Date: May 2026

How Spectrum Dynamics Medical works with GDPR

On May 25, 2018, the General Data Protection Regulation (the "GDPR") entered into effect. The law gives individuals stronger protection of their personal data. This document describes, at a high level, how Spectrum Dynamics Medical ("SDM") works with data privacy compliance and the support we would like from our customers to support our compliance activities regarding patient data.

1. Internal policies and procedures

   The SDM Privacy Office has updated our internal policies to meet the requirements of the new law and is rolling out training on our data privacy program to all employees globally. The data privacy program includes comprehensive guidelines to all SDM employees on how to handle personal data collected externally from stakeholders such as customers, vendors, and other business partners to ensure that all our products and processes meet the requirements of GDPR.

2. Data privacy contract management

   When SDM shares personal data with a third party that will process the data on SDM instructions (a so-called Data Processor) a written contract needs to be in place between the parties (a data processor agreement) imposing certain obligations and controls on the third party. SDM is reviewing and updating all our supplier contracts to ensure they meet this requirement.

   When SDM collects personal data from customers and other business partners to *handle your order or the overall customer relationship SDM is the so-called Data Controller*. This means that SDM independently handles the personal data collected and that SDM needs to follow the GDPR requirements put on data controllers, such as having a lawful ground for processing the personal data, having adequate security measures in place to safeguard the data, and informing the individuals in an appropriate way how their personal data is being processed. SDM global privacy statement offers in-depth information on how SDM handles data which customers submit:

   CVE@spectrum-dynamics.com

Spectrum Dynamics Medical SA
Rue de Lausanne, 31 1110 Morges Switzerland
Tel: +41 21 544 4710 Fax: +41 21 544 4711
spectrum-dynamics.com

3. Handling of patient data

Under the GDPR, processing of special categories of personal data such as health related data of patients, needs to be managed with special care and stronger protection and GDPR does thus place stronger obligations on the data controller. Further the principle of data minimization means that SDM is not allowed to collect more personal data than necessary in relation to the purposes for which it is processed.

To comply with the above requirements SDM does not need or want any information which enables the company to identify the individual patient, as SDM does not need to do this to manage customer orders. When it comes to the submission of patient specific orders to SDM, customers should never include any identifiable information about the patient such as name, date of birth, gender, age etc. SDM acknowledges that customers need to keep track of orders, and so therefore SDM kindly asks customers to arrange their own order reference number system to match orders (this way the data will be pseudonymized).

Even though customers are only sending pseudonymized data, the GDPR applies to this data. Therefore, SDM kindly asks customers to ensure that they have collected the appropriate consents from their patients to share the data with SDM.

In those cases when any data is submitted in an order situation, the same principle as above applies, i.e., the patient identifiable information should be deleted/erased.

4. Who to contact for questions:

The SDM local customer service representatives will answer any further questions:

CVE@spectrum-dynamics.com

Spectrum Dynamics Medical SA
Rue de Lausanne, 31 1110 Morges Switzerland
Tel: +41 21 544 4710 Fax: +41 21 544 4711
spectrum-dynamics.com