

MediSapiens Customer Data Privacy Policy

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Introduction

MediSapiens, like practically all other businesses, has a database of its past, present and hopefully future customers, collaborators and partners. At MediSapiens, a company that deals with highly confidential medical and genomic data, we take all the security of all data very seriously. For the purpose of marketing, we store data on our existing and prospective customers. In a nutshell, these data are limited strictly to what is needed to conduct marketing activities, are not only accessible to relevant personnel and are never given to any outside parties. Furthermore, these data are only used for marketing activities.

This document details our privacy policy with regards to data on our customers as stored in our Customer Relationship Management (CRM) systems.

Information we store

We receive and store a number of pieces of personally identifiable information. These data can consist of one or more of the following:

- name
- phone number
- e-mail address
- mailing address
- corporate profile
- notes of previous correspondence or mutual business

Sources for the data

These data can come from multiple sources, and from multiple different events. Often, after an initial meeting during which business cards are exchanged, emails are then exchanged, teleconferences are held, an in-person meeting is arranged or similar activities occur. From these accrue the above-mentioned data.

The initial data point for any particular person might come from one of any number of different sources:

- Online channels, such as
 - Direct contact through our website
 - E-mails
 - Etc.
- Offline channels, such as
 - Business events, meetings and conferences
 - Direct phone calls
 - Etc.

Data storage

The information detailed above is stored within our CRM system. Currently we use **Pipedrive** for our CRM activities. Certain information for certain parties, namely e-mail addresses for people who believe might benefit from a particular piece of info (e.g. newsletters of new product to target audience based on their fields) are additionally stored in an e-mailing service. We use **MailChimp** for this service.

Our usage of the data

As a business MediSapiens strives to offer the best products and services to our customers, ones that deliver the most benefit at the best speed and cost. MediSapiens' offerings, both products and services are always at least somewhat tailored for each individual customer.

MediSapiens has a legitimate interest in storing the personal data of direct or potential customers as well as of people with direct interest in our domain of business or company's progress. Our interest for these data includes:

- Storing and processing of personal data for direct marketing purposes so that we can provide relevant information tailored for the needs and interests of the person.
- Utilizing the data of our current and potential customers so that we could understand their needs and interests better to provide them with a customized solution matching their needs.

We appreciate the sensitive nature of any personally identifiable data. Thus, we will not use these data for any purpose other than those outlined above. Nor will the data be combined with any other data that might possibly exist. We will not give the data, or access to it to third parties, unless under special circumstances (see below).

Access to customer data

Access to the personal data of our potential and existing customers is restricted within MediSapiens, only being accessible by the Sales and Marketing team, as well as Management of the company. In essence, only the people who carry out the tasks outlined above, or are in some other way necessary to perform them can access the data.

We will not disclose the customers' personally identifiable information to any third party for any reason except to third parties whose role is to maintain or operate our web site, fulfil the requests made through our website, or who may be engaged by us specifically to handle and deliver certain online activities within the scope of our interest in these data. We also, in select circumstances, share data with our Strategic Partners. This could happen when we feel that together with our Strategic Partner we can deliver the best possible product to the customer. This can only happen when we offer specific solutions, we never share data for marketing purposes.

All these third parties have access to personally identifiable information only to carry out their specific support obligations, cannot use it for other purposes, and must agree to maintain the confidentiality of such information.

Data Retention Policy

MediSapiens' data retention policy aims to balance the needs of our marketing efforts with the privacy concerns of our customers. It has been our experience that patient, long-term work has led to the best result for both our customers and us. Therefore, we store data on our customers for some time after we have concluded our business with them. We do not store data indefinitely. Exactly when we get rid of the information concerning any particular individual depends on what kind of interaction we have had in the past. Note that the data retention concerns personally identifiable data. Data on organizations, institutions or other similar entities can be retained indefinitely.

Subscribers to our Newsletter

For people who have subscribed to our Newsletter we retain the data until the person unsubscribes.

Cases where contracts have been signed

In cases where we have legally binding contracts with the customer, we store their information for as long as is required by the contract (its duration, any liability clauses, any other encumbrances) and for *three years* afterwards.

Cases where there is active communication

Where there has been active bilateral communication where interest in our products or services has been indicated, we store the information for *two years* since the last active communication.

Cases where there is only one sided communication

In cases where we have reached out to a potential customer with some sort of communication but have not received any response we retain the information for *one year*.

Unsubscribing

If any person, whose information may or may not exist within MediSapiens, wishes to no longer receive any communication from us, we will immediately upon receiving the request cease any communication. Barring any contractual obligation, we will treat said person's personally identifiable data as have had one-sided communication with regards to retention.

Our newsletter contains instructions and an easy-to-use link to unsubscribe from it.

Requesting changes to personal data

If any person wishes to notify us of an update to any of their personal data that MediSapiens may or may not have, they can email us at support@medisapiens.com. Upon verification of the person's identity we shall change our stored information forthwith. We will then communicate back and inform the person on the exact nature of the changes that have been done.

Requesting removal of personal data

If any person, whose information may or may not exist within MediSapiens' CRM, wishes to have these data deleted, they can email us at support@medisapiens.com. Upon verification of the person's identity we shall delete all our stored information regarding that person forthwith. We will then communicate back and inform the person on what data (if any) of theirs was deleted.

Legislation and standards

Here is a listing of the relevant regulations, legislation, standards and guidelines that we follow and/or adhere to for our data privacy policy.

GDPR

The EU's General Data Protection Regulation (GDPR) was introduced to unify all EU member states' approaches to data regulation, ensuring all data protection laws are applied identically in every country within the EU. It will protect EU citizens from organizations using their data irresponsibly and puts them in charge of what information is shared, where and how it's shared.

Finnish data privacy law

Finland is a member of the European Union and has implemented the EU Data Protection Directive 95/46/EC with the Personal Data Act 523/1999 ('Act') (*Henkilötietolaki*) in June 1999. The PDA implements Directive 95/46/EC on data protection (Data Protection Directive) and applies to all types of processing of personal data. The objectives of this Act are to implement, in the processing of personal data, the protection of private life and the other basic rights which safeguard the right to privacy, as well as to promote the development of and compliance with good processing practice.

Data Security

At MediSapiens we handle all data with care, be it internal or customers' data. Our internal policies aim to minimize the chance of data breach. Our policies state that we don't allow any unnecessary prints, copies, or other duplications of any data. Also, access to data is not general within MediSapiens, instead being limited to only those persons who need access to perform their duties. All our personnel have been trained with these policies, and compliance to them is monitored.

External partners

We expect our external partners to conform to our standards of data security. We currently partner with **Pipedrive** for our CRM system and **MailChimp** for emailing. They have verified that they conform to our security standards, particularly of not using data for purposes other than those explicitly stated by MediSapiens.

Effective date

The effective date of this privacy policy is May 25, 2018.