



Privacy and security

1. Introduction

Trajan Scientific and Medical conducts business through the following entities:

- Trajan Scientific Australia Pty Ltd
- Trajan Scientific Americas Inc.
- Trajan Scientific Europe Ltd
- Trajan Scientific Japan Inc.
- Trajan Scientific Malaysia Sdn Bhd
- Trajan Scientific Switzerland Sàrl

In this privacy policy, “Trajan” refers to each and all of the entities listed above.

This policy sets out how Trajan collects, processes, uses and stores information that can be used to directly or indirectly identify you (your “Personal Information”). Trajan is committed to protecting your privacy and has prepared this policy to comply with all laws and regulations which apply to its business such as:

- the *General Data Protection Regulation* (“GDPR”) and the *Privacy and Electronic Communications Regulations* (“PECR”) in Europe; and
- the *Privacy Act 1988* (Cth) in Australia.

Trajan Scientific Australia Pty Ltd is the entity in the Trajan group which takes responsibility for the processing of Personal Information in the course of our business. Under the GDPR, this means that Trajan Scientific Australia Pty Ltd is the “data controller” for the Trajan group.

2. Collection and use of your Personal Information:

Depending on whether you or the business you work for is a customer, supplier or other business contact of Trajan, or are applying for employment with Trajan, we may collect various types of Personal Information about you. This may include:

- Information used to communicate with you, such as your name, address, telephone numbers, email address and job title.
- Payment or tax information such as your business identification or registration numbers, your tax file number, bank account details, credit status and purchasing history.
- Information obtained through your online interactions with Trajan such as your IP address or cookie identifiers.
- Information contained in your application for employment such as your resume, age, education, professional history and contact details.

We will only collect and use the Personal Information, which is necessary for our business purposes, to perform a contract with you, or to comply with our legal obligations.



In particular, Trajan may use your Personal Information to enable us to, as relevant:

- provide our products and services and technical support to our customers.
- acquire goods or services from our suppliers.
- explore potential business opportunities and work with our business partners.
- carry out transactions.
- provide more effective customer service.
- communicate with you, such as in relation to industry events or to let you know of other products and/or services which might interest you or the company you work for.
- enhance your experience on our websites; or
- process your application for employment, consider you for future positions and carry out human resources functions in accordance with applicable law.

The Personal Information we request is optional for you to provide, but we may not be able to fulfil your request or provide you with our products and services without that information. To protect your privacy, you should not provide any information that is not specifically requested. Sometimes there are situations where we are required by law to collect certain Personal Information from you and if this is the case, we will inform you of the law that imposes this requirement. Where reasonably practical, we will collect your Personal Information only directly from you. However, in some circumstances we may also collect Personal Information from a third party (such as a credit report agency), or from publicly available sources of information.

We will not use your Personal Information in a manner that is inconsistent with the purpose of its original collection, unless you have consented.

Trajan will only retain your Personal Information for as long as we reasonably require it for our business purposes, or as required by applicable laws or regulations.

3. Disclosure of your Personal Information:

Trajan is a global organization with legal entities, business processes and technical systems that operate across borders. From time to time, we may disclose your Personal Information to other entities in the Trajan group and other third parties necessary to process your transactions, service your account or provide you with our goods and/or services. Examples of such third parties include auditors, accountants, lawyers, advisers and credit reporting agencies.

Where Trajan engages a third party to process any Personal Information on its behalf, we will have in place an appropriate data processing agreement which protects your Personal Information as required by law. Where we transfer your Personal Information to another country, we will always take appropriate measures to protect your Personal Information and comply with applicable laws relating to cross-border transfers.

4. Your rights in relation to the Personal Information we collect from you:

Trajan takes all reasonable steps to ensure that the Personal Information we collect, use and disclose is accurate, complete and up to date. You have the right to request access to the



Personal Information we are holding about you, and to request that any inaccurate Personal Information is deleted or corrected without delay.

If you no longer do business with us and we no longer need your Personal Information for the purposes which we collected it for or to comply with a legal obligation, you can also ask us to delete or de-identify the Personal Information we hold about you.

If you wish to access your Personal Information, or request that it be corrected or deleted, please make your request directly to Trajan using the contact details set out below.

5. Protection of your Personal Information:

Trajan takes all reasonable and appropriate steps to protect your Personal Information from misuse, loss and unauthorized access, modification and disclosure. We do this by ensuring that our systems, databases and facilities are secure, that our employees and associates are bound by and comply with our policies and procedures regarding Personal Information and confidentiality, and by putting in place appropriate contractual terms with third parties. While we will take all reasonable and appropriate steps, we cannot guarantee or warrant the security of your Personal Information.

6. Cookies:

Like almost all websites, Trajan websites use “cookies”. Cookies are text files containing small amounts of data which are stored on and accessible from your device when you visit a website. Our websites use cookies to enhance the functionality of the websites, to personalize content for you, to provide social media features, and to analyze our traffic. Cookies cannot execute programs or be used to access other information on your device.

How are cookies used on this website?

Trajan websites use the following categories of cookies:

- Necessary Cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. Trajan websites also use cookies to enable functionality provided by third parties, such as embedded YouTube videos. Our websites cannot function properly without these cookies.
- Preference Cookies enable our websites to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.
- Statistic Cookies help us to understand how visitors interact with websites by collecting and reporting information anonymously. For example, statistic cookies collect data such as the dates and times of visits as well as the number and pages viewed by each visitor, which is used to evaluate the performance and usefulness of our websites.
- Marketing Cookies are used to track visitors across websites. They allow Trajan or third-party advertisers to display ads (whether on a Trajan site or a third-party site) that are relevant and engaging for the individual user.

The information collected through the use of cookies may include your browser type, operating system, Internet Protocol (IP) or URLs of the sites you have visited before or after accessing Trajan websites, as well as how long you have spent on a particular site.



Some of the cookies used by Trajan websites are session cookies (that is, they remain on your device only while you are browsing a website) whereas other cookies remain on your device for longer periods, or permanently (unless they are deleted as discussed below). The cookies are placed by Trajan, or by third parties such as social media companies with services that appear on our pages.

Giving your consent to our use of cookies

Under the laws applicable to Trajan, we can store cookies on your device if they are strictly necessary for the operation of our sites (i.e., the Necessary Cookies described above). For all other types of cookies, we need your permission.

When you use your device to visit a Trajan website for the first time, or where a certain period has elapsed between visits, you will be asked to complete a declaration (the “Cookie Declaration”) which provides you with information regarding the cookies which are placed by the site, and requires you to indicate whether you consent to the placement of Preference Cookies, Statistic Cookies and Marketing Cookies as described above).

Please note that if you do not consent to the placement of Preference Cookies, Statistic Cookies or Marketing Cookies on your device, this may reduce the functionality of our websites.

You can also change or withdraw your consent by updating your Cookie Declaration at any time by [clicking on this link](#).

Deleting or managing cookies using your internet browser settings

In addition to controlling the placement of cookies using our Cookie Declaration, you can also manage the use of cookies by changing your internet browser settings. This means that you can set your preferences regarding the use of cookies before you begin browsing, or you can delete cookies once you have finished visiting a website. For further information about how to manage cookies, please refer to your browser “help” section.

7. External sites:

You may be able to access external websites by clicking on links we have provided. Those websites are not subject to this Privacy Policy, and we are not responsible for their privacy practices or the content of such other websites. You should contact those websites directly to ascertain their privacy standards, policies and procedures.

8. Opting out of communications from Trajan

You can opt out of receiving communications from Trajan at any time by contacting us using the contact details set out below.

9. Changes to this Privacy Policy:

Trajan reserves the right to make changes to this Privacy Policy at any time. We will take reasonable steps to notify you of changes to our Privacy Policy (such as by posting a notice on our homepage) but it is your responsibility to refer to this policy from time to time to familiarize yourself with any changes.

10. Contact details:



If you wish to contact us regarding any matter in this privacy policy, or if you have questions or complaints about Trajan's use of your Personal Information, please email us at dataprotection@trajanscimed.com.

Alternatively, you may contact us in writing at the following address:

Data Protection Manager
Trajan Scientific Australia Pty Ltd
7 Argent Place, Ringwood
Victoria 3134, Australia