



PRIVACY NOTICE

Last updated: October 31, 2023

PinPoint Testing, LLC and any of its subsidiaries (referred to as “we”, “us” or “our” or “PinPoint”) respect your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you and how you can exercise your privacy rights.

If you have any questions or concerns about our use of your personal information, please contact us using the contact details provided at the end of this Privacy Notice. For more information about PinPoint, refer to the "About Us" section of our website.

Read this Privacy Notice carefully to ensure you don't miss any information that may be relevant to you.

Scope of this Privacy Notice

This Privacy Notice is relevant to:

- i. Any user of, or visitor to, PinPoint's websites, platforms, applications and other online services or products under our control (“Online Services”).
- ii. Individuals who share their business contact information and other personal information with PinPoint in the framework of a potential or ongoing business relationship, during webinars, trainings or events including tradeshows or conferences, or for other business purposes, including customer services and product or laboratory services, such as current or prospective customers and their representatives; and
- iii. Any members of the public who interact with PinPoint and individuals with whom we do business, including, but not limited to, staff of regulatory authorities and suppliers and visitors to our sites and offices.

In certain cases, the collection and use of personal information may be described in a separate privacy notice.

Who is responsible for the collection and use of your personal data?

The PinPoint company responsible for the collection and use of your personal data (the so called “Data Controller”), and that determines what data to collect, how to use it, for how long to store it, and with whom to share it, depends on your relationship with us. For example:

If you are a visitor of the PinPointTesting.com website or a customer, the Data Controller is PinPoint Testing, 13 Children's Way, R2109, Little Rock, AR, USA, and its joint controller affiliated companies whose webpages you have visited and to whom your questions are forwarded based on your request and your location (as provided in the request form).

If you are or work for one of our customers or suppliers, the Data Controller is the PinPoint company you are having business with. This information can be found on the invoice or purchase order you receive or in the agreement you have entered into with PinPoint.

For any other individuals interacting with PinPoint, the Data Controller is the legal entity that manages your relationship to PinPoint. This information can be found in the agreement you or your company have entered into with PinPoint or can be obtained from your contact person at PinPoint.

What personal information does PinPoint collect and why?

The personal information that we collect about you broadly falls into the following categories:



- a. Information that you provide voluntarily
- We may collect personal data directly from you when you interact with PinPoint and use it for the purposes described below or as communicated to you at the time of collection.
 - When you register an account on a PinPoint platform, or when you submit a contact or feedback form on our website, you may be asked to submit certain information to us, such as contact details (name, surname, e-mail address, phone number, etc.), your role within your company and your company's interaction with PinPoint, geographical information (i.e. business address/country), and how you would qualify your interest in PinPoint.
 - When you participate or are an invited speaker in seminars, workshops, tradeshow, or conferences we may ask you to provide contact details (name, surname, e-mail address, phone number etc.), your role within your company and your company's interaction with PinPoint, geographical information (i.e. business address/country), and national registration number if you are a healthcare professional in certain countries, where applicable.
 - When you complete a survey on your experience with our product and services, and to help us improve our products and services, we may ask you to indicate your role within your company and your company's interaction with PinPoint, geographical information (i.e. business address/country).
 - When you visit our sites and offices, we may collect name, surname, e-mail address, phone number, etc.), your role within your company and your company's interaction with PinPoint, geographical information (i.e. business address/country) to register you as a visitor in our system, to screen our visitors against sanctioned parties list, and to provide you with appropriate access credentials.
 - If you are a consultant of a PinPoint company, work for a company having a contractual relationship with PinPoint, or otherwise provide services to us you may be asked to submit certain information to us, such as contact details (name, surname, e-mail address, phone number, etc.), your role within your company and your company's interaction with PinPoint, geographical information (i.e. business address/country).
 - If you fill out any other kind of form at a fair or other marketing event organized by PinPoint or where PinPoint is represented, we may collect (name, surname, e-mail address, phone number, etc.), your role within your company and your company's interaction with PinPoint, geographical information (i.e. business address/country), and how you would qualify your interest in PinPoint.
- b. Information that we collect automatically
- In certain cases, we may automatically collect personal information about you and the device you use when interacting with us.
 - When you use and navigate our online services, visit one of our websites, subscribe to a news feed on social media, watch a webinar, we automatically collect certain information from your device. This personal data may include: your IP address, device type, unique device identification numbers, browser-type, the URL of the website you came from, broad geographic location (e.g. country or city-level location), date-time of access, the amount of time you spend using the services and websites, data transferred, pages visited, and other technical information. We may also collect information about how your device/hardware has interacted with our website or platform (including links clicked), what activities users have performed within an application (i.e. login history). Most of this data is generated and collected automatically, as part of the standard operation of our online services and will only be processed in accordance with applicable laws and regulations.
 - When you are invited and participate to a videoconference with PinPoint, we automatically collect certain information about you (e.g. first and last name, e-mail address, profile picture if any), meeting metadata (e.g. date, time and duration of communication, name of the meeting, participant IP address), device data (e.g. IP addresses, MAC addresses, Client version), text and video data (e.g. chat histories; video, audio and presentation recordings as permitted under the applicable by law and under your consent, where applicable), and connection data (e.g. phone numbers, country names, start and end times, IP addresses)
 - When you receive an e-mail from PinPoint, we may collect information on whether the e-mail was opened, and any content was accessed through the e-mail.



- Some of this information may be collected using cookies and similar tracking technology, as explained further in our Cookie Notice page.
- c. Information collected from third parties
 - We may collect information about you from third parties usually to complete the information we need to create or maintain our relationship with you.
 - We may collect personal information when we acquire companies and perform post-merger integration, to evaluate the target company and its business, in accordance with relevant laws and regulations.
 - We may collect additional personal information about you when we perform screenings for compliance purposes as indicated under letter a. (Information you provide voluntarily) above, to complete part of the personal information already provided by you.
 - We may use publicly available resources that hold personal information provided by you and/or your company (i.e. commercial register, company websites, professional networks, university, publication websites, social media and other digital platforms) or from third-party vendors who act on our behalf, in accordance with relevant laws and regulations.

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as scientific or historical research purposes or statistical purposes) if and where this is permitted by applicable data protection laws.

As a general principle, your granting of any consent and your provision of any personal information to PinPoint is entirely voluntary; there are generally no detrimental effects on you if you choose not to consent or to provide your personal information. However, there are circumstances in which we cannot take action without certain personal data, for example because this personal data is required to process your orders or requests, manage the contractual relationship PinPoint maintains with you or the company you work for, or provide you with access to a specific online content or newsletter. In these cases, it will unfortunately not be possible for us to provide you with what you request without the relevant personal data.

Why we process your personal information

Whether you are a customer, a user of our online services (including our websites), a supplier of products and services to us, an attendee or speaker at a conference, event, or roadshow organized or attended by PinPoint, or you collaborate in a scientific research or project with PinPoint, we will process your personal information to (as applicable):

- i. Create an account on our online services for you or the company or organization you work for, and maintain and update such account;
- ii. Enable you to access or interact with our online resources, including webinars
- iii. Verify your identity, where required by law;
- iv. Negotiate and enter into agreements (such as sales and service agreements or research collaborations) with the company or organization you work for, and fulfill your orders for products and services, and perform any obligation arising from our relationship with the company you work for, or as required by law;
- v. update orders and transactions;
- vi. Contact you about products and services you may be interested in, or provide you with updates and support on products and services;
- vii. Provide the company or organization for which you work with our product and services;
- viii. Comply with any legal obligations that apply to us;
- ix. Verify financial transactions and undertake compliance screening checks.

In accordance with the applicable local laws, and based on your consent where required, we may also:



- i. Contact you to send you marketing e-mails or newsletters, marketing material via regular e-mail, or call you over the phone, to understand whether you are interested in our products and services. In these cases, you will have the opportunity to opt out from being contacted by PinPoint at any time;
- ii. Collect personal information about you (e.g., your position, specialty, and publications) from publicly available sources such as company, university, publications websites, and combine it with personal information we have collected about you, to enhance the customer profile in support of our sales and marketing activities.

Third Parties

We may disclose your personal information to the following categories of recipients:

- to our website or application hosting partners and other third parties who assist us in operating our platforms, conducting our business, or servicing you, as long as these parties agree to process any personal data in compliance with applicable data protection law;
- to our group companies, third party services providers and partners, including distributors and other sales intermediaries, who provide data processing services to us or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we process your personal information, Third party service providers and partners include Customer Relationship Management (“CRM”) solution providers or Marketing Automation Solution providers and a list of the third-party service providers and partners relevant with regard to your personal information is made available on request;
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to an actual or potential buyer (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to any other person with your consent to the disclosure.

Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you, including to understand and save your preferences for future visits and serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please consult our Cookies Notice.

How does PinPoint keep my personal information secure?

We use appropriate technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include regular malware scanning. Your personal information is contained behind secure networks and is only accessible by a limited number of people who have special access rights to such systems and are required to keep the information confidential. We require the same level of diligence from any third party involved in the processing of your personal information in accordance with applicable law.

International data transfers

Since PinPoint is operating within a global network of partners, your personal information may be transferred to and processed in countries other than the country in which you reside, including the USA and the EU. Transfers of personal data outside of your country of origin are made according to the applicable data



protection laws, based on your consent where required, or with the implementation of appropriate safeguards such as, but not limited to, a decision taken by the competent data protection authority declaring that the level of data protection of the country of destination is adequate, the EU Standard Contractual Clauses or similar contracts where legally permitted.

If you'd like to know more about how PinPoint ensures compliance when transferring your personal information internationally, please contact us at the contact details provided below.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Your data protection rights

Please note that in many circumstances we cannot effectively do business with you without processing some personal information about you (e.g. your contact information).

You can use our online services without consenting to cookies (unless strictly necessary); the consequence is that some features may be less tailored to you.

You have the right to opt out of receiving marketing communications at any time. Please use the unsubscribe functionality on such communications.

You can submit a request to PinPoint with respect to your personal information by completing this form. More information about specific rights for individuals located in the EU/EEA or California resident is described below.

We will make reasonable efforts to respond promptly to your requests in accordance with applicable laws. When you contact us, we may require you to provide information to authenticate your identity to assist you with your request. If you are unable to provide this information, we may be unable to process your request. Where we receive your personal information from our customers and process your personal information on their behalf when fulfilling our contractual duties, we may do so in the capacity of a processor. We do not have control over our customers' privacy and security practices and processes. If your personal information has been submitted to us by a PinPoint customer and you wish to exercise any of the above-mentioned rights, please contact the relevant customer directly, or provide us with the name of the customer so that we can appropriately refer your request to them.

Privacy Statement EU/EEA and Switzerland

If you are located in the EU/EEA or Switzerland the following additional privacy notice applies.
Legal Basis for processing your personal data.

In accordance with applicable laws, we in most cases rely on the following legal bases to process your personal data, as appropriate:

- **Contract Performance:** The processing is necessary for us to perform a contract with you or take steps at your request prior to entering into a contract
- **Legal Obligation:** The processing is necessary for us to comply with an applicable legal obligation



- Legitimate Interest: The processing is necessary for us to realize a justified and legitimate interest considering your privacy and other fundamental rights and interests
- Consent: The processing is performed according to your consent

The specific legal bases on which we rely for each of the purposes which we process your personal information for are set forth below:

| Purposes | Legal Basis (as applicable) |
|---|--|
| <i>Sale of our Product and Services</i> | |
| Create an account on our online services for you or the organization for which you work. | |
| Enable you to use online platform to access resources that we may offer from time to time. | |
| Enter into and fulfill a contract with you or the organization you work for. | |
| Send you information (via e-mail or other channels) about changes to our products and services, and to send notices and other disclosures as required by law. | Contract Performance based on applicable contract. Legitimate Interests to provide services. |
| Fulfill your or your organization's orders for products and services. | Consent. |
| Perform our contractual obligations to you or the organization you work for under any applicable contract. | |
| Maintain and update your account, orders and transactions. | |
| Fulfill our contractual obligations to you or the company/organization you work for. | |
| <i>Authentication</i> | Legal Obligation. |
| Authenticate your identity, where necessary or required by law. | Legitimate Interest. |
| | Contract Performance. |
| <i>Fulfillment of your requests</i> | If your request or inquiry relates to a service you have ordered, registered for or otherwise contracted for, Contract Performance based on our Terms of Service or other applicable contract. |
| Provide requested services, information and product support. | If we are legally obligated to respond to your request or inquiry, Legal Obligation. |
| Respond appropriately to your inquiries. | In all other cases, Legitimate Interest as part of our commitment to provide you with good customer service. |
| Request feedback | |
| | Consent. |
| <i>Compliance</i> | Legal Obligations per applicable laws. |



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| <p>Comply with any legal obligations that apply to us.</p> <p>Verify financial transactions and undertake compliance screening checks, including against sanctioned parties lists.</p> | <p>Legitimate Interests in protecting customers and PinPoint Testing.</p> |
| <p><i>Marketing and communication</i></p> | |
| <p>Customize your experience on the Online Services.</p> <p>Contact you to determine whether you would like to initiate a business relationship with us or to send you marketing e-mails.</p> <p>Collect personal information about you (e.g. your position, specialty and publications) from publicly available resources such as company, university, and publications websites, and combine it with personal information we have collected about you, to enhance our profile of you in support of our sales and marketing activities.</p> <p>Invite you to participate in questionnaires and surveys to understand if you are satisfied with the products and services offered to you or the organization you work for, and to improve our products and services.</p> | <p>Legitimate Interest.</p> <p>Consent as legally required.</p> |
| <p><i>Establish and Maintain communication with you</i></p> | |
| <p>Invite you to participate to videoconference meetings using online tools, such as Webex or Microsoft Teams</p> | <p>Legitimate Interest to ensure consistency and high performance when using online tools across PinPoint Testing.</p> |
| <p><i>Customer Support</i></p> | |
| <p>Process your calls with our customer services and sales representatives to ensure we deliver high-quality service, assist in the training and development of PinPoint Testing representatives, and generally improve our customer service to you.</p> | <p>Contract Performance.</p> <p>Legal Obligation.</p> |
| <p><i>Health and Safety</i></p> | |
| <p>In the case of an epidemic or pandemic, collect information on your presence in high risk areas or screen your temperature before entering the buildings, in accordance with the applicable local laws.</p> | <p>Consent.</p> <p>Legitimate interest to maintain the health and safety of our employees on site</p> |

Your Data Subject Rights

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by emailing laboratory@pinpointtesting.com



- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below.
- You have the right to **opt-out of marketing communications** from PinPoint Testing at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details provided under the “How to contact us” heading below.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

CCPA Privacy Statement

If you are a California resident, California law provides you with the following rights with respect to your personal information:

- The right to **know** what personal information we have collected, used, disclosed and sold about you. To submit a request to know, you may contact us at laboratory@pinpointtesting.com
- The right to request that we **delete** any personal information we have collected about you. To submit a request for deletion, you may email us at laboratory@pinpointtesting.com

When you exercise these rights and submit a request to us, we will verify your identity by asking you for your email address, telephone number, information about your company’s contract or your direct relationship with PinPoint Testing. We also may use a third-party verification provider to verify your identity.

Your exercise of these rights will have no adverse effect on the price and quality of our goods or services.

For the 12-month period prior to the date of this Privacy Notice, PinPoint Testing has not sold any personal information, nor does it have any plans to do so in the future.

Please note: If you are a customer of one of our customers, you should contact them first concerning your California Privacy rights.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

How to contact us

If you have any questions or concerns about our use of your personal information, please contact us using the following details:

PinPoint Testing, LLC
13 Children’s Way, R2109
Little Rock, AR 72202

PinPoint's Chief Privacy Officer can be reached at:
Jason.Truskowski@PinPointTesting.com