

Breas Global Data Privacy

1. Data Privacy Focus and Purpose

We, at Breas, are firmly committed to protecting the privacy, integrity and security of all Personal Data we work with across our organizations. This Global Data Privacy Statement applies to all global entities within Breas Medical Group (“Breas”) and reflects our dedication to ensuring that all processing of Personal Data is conducted fairly, lawfully and transparently, in accordance with applicable data protection laws.

This commitment extends to all Breas employees, contractors, management, and third-party partners who handle or access Personal Data as part of their responsibilities. Breas ensures that Personal Data is only collected and processed for clearly defined and legitimate purposes, with appropriate privacy controls and safeguards in place.

2. Personal Data

Personal Data refers to is any information that can directly or indirectly identify a natural person. At Breas, we collect and process Personal Data from a wide range of individuals, including but not limited to customers, employees, suppliers, and business partners, whether the interaction occurs in person, via phone, email, or through digital platforms such as our websites.

While the legal definition of Personal Data may vary across jurisdictions, Breas ensures that its handling of such data always aligns with the most stringent applicable laws and standards. We conduct jurisdictional assessments to determine the required safeguards and take all necessary steps to maintain compliance across our global operations.

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3. Data Privacy Obligations

3.1 Personal Data Review

Breas reviews and considers all privacy risks for Personal Data before we collect, use, retain, or disclose within our company systems, projects, or to third parties we work with.

Before Personal Data is processed, Breas performs risk assessments and evaluates the use of the Personal Data for our internal and external projects, websites, and implementation of any work process.

3.2 Transparency and Consent

We care about Personal Data at Breas. We always offer transparency to the individuals to whom we process Personal Data about. We only collect Personal Data that is necessary for the purposes for which it was collected.

Where applicable, Breas makes available a Privacy Notice about how Personal Data is processed for that specific business operation or system. Privacy Notices can include the information listed below, in addition to any other information, required by applicable local law:

- The identity of the Breas Medical affiliate collecting the information;
- The use(s) of the Personal Data;
- If the Personal Data will be shared with or disclosed to third parties or other Breas affiliates;
- If the Personal Data will be transferred from its original country of origin; and
- Statement of how individuals can exercise their rights in connection to their Personal Data and a contact person to inquire about their rights (if any).

Breas, when required by the applicable law for certain countries, will obtain the consent of individuals to collect, use, retain, and disclose their Personal Data or Sensitive Personal Data. Sensitive Personal Data is collected only when absolutely necessary and legally required. Some examples of Sensitive Personal Data include:

- Political opinions;
- Religious or other similar beliefs;
- Race or ethnic origin;
- Physical or mental health data;
- Sexual life or sexual orientation;
- Trade union membership;
- Any offence, or proceedings relating to an offence;
- Passport or Social Security Number;
- Financial information;
- Genetic information; or

- Biometric Data.

Breas must gain additional consent from an individual if the purpose for processing of the Personal Data changes to a new purpose. Breas will follow the legal requirements for all countries when processing consent for Sensitive Personal Data.

3.3 Minimizing Personal Data

Breas will collect and use only the adequate, relevant, and necessary amount of Personal Data that is required for its intended purpose. Access to the Personal Data will be strictly enforced. Only authorized individuals who require access to the Personal Data will be given the appropriate level of access to that Personal Data.

3.4 Legitimate Interest

Breas will only use Personal Data where we are required to fulfill our legal obligation that aligns with our legitimate interest. Personal Data will be processed for the purpose it was collected for and as outlined in a Privacy Notice or information given to an individual.

3.5 Accurate and Up to Date

Breas will maintain Personal Data to be accurate and up to date at all times. Personal Data must remain accurate and up to date during its processing. Individuals have the right to update their Personal Data when necessary.

3.6 Security and Threats

Breas will protect any Personal Data collected and processed by following our relevant Breas policies and procedures and the appropriate level of technical security as expected or required by law or regulation.

Breas has the appropriate security to protect Personal Data against a range of threats for loss, theft, access, tampering, copying, and improper retention.

All employees at Breas are required to assess how Personal Data is processed for each business situation and take the appropriate steps to protect the Personal Data according to the local law and regulation by following Breas policies and procedures or collaborating with the Breas Data Protection Officer. Employees will report any threat in accordance with our Breas data incident reporting process.

3.7 Individual Requests About their Personal Data

Breas accepts and responds to any individual who inquiries about how their Personal Data is processed or what Personal Data is on file. Breas will respond to the individual's request based on the applicable law and the individuals' rights under that law.

3.8 Retention and Deletion

Breas will process and retain Personal Data for the purpose it was collected for and according to the law that applies. Personal Data will be securely deleted or destroyed after it is no longer necessary for the business activity or legal or regulatory requirement it was collected for.

3.9 Transferring Personal Data Internationally

Breas complies with all applicable laws when transferring Personal Data collected from its original country to an international location. Additional actions from Breas will be performed when required and necessary to fulfill the transfer.

3.10 Business Relationships with Third Parties

Breas reviews the business relationship with third parties and how Personal Data is transferred between and to those third parties in order to identify and evaluate any risks. The third-party access to the Personal Data must be appropriately limited and technically secured. Where required by law, a contract will outline and stipulate all the privacy standards for processing the Personal Data.

3.11 Marketing Material and Surveys

Breas cares about appropriately sending our marketing material and surveys. We follow the required laws that have rules in place for sending marketing materials or surveys. Breas will obtain consent from individuals where and when required.

Individuals can unsubscribe or remove consent from receiving Breas marketing material or surveys at any time. Breas will remove the individual's name from receiving any further information as requested.