

Aspen Surgical Privacy Policy

Last updated: September 15, 2026

This Privacy Policy (the “Policy”) describes the types of personal information Aspen Surgical Products, Inc. (“Aspen Surgical,” “we,” “us,” or “our”) collects when you visit our website (aspensurgical.com), transact business with us, communicate with us, or otherwise interact with us online or offline. This Policy also describes how we use your personal information, who we disclose the information to, and certain rights and options you may have regarding your personal information.

By using our website, engaging in business with us, communicating with us, or otherwise interacting with us, you consent and agree to our collection, use, and disclosure of your personal information as described in this Policy. If you do not agree with this Policy, please do not provide us with your information.

Important Information About This Policy

While we always aim to provide complete and transparent information about how we process your personal information, we reserve the right to amend or update this Policy to accurately reflect changes in our processing activities or align with new legal requirements. As a result, it is important that you read this Policy closely so that you are aware of how and why we are using your personal information.

To assist us in ensuring that we can provide the most accurate information possible, we ask that you check this Policy for updates. We also ask that, when we have an ongoing relationship with you and any of the data you have provided is no longer accurate, you keep us informed of this so we can amend our records accordingly.

1. Personal Information We Collect

A. Personal Information You Provide or Make Available

For the purposes of this Policy, “personal information” is any information that identifies, relates to, or can be used to contact a particular individual. Aspen Surgical operates on a business-to-business basis and, as such, we do not collect personal information from individuals acting in a personal or consumer capacity. The types of personal information we collect and receive about you include the following categories.

- **Contact information** - First name, last name, employer, employment position, mailing address, billing address, email address, and telephone number.
- **Account information** – If you register for an account with us, your username, account password, and other information that we may request or that you may provide relating to your account.
- **Customer support information** - Copies of any inquiries you submit to us or communications you engage in with us (such as customer support requests), whether by emails, calls, forms, social media, features available on our website, or other means.
- **Marketing and communications information** - Details regarding informational and promotional materials you may have requested or received from us, the services or products in which you are interested, your receipt of newsletters or other promotional communications, and information on your marketing or communication preferences.

- **Transactional information** - Details about your company's transactions with us, including products purchased, method of payment and related information (e.g., bank account number), relevant billing or shipping addresses, payments received, transaction history, and other information relating to the products or services purchased by you or your company.
- **Job applicant information** - If you are applying for a job with Aspen Surgical, we may also collect information about you that you submit to us in response to our company job posting. In addition to your contact information, we may collect your education and previous employment information, resume, cover letter, or other relevant documents, and information sufficient to conduct a background check in connection with your application.
- **Device, usage, location, and preference information** - Details regarding how and when you use our website, including the frequency and duration of your usage, the pages you view, your IP address and device identifier, general location based upon IP address, what website or search terms referred you to our website, and information about your interaction with our website.

We collect this information when you access, use, or navigate our website, purchase products on our webstore, fill in forms on our website, request information, communicate with us (including by phone, email, or otherwise), interact with features of our website, visit or engage with our social media pages, participate in surveys or sponsored activities, or otherwise provide us with personal information.

Please note that we may aggregate or anonymize the foregoing types of data such that they are no longer capable of identifying you, in which case they are no longer considered "personal information."

B. Automatically Collected Personal Information

Like most website operators, we use various technologies to collect certain types of information about the users of our website. Please note that the vendors that supply the pixels, tags, web beacons, cookies, and the other tracking technologies discussed below may collect or receive this information at the same time we do.

The technologies we use on our website include the following.

- **Pixels, tags, web beacons, gifs, and similar code-based technologies.** These technologies are small pieces of code that run when a website page or an email is loaded. They are used to monitor the behavior of the visitor or email recipient (such as what icons were clicked on or whether links in an email were opened) and gather analytics and details about the interaction. For example, when you open our homepage, a pixel may run and generate information based on the visit (e.g., what day and time you were on the homepage), and then this information is processed by us or our vendors. Pixels work in conjunction with cookies to let us know what portions of our website are of interest to you and to help us provide you with tailored information. Even if you have disabled or turned off cookies (discussed below), the pixels, tags, and web beacons we use may still detect and collect certain information about your interaction with our website.
- **Cookies:** Cookies are small text files that can be used by websites to make a user's experience more efficient. Our website uses different types of cookies to, among other things, automatically recognize you when you return to our website, store information regarding your preferences, and analyze traffic to our website. Please note that where cookies are essential to the operation of our website, if disabled, you may not be able to enjoy certain features of the

website. For further information about cookies, including how to refuse cookies, please visit www.allaboutcookies.org.

- **Log Files.** We use log files to track actions occurring on our website and to collect data about visitors, including internet service provider, referring/exit pages, and date/time stamps. This information is used for security purposes and to detect and prevent fraud.
- **Analytics.** Our website may also deploy third-party analytics tools, such as Google Analytics. You can find more information about how data is collected and processed in connection with the Google Analytics [here](#). You can also read Google's privacy policy [here](#).

These technologies may be set or controlled by us (first-party technologies), or they may be set or controlled by third-party vendors (third-party technologies). Further, these technologies can be categorized as follows.

- **Essential:** These technologies are necessary for the website to function and cannot be switched off in our systems. For example, cookies that allow pages to load correctly.
- **Performance:** These technologies allow us to count visits and traffic sources so we can measure and improve the performance of our website. They help us to know which pages are the most and least popular and see how visitors move around the website. For example, technologies we use for analytics.
- **Functional:** These technologies are not strictly necessary for the website to function but help us improve your experience and understand how our site is used. For example, cookies and pixels that analyze your browser settings and preferences.
- **Advertising:** These technologies support features like embedded videos or social media sharing. These technologies may collect personal information and may track your activity across other websites.

The information collected through these technologies may be combined with personal information or aggregated with other information we technologically or manually collect about or from you. We may share information about your use of our website with our advertising and analytics partners, who may combine it with other information that you previously provided to them.

Please see the section below titled "Your Choices About Personal Information" for more information about options you may have to with respect to these technologies.

C. Personal Information from Other Sources

We may obtain both personal and non-personal information about you from affiliates, business partners, suppliers, and other third parties and add it to other information we have collected. For example, we may receive invitee lists for events that we are co-sponsoring. We may also purchase business contact information about leads and potential customers so that we can market to, or communicate with, those leads and potential customers regarding our products and business. We, and the third parties we engage, may combine information we collect from you with information obtained from other sources. This helps us improve the information's overall accuracy and completeness, and also helps us better tailor our interactions with you.

D. Personal Information from Social Media

If you interact with us on any social media platform: (i) depending on your social media privacy settings, the personal information that you submit on the social media platform may be read, collected, or used by us as described in this Policy, and (ii) where we respond to any interaction with you on social media, your account name/handle may be viewable by any and all members or users of our social media accounts. Social media platforms operate independently from us, and we are not responsible for the personal information that you choose to share on any social media platform. We encourage you to review the privacy policies and settings of any social media platform with which you interact to help you understand their privacy practices.

2. How We Use Personal Information

We (or service providers acting on our behalf) use your personal information for the following purposes:

- Negotiating, entering into, and managing our business relationship, agreements, and transactions with your company.
- Providing requested products and services, including responding to sales requests, providing quotes for products and services, and providing updates on orders.
- Communicating with you and responding to your inquiries and communicating regarding our products and services, informing you about new products, responding to your inquiries, managing customer services issues, and otherwise communicating with you regarding our agreements with, or products and services for, your company.
- Providing and optimizing your experience using our website and ensuring that our content is presented to you in the most effective manner. This includes by leveraging third-party service providers who may assist with or facilitate our website's functionalities to gather analytics and other insights into the users who visit our website.
- Developing, updating, and improving our goods and services, website, customer service, and customer experience, and otherwise improving our knowledge and insights regarding customers.
- Sending you promotional or informational communications and solicitations, tracking your marketing preferences, engaging in analytics on our website, and for our internal marketing purposes.
- Notifying you about changes to products, services, or the terms governing our products and services, or material changes to this Policy.
- Preventing and detecting fraud, financial crime, hacking activities, security breaches, and other unlawful activities in connection with the website or the purchase or use of our goods and services.
- If you are a job applicant, to process your application to our company, including facilitating and scheduling interviews or any other follow up items.
- Providing you with surveys or otherwise soliciting feedback from you.
- Enforcing our agreements with you or your company, complying with our legal or regulatory obligations, and defending or advancing legal claims.
- Performing other functions, our agreements with you or your company, and other issues.
- As otherwise described to you at the time of collection or to which you otherwise consent.

For more information about your options relating to your personal information and your communication preferences, see "Your Choices About Personal Information" below.

3. Sharing of Your Personal Information

When the information we collect about you is aggregated, anonymized, or otherwise does not identify you, we may use that information for any purpose or disclose it to third parties, to the extent permitted by applicable law.

In addition, we may share your information with the following:

- Service providers and third-party vendors we use to administer our business and as necessary to conduct our business. For example, our IT providers, secure payment processing providers, email, chat, and phone communication providers, insurance providers, and document storage providers.
- Legal authorities, courts, regulators, or other governmental entities where required by applicable law, regulation, court order, subpoena, search warrant, or other lawful request for information.
- Marketing and advertising vendors that may assist with lead generation, hosting information relating to customers and business partners and potential customers or business partners, marketing automation, advertisement placement and targeting, and marketing campaigns and communications.
- Analytics vendors to understand our website traffic and usage patterns, optimize our website, track marketing conversions, and identify potential new customers or users.
- Affiliates, related entities, and business partners who may offer products or services that are relevant to your company.
- Our professional advisors, such as lawyers, accountants, and other similar advisors.
- Buyers or other successors prior to or in the event of a merger, sale, divestiture, restructuring, dissolution, or reorganization, or sale or transfer of some or all of our assets, whether as a going concern or part of a bankruptcy, liquidation, or similar proceeding.
- Other parties for any purpose we disclose at the time you provide personal information.

We further reserve the right to refer or disclose your information to law enforcement or regulatory authorities in the event that we believe you, other individuals, our partners or service providers, or anyone else is in danger, at risk of harm, in violation of applicable laws, or represent a safety concern.

4. Retention of Data

We retain personal information for as long as necessary to fulfil the purposes we collected it, including for the purposes of satisfying any legal, accounting, or other mandatory reporting requirements. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process it, whether we can achieve those purposes through other means, and the applicable legal requirements.

5. Our Marketing Efforts

We may send you or your company direct marketing communications from time to time via physical, email, or text message, including news, updates, and other announcements relating to our goods, services, and business activities. We may also disclose your information to those of our affiliates and partners who have products or services that we believe may be of interest to you or your company. We will only send marketing messages where the law allows us to do so and, in the event that you no

longer wish to receive marketing communications from us, then you can always unsubscribe from our marketing communications using the functionality in the communication you have received or by contacting us at the information below.

6. Text Messages

If you opt in to receive text messages from us, we may collect your mobile phone number(s) and your consent to receive text message communications at that number(s). The text messages we send may include purchase confirmations, delivery reminders, informational updates, and other communications related to our products and services. They may also include promotional or marketing messages. These messages may be sent using automated dialing technology and may be sent by Aspen Surgical or service providers acting on our behalf.

Message frequency may vary. Message and data rates may apply and Aspen Surgical is not responsible for any fees or charges imposed by your mobile carrier. Consent is voluntary and is not a condition of purchase. You may opt out of receiving text messages at any time by replying STOP to any message. After you send STOP, you may receive a confirmation message confirming your opt-out. For assistance, reply HELP to any message you receive from us or contact us using the information provided below.

We maintain records of your opt-in consent in accordance with applicable laws and mobile carrier requirements. We rely on mobile carriers to transmit text messages, and carriers are not liable for any delayed or undelivered messages.

7. Your Choices About Personal Information

A. Website Technologies and Advertising

Depending on your browser or device, you may have the option to set the browser to accept all cookies, reject all cookies, notify you when a cookie is set, or delete cookies. Each browser and device are different, so we recommend you evaluate the tools and settings available in your browser or device, as well as any available instructions for the same. In addition, you may configure cookie settings using our cookie management tool here. Please note that if you disable or delete cookies, you may not be able to access or use certain features of our website.

The National Advertising Initiative also makes resources available to assist consumers in opt-out of certain tailored online ads, which you can access at <https://optout.networkadvertising.org/?c=1>.

B. Marketing Emails

As required by applicable laws, you can opt-out of receiving promotional emails from us by clicking the “opt out,” “unsubscribe,” or similar link in any such promotional emails and following the instructions provided. You can also opt out of receiving certain communications by contacting us at the “Contact Us” information below.

C. Analytics Tools

We may use Google Analytics and similar tools in connection with our website. If you would like to refrain from having your data collected by these tools, use the following link:

<https://tools.google.com/dlpage/gaoptout>.

D. Updating Your Information

We take reasonable steps to keep your personal information accurate and complete. You can access or update your personal information, including contact or account information, by contacting us at the “Contact Us” information below.

E. Declining to Provide Information

You can choose not to provide us with information we may request, but that may result in you being unable to use certain features of our website, request information about our Services, or initiate other transactions with us.

F. Do Not Track Mechanisms

Please note that our website does not honor “Do Not Track” signals, and such signals will not impact the operation of our website. Do Not Track signals are different than the Global Privacy Control (more information about GPC can be found at <https://globalprivacycontrol.org/>).

8. Security

We use certain administrative, technical, and physical safeguards to protect your personal information against loss, theft, and unauthorized use, disclosure, or modification. Please be aware that no data transmission online is 100% secure. While we strive to protect your personal information, we cannot ensure or guarantee the security of any information you provide us and you do so at your own risk.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

9. Additional Information for California Residents

If you are in California, please see our Privacy Notice for California Residents, which contains additional information about our collection and use of your personal information and rights you may have under California law.

10. Additional Information for Individuals in the EU, UK, and Switzerland

A. Rights Under the General Data Protection Regulation

Individuals in the EU, the UK and Switzerland have the following rights with respect to their personal information pursuant to the General Data Protection Regulation (“GDPR”) (or an analogous data protection law, such as the UK GDPR or Swiss FADP). Note, however, that not all rights apply in all circumstances.

- **Right of access:** subject to certain exceptions, you have the right to access the personal information that we hold about you. If you request access to data to protect the rights of others, we may verify your identity before releasing information to you.
- **Right to rectify your personal information:** if you discover that the information we hold about you is inaccurate or incomplete, you have the right to correct the information.
- **Right to erasure:** you may ask us to delete information we hold about you in certain circumstances. This right is not absolute, and it may not be possible for us to delete the information we hold about you, for example, if we have an ongoing contractual relationship or are required to retain information to comply with our legal obligations.
- **Right to restrict processing:** in some cases, you may have the right to have the processing of your personal information restricted. For example, where you contest the accuracy of your personal information, its use may be restricted until the accuracy is verified.
- **Right to object to processing:** you may object to the processing of your personal information (including profiling) when it is based upon our legitimate interests. You may also object to the processing of your personal information for the purposes of direct marketing and for the purposes of statistical analysis.
- **Right to data portability:** you have the right to receive, move, copy, or transfer your personal information to another controller when we are processing your personal information based on consent or on a contract and the processing is carried out by automated means.

You may also have the right to make a complaint to the relevant Supervisory Authority. A list of EU Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en. For the UK, please visit: <https://ico.org.uk/make-a-complaint/>. For Switzerland, please visit: <https://www.edoeb.admin.ch/en/contact-2>.

For the personal information discussed in this Policy, we are typically the “data controller” under the GDPR. As a result, if you wish to exercise one of the rights discussed above, you may do so by submitting a written request to customerservice@aspensurgical.com with the subject line, “GDPR Request.” This is normally free, unless this process is unduly difficult or is clearly unfounded, repetitive, or excessive, in which case we may charge a reasonable fee or decline to respond. Once we have received your request, we will review it and contact you within thirty (30) days of receipt of your request, will notify you of any delay in processing your request and, in any event, will respond to the request within three (3) months. Please note that we may need to request specific information from you to help us confirm your identity.

B. Lawful Basis Under GDPR

We will use different lawful basis under the GDPR to process personal information, depending on the nature of the information and your relationship with us. The following table describes how we use your personal information and our lawful basis for doing so. We may process your personal information on more than one basis depending on the specific purpose for which we have collected or use the information.

Purpose/Activity	Type of Information	Basis for Processing
To enter and manage our business relationship with your company, including:	• Contact information • Customer support information	• Necessary for our legitimate interests (to manage our business)

• Negotiating and performing agreements with your company • Responding to inquiries and providing customer support and service • Managing and processing transactions for our products • Notifying you about changes to our products, Services, business terms, or this Policy • Communicating with you and responding to your inquiries regarding our products, agreements with you or your company, and other issues	• Transactional information • Financial information	relationships and administer our operations including through the keeping of appropriate records) • Performance of a contract with you • Necessary to comply with legal obligations
To administer and protect our business including: • Maintaining business records for legal purposes and complying with tax requirements • Defending and advancing legal claims • Enforcing our rights under any agreements • Ensuring effective security for our website and Services • Conducting website maintenance • Identifying and addressing security risks and unlawful activity	• Contact information • Customer support information • Transactional information • Device, usage, location and preference information	• Necessary for our legitimate interests (running our business, facilitating administration and IT services, network security, to prevent fraud, or in the context of a business reorganization or restructuring) • Necessary to comply with legal obligations
To make decisions about how optimize our website and services, advertisements, and marketing efforts, and to better understand the effectiveness of our marketing efforts	• Contact information • Marketing and communications information • Transactional information • Device, usage, location, and preference information	• Necessary for our legitimate interests (better understanding website functionality and how website users navigate and interact with the site)

To advance and promote our business interests including contacting you regarding products, services, or promotions that may be of interest to your company, conducting surveys or soliciting feedback on our services, and updating, developing, and improving our products/services, customer service, and marketing efforts	• Contact information • Account information • Marketing information • Transaction information • Device, usage, location, and preference information	• Necessary for our legitimate interests (to enhance our services, improve our marketing strategies and develop our business) • Consent
To process your job application, conduct background investigations, and communicate with you regarding your application	• Contact information • Device, usage, location, and preference information • Job applicant information	• Necessary for our legitimate interests (to hire qualified applicants) • Consent

C. Transfers from the EU, Switzerland, and UK

If we transfer personal information from the EEA, Switzerland, or UK to the United States or any other country, we will implement appropriate legal mechanisms to ensure an adequate level of personal data protection consistent with the GDPR's requirements. For example, if the recipient country has not received an Adequacy Decision from the European Commission (such as the United States), we will rely on Standard Contractual Clauses (SCC) that have been approved by the European Commission as the lawful mechanisms for such transfers. Further, we will enter into appropriate data processing agreements with all non-EU (sub)processors that contain SCCs and define data protection standards to be employed by each (sub)processor.

11. Children's Privacy

Our website and services are intended for individuals over the age of 18 years old. We do not intentionally collect personal information from children under 13. If we learn that we have collected personal data from a child under 13 without verified parental consent, we will take steps to delete that information as required by applicable law. If you believe we may have collected information from a child under 13, contact us at customerservice@aspensurgical.com.

12. Links to Third-Party Websites

Our website may contain links to third-party websites. Those websites have separate privacy policies that you should review. We cannot take responsibility for the content of the websites or the third parties' data-handling practices.

13. Updates to this Policy

Please note that we may change this Policy from time to time. If there are changes to our Policy, we will post them here and update the “Last Updated” date at the top of this document. Continued use of the Services after any changes is deemed to be acceptance of those changes. Accordingly, we encourage you to check the Policy periodically for updates.

14. Contact Us

For questions, requests, or complaints about this Privacy Policy or our data practices, contact:

Aspen Surgical Products, Inc.
6945 Southbelt Dr. SE
Caledonia, MI 49316
+1-888-364-7004
customerservice@aspensurgical.com