



Privacy and Personal Data Policy of the Company Magnus Medical GmbH (PPDP)

1. Data Controller

Magnus Medical GmbH, identified with RUT 424.359.362, with main address at Othmarsingerstrasse 37A - 5600 Lenzburg - Switzerland, with www.magnusmedical.ch website and email info@magnusmedical.ch, in compliance with the provisions of Law 1581 of 2012 and Decree 1074 of 2015, is Responsible for the Processing of Personal Data of the Holders, on which it will decide directly and autonomously.

This Privacy and Personal Data Policy of the Company is addressed to users and/or customers of Magnus Medical GmbH and, in general, to any person whose Personal Data is being or will be processed by Magnus Medical GmbH, including customers, potential customers, suppliers, distributors, business advisors, visitors and/or any other third party from whom Magnus Medical GmbH processes personal data.

In the course of its activities and business relationships, Magnus Medical GmbH may access, collect, receive, manage and delete personal data. All information will be considered confidential information and will be subject to appropriate security measures to protect it from loss, misuse or unauthorized and alteration, to the extent reasonable.

Magnus Medical GmbH uses and will use this information in the future, to carry out the purposes set out herein and those expressly

informed to you at the time of data collection. For the purposes of the above, Magnus Medical GmbH carries out the Treatment under the mandates of Law 1581 of 2012 and Decree 1074 of 2015 and other regulations that add, modify or repeal them.

2. Definitions

The terms used with initial capital letters that are not expressly defined in this Policy will have the definition assigned to said terms in Law 1581 of 2012 and its regulatory decrees or the rules that modify, complement or replace them:

2.1. Authorisation

It is the prior, express and informed consent of the Owner for Magnus Medical to carry out Treatment on your Personal Data.

2.2. Database

Organized set of Personal Data that are subject to Treatment, electronic or not, whatever the modality of their formation, storage, organization and access.

2.3. Personal Data

It is any information of any kind, linked or that can be associated with one or more determined or determinable natural persons.

2.4. Public Data

It means the Personal Data qualified as such according to the mandates of the law or the

Political Constitution and that which is not semi-private, private or sensitive. Data relating to the civil status of persons, their profession or trade, their status as a trader or public servant and those that can be obtained without reservation are public, among others. By their nature, public data may be contained, among others, in public registers, public documents, official gazettes and gazettes, duly enforceable judicial judgments that are not subject to reservation.

2.5. Sensitive Data

It is the Personal Data that could affect the privacy of the Holder or whose improper use could generate discrimination, such as those that reveal union affiliations, racial or ethnic origin, political orientation, religious, moral or philosophical convictions, membership in trade unions, social organizations, human rights or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data relating to health, sex life, and biometric data.

2.6. Manager

It is the natural or legal person, public or private, who by himself or in association with others, performs the Treatment on behalf of Magnus Medical GmbH.

2.7. Law

Law 1581 of 2012, Decree 1074 of 2015, Judgment C-748 of 2011, and the precedent-setting jurisprudence of the Constitutional Court related to personal data, and any regulation issued by the government regulating the legal precepts, which are in force at the time the Treatment begins by Magnus Medical GmbH, according to said Law is amended from time to time and such modification applies to the Treatment carried out by Magnus Medical GmbH.

2.8. Policy

It refers to this document, in which the information processing policy is recorded and which contains the guidelines and guidelines in relation to the protection of personal data and which includes, among other things, (i) full identification of the Responsible (name, company name, address, address, email and telephone); (ii) the forms of Data Processing; (iii) the purposes to which they are subject; (iv) the Rights of the Holders; (v) the procedures for the exercise of the rights in the head of the Holders through consultations and claims, and (vi) the person or agency in charge of attending all the queries of the Holders.

2.9. Owner

It is the natural person to whom the Personal Data refer, which are in a Database, to whom the rights of habeas data assist. Among them, customers, potential customers, suppliers, distributors, commercial advisors, visitors.

2.10. Treatment

It is any systematic operation and procedure, electronic or not, that allows the collection, conservation, ordering, storage, modification, relationship, use, circulation, evaluation, blocking, destruction and, in general, the processing of Personal Data.

3. Origin of the information

The Personal Data that are processed by Magnus Medical GmbH may come from the www.magnusmedical.ch web portal, info@magnusmedical.ch e-mail, commercial negotiations, contracts, public directories, formats and/or forms authorized by customers, potential customers, suppliers, distributors, commercial advisors, visitors. Specifically, the following Personal Data will be processed:

3.1. Customers and potential customers

It includes, but is not limited to identification data, contact, among others.

3.2. Distributors

It includes, but is not limited to contact data, identification, among others.

3.3. Suppliers

It includes, but is not limited to, contact data, identification, demographic data, licenses, among others.

3.4. Visitors

It includes, but is not limited to, contact information, identification data, among others.

Sensitive Data will be treated with the greatest possible diligence and with reasonable security standards for the type of Personal Data that is processed. Limited access to Sensitive Data will be a guiding principle to safeguard the privacy of that Personal Data and, therefore, only authorized personnel may have access to this type of information.

4. Purposes

Personal Data will be processed for the following purposes, without prejudice to what is established in each specific Authorization text:

4.1. Customers and potential customers

Confirm, update and verify your information and identity; contact them for commercial and marketing purposes, through any means; conduct satisfaction and quality surveys; Verify and manage compliance with legal and contractual obligations, including the control and prevention of fraud and money laundering, among others.

4.2. Distributors

Compliance with legal or contractual obligations; the proper execution of the employment contract; compliance with the internal policies of Magnus Medical GmbH; the administration of information and communications systems, and the generation of copies and information backup files on the Intranet of Magnus Medical GmbH; among others.

4.3. Suppliers

Compliance with legal or contractual obligations, including the control and prevention of fraud and money laundering; the proper execution of the contract; compliance with the internal policies of Magnus Medical GmbH; verification of compliance with the supplier's obligations; verify your identity, among others.

4.4. Visitors

Keep our facilities safe; Carry out internal administrative processes and comply with our legal and contractual obligations, among others.

It is the duty of the Holders to guarantee the veracity of the data provided. Magnus Medical GmbH has adopted the security measures at its disposal, at a technical and administrative level with a view to protecting the Personal Data under its responsibility, however, the Holders must understand that these measures are not impregnable and are in a process of permanent review and improvement.

5. Authorization

All Treatment will be preceded by obtaining the Authorization of the Holders, whenever the Law requires it. For this purpose, Magnus Medical GmbH, its employees and authorized third parties will collect Personal Data and

subscribe to an Authorization form, keeping a copy of this document for future reference.

6. Rights of the holders

Magnus Medical GmbH shall grant the Data Controllers the following rights, which may be exercised in accordance with the procedures and forms set out in this Policy:

6.1. Update

Update the Personal Data held in the Databases of Magnus Medical GmbH to maintain their integrity and veracity.

6.2. Knowledge, Use and Access

Know and access your Personal Data and be informed by Magnus Medical GmbH, upon request, regarding the use it has given to your Personal Data. Access can be requested free of charge from Magnus Medical GmbH at least once a month.

6.3. Test

Request proof of the Authorization granted to Magnus Medical GmbH, unless the Law indicates that such Authorization is not necessary, in accordance with the provisions of Article 10 of Law 1581 of 2012.

6.4. Complaint

Submit complaints to INVIMA for violations of the Law when the application and/or claim process before Magnus Medical GmbH has been exhausted beforehand.

6.5. Rectification

Modify the Personal Data managed by Magnus Medical GmbH when they are partial, inaccurate, incomplete, fractional or misleading.

6.6. Deletion

Request the deletion of your Personal Data from the Databases of Magnus Medical

GmbH, provided that there is no legal duty or contractual obligation obliging Magnus Medical GmbH to keep the Personal Data in its Database. In this case, Magnus Medical GmbH will in any case delete the Personal Data once the legal or contractual obligation has been exhausted.

6.7. Revocation

Request the revocation of the Authorization, provided that there is no legal duty or contractual obligation requiring Magnus Medical GmbH to continue to Process Personal Data.

6.8. Claim

File complaints with Magnus Medical GmbH to correct, update or delete Personal Data.

6.9. Application

Submit requests to Magnus Medical GmbH to be informed about what Personal Data its database has and how it is being used.

The Holders may exercise their rights enshrined in the Law and carry out the procedures established in this Policy by presenting an identification document.

7. Modifications

Magnus Medical GmbH reserves the right to modify or update this policy at any time. Whenever the Policy is substantially modified, the Holders will be notified. The Personal Data that are stored, used or transmitted will remain in our Database, based on the criteria of temporality and necessity, for as long as necessary for the purposes mentioned in this Policy, for which they were collected.

8. Validity

This Policy applies as of August 28, 2023 and the period of the databases will be valid equal to the period in which the purpose or

purposes are maintained, or the period of validity indicated by a legal, contractual or jurisprudential cause in a specific way.

9. What do we do with your information?

When you register on our Blog, Intranet or request information from one of our channels, we collect the personal information you provide us.

When you browse our website, we also automatically receive your computer's Internet Protocol (IP) address to provide us with information to help us understand your browser and operating system.

Email marketing (if applicable): With your permission, we may send you emails about our products, new products, and other updates.

Text marketing (if applicable): With your permission, we may send you text messages about our products, new products, and other updates.