General Privacy Notice – Ireland



Privacy Notice

Introduction

Sahajanand Medical Technologies Ireland Ltd ("the company", "us", "we", and "SMT") is a global medical device company committed to making advance medical technologies accessible to everyone around the world. This privacy notice is a statement of how SMT uses personal data of its customer, business partners, vendors, job applicants and any other categories of individuals.

SMT may change or update this Notice when necessary and the updated Notice will be made available on our website <u>www.smtpl.com</u>.

Who are we and how can you contact us:

Name: Sahajanand Medical Technologies Ireland Ltd

Address: Ground Floor, Block 5, Galway Technology Park, Parkmore, Galway, H91 R9YR, Ireland.

Phone number: (091) 397 470

Email: Country Head: <u>cheran.jove@smt.in</u> Data Protection Committee: <u>dpc@smtpl.com</u>

What personal data we process and why:

Data Subjects	Data elements we collect	Purpose for collection
Job applicants	Full nameContact DetailsCV/Covering letter	• We use personal data of our job applicants to verify their identity and assess their skills and expertise to hire suitable candidates for the opening positions.
Customers/ Distributors	 Name Contact information (email address, contact number) Designation Company name 	• We use this information to receive purchase orders from customers, deliver the products as requested and sometimes we check if they have sufficient stock in their inventory as per their request.



Potential Customers/ Distributors	 Name Contact information (email address, contact number) Designation Company name 	 We use the personal data of our potential customers to establish customer relation based on their request [we may collect contact information from potential customers/the medical professionals when they show interest in buying our products. E.g. at our conferences medical professionals may contact us to have further discussion about our products].
Vendors (Corporate)	 Name Contact information (email address, contact number) Designation Company name 	• We use this information to receive proposals from our vendors, negotiate the terms, enter into contract and for ongoing communication with the vendor
Vendors/Consultants (Individuals)	 Name Contact information (email address, contact number) Company name Plant Address (if applicable) VAT no. Registration no. Bank Name Account Holder Name Account Holder Name Account No/IBAN Swift /BIC code Agreement copy Declaration / Any other supporting document in case of proprietorship (Bank Account Name) 	 We maintain our communications with our vendors/consultants for the performance of the agreements that includes obtaining products and services from them.

How do we collect your personal data

- Directly from you
- From employee referees (internal and external)
- Publicly available portals

Lawful basis for processing your personal data

We process your personal data where such processing is:

i) necessary for the performance of your contract with us or taking steps to enter a contract,

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- ii) reasonably necessary for compliance with a legal or regulatory obligation to which SMT is subject, or
- iii) within SMT's legitimate business interests, principally for the purposes listed above.

The collection of your personal information is essential. If you do not provide us with required information, we will be unable to fulfil our purposes specified above. Where collection of personal information is not mandatory, we will notify you accordingly.

Sharing and disclosure of your personal data

We are committed to maintaining the confidentiality of information relating to you. We will also comply with all legal requirements regarding the sharing and disclosure of personal information. We may disclose information to the following recipients, where it is legitimate to do so:

- Central and local government departments and other statutory or public bodies such as the Office of the Revenue Commissioners.
- Crime prevention and detection authorities.
- Service providers: we use third parties to provide services for some of our HR, finance, Security, IT operations. We only share such information when the third party has a legitimate business reason to have the information to provide that service to us. We will only disclose your personal information to third parties that have agreed in writing to provide an adequate level of protection.
- Our professional advisors including auditors, accountants, and lawyers.
- Regulators: various regulatory and professional bodies have the powers to request us to provide information about you where we are legally required to share information to such bodies.

International data transfer

We store some of your personal data in our corporate data server which is located in India and managed by our parent company (Sahajanand Medical Technologies Limited, India). We take appropriate measures to protect your personal data and ensure your rights under the EU GDPR and Data Protection Act are protected even when your personal data is transferred outside Ireland.

Protection of your personal data

We maintain appropriate administrative, technical, and organizational measures designed to help safeguard the confidentiality and integrity of your personal information and to protect it against accidental or unlawful destruction, accidental loss, unauthorized alteration, disclosure or access, misuse, and any other unlawful form of processing of the personal information in our possession. In adherence with data protection laws and internal company policies, we address security at all appropriate technology infrastructure points.

We also train our employees regarding our data privacy policies and procedures. The permission to access your personal information is granted only to authorized personnel on a need-to-know basis, as required to carry out duties relating to their role.

External Links & Embedded Content

Although SMT only looks to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout its emails, website or web platform. SMT cannot guarantee or verify the contents



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of any externally linked website or embedded content despite their best efforts. Users should therefore note they click on external links or content at their own risk and SMT cannot be held liable for any damages or implications caused by visiting any external links mentioned.

How long we keep your information

We will retain your personal information for appropriate duration to fulfil the purposes for which we have collected the personal information, unless the law permits or requires certain data to be retained for longer periods to establish, exercise, or defend our legal rights and for archiving and historical purposes.

We will hold your information in line with the applicable laws and regulations.

Your rights

We take reasonable effort to honour your privacy rights. You have the following rights under GDPR:

- Right to access: You can ask us what information we hold about you and request to • have access to it.
- Right to rectification: You can ask us to correct/update any information you believe to • be as inaccurate or outdated.
- Right to erasure: You can request our Company to erase your personal data, under • certain conditions.
- Right to restrict processing: You can request to restrict the processing of your personal • data, under certain conditions.
- Right to object to processing: You have right to object to company's processing of • your personal data, under certain conditions.
- Right to data portability: You have right to request us to transfer your personal data to another organization, or directly to you, in a machine-readable format.
- Right to withdraw consent: You can withdraw your consent to process personal data • at any time, this applicable when SMT is processing personal data based on your consent.

You can contact our Country Manager or Data Protection Committee to exercise your rights. Sometimes, we may not be able to fulfil your request to delete some of your personal information if we are legally obligated to retain such information as per law.

How to complain

We are committed to protect your information and your right to privacy. If you have queries or concerns on how we use your personal information, you can raise your queries or complaints with our Data Protection Committee.

You can also raise your complaint with the Office of the Data Protection Commissioner if you are unhappy with the way we use your personal information.

Address: Office of the Data protection Commissioner, Canal House, Station Road, Portarlington, Co. Laois Ireland

Website: https://dataprotection.ie