



Hygiena SureTrend 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 “SURETREND SOFTWARE”).

WE DO NOT SELL YOUR PERSONAL DATA

Controller

The Controller for the use of your personal data is: Hygiena LLC - 941 Avenida Acaso, Camarillo, CA 93012

Data Collection & Processing

We may process your personal data to be able to provide you our SURETREND SOFTWARE and thereby perform the contract between your organization and Hygiena. Please find below a more detailed explanation of our purposes. Note, except for the data requested for creating your accounts, content data uploaded or otherwise documented in SURETREND SOFTWARE 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 SURETREND SOFTWARE except for the personal data required for the creation of accounts.

Legitimate Interest and/or Consent & Related Data

Below is an unexhaustive list of actions you may take that create a legitimate interest and/or consent.

New User Account Creation (legitimate interest)

When you create a new user account and/or use SURETREND SOFTWARE a legitimate interest of use is established. 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.

Authenticating to SureTrend Software (legitimate interest and/or consent)

When you sign in to SURETREND SOFTWARE, including when you access our SURETREND SOFTWARE by signing in with Single Sign On (SSO), or with your Google account. The relevant personal data are: your name, email address, language preference, and profile picture. Please be aware that if 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.

Administration of User Account (legitimate interest)

The relevant personal data are: region, date, time, domain (if you wish to prohibit SURETREND SOFTWARE 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).

Business Operations and Credit Checks (legitimate interest and legal obligation)

We may process your account information and usage of our SURETREND SOFTWARE to provide you our services for billing and account management, tax, compensation such as calculating employee commissions and partner



incentives, internal reporting and business modeling, such as forecasting, revenue, capacity planning, product strategy, and financial reporting as well as credit checks, which involve credit agencies.

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.

Marketing Communication, Research and Surveys (legitimate interest and/or consent)

When you register on our SURETREND SOFTWARE or when you otherwise sign up explicitly to receiving marketing communication, we may process your personal data 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. 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 receive marketing communication. In such cases, the registration to receive 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 found at the end of every email. You can find more information on how to exercise your rights 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, and respective product or service.

Website Analysis and Use of Cookies (consent or legitimate interest)

We use web analysis tools for the appropriate design of our websites and to identify and count returning visitors. These tools generate usage files based on 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 allows you to "Accept All" or "Decline All." Hygiena may choose to list all cookies, including their provider, purpose, description and other relevant information and provide you the ability to select specific cookies to accept. If you are uncomfortable with website that use any level of cookie technology, we recommend you do not visit Hygiena website. By using our website you accept our current implementation of cookie settings.

Tracking and Retargeting for Marketing Purposes (consent)

We use (cross-device) tracking technologies to display targeted advertising outside of our website and determine how effective our advertising is. To this purpose, cookies are being used.

Evaluation of SURETREND SOFTWARE Use (legitimate interest)

We collect data to understand how you use SURETREND SOFTWARE. This data is used for statistical purposes to improve the quality of our platform.

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.

Maintenance of the Security of our Websites, Platforms, Applications and other Products and Services (legitimate interest)

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.

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 to establish, exercise and defend legal claims.

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.

Embedded Video Content

We embed video on our website regarding how to use our SURETREND SOFTWARE. These videos are not hosted on our servers. To prevent any information from being 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”.

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 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 fulfill 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 web pages. Therefore, it cannot be excluded that they may use your profile data for purposes such as evaluating your habits, personal relationships, preferences, etc. We have no influence on the processing

of your data by 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 provider's social media page can be found in the respective provider's privacy policy.

Data recipients

We may disclose your personal data to third parties to fulfill 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 with a contract with us may also receive data for the abovementioned purposes. These third parties are, in particular, service providers who support us with 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 fulfillment 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".

Purposes	Categories of Personal Data	Sources	Legal Basis	Disclose
Creation of a new user account and use of our SURETREND SOFTWARE.	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 SURETREND SOFTWARE 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 SURETREND SOFTWARE	Obtained directly from the user and from the user's interaction with	Legitimate interest and legal obligation	Our Hygiena Group companies; our service providers; our business

		our products and services.		partners; credit agencies.
Technical support and respond to requests	Name, email address, telephone number, company, country, content of request, date of request, any other data you may disclose to us.	Obtained directly from the user.	Legitimate interest	Our Hygiena Group companies; our service providers.
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 SURETREND SOFTWARE 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	Hygiena might be required to process your data for legal and regulatory requirements or in	Obtained from the user's interaction with	Legitimate interest or legal obligation	Our Hygiena Group companies; our service providers;

requirements and requests.	order to establish, exercise and defend legal claims.	our products and services.		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.

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 require longer retention.

Your rights as a data subject depends on your jurisdiction, you may have the right to:

1. Access your data and receive a copy of your data
2. Rectify and erasure of your data
3. Restrict the processing of your data
4. Move your data
5. Withdraw consent
6. Object to the processing if the data is processed pursuant to the legitimate interests of Hygiena, including for marketing purposes
7. Submit 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.

Data Protection Requests

In case of questions related to data protection, requests about your rights as a data subject, or complaints please email customerservice@hygiena.com.

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")

California Privacy Rights

You might have the right to:

1. know about the personal data we collect about you and how it is used;
2. know whether and to whom your personal data is sold and/or disclosed;
3. request that personal data collected from you are deleted;



4. not be discriminated for exercising your CCPA and CPRA rights;
5. request the rectification of personal data we collect about you.

If you wish to assert your rights, please email customerservice@hygiena.com or call 1-805-388-8007.

WE DO NOT SELL 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 with 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.

Further information on the categories of data we collect (and that we might have collected in the preceding 12 months) the sources from which the personal data is collected, the purposes for collecting the data and the parties to which the data is shared for such clarified purposes can be found in this privacy policy

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.