliates established in the EU/EEA.

Governing law: Regulation (EU) 2016/679 (General Data Protection Regulation — GDPR); national implementing legislation; the ePrivacy Directive.

A.1 Legal Bases Under GDPR

Our processing activities rely on one or more of the following legal bases under Article 6 GDPR (and Article 9 GDPR for sensitive data):

- **Article 6(1)(a) — Consent:** Where you have freely given, specific, informed and unambiguous consent (e.g. profiling, e-learning, certain marketing).
- **Article 6(1)(b) — Contract:** Where processing is necessary to perform or prepare a contract with you or your employer.
- **Article 6(1)(c) — Legal obligation:** Where processing is required by EU or Member State law (e.g. accounting, medical device traceability, sanctions).
- **Article 6(1)(f) — Legitimate interests:** Where our interests (or those of a third party) override your interests, rights and freedoms — e.g. customer relationship management, direct marketing to existing contacts, intra-group data sharing, fraud prevention. We have carried out Legitimate Interest Assessments (LIAs) for these activities.

A.2 Your GDPR Rights

All rights set out in Section 7 of the main notice apply in full under the GDPR. You may exercise them by contacting our DPO at dataprotection@vitrolife.com. We will respond within 30 days (extendable by a further 2 months for complex requests). Please note that your right of access under Article 15 GDPR may be subject to certain exceptions, including situations where the information requested:

- adversely affects the rights and freedoms of others,
- relates to ongoing legal proceedings, or
- cannot be disclosed due to statutory or contractual confidentiality obligations.

There is no fee for making a request. Normally, there is no fee for making a request. However, a reasonable fee may be charged for requests that are manifestly unfounded, excessive, or repetitive, in accordance with Article 15(3) GDPR.

A.3 Supervisory Authority

You have the right to lodge a complaint with your national data protection supervisory authority. Vitrolife's lead supervisory authority for EU-wide processing is the **Swedish Authority for Privacy Protection (IMY)**. A full list of EU/EEA supervisory authorities is available at: edpb.europa.eu/about-edpb/about-edpb/members_en.

A.4 Automated Decision-Making & Profiling

We use profiling to improve the relevance of our marketing. This does not produce legal or similarly significant effects on you. Where we do use profiling, it is based on your consent (for e-learning persona assignment) or legitimate interest (for marketing personalisation). You have the right to object to profiling for direct marketing at any time (Article 21(2) GDPR).

ADDENDUM B - United Kingdom Supplement (UK GDPR / DPA 2018)

Applies to: Data subjects resident in the United Kingdom.

Governing law: UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

All provisions of the main notice and Addendum A apply with the following modifications:

- **Legal transfers to the UK:** The UK is treated as having an adequate level of protection by the EU Commission (and vice versa under the UK's own adequacy regulations). Transfers between the UK and EU operate under standard mechanisms as described in Section 5.1.
- **Supervisory authority:** You have the right to complain to the UK Information Commissioner's Office (ICO) at ico.org.uk. Our UK representative is contactable through dataprotection@vitrolife.com.
- **Rights:** All rights under the UK GDPR mirror those under the EU GDPR, as described in Section 7 of the main notice.

ADDENDUM C - United States Supplement (CCPA/CPRA & State Privacy Laws)

Applies to: Residents of US states with applicable privacy laws. Note: the CCPA/CPRA contains an exemption for B2B data (personal information collected in the context of a business-to-business relationship). However, we provide this addendum as a matter of transparency and good practice.

C.1 Categories of Personal Information Collected (CCPA)

In the preceding 12 months, we have collected the following categories of personal information (as defined by the CCPA):

- Identifiers (name, email address, IP address, professional identifiers)
- Professional or employment-related information (job title, employer, professional contact details)
- Internet or other electronic network activity (browsing history on our websites, email engagement data)
- Geolocation data (approximate location based on IP address)
- Commercial information (purchasing/ordering history, supplier/vendor contract information)

C.2 Sources, Purposes and Disclosure of Personal Information

Sources, purposes and categories of third parties to whom we disclose personal information are described in Sections 3, 4 and 5 of the main notice.

Do we "sell" or "share" personal information? We do not sell personal information for monetary consideration. We may share personal information (as defined by CPRA) with advertising platforms for targeted advertising purposes (see Section 4.3.3). California residents have the right to opt out of this sharing.

C.3 Your Rights (California & Other US States)

Depending on the state in which you reside, you may have the following rights:

- **Right to know:** To request disclosure of the categories and specific pieces of personal information we have collected about you.
- **Right to delete:** To request deletion of personal information we have collected from you, subject to exceptions.
- **Right to correct:** To request correction of inaccurate personal information (CPRA).
- **Right to opt out of sale/sharing:** To opt out of the sale or sharing of your personal information for cross-context behavioural advertising.
- **Right to limit use of sensitive personal information:** To limit how we use sensitive personal information (CPRA).
- **Right to non-discrimination:** We will not discriminate against you for exercising your privacy rights.

How to exercise these rights: Submit a verifiable consumer request to dataprotection@vitrolife.com. We will respond within 45 days (extendable by a further 45 days where reasonably necessary).

Authorised agents: You may designate an authorised agent to make a request on your behalf, provided you provide written authorisation and we can verify both your identity and the agent's authority.

Virginia (VCDPA), Colorado (CPA), Connecticut (CTDPA) and other US state laws: We honour rights equivalent to those described above for residents of all US states that have enacted comprehensive privacy laws.

ADDENDUM D - China Supplement (PIPL)

Applies to: Processing of personal information of individuals located in China.

Governing law: Personal Information Protection Law (PIPL), effective 1 November 2021; Cybersecurity Law; Data Security Law.

Where we process personal information of individuals located in China:

- **Legal basis:** We obtain separate consent where required by PIPL, or rely on PIPL-recognised bases such as contract performance, legal obligation, or legitimate interest.
- **Cross-border transfers:** Any transfer of personal information from China requires compliance with applicable transfer mechanisms under PIPL, which may include: passing a security assessment by the Cyberspace Administration of China (CAC), obtaining a personal information protection certification, or entering into standard contracts issued by the CAC.
- **Data localisation:** Critical information infrastructure operators and personal information processors who process large volumes of data may be subject to data localisation requirements. We comply with these requirements where applicable.
- **Individual rights:** Individuals in China have rights to access, copy, correct, delete and restrict processing of their personal information, and to withdraw consent. You may exercise these rights by contacting dataprotection@vitrolife.com.

ADDENDUM E - Brazil Supplement (LGPD)

Applies to: Processing of personal data of individuals located in Brazil, or where processing occurs in Brazil.

Governing law: Lei Geral de Proteção de Dados Pessoais (LGPD), Law No. 13,709/2018, as amended.

Where we process personal data subject to LGPD:

- **Legal bases:** We rely on LGPD-recognised legal bases including consent, contract performance, legitimate interest, legal obligation, and the protection of credit (for supplier/financial data).
- **Consent:** Where we rely on consent, it is freely given, specific and informed. You may withdraw consent at any time.
- **Cross-border transfers:** Transfers outside Brazil require adequate protection via contractual clauses, BCRs, specific consent, or regulatory authorisation.
- **Your rights under LGPD:** You have the right to access, correct, delete, anonymise, and port your personal data. You also have the right to know the entities with which we have shared your data, and to receive information about the possibility of not providing consent and the consequences of denial. You may exercise these rights at dataprotection@vitrolife.com.
- **Supervisory authority:** Autoridade Nacional de Proteção de Dados (ANPD) — gov.br/anpd.

ADDENDUM F - Australia Supplement (Privacy Act 1988)

Applies to: Individuals located in Australia.

Governing law: Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs).

- **Collection notice:** This notice serves as our collection notice under APP 5.
- **Cross-border disclosure:** When we transfer your personal information overseas (including to Vitrolife Group entities in other countries), we take reasonable steps to ensure the overseas recipient handles it consistently with the APPs.
- **Your rights:** You may access and correct your personal information by contacting dataprotection@vitrolife.com.
- **Complaints:** You may complain to the Office of the Australian Information Commissioner (OAIC) at oaic.gov.au if you believe we have interfered with your privacy.

ADDENDUM G - Japan & APAC Supplement (APPI / PIPA)

Applies to: Individuals located in Japan and other APAC jurisdictions where we operate.

Japan (APPI): Vitrolife Group complies with the Act on the Protection of Personal Information (APPI) as amended. Where required, we obtain consent before sharing personal information with third parties. Cross-border transfers require the recipient to maintain a comparable level of protection or the individual's consent. You may request disclosure, correction or deletion of your personal information held by us.

South Korea (PIPA): Where we process personal information of South Korean residents, we comply with the Personal Information Protection Act (PIPA). This includes providing required notices, obtaining consent where mandated, and ensuring cross-border transfer requirements are met.

Other APAC jurisdictions: We comply with applicable data protection laws in all APAC jurisdictions where Vitrolife Group operates, including Singapore (PDPA), India (DPDP Act 2023), and others. Contact us for jurisdiction-specific information.

ADDENDUM H - Canada Supplement (PIPEDA / Provincial Laws)

Applies to: Individuals located in Canada.

Governing law: Personal Information Protection and Electronic Documents Act (PIPEDA), as amended; provincial laws (PIPA Alberta, PIPA BC, Law 25 Quebec where applicable).

- **Consent:** Where we collect personal information in Canada, we obtain meaningful consent for collection, use and disclosure, except where an applicable exception applies.
- **Cross-border transfers:** Personal information transferred outside Canada receives comparable protection through contracts or other appropriate means.
- **Quebec (Law 25):** For Quebec residents, we comply with enhanced requirements including privacy impact assessments for high-risk processing, mandatory breach notification, and the right to request technology-based decision-making explanations.
- **Your rights:** You may access, correct or withdraw consent for the use of your personal information. Contact: dataprotection@vitrolife.com.
- **Complaints:** Office of the Privacy Commissioner of Canada (priv.gc.ca), or applicable provincial commissioner.

Questions? We're here to help.

Contact our Data Protection Officer at dataprotection@vitrolife.com — or reach out to your local Vitrolife Group affiliate via vitrolifegroup.com/en/contact-us.