

Privacy Policy

Last updated: June 16, 2020

Aspen Surgical Products, Inc., headquartered at 6945 Southbelt Dr SE, Caledonia, MI 49316, is committed to protecting and respecting your privacy. This Privacy Notice applies to your use of any of our online, mobile and social services or applications and via any other means through which you may interact with our business (the “**Services**”). This Privacy Notice sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. **Please read the following carefully to understand our practices regarding your personal information and how it will be treated by Aspen Surgical or any of our owned businesses including Precept Medical Products.**

1. INFORMATION WE MAY COLLECT FROM YOU AND HOW WE USE IT

We may collect and process the following information about you:

Submitted Information

We may collect any information that you provide to us when:

- you register to use any of the Services (for example filling out a form to request a sample or more information about a product or place an order for one of our products online),
- (ii) you create an account or complete details of any profile using the Services,
- (iv) you report a problem with any of the Services, or
- (v) you make a transaction using one of our Services.

This kind of information may include your name, email address, and other contact details such as your home or work address. We use this information to enable you to make use of the Services and to enable us to provide a good level of customer service.

Additional Information

If you contact us with a complaint or query about the Services or any of the products or other services that we offer, we may keep a record of that correspondence to ensure we provide good customer service. We may also ask you to complete surveys about our products and Services that we use for research purposes, although you do not have to respond to such surveys.

Device Information

We may collect information about the device you use to download certain of our Services or to download documents contained on our website, including, where available, the device's unique device identifiers, operating system and mobile network information, for system administration

purposes. We may associate this kind of device information with the Submitted Information and Additional Information referred to in the sections above for customer service and system administration purposes. We will treat the combined information as personal information in accordance with this Global Privacy Notice for as long as it is combined.

Log Information

When you use the Services, we may also automatically collect and store certain information in our server logs to get a better understanding of how people use the Services, for system administration purposes, and to ensure we provide a good user experience and customer service. This type of information includes information about when, how, and what parts of the Services you use.

Security and Fraud Prevention

We may also use your personal information to ensure the security of your use of the Services, any user accounts you may have with us and our business, as well as for the purposes of preventing or detecting fraud or abuse of our Services.

Marketing

We may also use your contact details to provide you with information about our products and services which may be of interest to you where permitted by applicable law. If you do not want us to use your information in this way, you can opt-out by clicking 'unsubscribe' in the email footer of the marketing communication that we send to you. Please note that if you opt out from receiving marketing communications, we may still contact you about service-related issues, such as where we make any changes to the Services, any terms and conditions or this Global Privacy Notice.

2. PURPOSES OF PROCESSING YOUR PERSONAL INFORMATION

We process your personal information to operate, maintain and provide you with the features and various functionalities unique to each of the Services (including any additional functionalities you may have requested), as well as to provide customer service and support. We will always indicate if the provision of certain information is voluntary and you will be able to withdraw your consent or exercise your rights in relation to this information at any time as permitted by applicable law.

This means that the 'legal basis' for us processing your personal information as described above will typically be one of the following:

- it is necessary to fulfil a contract that we have in place with you;
- for our or our third parties' legitimate business interests;
- your consent; or
- where the processing is necessary for compliance with our legal obligations.

We will only process personal information which is considered "sensitive" where we have obtained your explicit consent for the purposes of providing our Services to you. An example of sensitive personal information is information relating to your medical history, which may include patients' experiences using our products.

3. CHILDREN'S PERSONAL INFORMATION

If you are under the age of 16, you are not allowed to use any of our Services or create an account with us unless permitted by applicable law or your parents / guardians have provided their consent.

4. COOKIES AND SIMILAR TECHNOLOGIES

Some of the Services such as our website and mobile apps use cookies and technologies which are similar to cookies ("**Cookies**"). A Cookie is a small file of letters and numbers that we may set on your device to store and sometimes track information about you. The Cookies and similar technologies we use are designed for "analytics". This allows us to distinguish you from other users of the website or other of our Services. This helps us to provide you with a good experience when you use the website or other Services and also to improve the Services. A more detailed list of the Cookies used when providing the Services is set out by category below:

Strictly Necessary Cookies

These Cookies are essential to enable you to move around our websites or other Services and enable you to use certain features and Services that you have specifically asked for. Without these Cookies, certain Services that you have asked for cannot be provided. They are deleted when you close the browser.

Performance Cookies

These Cookies collect information about how you use the Services to allow us to improve them and identify which parts are most important to you and your use of the Services. All of the information these Cookies collect is aggregated and does not seek to personally identify you.

Functionality Cookies

These Cookies remember the choices you make when using the Services (such as your user name, language, preferences, country codes or information as to the country or region you are in) and provide enhanced, more personal features to improve your experience.

Targeting Cookies

These Cookies are used to deliver advertisements that are more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns. These Cookies collect information about your browsing habits to make advertising relevant to you and your interests.

Google Analytics

Our website may use Google Analytics, a web analysis service provided by Google LLC ("Google"). Google Analytics uses Cookies to help analyze how users use the website. The information generated by the Cookie about your use of this website (including your abbreviated IP address) is transmitted to a Google server in the USA and stored there. Google will use this information to evaluate your use of the website and will compile reports on website activity for website operators and provide others with website and Internet-related services. Google may also transfer this information to third parties when required to do so by law or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

You may object to the use of your data by Google Analytics by installing an Add-on on your browser. To do so you can use the following link that takes you to the Google page: <http://tools.google.com/dlpage/gaoptout?hl=en>.

Your choices and opting-out

We assume that you are happy for us to place Cookies on your device. Most internet browsers automatically accept Cookies. However, if you, or another user of your device, wish to withdraw your consent at any time, you have the ability to accept or decline Cookies by modifying your browser or app settings. If you choose to decline Cookies, you may not be able to fully experience the interactive features of our websites, platforms and Services.

5. WHERE WE STORE YOUR PERSONAL INFORMATION

The information that we collect may be transferred to, and stored at, a destination outside of your country which may have less strict, or no data protection laws, when compared to those in your country.

If you are located in the European Economic Area (the "EEA"), including the UK, the following text shall apply: It may also be processed by staff operating outside the EEA who work for us or for one of our vendors, for example in the provision of support services. Whenever we transfer your information outside of the EEA, we will take legally required steps to ensure that adequate safeguards are in place to protect your personal information and to make sure it is treated securely and in accordance with this Global Privacy Notice. You may contact us for a copy of the safeguards which we have put in place to protect your personal information and privacy rights in these circumstances.

6. HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

Your personal information will be retained for as long as is reasonably necessary for the purposes listed in paragraphs 1 and 2 above or as required by applicable law. Please contact us for further details of applicable retention periods.

7. DISCLOSING YOUR INFORMATION

We may disclose your personal information to any other Aspen Surgical Entity.

We may disclose your personal information to third parties: (a) if we sell any business or assets, in which case we may disclose your personal information to the prospective buyer of such business or assets, (b) if we or substantially all of our assets are acquired by a third party, in which case personal information held by us about our users will be one of the transferred assets, (c) if we partner or work with a third party to help us provide Services to you, or (d) if we are under a duty to disclose or share your personal information to comply with any legal or regulatory obligation or request.

We may also disclose your personal information: (a) to enforce any agreements we may have with you or to investigate potential breaches, or (b) to protect the rights, property or safety of us, the users of our Services, or others.

8. THIRD PARTY SITES AND SERVICES

Our Services may contain links to and from various other websites. If you follow a link to any such websites, please note that these websites have their own privacy notices and policies and we cannot be held responsible for them.

Your use of any of our online or mobile applications will also be subject to the privacy notices and policies of any app store provider and/or operator ("App Store Provider") from whom you have downloaded the app.

Please check these third-party privacy notices and policies before providing any personal information to any other website or App Store Provider.

9. YOUR RIGHTS AND ACCESS TO INFORMATION

Data protection legislation in certain circumstances and certain jurisdictions gives you rights with respect to your personal information. These rights differ by country/region but may include: the right to object to or withdraw consent to the processing of your personal information, the right to access a copy of your personal information, and the ability to erase, restrict or receive a machine-readable copy of your personal information.

You may update or delete your account(s) or profile(s) at any time through the applicable Service. Please note that deleting your account or profile does not delete your personal information previously submitted through the applicable Service and does not delete any personal information transferred from the applicable Service to a healthcare professional's electronic medical record.

California law permits our users who are California residents to request certain information about our disclosure of personal information to third parties for their direct marketing purposes during the preceding calendar year. This request is free and may be made once a year. To make such a request, please send us an e-mail or write to us at the address provided in the "Contact Us" section of this Global Privacy Notice, or as we may otherwise advise, and indicate in the subject line that you are a California resident making a "California Shine the Light" inquiry.

We will handle any request to exercise your rights in accordance with applicable law. If you wish to exercise any of these rights, please refer to the "Contact Us" section of this Privacy Notice.

10. SUBMITTING COMMUNICATIONS OR IDEAS THROUGH OUR SITE

Any communications or other information you send to Aspen Surgical through its websites are on a non-confidential basis, and Aspen Surgical is under no obligation to refrain from reproducing, publishing, or otherwise using them in any way or for any purpose. Aspen Surgical shall be free to use the content of any such communications, including any ideas, inventions concepts, techniques or know-how disclosed therein, for any purpose including developing, manufacturing and/or marketing goods or Services. The sender of any communications to Aspen Surgical websites shall be responsible for the content and information contained therein, including its truthfulness and accuracy.

11. CHANGES TO THIS GLOBAL PRIVACY NOTICE

We may change this Global Privacy Notice at any time by updating the policy on our website which will notify you of a change when you next use the Services. The new Global Privacy Notice may be displayed on-screen and you may be required to read it to continue your use of the Services. The date this Global Privacy Notice was last updated appears at the beginning of the document.

13. CONTACT US

Questions and comments regarding this Privacy Notice should be sent to:

Aspen Surgical Products, Inc.
Attn: Customer Service
Address: 6945 Southbelt Dr SE, Caledonia, MI 49316
Phone: 888-364-7004
Email: customerservice@aspensurgical.com



You may also have the right to complain to a data protection authority if you think we have processed your personal information in a manner which is unlawful or violates your privacy rights.