



MicroGEM International Plc and its Group companies (**'MicroGEM'**) is committed to being transparent about how it collects and uses personal information and will ensure that it collects, processes and maintains personal information in accordance with GDPR and other applicable laws in countries around the world where MicroGEM conducts its business operations.

### **Collection and Use of Personal Information**

Personal information is data that can be used to identify or contact a single person.

You may be asked to provide your personal information anytime you are in contact with MicroGEM directly, and/or visit or make a purchase from [www.microgembio.com](http://www.microgembio.com) (the **'Site'**). MicroGEM may share this personal information within the Group and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, content, and advertising. You are not required to provide the personal information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our products or respond to any queries you may have.

We also collect data in a form that does not, on its own, allow us to identify a specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose.

Here are some examples of the types of personal information MicroGEM may collect and how we may use it:

#### What information we collect

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, type of operating system if accessing from a mobile device, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, that websites or search terms referred you to the Site, and information about how you interact with the Site (**'Device Information'**). This is considered to be non-personal information except where local laws consider IP addresses or similar identifiers as personal information.

When you make a purchase or attempt to make a purchase through the Site, we collect certain information from you, including your name, billing address, shipping address, payment information (including credit card numbers), email address, and phone number (**'Order Information'**).

When you contact us by email, telephone or using the online 'contact us' form, certain information is collected from you, including your name, address, phone number, email address, and company details and marketing preferences.

#### How we use your personal information

We may process your personal information and non-personal information for the purposes described in this Privacy Policy, with your consent, for compliance with a legal obligation or when we have

assessed it is necessary for the purposes of the legitimate interests pursued by MicroGEM or a third party to whom it may be necessary to disclose information.

The Order Information that we collect will be used generally to fulfill any orders placed through the Site (including processing your payment information, arranging shipping, providing you with invoices and/or order confirmations, and contacting you in the event of an issue with your order) and to screen our orders for potential risk or fraud. This might include sharing your personal information with a third party such as the provider of our online store – Shopify. You can read more about how Shopify uses your personal information here: <https://www.shopify.com/legal/privacy>.

The personal information we collect allows us to keep you posted on MicroGEM’s latest product announcements, offers and upcoming events in line with the preferences you have shared with us. This may include us sharing this information with our approved distribution network for the purposes of marketing and promoting MicroGEM only. If you do not want to be on our mailing list, you can share your preferences with us through the Site or unsubscribe at any time by clicking the link in any marketing email you receive.

We also use personal information and non-personal information for internal purposes such as data analysis and research to help us develop, deliver, optimise and improve our products, content, advertising and customer communications. This can involve sharing personal information with a third party such as Google Analytics to understand how our customers use the Site. You can read more about how Google uses your personal information here:

<https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

### **Cookies and Other Technologies**

We collect Device Information using the following technologies:

“Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.

“Log files” track actions occurring on the Site, and collect data including browser type, Internet service provider, referring/exit pages, and date/time stamps.

“Web beacons,” “tags,” and “pixels” are electronic files used to record information about how you browse the Site.

These technologies help us better understand user behavior, tell us which parts of the website customers have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information.

MicroGEM may also use cookies and other technologies to remember personal information when you use the Site. In these cases, our goal is to make your experience more convenient and personal and optimise our Site for our users.

As described above, we use your personal information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative’s (“NAI”) educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

### **Do Not Track**

MicroGEM does not track its customers over time and across third party websites to provide targeted advertising and therefore does not alter its data collection and use practices when Do Not Track (DNT) signals are received from your browser.

### **Protection of Personal Information**

MicroGEM takes the security of your personal information very seriously. MicroGEM ensures that all personal information is stored on a computer system which is password protected, with encrypted files and access limited to only those with need to know within the business.

### **Integrity and Retention of Personal Information**

MicroGEM will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy. When assessing these period we carefully examine our need to collect personal information, and if we establish a need to collect personal information, we will store it only for the minimum necessary period or as required by law.

We ask that you help us to ensure that your personal information is accurate, complete and up to date by advising us of any changes. Should we not hear from you for a period of three years and there is no evidence that the personal information retained by MicroGEM remains valid, we shall delete the personal information from our system. An exception to this is that MicroGEM reserves the right to retain Order Information for our records and audit purposes unless and until you ask us to delete this information.

If you are a European resident, you have the right to access personal information we hold about you and to ask that your personal information be corrected, updated, or deleted. If you would like to exercise this right, please contact us through the contact information below.

Additionally, if you are a European resident we note that we are processing your information in order to fulfill contracts we might have with you (for example if you make an order through the Site), or otherwise to pursue our legitimate business interests listed above. Additionally, please note that your information will be transferred outside of Europe, including to Canada and the United States.

### **Changes**

We may update this Privacy Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

### **Contact Us**

For more information about our privacy practices, or if you have any questions or concerns about MicroGEM's Privacy Policy, please contact Gemma Steele, Group Legal Counsel, at [g.steele@microgembio.com](mailto:g.steele@microgembio.com).

