

## Privacy statement – October 2020

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### *Revisions in privacy statement (in privacy statement May 2018):*

- Business units on page 2 have been updated
- Throughout the text, "Arion Holding" is replaced by "Arion"
- Typos have been removed throughout the text without changing the content

## Privacy statement – October 2020

This privacy statement is of Arion Holding B.V. (Rutherford 11, 6422 RE Heerlen, phone number +31 45 209 4000, e-mail: [gdpr@arion-group.com](mailto:gdpr@arion-group.com)), and is also applicable to the business units belonging to the Arion Holding B.V. (from now on called “Arion”. The business units falling under the scope of this privacy statement are:

- Arion International B.V.
- Arion Nederland B.V.
- Arion Benelux B.V.
- Arion North America Inc.
- Arion Deutschland GmbH
- Arion Iberia S.L.
- Arion Sverige AB
- Arion Bathing '21 International B.V.
- Arion Nordic ApS
- Arion Slide Solutions B.V.
- Arion Manufacturing B.V.
- Quimple B.V.

This privacy statement is based on the European General Data Protection Regulation 2016/679 (GDPR) that replaces the Data Protection Directive 95/46/EC and was designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens' data privacy and to reshape the way organizations across the region approach data privacy. Arion is active in several European countries, and selected the Dutch privacy authority (Autoriteit Persoonsgegevens) as the leading authority, based on the GDPR.

Arion revises its privacy policy/statement from time to time. The revisions will be identified and made public on our website. In case one of the revisions change the way we process personal data, we will notify the relevant persons directly.

This privacy statement contains information about the kind of personal data that we process (e.g. collect, save, use, consult, share, and document). Data is considered personal data if it is reducible to a single person. In other words, personal data is any information related to a natural person or 'Data Subject' that can be used to directly or indirectly identify the person. It can be anything from a name, a photo, an e-mail address, bank details, posts on social networking websites, medical information, or a computer IP address. Furthermore, information is provided about the duration that personal data is saved and whether the data is shared with third parties. Finally, you can find information about your rights with respect to the personal data that we process from you as a customer, (potential) partner, supplier, job applicant, employee or other person of which we process information. If you think your rights are violated by Arion, you can file a complaint at the Dutch privacy authority (Autoriteit Persoonsgegevens) of which you will also be informed in this privacy statement.

In general, we set clear boundaries with respect to the processing of personal data to respect your privacy, which mainly means, we will only use personal data for legitimate purposes. In the remainder of this privacy statement, we make the distinction between 1) information that we process for which you need to give permission and 2) information that we need to fulfill contractual obligations or agreements and for which we do not need your permission.

For every stakeholder, we also provide information about personal data that is shared with third parties in order to be able to deliver our services, if applicable. In general, Arion does not share your personal data with third parties. Arion shares personal data with third parties only when this is necessary for the execution of contractual obligations or for meeting possible legal obligations. For example, we have to share address information with third parties that ship our products. Your permission is only valid if it is clear for what you gave permission. You can withdraw your permission at any time.

We share personal data with third parties when we ask third parties to process these personal data. In some cases, third parties process personal data based on instructions of Arion and in accordance with our privacy statement. To ensure your personal data is protected and confidential at least as well as the data is protected at Arion, we have processing agreements with third parties with which we share your personal data. Arion remains responsible for data processing. Examples of third parties that

process personal data on behalf of Arion are our IT-suppliers, our website administrator, the administrator of our Customer Relationship Management (CRM) system and our Payroll partners. If applicable, we will inform you in this privacy statement which personal data is shared with third parties because of legal or contractual obligations and which personal data can only be shared with third parties with your permission.

#### *Automated decision-taking*

Arion does not make any decision based on automated processing. This means that no decisions are taken by computer programs without the involvement of humans, such as Arion employees.

#### *How long we keep personal data*

At Arion, personal data is kept for no longer than strictly necessary to achieve the objectives for which the personal data has been collected. Whenever there is a legal retention period, Arion will keep the particular personal data at least as long as this retention period. In general, we will keep the data for as long as we have a relationship with the particular person. Exceptions will be mentioned if applicable.

#### *What about backups of personal data at Arion?*

To secure our data from getting lost, we make backups of all our data, including personal data. Whenever a person of whom we process personal information requests for removal of such information, primary instances of the particular data will be erased with all due speed (unless we have to keep the particular data due to contractual or legal obligations). The personal data may reside in backup archives that must be retained for a longer period of time – either because we are required to retain data longer for contractual, legal, or compliance reasons. However, you can be assured that your personal data will not be restored back to our production systems (except in rare instances, e.g., the need to recover from a natural disaster or serious security breach). In such cases, the personal data may be restored from backups, but we will take the necessary steps to honor the initial request and erase the primary instance of the data again. Backup archives containing personal data will be protected with strong encryption, so that even if criminals were able to steal the archive, its contents will remain useless to them. Furthermore, retention rules have been put in place so that personal data in backup archives is retained for as short a time as necessary before being automatically deleted. Finally, records of all persons' requests regarding their personal data will be retained, as will audit logs that record all activities on backup archives containing personal data. This means that the user can be confident that their personal data has been backed up in accordance with GDPR principles and that their rights, including the right to be forgotten, have been honored.

### **Your privacy rights**

The privacy rights of all persons of which we process personal information are governed by the GDPR. These rights are explained below:

1. **Right to information:**  
This right provides the stakeholder of which personal information is processed to ask a company for information about what personal data is processed and the rationale for such processing.
2. **Right to access to your personal data:**  
Stakeholders have the right to obtain confirmation from Arion as to whether or not personal data concerning them is being processed, where and for what purpose. Arion shall provide a copy of the personal data, free of charge, in an electronic format. In other words, you have the right to know what data has been collected about you and how such data has been processed.
3. **Right to restriction of processing of your personal data:**  
Right of the stakeholder of which personal data is processed to limit the processing of his/her personal data.
4. **Right of rectification or correction:**  
You have the right to make changes to inaccurate data.
5. **Right of removal of your personal data (right to be forgotten):**  
The stakeholder of which personal data is processed by Arion is entitled to have Arion erase his/her personal data, cease further dissemination of the data, and potentially have third parties halt processing of the data. Conditions for erasure include the data no longer being relevant to original purposes for processing, or as stakeholders withdrawing consent. Data

that is processed because of “the public interest” may not be removed by Arion. In that case, the stakeholder will be informed about this.

Arion will delete the requested personal data if:

- The personal data is not needed anymore for the purpose for which Arion processed the particular data;
  - You withdraw your permission for (further) processing and there is no other legitimate basis to process the particular data;
  - You file a substantiated objection and there are no reasons to reject your objection;
  - Arion unlawfully processed the personal data;
  - Arion needs to delete the personal data based on a legal obligation.
6. Right to object to processing of your personal data:  
The right of stakeholders of which personal data is processed by Arion to inform that they don't want the personal data processing to take place.
7. Right to withdraw permission to process personal data:  
You must be informed in “clear and plain language”. If Arion is relying on your consent to process your personal data, you may object to elements of processing or withdraw your consent altogether.
8. Right of data portability:  
The stakeholders' right to receive the personal data concerning them, which they have previously provided in a 'commonly use and machine readable format' and have the right to transmit that data to another data processor.

You have the right to be informed, to correct, or to request for removal of your personal data. Furthermore, you have the right to withdraw permission to process personal data or to object to the processing of personal data by Arion. Also you have the right to receive all the personal data processed by Arion in a format which can be used by you to share data with other parties. This means you can file a request to send all personal data which is processed by Arion in a computer file to you (or any other company which you would like to share the particular personal data with). A request for information, correction, removal or data portability of your personal data, a withdrawal of any given permission, or an objection to process your personal data can be send to [gdpr@arion-group.com](mailto:gdpr@arion-group.com). To ensure the request is made by you, we ask you to accompany your request with a copy of your id. Please make your photo, the machine readable zone (area with numbers at the bottom of your id), the id number, and the BSN (Dutch) black in the copy that you send to us to protect your privacy. We will respond to your request as soon as possible and always within 4 weeks. Finally, we also want to inform you about the option to file a complaint at the national authority with respect to persona data, which is the Autoriteit Persoonsgegevens. This is possible via this link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

#### *Violation of privacy*

Arion takes the protection of your personal data seriously and takes appropriate measures to prevent abuse, loss, unauthorized access, unwanted publication, or unauthorized changes. In case you think, your personal data is not protected sufficiently or in case you found signs of abuse, please contact us: [gdpr@arion-group.com](mailto:gdpr@arion-group.com).

### ***You are a customer of Arion***

We collect and process data on a company level. In case customers are one-man businesses, this data becomes personal data governed by the GDPR because there is no legal distinction between owner and business entity when it comes to a one-man business. All customer data that we process (see the overview below) is obtained from the particular actor directly.

Data that we process of our customers:

- Contact information (phone number), including name, gender, e-mail address, address
- Chamber of commerce registration number
- Payment information such as bank account number

#### Personal data used to fulfill contractual obligations:

We collect and use personal data to fulfill our contractual obligations with respect to the delivery of goods or the payment of invoices.

#### Personal data that we need permission for:

We use contact information to respond to questions, to send information as part of our services, and to send marketing related information (under the condition that you gave permission at the time you provided your contact details and you did not withdraw your permission).

As described before, you are able to indicate that we may not collect, save or use the information above. In that case, it is possible that we are not able to provide you the optimal service anymore. For example, this might mean that we cannot proactively offer after-sales support as we are not able to contact you anymore.

Arion might send targeted marketing communication messages. In each direct marketing e-mail message, we offer options to sign out for such messages. Furthermore, you can delete cookies in the settings of your browser if you don't want to see targeted marketing messages related to Arion on the web.

#### Personal data shared with third parties

For some of our services, it is necessary to collaborate with third parties, for which sometimes, personal information needs to be shared with the particular third parties. For customers of Arion, the following personal data is shared with third parties:

- Invoices are processed in a system of a third party. Possible personal data that are mentioned on invoices is the name, address, contact information and bank account number
- Payment information is used by a third party to secure payment
- Address and name is shared with logistic companies that ship our products for us
- Contact information is shared with sales partners (e.g. distributors) with whom Arion collaborates

#### *You bought a product on the Arion webshop*

Persons that buy a product on our webshop have to type in a name and address to which the order can be send. Furthermore, we need to collect payment information to ensure the payment of the goods delivered.

Furthermore, if someone wants to write a review for one of our products, an e-mail address must be provided to contact the person who wrote the review in case we suspect the review to be fake.

Our websites (including our webshop) are well protected. Furthermore no contact details are collected (except for the webshop in case products are ordered and/or a review is written). Moreover, Arion does not collect IP-addresses, this option is not selected in Google Analytics.

#### Personal data used to fulfill contractual obligations:

We collect and use personal data to fulfill our contractual obligations with respect to the delivery of goods or the payment of invoices.

#### Personal data that we need permission for

As described before, you are able to indicate that we may not collect, save or use the information above. In that case, it is possible that we are not able to provide you the optimal service anymore, for example that we need to ask for your address or payment data every time you order again from us.

### Personal data shared with third parties

For some of our services, it is necessary to collaborate with third parties, for which sometimes, personal information needs to be shared with the particular third parties. For customers of Arion, the following personal data is shared with third parties:

- Invoices are processed in a system of a third party. Possible personal data that are mentioned on invoices is the name, address, contact information, and bank account number
- Address and name is shared with logistic companies that ship our products for us

### ***You are a healthcare worker or other kind of employee working for one of our (potential) customers***

In addition to the data that we process related to the company, we also collect and process data related to some individuals working for our customers. This personal data is obtained from the particular actor directly or from one of his/her colleagues and is saved in our customer relationship management system (CRM) which is accessible by all relevant employees of Arion.

Data that we have in general of employees of health care institutions that we are in contact with:

- Contact information, including name, gender, e-mail address, address of the customer for which the employee is working, and department
- Personal background information, including details about nationality, employment history and education is stored in our customer management system to optimize our service and to smoothly transfer customer information internally

As described before, you are able to indicate that we may not collect, save or use the information above. In that case, it is possible that we are not able to provide you the optimal service anymore. For example, this may mean that new sales employees cannot meet your demands as quick as they would be able by having some personal background information. Another example might be that we contact the wrong person within the healthcare institution in case we have important information to share and we don't have information about responsibilities of employees working for the healthcare institution whom we contacted before.

Occasionally, employees of customers are involved in projects of Arion, for example new product developments, which involves testing in health care institutions. Also, a pilot study is executed at health care institutions that want to implement our products. In such cases, the information collected and processed (all obtained from the particular person directly) is (although it may vary from project to project):

- Contact information of the persons involved in the research
- Name
- Gender
- Job function
- Department you are working for
- Age (category)
- Product experience

These types of personal information are collected to study the feasibility of new projects or to support the implementation of our products at a new institution. This data allows us to find patterns in user experiences. Data, such as gender, job function, department and age, are asked to find possible differences in preferences, opinions or results between different categories of persons. Names are only used for validity checks. The reports that are the results of these analyses show how interesting new products or services are for the market or what the potential savings are for the healthcare institution that is considering to use our products. Product experiences can be used for product positioning as well. The reports will not contain personal data as we will combine and anonymize the data that we use. This data is collected for legitimate reasons, for example, improving our service, determining opportunities for new products, or identifying trends in the market.

Contact information is collected in order to present the results of the research.

### Personal data used to fulfill contractual obligations:

None of the personal data mentioned above is processed to fulfill contractual obligations.

### Personal data shared with third parties

For some of our services, it is necessary to collaborate with third parties, for which sometimes, personal information needs to be shared with the particular third parties. For studies at healthcare

institutions, it is possible that questionnaires need to be filled out using our app or an online environment, both from a third party. In both cases, we have agreements with the third parties involved to protect your personal data. These third parties are only allowed to process the data for us and do not use this data for any other purpose than we instructed them about (not for own use).

*You are a healthcare worker or other kind of employee working for one of our customers, who gave a reference for one of our products*

Finally, we may ask customers, or employees working at our customers to provide us with references that we can use in our marketing materials. We would like to mention the name of the person of whom the reference is and the name of the institution that particular person is working for.

We are only allowed to do so if we got permission of the particular person up and until the permission has been withdrawn.

As described before, you are able to indicate that we may not collect, save or use the information above. In that case, it is possible that we are not able to provide you the optimal service anymore. For example, this might mean that we cannot improve our services and products for your interest.

Personal data used to fulfill contractual obligations:

None of the personal data mentioned above is processed to fulfill contractual obligations.

***You are a care recipient of a health care institution that uses our products (potentially)***

Generally, we do not collect information of patients or clients of health care institutions. However, for some of the new product developments or in case of pilot studies at healthcare institutions that consider to use our products, we do collect information about patients or clients. In such cases, the information collected and processed is (although it may vary from project to project):

- Patient name
- Gender
- Age (category)
- Product experience
- Pictures of patients/models

This personal data is obtained from the particular actor him or herself or from a healthcare worker providing care to the particular person. In the latter case, we can only process data from patients that gave permission for processing this data.

These types of personal information are collected to study the feasibility of new projects or to support the implementation of our products at a new institution. This data allows us to find patterns in user experiences. Data, such as gender, job function, department and age, are asked to find possible differences in preferences, opinions or results between different categories of persons. Names are only used for validity checks and are removed afterwards (anonymization). The reports that are the results of these analyses show how interesting new products or services are for the market or what the potential savings are for the healthcare institution that is considering to use our products. Product experiences can be used for product positioning as well. The reports will not contain personal data as we will combine and anonymize the data that we use. This data is collected for legitimate reasons, for example, improving our service, determining opportunities for new products, or identifying trends in the market.

References and/or pictures of patients can be used for market positioning purposes and might be included in marketing materials with permission of the particular patient. If the patient is not able to give permission, only pictures will be shown that make it impossible to identify the patient of whom the picture was taken.

Personal data used to fulfill contractual obligations:

None of the personal data mentioned above is processed to fulfill contractual obligations.

Personal data shared with third parties

For some of our services, it is necessary to collaborate with third parties, for which sometimes, personal information needs to be shared with the particular third parties. For studies at healthcare institutions, it is possible that questionnaires need to be filled out using our app or an online environment, both from third parties. In both cases, we have agreements with the third parties involved to protect your personal data. These third parties are only allowed to process the data for us and do not use this data for any other purpose than we instructed them about (not for own use).

*You are a patient who gave a reference for one of our products*

Finally, we may ask patients to provide us with references that we can use in our marketing materials. We would like to mention the name of the person of whom the reference is and the name of the institution that this particular person received care.

We are only allowed to do so if we got permission of the particular person up and until the permission has been withdrawn.

As described before, you are able to indicate that we may not collect, save or use the information above. In that case, it is possible that we are not able to provide you the optimal service anymore. For example, this might mean that we cannot improve our services and products for your interest.

Personal data used to fulfill contractual obligations:

None of the personal data mentioned above is processed to fulfill contractual obligations.



### ***You are applying for a job at Arion***

During the application process, we collect personal data, such as name, address and e-mail address, phone number, etc. via e-mail, post or telephone or an external website from applicants to be able to make recruitment and selection decisions. Arion also processes data related to education or educational level, and work experience. Arion only processes personal data that is relevant for the recruitment process.

This data is all directly obtained from the particular person him or herself except for results of competency tests, which are obtained from the third party specialized in competency tests. These third parties only share the results of the competency tests with the permission of the particular applicant who did the test. The data that we process is:

- Name
- Contact details
- Gender
- Resumes
- Application letters
- Competency tests

This personal data is processed by the HR department of Arion and the employee who will manage the job applicant in case he or she gets the position. In case the job applicant will not be recruited, only the HR manager will keep this personal data for 4 weeks. After 4 weeks after the completion of the application process, we will delete the personal data. If we want to keep the data for longer than 4 weeks, this is only allowed with the candidate's permission.

As described before, you are able to indicate that we may not collect, save or use the information above. In that case, it is possible that we are not able to provide you all the benefits that we could have offered if we are allowed to process this data, such as informing you about possible new job vacancies which might be suitable for you.

#### Personal data used to fulfill contractual obligations:

None of the information above is processed to fulfill contractual or legal obligations.

#### Personal data shared with third parties:

Personal data is only shared with third parties offering competency tests in case such a test is part of the recruitment and selection procedure.

***You are a potential partner (e.g. distributor or sales agent) or supplier of Arion***

In the sales, development and production processes of Arion's products, we are constantly looking for partners, of which we also process information:

- Name
- Gender
- Contact information
- Nationality
- Job description
- Personal background information

This personal data is obtained directly from the particular person to which the personal data relates and is processed in our customer relationship management (CRM) system (which is not only used to process customer data but data from other stakeholders as well), which is accessible by all relevant employees of Arion.

Arion often partners up with knowledge institutions, such as universities. In many cases, students are involved in these projects. In such cases, we collect the following personal data of students, which are directly obtained from the student or from the knowledge institution where the students are studying:

- Name
- Contact information
- Resumes (for some students)

This data will only be processed by the employee of Arion who is involved in the project with the knowledge institution and will be kept as long as the assignment or project takes.

As described before, you are able to indicate that we may not collect, save or use the information above. In that case it is possible that we are not able to provide you all the benefits that we could have offered if we are allowed to process this data, such as informing you about possible future opportunities which might be interesting for you.

Whenever we decide to actually do business with a particular partner, we also process:

- Chamber of commerce registration number
- Bank account number

Personal data used to fulfill contractual obligations:

We collect and use personal data to fulfill our contractual obligations with respect to the delivery of goods or the payment of invoices. All the data that we use is obtained directly from the particular person.

Personal data shared with third parties

For some of our services, it is necessary to collaborate with third parties, for which sometimes, personal information needs to be shared with the particular third parties. For partners, such as sales agents of Arion, the following personal data is shared with third parties:

- Invoices are processed in a system of a third party. Possible personal data that are mentioned on invoices is the name, address, contact information, and bank account number
- Payment information is shared with a third party to ensure payment
- Address and name is shared with logistic companies that ship our products for us
- Contact information is shared with sales partners (e.g. distributors) with whom Arion collaborates

### ***You are a visitor of our website***

It is not possible to leave any personal data behind on our corporate website. However, it is possible to send an e-mail, which might contain contact information in order for us to be able to answer your questions or execute your requests. In such cases, the personal contact information is used to react to your questions and to send you information about Arion (for example about our corporate social responsibility policy). Only if you give permission to save your contact details after the initial question has been resolved, then we are allowed to save it in our customer relationship management (CRM) system, which is also used for sending marketing messages.

We use your contact details (e-mail address or postal address) to send marketing messages such as newsletters, only if you gave explicit permission to use your contact details for this purpose. Arion might send targeted marketing communication messages. In each direct marketing e-mail message, we offer options to sign out for such messages. Furthermore, you can delete cookies in the settings of your browser if you don't want to see targeted marketing messages related to Arion on the web.

As described before, you are able to indicate that we may not collect, save or use the information above. In that case, it is possible that we are not able to provide you the optimal service anymore. For example, we might not be able to offer you information about new products which might be of added value to you or to send you information which might be relevant for you as a stakeholder of Arion.

Arion does not collect IP-addresses, this option is not selected in Google Analytics. Our websites (including our webshop) are well protected by using SSL certificates. Furthermore no contact details are collected (except for the webshop in case products are ordered and/or a review is written).

### Personal data shared with third parties

The information we collect on our website is not shared with external third parties.

### Cookies

Arion only uses technical, functional, and analytical cookies that do not infringe your privacy. Arion does not use cookies for commercial purposes. By using our website, you agree with the use of these cookies. A cookie is a small text file, which is saved on your computer, tablet or smartphone at the first visit of our website. The cookies that we use are necessary for the technical functioning of our website and to ensure ease of use. These cookies ensure that the website works properly, for example, by remembering your preferred settings. Furthermore, these cookies help us in optimizing our website. You can sign out for the use of cookies by changing the settings of your internet browser to prevent it from saving cookies. Finally, you can delete information that is already saved.

***You are a visitor of our building***

For safety reasons, we collect information about our visitors:

- Name of the visitor
- Name of the company the visitor is representing
- Name of the Arion employee with whom the visitor has an appointment
- Time of arrival
- Time of departure

We need the data above to take appropriate measures in case of a calamity at Arion. Whenever there is a threat for the persons that are present in our building, we need to know who is actually inside for evacuation. Furthermore, we need information to be able to contact others in case of a calamity. You are able to indicate that we may not collect, save or use the information above. In that case, it is possible that we are not able to provide you the optimal service anymore or that we even deny access to our building as we cannot guarantee your safety without processing this personal data.

This personal data is directly obtained from the particular person to which the personal data relates. We do not share this personal data with third parties.

***You are a visitor of an Arion booth at a trade fair or event***

Often, during events and trade fairs, Arion takes pictures for promotional purpose. These pictures might show persons that visited our booth, which makes it possible that others recognize the particular person in the picture. Arion will only use pictures of persons with the explicit permission of the particular person.