

MRHT COMMUNITY – PRIVACY POLICY

MR HealthTech Ltd (MRHT), who is responsible for processing your data, is committed to protecting your privacy. Our full address is:

MR HealthTech Ltd. 95-97 Kifisias Avenue

151 24 Maroussi, Athens, Greece

T. +30 213 0104800

F. +30 210 8064580

We are a private online community that enables you to establish a quality and value-driven online interaction with your peers and make an impact on MRHT's product roadmap. Also, this community gives you the opportunity to network with peer members offline at exclusive events and workshops, as well as gain access to exclusive content (e.g. industry insights and market reports) and early access to new features and products. We offer to our personnel, our Clients' personnel, and our third business partners' personnel a private online B2B community an expanded suite of engagement capabilities, including online discussions and peer networking opportunities through exclusive events (via the community), as well as exclusive content (market reports, industry insights, product-related materials).

This Privacy Policy explains the type of data that we request from our community members and the type of content that is shared, who can access the content and personal data, how we process community data, our data practices, our choices available to the subject matters regarding the use of, the access to, how to update and correct Personal Data (as defined below) and other information that we collect in connection with:

- i) your use of the website where MRHT's clients can engage and network with other community managers within the MRHT's Community
- ii) events you may attend to.

Our use of information on behalf of our personnel, our Clients, and third business partners who have registered to use the MRHT's online community platform (pursuant to which our personnel, our clients' personnel and third business partners' personnel offer access to a community website, called as a "**Platform**") is governed by our contract with that Client and the Client's own privacy policies. We are not responsible for the privacy policies or privacy practices of Clients or other third parties.

By using our Platform, you consent to policies and practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not use our Platform.

Our Collection of Your Personal Data

MRHT collects and uses information that, alone or in combination with other information, could be used to identify you (“Personal Data”) in order to deliver our products and services, process applications to join programs, inform you of various opportunities, and provide support, as described below (please also see the “How We Process Community Data” section below).

Personal Data Requested by Our Community Members

The types of Personal Data that we collect vary based on the services offered on the Platform, but generally include your first and last name, postal address, telephone number, company name, job title, e-mail address, social media accounts, skills, expertise, willingness to mentor other members, attendance to online and offline events, and other optional information such as working experience.

Moreover, when you create a profile in the MRHT customer Community on our Platform, we will collect the information that you elect to upload to your profile, such as a biography, your education and job history, company information. We also collect information that is provided, posted or uploaded by users to the Customer Community platform. You should carefully consider and tailor any content you submit appropriately. You should also review any additional terms and conditions that may govern your use of our services.

Other type of content that will be shared within the community:

- Business reports (e.g. industry insights, market and innovation reports)
- Product-related materials (e.g. release notes, product sheets, and early access to new product features)
- Training materials (e.g. presentations, (recorded) webinars and seminars, etc.)
- Invitations to events organized by MRHT or that MRHT attends
- Corporate news about MRHT and customers’ organizations
- Interviews of MRHT and customers’ personnel
- Personal opinions and ideas about MRHT and its software solutions through customer satisfaction surveys, discussion threads, and surveys
- Business-related stories and experiences, generated by MRHT, customers, and partners (e.g. success stories, strategy & thought leadership content)

Service Data

In providing our services through the Platform, we process on behalf of Clients information, including Personal Data, that Clients upload to, integrate with or otherwise submit to our services. Our Clients decide what data to submit. We only collect such information under the direction of Clients and have no direct relationship with the individuals whose Personal Data we process. Our use of information collected through the Platform on behalf of our Clients is limited to the purpose of providing to its customers as an added-value service beyond the products & services agreed per contract.

How We Process Community Data

MRHT will monitor customer and partner members' behavior and activity within the community for:

- Marketing purposes – to improve content quality and relevance for its audience, personalize member experience in the community, identify usage trends, determine the effectiveness of our promotional campaigns
- Business purposes – data analysis, audits, new products development, enhancement, improvement or modification of our Sites and services, and operation and expansion of our business activities.

Moreover, MRHT personnel responds to any questions that may arise among discussions in the community and resolves any disputes or similar occurrences.

MRHT will also use personal contact details (phone, email) for communication purposes, i.e. to send marketing materials or other type of information that may be of one's interest. Also, we will occasionally send push notifications and/or private messages regarding content updates in the community, as well as status changes on each member's profile (via gamification).

How to Opt Out or Unsubscribe

Community members can set preferences regarding the type and frequency of communication MRHT establishes with them in the context of MRHT Community's usage, by clicking on the respective link placed at the bottom of an email sent by MRHT Community. Alternatively, members can opt out of all marketing communications by clicking on the "Unsubscribe" link at the bottom of an MRHT's email, or by requesting to unsubscribe by sending an email to community@mrhealthtech.com.

Correspondence

If you correspond with MRHT via e-mail, the postal service, our web forms, or other form of communication, we may retain the correspondence and the information it contains. We may use the information for business purposes, including responding to your inquiry, notifying you of MRHT - related opportunities, and other marketing purposes (please read "How We Use Community Data" and "How to Opt out and Unsubscribe" above for more information on our marketing practices and how to opt out or unsubscribe).

Anonymized and Aggregated Data

We may also compile, anonymize and/or aggregate Personal Data and other information collected about our community, as described in this Privacy Policy, and use such anonymized and/or aggregated data for our business purposes, including disclosing such data to our partners, service providers, advertisers and/or other third parties for marketing or promotional purposes. This aggregate information does not identify you. For EU Data Subjects, this use of your Personal Data is necessary for our legitimate interests in understanding how the Platform and our products and services are being used by you and to improve your experience on it. For more information about what we mean by legitimate interests, and when we may process Personal Data for our legitimate interests, please see the "EU Data Subjects" section below.

Disclosure of Information

MRHT customer community discloses Personal Data that we collect (described above) in accordance with the terms set forth in this section.

We share your Personal Data with third parties who provide certain services to us to assist us in meeting business operation needs. These parties are authorized to process your Personal Data, on our behalf and pursuant to our instructions, only as necessary to provide these services to us.

We may also disclose Personal Data to third parties in the following circumstances: (1) if you request or authorize (when required by the law, we will inform you in advance of the third parties to which we may provide your data and the purpose for doing so, and we will obtain your prior consent for such use); (2) the information is provided (a) to comply with the law (for example, to comply with a search warrant, subpoena or other legal process), (b) to enforce an agreement we have with you, (c) to protect our rights, property or safety, or the rights, property or safety of our employees or others, (d) to investigate fraud, or (e) to respond to a government request or to lawful requests by public authorities, including to meet national security or law enforcement requirements;

(3) to address emergencies or acts of God; (4) to address disputes, claims, or to persons holding a legal or beneficial interest; (5) if we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, in which case your Personal Data and other information may be transferred to a successor or affiliate as part of that transaction along with other assets.

We collect, store and process the information from our Platform in the EU. If you are outside the EU, then your Personal Data and other information will be transferred to the EU. The data privacy and data protection laws outside your country may offer less protection than the laws in your country. By using our services, the Platform or otherwise providing us with your Personal Data, you agree to the transfer of your Personal Data as described in this Privacy Policy. If you do not agree to such cross-border transfers of your Personal Data, please do not submit it through the Platform. We have entered the Model Contractual Clauses for the international transfer of Personal Data collected in the European Economic Area and Switzerland with certain service providers, customers and other parties. Please contact us as described under the “Contact Us” section below to obtain a copy of the Model Contractual Clauses we use.

How You Can Access and Change Information

MRHT acknowledges that you have the right to access your Personal Data. Our Platform allows you to access, correct, amend, or delete inaccurate data. In case you request us to remove data, we will respond within a reasonable timeframe.

Upon request, MRHT will provide you with information about whether we hold any of your Personal Data. You may access, update or correct your Personal Data or remove it from our system by making a request to us at the contact information provided below. Requests typically receive a response within thirty (30) days. If access cannot be provided within that time frame, we will provide the requesting party with an estimated date by which the information will be provided. If for some reason access is denied, we will provide an explanation of why access has been denied.

MHRT has no direct relationship with the individuals whose personal data it processes on behalf of clients. An individual who seeks to access, correct, amend, or delete inaccurate data should direct his query to the MHRT Client (the data controller). If requested to remove data, we will respond within a reasonable timeframe.

If you are an EU Data Subject, please see the “EU Data Subject” section below for information on your rights in relation to the Personal Data we hold about you.

EU Data Subjects

Scope. This section applies if you are an individual located in the European Union (“EU”) (“EU Data Subject”). For these purposes, reference to the EU also includes the European Economic Area countries of Iceland, Liechtenstein and Norway and, where applicable, Switzerland.

Data Controller. MRHT is the data controller for the processing of your Personal Data, but we act as data processor on behalf of Clients for Personal Data that we process through the Customer Community.

Your Rights. Subject to applicable law, you have the following rights in relation to your Personal Data:

- **Right of access:** If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If your Personal Data is inaccurate or incomplete, you are entitled to have it rectified or completed. If we have shared your Personal Data with others, we will tell them about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to erasure:** You may ask us to delete or remove your Personal Data and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion). If we have shared your data with others, we will tell them about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to restrict processing:** You may ask us to restrict or ‘block’ the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or object to us processing it. We will tell you before we lift any restriction on processing. If we have shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to data portability:** Effective 25 May 2018, you have the right to obtain your Personal Data from us that you consented to give us or that is necessary to perform a contract with you. We will give you your Personal Data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.

- **Right to object:** You may ask us at any time to stop processing your Personal Data, and we will do so:
 - If we are relying on a legitimate interest to process your Personal Data — unless we demonstrate compelling legitimate grounds for the processing; or
 - If we are processing your Personal Data for direct marketing.
- **Rights in relation to automated decision-making and profiling:** You have the right to be free from decisions based solely on automated processing of your Personal Data, including profiling, that affect you, unless such processing is necessary for entering into, or the performance of, a contract between you and us or you provide your explicit consent to such processing.
- **Right to withdraw consent:** If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing based on your prior consent.
- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we have handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns. The authority responsible for MRHT is:

Hellenic Data Protection Authority

Kifissias 1-3 11523 Athens, Greece. <http://www.dpa.gr>. Email: contact@dpa.gr

You may exercise your rights by contacting us as indicated under “Contact Us” section below.

Legitimate Interest

“Legitimate interests” means the interests of MRHT in conducting and managing our organization. For example, we have a legitimate interest in processing your Personal Data to analyze how the Platform and our products and services are being used by you, as described in this Privacy Policy. When we process your Personal Data for our legitimate interests, we make sure to consider and balance any potential impact on you, and your rights under data protection laws. Our legitimate interests do not automatically override your interests. We will not use your Personal Data for activities where our interests are overridden by the impact on you, unless we have your consent, or those activities are otherwise required or permitted to by law. You have the right to object to processing that is based on our legitimate interests. For more information on your rights, please see “Your Rights” section above.

Data Transfers

We have entered the Model Contractual Clauses for the transfer of Personal Data collected in the European Economic Area and Switzerland with certain service providers, customers and other parties. Please contact us as described under the “Contact Us” section below to obtain a copy of the Model Contractual Clauses we use.

Our Security Measures to Protect Your Personal Data

We use a Platform with state-of-the-art technical and organizational security measures to protect data against accidental or intentional manipulation, loss, destruction, and access by unauthorized parties. Our Platform provider uses encryption to protect any information you enter in dialogue forms on our Platform and your data against unauthorized third-party access during transfer. You can recognize an encrypted connection by the change in your browser address line from “http://” to “https://”, and the padlock symbol appearing in your browser window.

If you send us unencrypted data in a normal, unprotected email, it is possible that unauthorized parties may gain knowledge of or modify your data during transmission via the internet. We are committed to taking reasonable efforts to secure the information that you choose to provide us, and we use a variety of security technologies and procedures to help protect against unauthorized access to or alteration, disclosure, or destruction of Personal Data. We restrict access to Personal Data to our employees, contractors and service providers (described in the “Disclosure of Information” section above) who need to know the information in order to operate, develop, or improve our services.

Unfortunately, no transmission of Personal Data over the Internet can be guaranteed to be 100% secure. Accordingly, and despite our efforts, MRHT cannot guarantee or warrant the security of any information you transmit to us, or to or from our online products or services. MRHT has no responsibility or liability for the security of information transmitted via the Internet. If you have questions about this Privacy Policy or the security of your Personal Data, please contact us as indicated under the “Contact Us” section below.

We retain your Personal Data for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements. We retain Personal Data collected through the Platforms we process on behalf of our Clients for as long as needed to provide services to our Client and pursuant to our contract with that Client.

Use of cookies

Cookies are been saved and processed by a third party (the community platform provider). For more information, please see the Legal Notice of Hivebrite.

Use of social networks

Social media functions and social plug-ins are embedded in our platform in the form of small icons. We currently embed the following social networks on our websites as icons: Facebook, Twitter, LinkedIn, Xing, Skype, and Google+.

By default, our Platform exclusively embeds deactivated icons, which do not contact the servers of these external networks when MRHT Platform is accessed. The buttons become active and create a connection only if you deliberately click an icon, thus indicating your consent to communicating with such providers. By entering your personal login data to these networks, you create a connection to yourself.

You thus leave MRHT internet presence and our sphere of influence. MRHT does not record which external network you activate. The next time you visit MRHT's Platform, the social media plug-ins return to their inactive modus, ensuring that no data is automatically communicated to social media upon such return visit.

When you share content from MRHT Community with the social plug-in, a corresponding notification is sent to the social network and saved in accordance with the respective network's policy. Please consult the respect social network's data protection statement regarding the scope and purpose of the data collected, its use and processing, as well as your respective rights and options in protecting your privacy.

Email

The email address you provide will be used by MRHT to reply to you with the information you request. Any personal or confidential information will be encrypted or, if this is not possible, sent to you by regular mail. If the contents of the email refer to a contractual relationship, MRHT will save the email. The email address will be saved exclusively for corresponding with you, and not disclosed to third parties. Some community members may be invited via email by an appointed colleague of MRHT who will contact them for the first time, either with or without a preceding introduction from an MRHT colleague who has an established communication with these members. Nevertheless, should you receive any unsolicited email that purports to be from us, it is fraudulent and should be deleted. Before you send MRHT an unencrypted email, please remember that its contents are not protected against unauthorized access or manipulation.

Inapplicability of Privacy Policies of Any Linked Websites or Other Third Parties

This Privacy Policy only addresses MRHT's use and disclosure of your Personal Data. The Platform may contain links to other websites, so please be aware that we are not responsible for the privacy practices of other websites, and we are not liable for their misuse of Personal Data. We encourage you to be aware that when you go to another website you should carefully read their privacy policy.

Children

The Platform is not intended for use by or targeted at children under 13, and we do not knowingly or intentionally collect information about children under 13.

Conditions of Use

By using the Platform and our services, you agree to the terms and conditions contained in this Privacy Policy and Conditions of Use and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use the Platform and/or any MRHT benefits or services. You agree that any dispute over privacy or the terms contained in this Privacy Policy and Conditions of Use and any other agreement we have with you will be governed by the laws of Greece.

Sending your data to third countries

If personal data needs to be transferred to service providers or Group companies outside the European Economic Area (EEA), this will be done only if the European Commission has confirmed that the respective country's level of data protection is sufficient, or if data protection is otherwise sufficiently guaranteed (for example through standard EU contractual clauses, Privacy Shield).

You may also request the information from the contact person.

Changes to the Privacy Policy

As MRHT, its products, and its services change from time to time, we may update this Privacy Policy to reflect changes to our information practices. We reserve the right to amend the Privacy Policy at any time, for any reason, and may do so by posting a new version online. Your continued use of the Platform and/or continued provision of Personal Data to us will be subject to the terms of the then-current Privacy Policy. If we make any material changes or if otherwise required by the applicable law, we will notify you by email (sent to the e-mail address specified in your account) or by means

of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Who is responsible for processing your data and who is our Data Protection Officer?

If you have any questions about this Privacy Policy or our treatment of the information you provide us, please contact as at:

MR HealthTech Ltd.
95-97 Kifisias Avenue
151 24 Maroussi, Athens, Greece
T. +30 213 0104800
F. +30 210 8064580
Email: dpo@mrhealthtech.com

You may contact our Data Protection Officer Panagiotis Rizos, at the above address, or via the email dpo@mrhealthtech.com.

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