



Privacy Policy

This Privacy Policy explain you about how Hygiena (“we”, “us”, “our”) handles your personal data when you use our SureTrend Cloud platform (hereafter “STC”).

1. **Controller** - The Controller for the use of your personal data is:
Hygiena LLC - 941 Avenida Acaso, Camarillo, CA 93012
2. **What personal data we process and why** - We may process your personal data in order to be able to provide you our STC and thereby perform the contract between your organization and Hygiena. Please find below a more detailed explanation of our purposes. Please be aware that, with the exception of the data requested for the creation of accounts, content data uploaded or otherwise documented in STC should not relate to an identified or identifiable natural person (“Personal Data”). We do not take any responsibility for the processing of any Personal Data uploaded by the user in STC with the exception of the personal data required for the creation of accounts.
 1. Creation of a new user account and use of our STC (legitimate interest). The relevant data consists of the following categories: first and last name, job title, phone number, email address, username and password, company name and company contact details.
 2. Authentication (legitimate interest and/or consent), including when you choose to access our STC by signing in with SSO, or with your Google account. The relevant personal data are: your name, email address, language preference, and profile picture. Please be aware that in case you use your Google account, Google shares the aforementioned data with us based on your consent. Google furthermore will also be able to process any logins with our SSC. For more information, please reach out to Google.
 3. Administration of user account (legitimate interest). The relevant personal data are: region, date, time, domain (if you wish to prohibit STC users from creating new accounts using an email address from the locked domain) and report emailing (in case you chose to receive alerts and reports when problems with your instrument occurs).
 4. Business operations and credit checks (legitimate interest and legal obligation). We may process your account information, and usage of our STC to provide you our services, for billing and account management, tax, compensation such as calculating employee commissions and partner incentives, internal reporting and business modelling, such as forecasting, revenue, capacity planning, product strategy, and financial reporting as well as credit checks, which involve credit agencies.

5. Technical support and respond to requests (legitimate interest). The relevant personal data are: name, email address, telephone number, company, country, content of request, date of request, any other data you may disclose to us.
6. Marketing communication, research and surveys (legitimate interest and/or consent). When you register on our STC or when you otherwise sign up explicitly to receiving marketing communication, we may process your personal data in order to provide you with personalized information about our products and services as well as conduct market research and satisfaction surveys. You may receive such marketing communication via email, WhatsApp, SMS or post after 48 hours of your registration or sign up. We may include individual tracking technologies in our messages, with which we can recognize when the message sent to you was accessed or opened and individualize the links in the message to determine when you clicked on which link. In certain regions, we may send you a confirmation message after you have explicitly signed up to receiving marketing communication. In such a case the registration to receiving marketing communication is not activated until you have clicked on the link in the confirmation message. You can opt out (therefore object to such processing or withdraw any given consent) from any marketing communication at any time. Simply use the unsubscribe link which is found at the end of every email. You can find more information on how to exercise your right in the paragraph “Your rights as a data subject” below. The relevant personal data are: name, address, company name, telephone number, email address, time and date of registration, usage data, respective product or service.
7. Website Analysis and use of Cookies (consent or legitimate interest). We use web analysis tools for the appropriate design of our websites and in order to identify and count returning visitors. These tools generate usage files on the basis of pseudonyms. To this purpose, cookies are being used according to the description in our consent management tool. We may use cookies and similar technologies (for simplicity reasons, hereinafter referred to as cookies), when you use our websites, platforms, applications as well as other products and services. Our cookie banner and consent management system show you a list of the cookies we use, including their provider, purpose, description and other relevant information. In the default setting, only the essential cookies are enabled. Via the consent management system, you can determine whether you allow the setting of additional cookies or not. You can adjust your preferences at any time via the consent management system.
8. Tracking and retargeting for marketing purposes (consent). We use (cross-device) tracking technologies so that we can display targeted advertising outside of our website and determine how effective our advertising is. To this purpose, cookies are being used according to the description in our consent management tool.

9. Evaluation of how you use our STC for statistical purposes and in order to improve the quality of our platform (legitimate interest). The relevant personal data are the following: date and time of visit, volume of data transmitted, access status, information about your web browser and operating system, referral link that indicates from which website you arrived, IP address (which is processed in such a way that it is not possible anymore to trace it back to you). The above-mentioned log data will only be evaluated anonymously.
10. Maintenance of the security of our websites (legitimate interest), platforms, applications as well other products and services. To protect our platform forms from automated requests, we use a Captcha function. As the Captcha function is provided by a third party, displaying the captcha will cause third-party content to be downloaded. This provides the third party with information that you have accessed our site and with the usage data technically required for this purpose. We have no influence on the further data processing by the third-party provider.
11. Compliance with legal and regulatory requirements and requests (legitimate interest or legal obligation). We might be required to process your data for legal and regulatory requirements or in order to establish, exercise and defend legal claims.
12. Corporate transactions purposes (legitimate interest or legal obligation). We may process your data during a sale of a (part of) business, or any restructuring, merger, joint venture, or other disposition of our business, assets, or stock or similar proceedings.
13. Embedded Videos Content. We embed video on our website regarding how to use our STC. These videos are not hosted on our servers. To prevent that any information is automatically sent to the third-party provider, we only display locally stored thumbnails. Consequently, content from third-party providers is only loaded and information is only being shared after you provide your consent via our consent management system.

You provide some of the relevant data directly to us, and we collect some data ourselves from your interactions, use, and experiences with our products and services.

Please find a table overview addressing the purposes, personal data, sources, legal basis and disclosure (recipient) under the section “Data Processing Table”.

3. **Social media** - When you visit our social media pages, we may process your personal data in the interest of public relations and communication (legitimate interest). Together with the provider of the respective social media pages you choose to visit, we are jointly responsible as controllers for the processing of your personal data. To the extent that the social media provider allows us to influence the processing of your personal data, we will act to ensure that they process your data in compliance with

the applicable data protection regulations. However, please be aware that in most cases we have no influence over the processing of your personal data by the social media provider. The data that you provide on our social media pages (such as comments, videos, pictures, public messages, etc.) are published by the social media platform provider. We do not process or use such data for any other purpose. We simply reserve the right to delete content, when this is required. If you wish to object to the processing of your personal data in this regard, please contact us as described in the section “Data Protection Requests” below. Depending on your request, we may refer you to other secure communication channels that guarantee confidentiality. In case we are not able to fulfil your request, we will direct your request to the relevant service provider. We may use our social media pages for advertisement purposes. To this end, we may use demographic, interest-based, behavior-based, or location-based target group characteristics provided by the provider of the respective social media page. You can find more information about the processing of your personal data when using social media pages in the privacy statements of the respective providers. Social media providers use their own tracking methods on their webpages. Therefore, it cannot be excluded that they may use your profile data for purposes such as to evaluate your habits, personal relationships, preferences etc. We have no influence on the processing of your data by the social media platforms. In particular, we cannot deactivate the statistics that the social media provider might disclose to us. Further information on the data processing conducted on the social media page by the provider can be found in the respective provider’s privacy policy.

4. **Data recipients** - We may disclose your personal data to third-parties in order to fulfil the purposes described in this Privacy Policy. For all Hygiena intragroup data access and transfers, we comply with applicable data protection requirements. Trusted third-party service providers who have a contract with us may also receive data for the abovementioned purposes. These third parties are in particular service providers who support us with regards to hosting, IT services and security, fraud detection, customer service, email delivery, data analysis, surveys, and consulting services. Hygiena may disclose your data to further recipients, such as public entities and institutions, including law enforcement, data protection authorities, tax authorities, credit agencies, banks, courts or other companies insofar as there is a legal basis for such disclosure. Hygiena shares your data to recipients outside of the Hygiena group only if there is a legal basis for the data transfer and appropriate data transfer mechanisms are implemented. For the fulfilment of the purposes described in this Privacy Policy we may transfer your personal data to countries that require additional safeguards under applicable data protection laws. If you wish to receive more information, please contact us at the email address specified in the paragraph “Data protection requests”.

5. Data Processing Table

Purposes	Categories of Personal Data	Sources	Legal Basis	Disclose
Creation of a new user account and use of our STC.	First and last name, job title, phone number, email address, username and password, company name and company contact details.	Obtained directly from the user	Legitimate interest	Our Hygiena Group companies; our service providers.
Authentication.	Name, email address, language preference, and profile picture	Obtained directly from the user.	Legitimate interest/consent	Our Hygiena Group companies; our service providers; our business partners.
Administration of users account.	Region, date, time, domain (if user wishes to prohibit STC users from creating new accounts using an email address from the locked domain) and report emailing (in case user choses to receive alerts and reports when problems with their instrument occurs).	Obtained directly from the user.	Legitimate interest	Our Hygiena Group companies; our service providers.
Business operations and credit checks	Account information and usage of our STC	Obtained directly from the user and from the user's interaction with our products and services.	Legitimate interest and legal obligation	Our Hygiena Group companies; our service providers; our business partners; credit agencies.
Technical support and respond to requests	Name, email address, telephone number, company, country, content of request, date of request,	Obtained directly from the user.	Legitimate interest	Our Hygiena Group companies; our service providers.

	any other data you may disclose to us.			
Marketing communication, research and surveys	Name, address, company name, telephone number, email address, time and date of registration, usage data, respective product or service.	Obtained directly from the user and from the user's interaction with our products and services.	Legitimate interest and/or consent	Our Hygiena Group companies; our service providers.
Website Analysis and use of Cookies	See our consent management system.	Obtained from the user's interaction with our products and services.	Consent or legitimate interest	Our Hygiena Group companies; our service providers.
Tracking and retargeting for marketing purposes	See our consent management system.	Obtained from the user's interaction with our products and services.	Consent	Our Hygiena Group companies; our service providers; our business partners.
Evaluation of how you use our STC for statistical purposes and in order to improve the quality of our platform	Date and time of visit, volume of data transmitted, access status, information about user web browser and operating system, referral link that indicates from which website user arrived, IP address (which is processed in such a way that it is not possible anymore to trace it back to user). The above-mentioned log data will only be evaluated anonymously.	Obtained from the user's interaction with our products and services.	Legitimate interest	Our Hygiena Group companies; our service providers.

Maintenance of the security of our website	See our consent management system.	Obtained from the user's interaction with our products and services.	Legitimate interest	Our Hygiena Group companies; our service providers.
Compliance with legal and regulatory requirements and requests.	Hygiena might be required to process your data for legal and regulatory requirements or in order to establish, exercise and defend legal claims.	Obtained from the user's interaction with our products and services.	Legitimate interest or legal obligation	Our Hygiena Group companies; our service providers; Public and governmental authorities, and professional advisors.
Embedded videos	See our consent management system.	Obtained from the user's interaction with our products and services.	Consent	Our Hygiena Group companies; our service providers.

6. **Storage Period** - Unless otherwise specified, we will delete your personal data when it is no longer necessary to achieve the purpose for which it was collected and no legal obligations exist that requires a longer retention.
7. **Your rights as a data subject** - Depending on your jurisdiction, you may have the right to:
 - access your data and receive a copy of your data;
 - rectification and erasure of your data;
 - restriction of processing;
 - data portability;
 - withdraw consent;
 - object to the processing, if the data is processed pursuant to the legitimate interests of Hygiena, including for marketing purposes;
 - lodge a complaint with a supervisory authority if you believe that the processing of your personal data infringes applicable data protection regulations.

If you wish to assert your rights, please use the contact details indicated in the paragraph “Data protection requests” below.

8. **Data protection requests** - In case of any questions related to data protection, requests about your rights as a data subject, or complaints please refer to our contact us webpage for regionally specific contact information: <https://www.hygiena.com/contact-us/>
9. **Additional information for Californian residents** - This section provides additional information for Californian residents, as required by the California Consumer Privacy Act 2018 (“CCPA”), as amended by the California Privacy Rights Act of 2020 (“CPRA”)

1. **9.1. California Privacy Rights** - You might have the right to:

- know about the personal data we collect about you and how it is used;
- know whether and to whom your personal data is sold and/or disclosed;
- request that personal data collected from you are deleted;
- not be discriminated for exercising your CCPA and CPRA rights;
- request the rectification of personal data we collect about you.

If you wish to assert your rights, please use the contact details (email address or toll-free telephone number) indicated in the Privacy Policy in the paragraph “Data protection requests” above.

2. **9.2. We do not sell nor share your personal data** - You have the right to know whether your personal data is sold and shared and to whom. According to the CPRA your personal data is:
 - sold when it is shared for monetary or other valuable consideration;
 - shared when it is shared to a third party for cross-context behavioral advertising for the benefit of a business where no money is exchanged.

We do not sell nor share your personal data and, therefore, we do not offer an opt out.

3. **9.3. We do not process your sensitive personal data** - We do not process sensitive personal information as defined by the CPRA and, consequently, we do not offer the possibility to limit the use of this category of personal data.

10. **Changes to the privacy policy** - We reserve the right to update this privacy statement at any time. This section provides you with information about the privacy statement version history.

Version	Date
Version 1.0	November 2022
Version 1.1	January 2023