

DATA USE POLICY

Last Updated June 11th, 2018

INTRODUCTION

At Accumetra we are committed to the protection of your data and your right to privacy. If you have any questions or concerns about our policy or practices regarding your information, please contact us at **info@accumetra.com**.

In this policy, we will cover what data we collect, how we use it and the rights you have regarding your information. This data use policy is applicable to all information we collect through use of our website ("http://accumetra.com/"), our services, and communications with our company. Our website and all services we provide will be referred to in this policy as "service platform" or "platform". Please take your time to read through this document carefully, as it is important. If you do not agree with any of the terms in this policy, please immediately discontinue the use of our services.

TABLE OF CONTENTS

- 1. WHAT INFORMATION DO WE COLLECT?
- 2. HOW DO WE USE YOUR INFORMATION?
- 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?
- 4. HOW LONG DO WE KEEP YOUR INFORMATION?
- 5. HOW DO WE KEEP YOUR INFORMATION SAFE?
- 6. WHAT ARE YOUR PRIVACY RIGHTS?
- 7. DO WE MAKE UPDATES TO THIS POLICY?
- 8. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect information that you have directly disclosed to us such as contact information, login credentials, communications with our company and medical image scans of calibration phantoms.

When interacting with our company and the services we provide, we collect data to ensure that you get the most from our services. The information we collect varies based on the type of interaction. Some of the information we collect **may** include the following:

Name and contact information: We collect your first and last name, email address, phone number, postal address, and other comparable contact information.

Credentials: We collect passwords and similar security information to keep your accounts safe and secure.

Payment data: We collect information necessary to process your payment if you decide to purchase any of our services.

Communications with Our Company: Some forms of contact you have with our company may be saved such as email and mail communications.

Medical Imaging Data: We collect the medical scans of calibration devices that some of our services require you to send us.

Information automatically collected

In Short: Information such as IP address and/or browser and device characteristics are collected automatically when you access our platform by means of **first-party** cookies.

While navigating our service platform, there is certain information what we will automatically collect. This information **does not** reveal your specific identity and is used to maintain our sites security, and for internal analytics and reporting purposes. Some information we collect can include IP address, browser and device characteristics, location, when you access our site, and other technical information.

2. HOW DO WE USE YOUR INFORMATION?

In Short: Your information will be used to fulfil services, maintain compliance with our legal obligations, and for legitimate business interests.

We use information collected from you for a variety of purposes described below. We process your information for these purposes to fulfill our legitimate business interests, in order to enter into or perform a contract with you or your institution, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

Send you educational and promotional material: Periodically we will send out educational material that helps explain the technology and services we offer.

Send administrative information to you: Your Information may be used to send you important information about new features and services we provide, and/or changes in any of terms, conditions or policies.

Fulfil and manage your orders: Your information may be used to fulfil or manage your orders, payments, and returns made through our service platform.

Request feedback: Your information may be used to request feedback about your use of our service platform.

Protect our site: Your information may be used for monitoring, and prevention of malicious activity to keep our service platform safe and secure.

Research and Data Analysis: When using services that include sending us medical images of calibration phantoms, we may use that data for research and data analysis purposes such as analyzing and documenting image quality trends and helping set new image quality recommendations and guidelines. [Important: All of your data used for this purpose will be anonymized and not personally identifiable. See "Will Your Information Be Shared with Anyone?" below for more information.]

Enforce our terms conditions and policies: We will use information you provide to verify compliance with service terms, such as the number of scanners using our services.

Respond to legal requests and prevent harm: In the event that we receive any form of legal request, we may need to inspect data we currently are in possession of in order to respond appropriately.

Other business purposes: Your information may be used for other legitimate business purposes such as data analysis, identifying usage trends, to evaluate and improve our service platform, and other internal assessments that help us to give you the best user experience possible.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: Your information is only shared with your consent, to fulfil business obligations and to protect your rights.

We will only share and disclose your data under the following circumstances:

Public Datasets and Publications: Some of the data we collect will be de-identified and placed in openly available data collections or shown in publications. This is most often performed to support the services we offer, for educational purposes, as a service to the research community, or to support further advancement of standards and methods.

Comply with Laws: If we are legally required to do so, your information may be shared in order to comply with governmental requests, any applicable laws, judicial proceedings, court orders, or legal processes.

Vital Interests and Legal Rights: Your information may be disclosed where we believe it is necessary to investigate, prevent or take action regarding any potential violation of our policies, suspected fraud, other suspected illegal activity, or as evidence in legal action in which we are involved.

Vendors, Consultants and Other Third-Party Service Providers: Your information may be shared with third party vendors, service providers, contractors, or agents who preform services on our behalf and require such information to perform that work. Some of these tasks can include: payment processing, data analysis, email delivery, and hosing services. We **do not** share, sell, rent or trade any of your data information with third parties for their promotional purposes.

Business Transfers: Your data may be shared under the circumstance of any merger, sale of company assets, financing or acquisition of all or a portion of our business to another company.

Affiliates: Your information may be shared with any affiliates we have. All of our affiliates are **required** to honor this privacy policy. Affiliates may include any subsidiaries, joint venture partners or any other companies that we control.

Business Partners: Your information may be shared with our business partners in order to collaborate and provide you with the products and services we offer. All of our business partners are **required** to honor this Data Use Policy.

With your consent: We may disclose your personal information for any other purpose with your consent.

4. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We will keep your information as long as it is needed to fulfil the purposes outlines in this privacy policy unless otherwise required by law.

We will only keep your personal information as long as it is necessary for any of the purposes described in this privacy policy unless a longer retention period is required or permitted by law. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it after 6 months. Anonymized data may be stored for research and statistical purposes.

5. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aspire to keep your personal information safe and secure through a system of organizational and technical security measures.

We do our best to keep the data we process safe and secure by implementing the appropriate technical and organizational security measures. However, please keep in mind that no organization can guarantee 100% security. Although we will always do our best to keep your personal information safe, transmission of personal information to and from our service platform should be done at your own discretion. You can help ensure the security of your data by only accessing our platform within a secure environment.

6. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: We will keep your use of our services and the results you obtain private unless you agree to make that information publicly available. In addition, you can take steps to limit the information we collect through cookies and limit the information we send you by opting out.

Service Use and Performance Data: We may use data we collect for legitimate business purposes as long as we do not disclose you or your institution's identity. In special circumstances, we may ask for permission to disclose your identity, but you will always have final say in these matters.

Cookies and similar technologies: Most web browsers automatically accept cookies. You can usually configure your browser to remove and reject the use of cookies, however, this may affect certain features and services we offer on our platform.

Opting out of e-mail notifications: If you do not wish to receive further education or promotion-related emails, you may opt-out by clicking on the unsubscribe button located at the bottom of the email. While this will remove you from our promotional email list, we will still need to send any service-related emails that are required for the administration of our platform.

Rights based on your location: Laws regarding the use of your data varies depending on your location. It is important that you know and understand what rights you have where you live.

7. DO WE MAKE UPDATES TO THIS POLICY?

In Short: Yes, we will update this policy as necessary to keep in compliance with current laws.

We will update this policy when necessary. Any updates made to this policy will be effective as soon as it is accessible. If we make any changes to the content of this policy, we may notify you by posting a notice on our platform and/or directly sending you a notification with the necessary information. We encourage you to read this policy and all future updates to stay informed on our practices regarding your personal information.

8. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have any questions or concerns regarding this policy, you can contact Accumetra's data protection officer at info@accumetra.com or by post to:

Accumetra Data Protection Officer 7 Corporate Dr. Clifton Park, NY 12065