

# Morgan Scientific, Inc. Privacy Policy

Effective Date: March 15, 2022. This update supersedes the previous versions of the document. To verify You have the latest version of this document, visit <https://www.morgansci.com/legal/privacy>.

## 1. Introduction

- 1.1. At Morgan Scientific, Inc. ("MSI"), We are committed to ensuring that Your privacy is protected, and to ensure that We comply with Our obligations under all relevant Privacy Regulations including but not limited to Data Protection Act 2018, General Data Protection Regulations, California Consumer Privacy Act 2018, Health Insurance Portability and Accountability Act 1996 and Act on Protection of Personal Information. The purpose of this Privacy Policy is to outline how We handle and safeguard all Personal Data provided to Us via Our websites.
- 1.2. By visiting MSI websites and providing Us with Your Personal data as defined below, via the websites You are accepting to the terms and conditions detailed within this Privacy Policy. Should You not agree with this Privacy Policy, please follow the directions mentioned in different sections of this Policy or leave the MSI website.

## 2. Interpretation

- 2.1. The following definitions will apply throughout this Privacy Policy:
  - "DPA 2018" means Data Protection Act 2018
  - "GDPR" means General Data Protection Regulations (both EU and UK);
  - "CCPA" means California Consumer Privacy Act 2018
  - "Personal Data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
  - "Personal information" under CCPA means information that identifies, relates to, or could reasonably be linked with You or Your household. For example, it could include Your name, social security number, email address, records of products purchased, internet browsing history, geolocation data, fingerprints, and inferences from other personal information that could create a profile about Your preferences and characteristics.
  - "MSI," "We," "Us," and "Our" means Morgan Scientific, Inc.

## 3. Personal Data Processed

- 3.1. The following personal data are processed by MSI: (i) general Data including but not limited to, name, job title, department, and company; (ii) contact information including address, phone number and email address; (iii) demographic information such as postcode/zip code, preferences, and interests; (iv) metadata and/or communication data such as IP Address; (v) browsing history on Our Websites; (vi) other information relevant to customer surveys and/or offers.

## 4. Reasons for Data Processing

- 4.1. We process Personal Data to allow Us to understand Your needs and provide You with a better service and in order to enable Us to do the following: (i) to develop and improve Our website services; (ii) to facilitate marketing analysis; (iii) to register customer purchased devices; (iv) to post the most relevant informational content; (v) device vigilance, including but not limited to the unlikely event of a recall.

## 5. Lawful Basis for Processing Data

- 5.1. Under data protection law, You have rights which include the following:
  - 5.1.1. Your right of access – You have the right to ask Us for copies of Your personal information.
  - 5.1.2. Your right to rectification – You have the right to ask Us to rectify personal information You think is inaccurate. You also have the right to ask Us to complete information You think is incomplete.
  - 5.1.3. Your right to erasure – You have the right to ask Us to erase Your personal information in certain circumstances.
  - 5.1.4. Your right to restriction of processing – You have the right to ask Us to restrict the processing of Your personal information in certain circumstances.
  - 5.1.5. Your right to object to processing – You have the right to object to the processing of Your personal information in certain circumstances.
  - 5.1.6. Your right to data portability – You have the right to ask that We transfer the personal information You gave Us to another organization, or to You, in certain circumstances. In accordance with CCPA You have rights, which include the following:
    - 5.1.6.1. Your right to know – You have the right to know about the personal information a business collects about You and how it is used and shared;
    - 5.1.6.2. Your right to delete – You have the right to have the personal information collected from You deleted (with some exceptions);
    - 5.1.6.3. Your right to opt-out – You have the right to opt-out of the sale of Your personal information; and
    - 5.1.6.4. Your right to non-discrimination – You have the right to non-discrimination for exercising Your CCPA rights.

## 6. Term of Data Retention

- 6.1. In accordance with GDPR We delete Your Personal Data as soon as We no longer have a legal basis for retaining it, and they are no longer needed to achieve the purpose for which they were originally collected; except where We have a legal obligation to retain said data.

## 7. Security of Personal Data

- 7.1. Data transmission over the internet cannot be 100% secure. However please be assured that We are committed to ensuring it is as secure as reasonably possible, with appropriate technical and security measures that meet or exceed usual and customary industry standards.

## 8. Personal Data and External Website Links

- 8.1. While visiting MSI Websites You may come across links to external websites which are not operated by MSI, when You click those links MSI is no longer in control of the data protection practices and therefore is no longer responsible for how Your Personal Data is managed. We suggest that You read the external website's privacy policies.

## 9. Use of Cookies

- 9.1. A cookie is a small amount of data that is passed to Your browser and stored on Your computer ready to be retrieved at a later time by the website that originally sent it. The cookies We use allow Our website to respond to You in a more personal way by remembering Your preferences and customizations. We also use cookies to anonymously analyze how You use the website which helps Us improve the user experience. No personal information about You is stored in cookies which Our website uses.
- 9.2. If You would prefer not to allow the use of cookies then You may configure Your browser to decline them. This may prevent You from taking full advantage of Our website.
- 9.3. MSI may elect to work with lead forensic third parties, who may provide tools for IP tracking. IP tracking tools are used to recognize businesses. Lead forensic tools may use a tracking code to identify said businesses. Tracking tools only provide data that is already available in the public domain; it cannot and does not provide MSI with any personal data and only uses Your IP address to provide data related to Your visits to MSI Websites. We may use this data to contact You for marketing purposes and/or to determine how You found Your experience using Our website.
- 9.4. Our website uses Google Analytics, this service is provided by Google LLC ("Google"). Google uses cookies to enable Us to understand how You use Our online services. For further information on how Google uses Your personal data, and about how to manage Your settings then please visit <https://policies.google.com/technologies/ads>.

## 10. Social Media and Personal Data

- 10.1. We are active on social media platforms, when You visit these platforms then the privacy practices of the platforms will apply. We will only process data when We respond to Your communications; including but not limited to the following examples: if You send Us a message via the platform; or if We respond to a comment on Our page.

## 11. Sale of Personal Data

- 11.1. We will never sell, distribute, or lease Your personal data and/or information to third parties unless required by law to do so.

## 12. How to Contact Us

- 12.1. Should You need to contact Us regarding Our Privacy Policy then please do so using the following details:

Vice President, Business Operations  
Morgan Scientific, Inc.  
151 Essex St. 8<sup>th</sup> Flr

Haverhill, MA 01832

[privacy@morgansci.com](mailto:privacy@morgansci.com)

### **13. Privacy Policy Updates**

- 13.1. We may from time to time be required to update this Privacy Policy. If We do implement any changes to this Privacy Policy then the updated version will be shown here, so please review frequently.