

## WEBSITE PRIVACY POLICY

This Privacy Policy (Policy) sets forth the Regen Lab SA (RGL, we, or us) policies regarding the collection and use of information relating to a RGL web site (Site) that links to this privacy policy. This policy also describes the choices available to you regarding our use of your personal data, the personal data of patients and how you can access and update this information. When we refer to RGL, we or us, we mean Regen Lab SA, including our affiliates and subsidiaries. This Policy was last updated on November 1, 2018.

This notice describes RGL's privacy policy as it pertains to the services available on this Site or any other RGL's Site (the "Services"). By registering for the Services, using the Services, registering on any RGL website, using RGL services or tools, or visiting the Site, you acknowledge and accept this Privacy Policy. This Policy is applicable to all RGL users and visitors worldwide, including users in the United States and the European Union. This Privacy Policy together with the Terms of Use govern your use of the Site. To the extent this Privacy Policy differs between users in the European Union and the United States, we have indicated such differences below.

Certain areas of the Site contain information intended only for licensed medical professionals. Accordingly, RGL reserves the right to limit certain areas of the Site to those persons who register and meet the qualifications imposed by us. This Policy addresses our privacy practices relating to general and registered use of our Site by all visitors

We process your personal data in compliance with the European General Data Protection Regulation (GDPR), the Federal Act on Data Protection (FADP) and the recommendations of the Federal Data Protection and Information Commissioner ("FDPIC") of Switzerland, and the German Federal Data Protection Act. In no case we will forward your personal data to third parties outside of RGL for advertising or marketing purposes without your consent.

The compliance of our Company with the applicable legal regulations and this policy is monitored by our Data Protection Officer.

Our employees are legally obligated and trained to comply with data protection regulations. We would only share your personal data under a strict 'need to know' basis and under appropriate contractual restrictions.

We draw your attention to the fact that data transmission via the Internet (e.g. when communicating by e-mail) may involve gaps in security. We attempt to protect your data from unauthorized access by third parties by means of precautions such as pseudonymization, data economy, observing deletion periods and in consideration of the current state of the art technology. Despite these protective measures, however, we cannot completely rule out unlawful processing by third parties.

The operator of this website and the responsible controller in terms of data protection is:

Regen Lab SA with address: En Budron B2, 1052 Le Mont-sur-Lausanne, Switzerland

### **What constitutes 'personal data'?**

**Personal data** is data that can be used to identify or contact you, such as your name, email address, telephone number or similar information. RGL only collects personal data that you choose to share with us, such as when (1) contacting us via the Site (or requesting information), (2) submitting your resume online in response to a job posting, (3) registering online for an event or course or, (4) upon registration for access to those areas of our Site intended only for licensed medical professionals.

Personal information within the sense of the EU GDPR, the Federal Act on Data Protection (FADP) and the Federal Data Protection and Information Commissioner ("FDPIC") of Switzerland, and the German Federal Data Protection Act as applicable includes details related to personal or factual matters of a specified or specifiable natural person (data subject), such as your name, your address, your telephone number and your date of birth. References to "personally identifiable information" or "personal information" include "personal data".

In accordance with the principle of purpose limitation and data minimisation of the GDPR, we only collect personal data on our website when it is either required for your desired purpose, we are obligated to do so due to legal regulations or contracts, we have a legitimate interest and/or if you voluntarily give us your consent.

### **What information we collect about you and with what purpose?**

The personal data we collect from you differs depending on the different functionalities of the website you use.

Once you visit our Site, specific information will be stored anonymously in a protocol file. There will be an anonymous storage of e.g. the IP-address, operating system (e.g., Microsoft Windows, Mac OS), browser type (e.g., Firefox, Chrome, Internet Explorer, Safari) and browser settings, the date and time our Site has been accessed and from where our Site has been accessed and the domain name of your internet service provider.

RGL collects the domain names and IP addresses of its visitors and users, along with usage statistics (see the Information about Google-Analytics within this policy). RGL will not combine this information with the personally identifiable and other information it collects. We use this information solely with the purpose to improve the appearance, contents and functionality of the website.

Specifically, when you visit our website, our web servers save each access temporarily to a log file. The following data are entered and saved until automated deletion:

- Anonymized IP address of the requesting computer
- Date and time of the access
- Name and URL of the called data
- Report whether the call was successful
- Identification data of the used browser and operating system
- Website, from which the access is carried out
- Name of your Internet access provider

The lawful processing of these data occurs for the purposes of enabling use of the website (establishing connection), for system security, for technical administration of the network infrastructure and for optimization of the Internet offering. We process this data on the grounds of our legitimate interest to maintain our service, to track how our services are used and also to track how our clients or visitors interact with the service. Without the use of this data our services may only be usable to limited degree.

These personal data are not processed beyond the cases indicated above, unless you explicitly consent to further processing.

## **Information collected when you decide to use our Services or to contact us**

When you decide to use our Services or you want to contact us, We may process your contact and business related data based on statutory regulations or in connection with existing or pending business relationships.

Sometimes when it is not required from you to provide us with certain personal data in order to use our Services or to contact us, but you still decide to provide us with this data, we will process this information based on your consent taking into account that the provision of the data was voluntary and on your own discretion. You have the right to withdraw your consent for processing of your data where such was given without this to affect the lawfulness of processing based on consent before its withdrawal.

The information that is required from you to be provided, in order to use our Services or to contact us, is marked through our websites in the fields indicated with **Asterisk**. This information is processed on the basis of our need to fulfil the contract that you have entered with us when you decided to use our services, on the basis of statutory regulations or on the basis of our legitimate interest to identify the subject who want to contact us or to submit a request to us.

We may collect the following information from you:

- Information about your business such as company name, company size, business type
- Medical condition/Therapeutic indication
- History of treatments/applications
- Demographic information such as age, education, gender, interests and location
- Contact information such as email address and phone number

## **Why do we use the collected personal data?**

We use this information to:

- Management of our business
- Provide the Services
- Send you requested product or service information
- Send you product updates
- Process and respond to your questions/inquiries
- Administer your account
- Conduct surveys or other research and analysis
- Send you a newsletter
- Send you marketing communications
- Improve our Site and marketing efforts, improve the Services, e.g., to determine which features are used most, to find and fix navigation problems, and to help guide future development, to enhance the user experience
- Display content based upon your interests, provide you with personalized content, e.g., storing your display and other preferences to help you customize your experience
- Enable you to post your resume, search job postings, and contact or be contacted by prospective RGL representative or agents
- For administration of the Site
- Alert you to new developments, features, special events and services with your consent or provide information to you about the Site

- For fraud prevention, and where necessary to safeguard legitimate interests of RGL or a third party or to prevent threats to state or public security or to prosecute crimes, provided this does not conflict the data subject's legitimate interest
- For other purposes so long as those purposes were clearly disclosed when the information was collected
- For statutory regulations, for example to Execute our Terms of Use and condition, enforce the Terms of Use, e.g., to contact you about an infraction of the Terms of Use or to initiate a legal complaint
- For Protection from or determination of possible fraudulent transactions
- For contractual purposes, for example Payment processing for purchases and other services or Processing of your application documents

When your explicit consent is given, personal data may be used for several reasons, for example:

- Making contact
- Sending of samples, rewards, products and information
- Registration with competitions, programs or offers at your request
- Delivery of other services that we have offered to you
- If permissible by law, delivery of user-specific, unsolicited offers and information about the products and services of RGL
- Surveys on our websites
- Development and provision of advertising that is adjusted to your interests

RGL may process personal data based on our legitimate interest for:

- Determination of the effectiveness of our advertising
- Development of new products and services
- Analysis of the use of our products, services and websites
- Knowledge, how you reached our website

We may process the collected personal data by reason of our legitimate interest in other occasions (not listed above). In such cases we will make sure to notify you in advance.

We use the data, which we collect, in order to make the products and services requested by you available, to inform you about other products and services offered by RGL and to manage our websites and services (e.g. newsletter) and to satisfy our rights and obligations with regard to data processing as stipulated by law.

In order to make a comprehensive offer available to you, your data is transmitted and used within the business departments of RGL.

Any personal information transmitted to the Site is used solely for the stated purpose when the information was transferred and any of the above uses. The data will not be used for any other purpose without your consent, provided, however, that RGL may disclose the information it collects about you to third parties in the event of any reorganization, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of RGL's business or operations (including without limitation in connection with bankruptcy or any similar proceedings).

## **Your rights as a data subject**

You always have the right of access (Art. 15 GDPR) to your personal data, their origin and recipients and the purpose of data processing, free of charge, as well as a right to rectification (Art. 16 GDPR), erasure (Art. 17 GDPR) that may be extended with the right to be forgotten or to restriction of processing of these data (Art. 18 GDPR). Furthermore, you have the right to obtain the personal data relating to you that you have provided to a responsible party, in a structured, common and machine-readable format (right to data portability Art. 20 GDPR).

You have also the right to object (Art. 21 GDPR) to certain types of processing such as direct marketing and the right to object to automated processing of your data, including profiling (Art. 22 GDPR). You have the right to withdraw your consent for processing of your data where such was granted without this to affect the lawfulness of processing based on consent before its withdrawal.

If you have further questions relating to the topic of personal data or you want to submit a request for exercising of your rights you can contact us at the address [compliance@regenlab.com](mailto:compliance@regenlab.com).

## **For how long we will store your personal data?**

For the different types of personal data that we collect, a different retention period may apply. Generally speaking, we store your data for the period for which you use our services and afterwards for the applicable limitation period for related claims.

## **Sharing and use of de-identified information originating in the United States**

With the exception of encrypted Protected Health Information (PHI) as that term is defined in applicable U.S. federal, state and local statutes, regulations and rules relating to data privacy and security, including the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the privacy and security standards pursuant to the same, as amended, and the Health Information Technology for Economic and Clinical Health Act (HITECH Act) and regulations and guidance issued pursuant to the same, other types of information that are fully de-identified (stripped of any information that could be used to identify any person) may be used by RGL for any reason and shared freely with third parties in de-identified or aggregated form subject to HIPAA and other applicable regulations. We will not re-identify such data and we will make sure our contracting parties keep only the data in its de-identified form (possessing the de-identified data but not any “additional information” allowing to re-identify individuals). PHI may be shared in compliance with HIPAA and HITECH. This section applies only to personal data that is not within the scope of the GDPR..

## **Google Analytics**

This Site may use Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help the website analyze how users use the Site. The information generated by the cookie about your use of the Site will be transmitted to and stored by Google on servers in the United States. In case IP-anonymisation is activated on this Site, your IP address will be truncated within the area of Member States of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases the whole IP address will be first transferred to a Google server in the USA and truncated there. The IP-anonymisation is active on this Site. Google will use this information on behalf of the operator of this Site for the purpose of evaluating your use of the Site, compiling reports on Site activity for Site operators and providing them other services relating to Site activity and internet usage. The IP-address,

that your Browser conveys within the scope of Google Analytics, will not be associated with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this Site. You can also opt-out from being tracked by Google Analytics with effect for the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current web browser: <http://tools.google.com/dlpage/gaoptout?hl=en>

Smartphone- and tablet-users have the possibility to refuse the use of Google Analytics by clicking on a link. An opt-out cookie will be set on the computer, which will prevent the future collection of your data when visiting this website.

Adobe Analytics, a web analysis service of Adobe Systems Software Ireland Limited ("Adobe"), may be used on this website. Adobe Analytics uses cookies. If the information regarding use of the website that is generated by the cookie is transmitted to an Adobe server, then the settings ensure that the IP address is anonymized before geolocalization and replaced by a generic IP address before saving. Adobe utilizes this information on behalf of the operator of this website in order to evaluate usage of this website by the user, to compile reports on website activity for the website operator and to perform additional services connected with use of the website and the Internet in respect of the website operator. The IP address transmitted by your browser in connection with Adobe Analytics is not combined with other data from Adobe. You can prevent the saving of cookies by a corresponding setting in your browser software. Note that in this case, you may not be able to fully utilize all functions of this website. You can furthermore prevent the entry of the data generated by the cookie and referring to your usage of the website (incl. your IP address) to Adobe as well as the processing of these data by Adobe by downloading and installing the available browser plugin [here](#).

You can block the collection or processing of data generated by the cookie related to your visit to RGL's website by Adobe, by exercising your right to opt-out via the following link: <http://www.adobe.com/privacy/opt-out.html>

### **Privacy policy for the use of etracker**

Our website may use the etracker analysis service. The provider is etracker GmbH, Erste Brunnenstraße 1, 20459 Hamburg Germany. Usage profiles can be created from the data under a pseudonym. Cookies can be used for this purpose. The cookies enable your browser to be recognized. The data collected using the etracker technologies will not be used to personally identify visitors to our website without the separately granted consent of the person concerned and will not be combined with personal data about the holder of the pseudonym. We use eTracker in order to be able to analyse and regularly improve the use of our website.

The data collection and saving by etracker can be objected to at all times with effect for the future. In order to object to a data collection and saving of your visitor data for the future you can obtain an Opt-Out-Cookie of etracker under the following link, this will lead to the fact that no visitor data of your browser will be collected and saved at etracker in future: <http://www.etracker.de/privacy?et=V23Jbb>

An Opt-Out-Cookie with the name "cntcookie" is used by etracker hereby. Please do not delete this cookie as long as you would like to uphold your objection. You can find further information in the data protection provisions of etracker: <https://www.etracker.com/en/data-privacy/>

## **Privacy policy for the use of reCAPTCHA**

In order to protect input forms on our website we may use the “reCAPTCHA” service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, hereinafter “Google“. By using this service a distinction can be made whether the corresponding input is of human origin or is carried out improperly by automatic mechanical processing.

reCAPTCHA is a free service which protects our website from spam and abuse.

According to our knowledge the referrer-URL, the IP address, the conduct of the website visitors, information about operating system, browser and dwell time, cookies, presentation instructions and scripts, the input conduct of the user as well as mouse movements in the area of the “reCAPTCHA” checkbox are transmitted to “Google”.

Google uses the thus obtained information among others to digitalize books and other printed products as well as to optimize services such as Google Street View and Google Maps (for example house number and street name recognition).

The IP address transmitted within the framework of “reCAPTCHA” is not combined with other data of Google, unless you are logged into your Google account at the time when using the “reCAPTCHA” plugin. If you want to prevent this transmission and saving of data about you and your conduct on our website by “Google” you must logout of “Google” before you visit our website or use the reCAPTCHA plugin.

The use of the information obtained through the “reCAPTCHA” service is carried out pursuant to the Google Terms of Use: <https://www.google.com/intl/en/policies/privacy/>

## **Customer Journey Tracking**

On this website through technologies of Pixelpark GmbH (<https://www.publicispixelpark.de/>) data may be collected in an anonymized form (Marketing Cookies) and sent to Pixelpark GmbH. These cookies are set for the design in line with the needs, as well as to optimize this website and for the determination of statistical analyses and for cross-medial use. Pixelpark GmbH uses so-called “cookies” for this purpose. Text files that are saved on the computer and which enable an analysis of the use of the website.

The data are not used to personally identify the visitor of this website.

These anonymized usage data can be used both by website operators as well as by other advertisers and partners of Pixelpark GmbH in order to identify usage interests without it being possible to draw a conclusion about your identity as a visitor of a website.

## **Social Media Plugins**

Within the Internet presence of RGL it may occur that contents of third parties are used (so-called “plugins”). These can appear in the form of YouTube videos, RSS-Feeds or graphics of other websites or also by social media pushbuttons, such as for example the share button of Facebook.

If you are on a website of RGL, on which contents of third parties are integrated, under certain circumstances a connection will be set up with the respective social network. The content of the

pushbuttons may be transmitted to your browser hereby and be integrated into the website hereby. This means that the respective provider always receives the information that you have called the RGL website. It is not relevant in this case whether you are a member of a social network or are not logged into such a network. Furthermore, irrespective whether you actually act with the integrated content, information will be automatically collected by the social network. The following data can be transmitted hereby: IP address, browser information and operating systems, screen resolution, installed browser plugins (e.g. Adobe Flash Player), origin of the visitor (if you have followed a link) and the URL of the current website.

If you are logged into one of the social networks during the use of the website of RGL, under certain circumstances the information about the call of the website will be linked with your member data and saved. If you are a member of a social network and do not want this data to be transmitted you must logout of the social network before visiting the RGL website.

RGL has no influence on the scope of the data that are collected by the social networks. Please refer to the privacy policy of the respective social network regarding the type, scope and purpose of the data collection, information about the further processing of the data as well as your rights in this respect and setting possibilities for the protection of your privacy.

You additionally have the possibility to block social media plugins by add-ons in your browser and therefore to prevent a data transmission.

### **Privacy policy for the use of Facebook plugins**

Plugins of the social network Facebook may be integrated on our websites, provider Facebook Inc., 1 Hacker Way, Menlo Park, California 94025, USA. You can recognize the Facebook plugins by the Facebook logo on our website. You will find an overview of the Facebook plugins here: [https://developers.facebook.com/docs/plugins/?locale=en\\_US](https://developers.facebook.com/docs/plugins/?locale=en_US).

If you visit our websites a direct connection is established between your browser and the Facebook server via the plugin. This way Facebook receives the information that you have visited our website with your IP address. Facebook can hereby allocate the visit to our website to your user account. We would like to point out that we as the provider of the websites neither receive any knowledge of the content of the transmitted data, nor their use by Facebook. You can find further information in this respect in the privacy policy of Facebook under <http://de-de.facebook.com/policy.php>.

If you do not want Facebook to be able to allocate the visit to our websites to your Facebook user account please logout of your Facebook user account.

### **Privacy policy for the use of Twitter**

Functions of the Twitter service may be integrated onto our websites. These functions are offered by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. By the use of Twitter and the "Re-Tweet" function the websites visited by you are linked with your Twitter account and announced to other users. Data are also transmitted to Twitter hereby. We would like to point out that we as the provider of the websites neither receive any knowledge of the content of the transmitted data, nor their use by Twitter. You can find further information in this respect in the privacy policy of Twitter under <http://twitter.com/privacy>.

You can change your data protection settings at Twitter in the account settings under: <https://twitter.com/login?lang=en>.

### **Privacy policy for the use of LinkedIn**

Our website may use functions of the LinkedIn network. The provider is the LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. A connection to servers of LinkedIn will be set up with each call of one of our websites, which contains functions of LinkedIn. LinkedIn is informed that you have visited our websites with your IP address. If you click the "recommend button" of LinkedIn and are logged into your account at LinkedIn, it is possible for LinkedIn to allocate your visit to our website to you and your user account. We would like to point out that we as the provider of the sites neither have any knowledge of the content of the transmitted data, nor their use by LinkedIn.

You can find further information in this respect in the privacy policy of LinkedIn under: <https://www.linkedin.com/legal/privacy-policy>

### **Privacy policy for the use of XING**

Our website may use functions of the XING network. The provider is XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany. A connection to servers of XING will be established with each call of one of our websites, which contains functions of XING. According to our knowledge no personal data are saved hereby. In particular no IP addresses are saved, nor the usage behavior evaluated.

You can find further information relating to data protection and the XING share button in the privacy policy of XING under [https://www.xing.com/app/share?op=data\\_protection](https://www.xing.com/app/share?op=data_protection)

### **Privacy policy for the use of YouTube**

Our website may use plugins of the YouTube website operated by Google. The operator of the websites is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. If you visit one of our websites fitted with a YouTube plugin a connection will be established to the servers of YouTube. It will be communicated to the Youtube server hereby, which of our websites you visited. If YouTube videos are embedded directly on our website, the content of the embedded video is transmitted directly from YouTube to your browser. At the same time, certain data is transmitted from your browser to YouTube:

- visited page on our website containing the video;
- the data generally transmitted by your browser (IP address, browser type and version, operating system, time);

If you are logged into your YouTube account, you enable YouTube to directly allocate your surf behavior to your personal profile. You can prevent this by logging out of your YouTube account.

You can find further information regarding the handling of user data in the privacy policy of YouTube under: <https://www.google.co.uk/intl/en-GB/policies/privacy/>

### **My RGL (Extranet)**

If you use our Extranet, you must enter some personal data that we process and save in order to orientate our offered range of service to your needs based upon this. You can manage your data at all times under

“My Profile”. For the deletion of your profile please inform us via our address [compliance@regenlab.com](mailto:compliance@regenlab.com) as the complete access to the **Extranet** will also be withdrawn with the deletion of your data.

### **Interaction with experts**

Via the Extranet you can exchange and network with employees of RGL. You will receive new information within the framework of your business network with RGL employees by e-mail to the address deposited by you.

### **Log files**

We would like to point out to you that in addition to the data entered by you the IP address, with which you visit our Extranet, is saved and, if applicable, used to secure claims and for providing evidence. No further use of the IP address data will be carried out, but the recording will exclusively take place within the scope of preventive measures. It will continue to be ensured that no conclusion can be drawn about a specific Extranet user.

### **Access to information and e-mail notifications**

After the successful identification and registration, you will receive access at My RGL to various information, documents and applications.

Free e-mail messages will be offered to you in the My RGL. For this purpose, you must specify an e-mail address solely used by you or an e-mail address allocated to you personally for your sole use for the receipt of these e-mails. Specifying other e-mail addresses, particularly those of third parties, is not permitted. By entering this e-mail address, you declare that you agree with the processing of these data.

A respective de-activation will be made available in order to cancel the e-mail services. In the event of technical or other problems technical support with the deactivation is available to the users under the address [compliance@regenlab.com](mailto:compliance@regenlab.com).

### **Deletion of your data**

We will only save your data as long as this is required or permissible according to statutory regulations or within the scope of the joint business relationship. All of your personal data is subsequently deleted, provided this is not opposed by any statutory retention period.

### **Registered Users**

If you are a licensed medical professional, to register, you must provide us with certain personal data which may include your name, profession, email address, postal mail address, telephone, title, Medical ID and clinical affiliation. We will use this personal data to review and verify your registration information. We may use your personal data to send periodic transactional, marketing, or promotional notices to you or notify you of any changes to this Policy. You can always opt-out of receiving marketing or promotional communications from us by following the "opt-out" procedures described below or on the specific marketing or promotional message.

## **Resume Submission**

If your personal data is submitted through the Site when applying for a position with RGL, your personal data will be used solely for the purpose of evaluating and accepting you for the position. We may retain your personal data for a period of time, but only for the purpose of considering your application for current or future positions at RGL or as necessary to comply with the law. This information may be shared within RGL employees as well as with third parties contracted by us to assist RGL with talent acquisition related activities. Retention of unsuccessful candidates' CVs constitutes processing of personal data on the basis of art. 6, letter b - taking steps at the request of the data subject prior to entering into a contract. Such retention shall not be longer than six months unless you have given your consent to continue holding the CV for consideration in regards to future open position and the respective recruitment process.

## **Surveys**

We may provide you the opportunity to participate in surveys on our site. If you participate, we may request certain personal data from you. Participation in these surveys or contests is completely voluntary and you therefore have a choice whether or not to disclose this information. The requested information typically includes contact information (such as name and email address) and demographic information (such as city, state or country). We use this information to understand what type of information visitors look for on the site, whether or not they are able to find it, what additional content would be useful on the site, and other information that can be used to help optimize user experience.

We may use third parties to conduct these surveys or contests. The third party would be prohibited from using our users' personal data for any purpose inconsistent with the management of such surveys or contests.

## **Testimonials**

With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at [compliance@regenlab.com](mailto:compliance@regenlab.com).

## **Blogs**

From time to time, the Site may offer publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, contact us at [compliance@regenlab.com](mailto:compliance@regenlab.com). However, we would advise you not to disclose any personal data in such publicly accessible sections because it is objectively impossible for RGL to control the means, purposes and processors of such openly published information. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

## **Contacting RGL**

If you contact RGL via the Site, we will only use your personal data contained in your email to respond to your specific inquiry, request, or comments in the email. We may retain your email for a reasonable period of time, but will not use any of your personal data for any purpose other than responding to your email, unless such additional use is required or permitted for us to comply with the law.

## **General Information and Accuracy**

Any information you provide to RGL must be true, accurate, current, non-misleading, and consistent and relevant for the purpose for which you are providing the information. If you are a registered user, you must have the authority to provide the information submitted to and through the Site, and understand and agree that we may from time to time verify such authority.

## **Usage Data**

The Site may automatically track certain information about your behavior while visiting the Site. The information gathered includes the URL from which you accessed this Site, and which URL you visit next. We collect and store this aggregate information in order to measure the Site's performance and improve the Site's design and functionality. We may also share this aggregate information with third parties to illustrate how the Site is used and for other marketing purposes.

If you are a registered user, we may use your Usage Data with or without your personal data, in order to measure the Site's performance and improve the Site's design and functionality. We may share aggregate Usage Data with third parties to illustrate how the Site is used and for other marketing purposes. See also "Cookies", below.

## **Cookies**

RGL may use both "session" and "persistent" cookies on this Site. A cookie is a small piece of information that is sent to your browser and stored in your computer's hard drive. The purpose of a cookie is to remember certain user inputs on the Site. Personalization features also use cookies to identify groups of users and deliver appropriate Site content and services, as well as feedback related to marketing and email campaigns.

Session cookies are temporary bits of information that are erased once you exit your web browser or turn off your computer. Persistent cookies are more permanent bits of information that are placed on the hard drive of your computer and stay there unless you delete the cookie. They store information on your computer for a number of reasons, such as retrieving certain information you have previously provided (i.e., username and password), helping to determine what areas of the Site you find most valuable, and customizing the Site based on your preferences on an ongoing basis. Persistent cookies placed on your computer by this Site may hold personal data, but only if you are a registered user or have otherwise consented to the provision of personal data in accordance with the terms of this Policy. Personal data would be used for things like simplifying the login process or serving personalized content on the site. Otherwise, the Site's server only knows that an unidentified visitor with your cookies has returned to the Site. In addition to customization, persistent cookies will be used to provide you with better service on the Site, to compile and analyze statistics and trends, and to otherwise administer and improve the Site for your use. Subject to applicable law and in accordance with the terms of this Policy, information gathered through the use of persistent cookies on the Site may also be shared with third parties who assist us with the management or optimization of our Sites and the delivery of enhanced user experience.

Cookies do not damage your computer. You can set your browser to notify you when a cookie is being sent to your computer. This will notify you whether or not you are required to accept the cookie in order to view certain Site content, and allows you to decide if you want to accept the cookie or not. You can also set your browser to accept all cookies or to refuse cookies altogether. If you do prevent your computer from accepting cookies, you will still be able to fully access the Site, although you may lose some additional functionality and convenience provided through the use of cookies. To learn more about cookies, please search for "cookie" in the Help portion of your web browser.

## **Third Party Tracking**

The use of cookies by our third parties is covered by our privacy policy. We may not always have access or control over these cookies, however the third parties act on our behalf. Our third parties use session ID cookies to track certain information about your behavior while visiting the Site, to facilitate surveys, and to identify groups of users and deliver appropriate Site content and services, as well as feedback related to marketing and email campaigns. Our third parties employ clear gifs (a.k.a. Web Beacons/Web Bugs), images, and scripts that help them better manage Usage Data. We do not tie the information gathered to your personal data. Third party cookies (such as Google Analytics, advertising platforms or other) are used to allow us to analyze your website usage and preferences. Some of them are used for reasons of marketing or advertising. Different type of cookie purposes are set out in detail within this Policy.

## **Social Media Widgets**

Our Site may include widgets, such as the Share this button or interactive mini-programs that run on our site. This feature may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with this feature are governed by the privacy policy of the company providing it.

## **Clear Gifs**

The Site may also use clear gifs (also known as web beacons) in combination with cookies, in order to help Site operators understand how visitors interact with the Site. A clear gif is typically a transparent graphic image (usually 1 pixel by 1 pixel in size) that is placed on the Site, which allows the Site to measure the actions of a visitor who opens the page that contains the clear gif. RGL uses clear gifs to measure traffic and related behavior, and to improve your experience when visiting the Site. We also use clear gifs to manage the content available on the Site. Clear gifs are not tied to personal data.

## **Flash LSOs**

We may use local shared objects, also known as Flash cookies, to store your preferences such as volume control, or display content based upon what you view on our site to personalize your visit. Third parties, with whom we partner to provide certain features on our site or to display advertising based upon your Web browsing activity, use Flash cookies to collect and store information.

Flash cookies are different from browser cookies. Cookie management tools provided by your browser will not remove Flash cookies. To learn how to manage privacy and storage settings for Flash cookies, go to [www.macromedia.com](http://www.macromedia.com).

## **Behavioral Targeting / Re-Targeting**

We may partner with a third party ad networks to either display advertising on our Site or to manage our advertising on other sites. Our ad network partner shall use cookies and Web beacons to collect non-personally identifiable information about your activities on this and other Web sites to provide you targeted advertising based upon your interests. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt out by contacting RGL at: [compliance@regenlab.com](mailto:compliance@regenlab.com). Please note this does not opt you out of being served advertising. You will continue to receive generic ads.

## **Disclosure**

In addition to the disclosures described throughout this Policy, and subject to applicable law, we and our third parties may disclose your personal data:

- To unaffiliated third parties that are under contract to perform services for or on behalf of RGL. Examples of such services are third parties 1) maintain our computer databases; and 2) perform marketing activities;
- To other persons as permitted by applicable law or regulation; and
- To law enforcement personnel and agencies, or as part of a legal process, in order to protect our property or in furtherance of an investigation regarding a breach of the Site rules and policies, unauthorized access to or use of the Site or any other illegal activities.

Any access to such information will be limited to the purpose for which such information was provided to our affiliate, subsidiary or third party. Our affiliates, subsidiaries and third parties may be located throughout the world including in countries that may not provide the same standard of protection of your personal data as in your home country (especially if you are located in EU) and you may not be able to exercise your rights as data subject. In such cases we will make sure that such recipients of your data have signed special contracts (e.g. Standard Contractual Clauses for transfer of EU data subjects' personal data) to make sure your confidentiality is respected. Nevertheless, the affiliates, subsidiaries and third parties are required to uphold and maintain RGL's policies with respect to privacy and the treatment of your personal data regardless of their locations or the laws of the countries they are based in.

## **Consent to Processing Outside Home Country**

By using our Site, or providing information to RGL, you understand and unambiguously consent to the collection, use, disclosure and retention of information in Switzerland and other countries and territories, for the purposes set forth in this Policy. You hereby consent to the collection, use, disclosure and retention by RGL of your personal data as described under this Policy, including but not limited to the transfer of your personal data between RGL's third parties, affiliates and subsidiaries in accordance with this Policy. For further certainty, any consent relating to a right to transfer information referred to in this paragraph shall be deemed to include your consent to the transfer of the applicable personal data to a jurisdiction which may provide a different level of privacy protection than that available in your own country.

Your personal data will not be forwarded to third parties (thus outside of RGL), unless you have granted us your corresponding prior consent. Excluded from this provision is the forwarding to service partners, such as for example parcel service provider or freight forwarders, if the transmission is necessary for the order processing or delivery of the goods.

The logistics service providers receive the data that are required for the delivery for use at their own responsibility. We accordingly restrict this to sending the data that are necessary for the delivery.

In addition, other service providers are involved in the work for the initiation and processing of the contracts, such as for example IT service providers or the hosting service provider for the website. These companies operate for RGL within the framework of a so-called order processing and may only use the personal data according to our instructions.

RGL has obligated these service providers to the General Data Protection Regulation as per contract and monitors these companies.

Further excluded is the transmission of data for the order processing or delivery of the goods or services or the transmission and use for regulatory compliancy, bookkeeping and settlement purposes within RGL. For the forwarding of the data these can be saved in the cloud application salesforce.com, Inc. The Landmark @ One Market Street, Suite 300, San Francisco, CA 94105, USA (“Salesforce”). In addition, no transmission will take place to third parties without your consent or without meeting requirements listed under art. 46 of the GDPR.

The scope of the transmitted data is only limited to the necessary minimum in this case.

### **Transfer and Sharing of Personal Information**

Personal health information and patient data may be transferred to affiliated companies and service providers of Regen Lab that have obligations to Regen Lab, e.g. IT providers, to perform our contractual obligations. Some of these affiliate companies and service providers are located outside Switzerland, the EU/EEA (e.g. United States, Canada, Brazil, Israel, China, India, Japan, Malaysia, Dubai, Singapore, Australia, Peru). Should third parties come into contact with your personal health information, we shall have made use of legal, technical and organizational measures and regular monitoring regarding such parties’ compliance with the relevant data protection regulations and with this Policy. When transferring personal data outside the European Economic Area, RGL relies most often on European Commission’s adequacy decision with respect to the country where data is transferred or on EU Commission approved Standard Contractual Clauses.

If you are in the European Union: Encrypted patient information will be stored exclusively in data centers within Switzerland and/or the European Union / European Economic Area. Encrypted personal information and personally identifiable information of users (master data), excluding patient data, may also be stored in data centers in the United States certified under the U.S.-EU Safe Harbor Program and on the basis of contractual agreements ensuring an adequate level of data protection in accordance with the EU GDPR and the Federal Data Protection, the Information Commissioner (“FDPIC”) of Switzerland or the German Federal Data Protection Act as applicable.

If you are in the United States: Encrypted patient information will be stored exclusively in data centers within the United States. Encrypted personal information may also be stored in data centers within Switzerland, the European Union / European Economic Area and the United States. Regen Lab does not share personal information with third parties for their direct marketing purposes.

### **Processing of Personal Information on Behalf of Others**

If you are in the European Union: As far as we and our service providers, which are bound by instructions, carry out inspections or maintenance of automated procedures or data processing systems and the possibility of access to personal information during such inspection and maintenance cannot be ruled out, the regulations of processing personal information on behalf of others with respect of the provisions of the EU GDPR, the Federal Data Protection and Information Commissioner (“FDPIC”) of Switzerland and the German Federal Data Protection Act as applicable. If you need to obtain a data protection agreement pursuant to the provisions regarding processing personal information on behalf of others please contact RGL at [compliance@regenlab.com](mailto:compliance@regenlab.com).

### **Accountability for Special Categories of Personal Information / Patient Information**

If you are in the European Union: Special categories of personal information in the meaning of the General Data Protection Regulation /REGULATION (EU) 2016/679/, the Federal Data Protection and Information Commissioner (“FDPIC”) of Switzerland and the German Federal Data Protection Act as applicable refer to information for example on health (e.g. patient information such as name, date of

birth, gender, medical condition/therapeutic indication, diagnoses, diagnostic imaging, history of treatments/applications and any information on a disease, disability, disease risk, medical history, clinical treatment or the physiological or biomedical state).

The user, including the medical professional, of the Services under a RGL site (for example [www.regenlab.com](http://www.regenlab.com), [www.cellularmatrix.info](http://www.cellularmatrix.info)) or under any other RGL Site is solely responsible for any patient information. The user is particularly solely accountable for providing legal admissibility for selecting, processing and using personal information with respect to the applicable data protection regulations. The user is further required to follow the rules and regulations of the applicable professional law. In particular, doctors and other health professionals as well as their assistants and trainees are bound to medical confidentiality. Therefore, the user being subject to the medical confidentiality is responsible for that personal information of patients, which is collected, processed and used under [www.regenlab.com](http://www.regenlab.com) or [www.cellularmatrix.info](http://www.cellularmatrix.info) or under any other RGL Site, is either to be anonymized or the patient has released the medical professional from medical confidentiality before. This written release from medical confidentiality has to refer to the processing of Protected Health Information (PHI) at RGL. It also has to comprise that for once a catastrophic event requires a data recovery and for necessary maintenance of the Service, PHI may be transferred to a Regen Lab's subsidiary

We do not monitor, examine, supervise or otherwise control any exchange of data between users, nor content of user data and patient information.

If you are in the United States: If you are in the United States, you are solely responsible for using the Services, related content, and the Site in a manner consistent with all applicable federal and state privacy laws relating to the use and disclosure of medical or health information, including but not limited to HIPAA and the HITECH Act and regulations and guidance issued pursuant to the same. By utilizing the Services, you represent and warrant that your use and/or disclosure of personal information, including protected health information (PHI), fully complies with all such applicable federal and state privacy laws and regulations and professional and medical practice laws and regulations governing health care providers and practitioners and their designees. You also are solely responsible for obtaining all appropriate consents or authorizations, as necessary, from patients whose personal information will be used or disclosed on the Site or in connection with the Services or taking appropriate steps to de-identify PHI consistent with HIPAA and HITECH. By uploading content, using the Site, and/or in any way using the Services or other features available to you on the Site or with the Services, you expressly certify compliance with all such requirements and your use is deemed your acceptance of this Policy and the Terms of Use. You also remain solely responsible for any medical or professional advice or opinions you provide on this Site and are solely responsible for any actions you take in reliance on advice or opinions you receive from other users on the Site.

You understand that nothing on this Site constitutes a recommendation for specific medical care by the Site or Regen Lab, nor do we make any warranty or representation of any kind as to the accuracy or appropriateness of recommendations or advice you receive from other users of the Services or the Site. We assume no liability for any diagnosis, treatment decision, or action taken based on information found on the Site or any other Site linked to it and assume no responsibility for any consequences related directly or indirectly to any action or inaction you take based upon the information, material, advice or recommendations obtained on this Site.

## **Data Security**

We have taken required, where applicable, or reasonable technical and operational precautions in order to protect personal information stored with us from unauthorized access, misuse or loss. Our security procedures are monitored regularly and updated in line with technological progress. Patient information

collected, processed and used by the user will be encrypted immediately upon upload. The uploaded patient information is stored encrypted.

No transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under the control of Regen Lab to intercept or access transmissions or private communications unlawfully. While we strive to protect personal information, neither Regen Lab nor our service providers can ensure or warrant the security of any information you transmit to us over the internet. Any such transmission is at your own risk.

### **Communications with You in the United States**

If You are in the United States: You authorize Regen Lab to transmit email to you or telephone You to respond to your communications, and provide information to you about new developments, features, services, special events, inquiries, or the Site.

Please note that unsubscribe requests may take up to ten (10) days to become effective. You may not opt out of receiving communications regarding your dealings with the Site or technical information about the Site.

### **Opt-Out Choices**

To "opt-out" of (1) having your Site provided personal data disclosed to third parties for marketing purposes, or (2) any other consent previously granted for a specific purpose concerning your personal data on this Site, send an e-mail to RGL at [compliance@regenlab.com](mailto:compliance@regenlab.com). To "opt-out" of receiving a particular marketing or promotional communication, follow the unsubscribe instructions included in the specific communication.

### **Access and Choice**

If you are a registered user or have provided RGL with your personal data, you may request to review, change or delete information previously provided to us by modifying your profile at the Login Screen or by sending an e-mail to [compliance@regenlab.com](mailto:compliance@regenlab.com). Requests for changes to or deletions of your personal data should be made by you directly. We will respond to all access requests within 30 days.

We will retain your information for as long as your account is active or as needed to provide you services. We will also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **Other Web Sites**

This Policy applies only to RGL Sites that link to this privacy policy. This Site includes links to both our affiliated sites and to non-RGL web sites, including access to content, products and services of such affiliated and non-affiliated sites (Other Sites). In some cases, these Other Sites are made available via "framing technology", and may appear to be part of this Site. Although some of the entities controlling these framed sites are under contract with RGL, we urge you to familiarize yourself with the individual privacy and other terms for each linked or framed site prior to providing your personal data. All RGL Sites that are governed by this privacy policy will have a link to this document.

## **Security**

RGL takes seriously the security of the information it collects. RGL has therefore implemented technology and security policies and procedures intended to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to, such information, reasonably appropriate to the nature of the data concerned.

When you enter sensitive information (such as personal health information), we encrypt the transmission of that information. We follow generally accepted standards to protect the personal data submitted to us through our Sites, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Website, you can contact us at [compliance@regenlab.com](mailto:compliance@regenlab.com).

In particular, the data transmitted to us that you have entered e.g. in HTML websites (contact forms) are transmitted in an encrypted form (SSL - Secure Socket Layer) via the public data network to RGL, where they are saved and processed.

This website uses an SSL encryption for reasons of security and for the protection of the transmission of confidential contents, such as for example the inquiries that you send us as the website operator. You can recognize an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line.

If the SSL encryption is activated the data, which you transmit to us, cannot be read by third parties.

## **Processing of your communication inquiries - Salesforce Marketing Cloud**

If you send us inquiries by using the contact form your details from the inquiry form including the contact details entered by you there will be saved by us for the purpose of processing the inquiry and for the event of follow-up questions. We will not forward these data without your consent.

## **Use of the Salesforce Marketing Cloud**

We use the remarketing functions of the Salesforce Marketing Cloud of the service provider salesforce.com, Inc. The Landmark @ One Market Street, Suite 300, San Francisco, CA 94105, USA ("Salesforce"). If you have consented to the receipt of newsletter(s) and visit our Website via a newsletter, web beacons are used. This way it is possible for us to track the effectiveness of our newsletter, e.g. whether you have opened an e-mail or which part of the newsletter was particularly interesting.

For this purpose we use e.g. the tracking methods "Email Open Tracking" and "Email-Link Tracking".

Email Open Tracking: Here we track whether you have opened the newsletter via the 1x1 pixel in the HTML template described below.

Email-Link Tracking: It is tracked here whether a link was clicked within the e-mail (Click-Trough). For this purpose the links are converted by the Marketing Cloud into trackable links.

Salesforce uses so-called “web beacons” in the majority of the used e-mails. Web beacons (also called “ClearGIFs” or “tracking pixels”) are small graphics (GIF files with a size of approx. 1×1) that are used among others on websites or in HTML e-mails. Web beacons fulfill similar functions as cookies, can however not be noticed by the user. Via web beacons information can, in particular, be obtained whether the e-mail was opened and whether the system of the user is capable of receiving HTML e-mails. No personal data are collected via the web beacon.

If you would not like to receive any e-mail notifications with web beacons, you can alternatively also receive your e-mails in a text form (not in the HTML format) by changing the corresponding settings to this extent within your e-mail client and by blocking the receipt of HTML formatted e-mails.

### **Transmission of data within the scope of the services requested by you**

You have decided to be informed about future offers and products (e.g. newsletters, forms, etc.) from RGL. Within the scope of the use of this portal data from you can be transmitted to the USA or elsewhere to a contractually bound and carefully selected service provider. The data protection existing in the USA is not comparable with the Swiss, German or European standards, therefore appropriate data protection cannot be guaranteed continuously. In order to nevertheless guarantee the security of your data as far as possible, our company takes necessary protective measures. Your data are therefore transmitted to the USA according to the principle of purpose limitation and data economy so that only the absolutely essential information that is provided by you is saved.

### **Newsletter data**

If you register for an offered newsletter your name and your e-mail address as well as information, which permits us to check that you are the holder of the entered e-mail address and agree with the receipt of the newsletter, are saved by us. Your address will additionally be required in case of postal dispatch. Your data are exclusively processed for the requested newsletter, your data will not be additionally used for other purposes. Neither will your data be forwarded by us to third parties. Our registration system ensures by the sending of a registration e-mail with a confirmation link that the chosen newsletter is also actually requested by you (so-called “Double-Opt-In-Procedure”).

You can revoke the granted consent at any time via the “unsubscribe” link in the newsletter.

If you order the newsletter by using our contact form we will process your inquiry in our Salesforce Marketing Cloud.

### **Minors**

Our Site is not intended for use by individuals under the age of 18, and RGL does not knowingly collect personal data from those in this age group. If you are under 18, please discontinue the use of our Site. If we become aware that someone under the age of 18 has registered, we will expunge any related personal data from our records.

## **Updates to Privacy Policy**

RGL may, in its sole discretion, update this Policy at any time and from time to time, by posting the amended Policy on this Site. The amended Policy shall be effective upon posting, and your access to or use of the Site following an update shall be deemed consent to the revised Policy. We urge each visitor to refer back to this page regularly and especially prior to providing or updating any personal data. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## **Contact, Questions, Comments, Complaints**

If you would like to communicate with RGL regarding privacy issues or have questions (e.g. regarding the processing of your personal data), comments or complaints about this Policy or Site, please contact us at: [compliance@regenlab.com](mailto:compliance@regenlab.com). RGL is also available for information requests, applications or complaints.

## **Your right to information**

In accordance with the General Data Protection Regulation, our customers have a right to information about their saved data, free of charge. Upon request, we will inform you in writing if and which personal data we have stored about you, in accordance with applicable law.

## **Your right to lodge a complaint at a regulatory authority**

In the event of a complaint, you can contact the designated regulatory authority:

Switzerland: Swiss Federal Data Protection and Information Commissioner (FDPIC)  
(However, we inform you that your complaint will not be treated individually by the FDPIC. In fact, the legislator has favored individual civil law actions by the persons concerned instead of the intervention of the authority. Therefore, if you consider that you are a victim of unlawful use/process of your personal data, you have the option of filing a civil law action based on article 15 of the Swiss Federal Act on Data Protection (FADP))

Germany: The data protection officer in Hesse; Gustav-Stresemann-Ring 1, 65189 Wiesbaden