

## PRIVACY POLICY

This **Privacy Policy** provides an overview of the personal information Minnetronix Medical, Inc. (“**Minnetronix Medical**”, “**we**”, “**our**”, or “**us**”) collects from you, how we use it, with whom we share it, and the choices you have in connection with this.

### APPLICABILITY OF PRIVACY POLICY

This Privacy Policy applies to [www.minnetronixmedical.com](http://www.minnetronixmedical.com) (the “**Website**”), as well as Minnetronix Medical’s offline services and interaction with you (collectively, the “**Services**”).

### PERSONAL INFORMATION WE COLLECT AND USE

Through your use of our Services, we collect personal information, which is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Through your use of our Services, we collect personal information from you directly and automatically as outlined below.

#### A. Information We Collect From Website Visitors

We collect personal information from you when you engage with certain features of our Website. Except as otherwise indicated below, the personal information you provide is such that we need in order to carry out the requested action. If you do not provide us with your personal information, we would not be able to do so. As a Website visitor, we collect personal information from you when you:

- **Apply for employment.** When you apply for employment with Minnetronix Medical, we collect your personal identifiers (name, email address, physical address, and telephone number) and your professional or employment information (resume, cover letter, employment history, and educational history). We use this personal information to assess and manage your application with Minnetronix Medical and as necessary to comply with the law. The legal basis for this processing is that the processing is necessary to perform a contract with you or to take steps, at your request, before entering a contract. We also process this personal information as part of our legitimate interest in the facilitation and optimization of our recruitment process. For more information, please see our [Applicant Privacy Notice](#).
- **Contact us.** When you contact us or submit an inquiry, you will need to provide us with your personal identifiers (name and email address) and any other information you choose to include in your correspondence. We use this personal information to respond to your questions or inquiries, troubleshoot where necessary, and address any issues you may have with the Services. The legal basis for this processing is performance of our contract with you.

In our processing of your personal information, we may also use your personal information to efficiently maintain our business, to comply with the law, and for other limited circumstances as described in **HOW WE SHARE YOUR PERSONAL INFORMATION**.

#### B. Website and Email Cookies

In addition to the personal information you provide directly to us, we also collect information from you automatically as you use our Website via cookies. This includes the following internet or other electronic network activity information:

- **Usage information.** We use strictly necessary, performance, analytics, and advertising cookies to collect information about your interaction with our Website, such as the pages you visit, the frequency of access, how much time you spend on each page, what you click on, and referring website address. We use this personal information to: (i) conduct analytics; (ii) enhance user experience; (iii) provide you with targeted online advertising; (iv) prevent fraudulent use of the Website; and (v) diagnose server and software errors.
- **Device information.** We use strictly necessary, performance, analytics, and advertising cookies to collect certain information about the device you use to access our Website, such as browser type, browser language, hardware model, operating system, and your preferences. We use this personal information to: (i) conduct analytics; (ii) enhance user experience; (iii) provide you with targeted online advertising; (iv) prevent fraudulent use of the Website; (v) diagnose server and software errors; (vi) remember your preferences; and (vii) provide enhanced functionality.
- **Location information.** We use strictly necessary, performance, analytics, and advertising cookies to collect information about your location, which may be determined through your IP address. We use this personal information to: (i) conduct analytics;

(ii) enhance user experience; (iii) provide you with targeted online advertising; (iv) prevent fraudulent use of the Website; (v) diagnose server and software errors; (vi) remember your preferences; and (vii) provide enhanced functionality.

Please visit our [cookie management platform](#) for a list of all cookies, their purpose, the information they collect, and for the ability to change your preferences. In general, to disable cookies and limit the collection and use of information through them, you can set your browser to refuse cookies or indicate when a cookie is being sent. Particular third-party cookies to note on our Website and emails include:

- **Pardot.** We use Pardot to automate marketing actions to provide Website visitors with personalized and useful content based on their interactions with our Website. The cookies placed by Pardot will collect information on your visits to our Website, such as web sessions, pages visited, and content download. To opt-out of Pardot cookies, please visit our [cookie management platform](#).
- **Google Analytics.** We use Google Analytics to collect information on your use of our Website to improve our Website. In order to collect this information, Google Analytics may set cookies on your browser, or read cookies that are already there. Google Analytics may also receive information about you from applications you have downloaded that partner with Google. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to our Website is restricted by the Google Analytics [Terms of Use](#) and [Privacy Policy](#). To prevent your data from being used by Google Analytics, you can download the [Google Analytics opt-out browser add-on](#) or visit our [cookie management platform](#).
- **Google Tag Manager.** Google Tag Manager is a tag management system to manage tags used for tracking and analytics on our Website. Tags are small code elements that, among other things, are used to manage traffic and visitor behavior and to test and optimize websites. We utilize Google Tag Manager to manage and organize all third-party tags on our Website and to control when those tags are triggered. You can view more information about Google Tag Manager's [privacy practices](#).

Our emails also contain cookies and other technologies that allow us to determine certain actions taken by the recipient, such as opens and clicks. To do so, our email provider collects technical information associated with the email, such as IP address, time of retrieval, browser type, and operating system. You can disable this tracking at any time by blocking automatic loading of images in your email.

### C. Information We Collect From Clients

If you are a client of Minnetronix Medical, we will collect business information (business name and physical address) and payment information accounts receivable, and invoices. We will also collect personal identifiers of your business representative (name, email address, and telephone number). We use this personal information to communicate with you, manage the business relationship, obtain payment, and to fulfill and manage your purchases. The legal basis for this processing is that the processing is necessary to perform a contract with you or to take steps, at your request, before entering a contract.

As a client, you also have the option to create an account on our VitalLink website.

In our processing of your personal information, we may also use your personal information to defend our rights and the rights of others, to efficiently maintain our business, to comply with the law, and for other limited circumstances as described in **HOW WE SHARE YOUR INFORMATION**.

### D. Information Collected From Third-Party Sources

Minnetronix Medical may receive personal information on conference attendees from conferences we attend. This includes the following personal identifiers: name, business name, telephone number, and email address. We use this personal information to identify you as a potential prospect for our Services and to communicate with you. The legal basis for this processing is your consent and legitimate interest in the promotion of our Services. We also use the personal information we collect as described in this section to comply with the law, to efficiently maintain our business, and for other limited circumstances as described in **HOW WE SHARE YOUR PERSONAL INFORMATION**.

## HOW WE SHARE YOUR PERSONAL INFORMATION

### A. General Sharing

Minnetronix Medical may need to make the personal information identified in this Privacy Policy available within Minnetronix Medical, with service providers, or with other third parties. These instances include:

- **Within Minnetronix Medical.** We may share your personal information within the Minnetronix Medical corporate family, including with subsidiaries or affiliates, for legitimate business purposes, to efficiently carry out our business, and to the extent permitted by law. The legal basis for this is our legitimate interest in carrying out our business operations efficiently.
- **With service providers for a business purpose.** In the preceding 12 months, we have shared your personal identifiers and internet and other electronic network information with service providers that assist us in providing the Services. These service providers include our IT support, communications vendor, website host, and our CRM provider. The legal basis for this is our legitimate interest in providing our Website and Services more efficiently.
- **In the event of a corporate reorganization.** In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, acquisition, sale, joint venture, assignment, consolidation, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we would share personal information with third parties, including the buyer or target (and their agents and advisors) for the purpose of facilitating and completing the transaction. We would also share personal information with third parties if we undergo bankruptcy or liquidation, in the course of such proceedings. The legal basis for this is our legitimate interest in carrying out our business operations.
- **For legal purposes.** We will share your personal information where we are legally required to do so, such as in response to court orders, law enforcement or legal process, including for national security purposes; to establish, protect, or exercise our legal rights, as required to enforce our terms of service or other contracts; to defend against legal claims or demands; to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person; or to comply with the requirements of any applicable law. The legal basis for this processing is compliance with the law, compliance with legal obligations, and our legitimate interest in the protection of the rights of others.
- **For a business purpose.** In the preceding 12 months, Minnetronix Medical has disclosed your personal identifiers and internet and other electronic network activity information to: (i) our IT support to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, identify and repair errors, and to maintain and improve the Website; and (ii) our service providers that perform function on our behalf, including our IT support, communications vendor, website host, and our CRM provider.
- **For a sale.** In the preceding 12 months, Minnetronix Medical has shared your internet or other electronic network activity information collected via cookies and other tracking technologies with our data analytics providers and ad networks. Such sharing may be deemed a sale under the California Consumer Privacy Act. To opt-out of this sharing, please visit [Do Not Sell My Personal Information](#).

## RIGHTS OF CALIFORNIA RESIDENTS

The California Consumer Privacy Act (CCPA) grants certain rights to California residents (subject to certain exceptions). If our processing of your personal information is subject to the CCPA, you are entitled to the following rights:

- **Right to access.** You have the right to request what personal information we have collected, used, disclosed, and sold about you within the preceding 12 months. You may only make a request for access twice within a 12-month period.
- **Right to deletion.** You have the right to request the deletion of your personal information that we collect or maintain, subject to certain exceptions.
- **Right to opt-out.** You have the right to opt-out of the sale of your personal information to third parties. Minnetronix Medical does not have actual knowledge that it sells personal information of minors under the age of 16 years.
- **Right to non-discrimination.** You have the right to not receive discriminatory treatment if and when you exercise your rights to access, delete, or opt-out under the CCPA.

To exercise your right to access or delete your personal information, you may submit a request at 1-888-301-1025 or [info@minnetronixmedical.com](mailto:info@minnetronixmedical.com). To opt-out of the sale of your personal information, please visit [Do Not Sell My Personal Information](#). For requests submitted via telephone or email, you must provide us with sufficient information that allows us to reasonably verify you are the person about whom we collected the personal information and describe your request with sufficient detail to allow us to properly evaluate and respond to it. If we are not able to verify your identity for access and deletion requests with the information

provided, we may ask you for additional pieces of information. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a request related to your personal information. If you are an authorized agent making a request on behalf of another individual, you must provide us with signed documentation that you are authorized to act on behalf of that individual.

## **RIGHTS OF INDIVIDUALS IN THE EUROPEAN UNION**

Individuals in the European Union (EU) are entitled to certain rights under the General Data Protection Regulation (GDPR). If our processing of your personal information is subject to the GDPR, you may be entitled to the following rights:

- **Right to access.** You have the right to ask us for copies of your personal information. This right has some exemptions, which means you may not always receive all the personal information we process.
- **Right to rectification.** You have the right to ask us to rectify personal information you think is inaccurate or incomplete.
- **Right to erasure.** You have the right to ask us to erase your personal information in certain circumstances.
- **Right to restrict processing.** You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Right to object to processing.** You have the right to object at any time, for reasons arising from your particular situation, to processing of your personal information, which is carried out on the basis of our legitimate interests.
- **Right to data portability.** You have the right to ask that we transfer the personal information you gave us from one organization to another, or give it to you. Please note this only applies to personal information you have given us.
- **Right to lodge a complaint.** You have the right to lodge a complaint with the relevant Supervisory Authority.

To exercise these rights, please contact us [info@minnetronixmedical.com](mailto:info@minnetronixmedical.com).

## **RIGHTS OF NEVADA RESIDENTS**

If you are a consumer in the State of Nevada, you may request to opt-out of the current or future sale of your personal information. We do not currently sell any of your personal information under Nevada law, nor do we plan to do so in the future. However, you can submit a request to opt-out of future sales by contacting us at [info@minnetronixmedical.com](mailto:info@minnetronixmedical.com). Please include “Opt-Out Request Under Nevada Law” in the subject line of your message.

## **CORRECT OR VIEW YOUR PERSONAL INFORMATION**

For clients, you can access your Vital Links Customer Portal account to correct or view certain personal information of yours in our possession and which is associated with your account.

## **MARKETING COMMUNICATIONS**

You may opt-out of receiving marketing emails from us by clicking the “unsubscribe” link provided with each email. Please note that we will continue to send you emails necessary to the Website, the Services, or any assistance you request.

## **RETENTION OF PERSONAL INFORMATION**

We will retain your personal information until the earlier of: (i) the personal information is no longer necessary to accomplish the purpose for which it was provided; or (ii) we delete your information pursuant to your request. We may retain your personal information for longer periods for specific purposes to the extent that we are obliged to do so in accordance with applicable laws and regulations and/or as necessary to protect our legal rights or for certain business requirements. This includes for security, fraud, and abuse prevention, for financial record-keeping, or to comply with legal or regulatory requirements.

## **DO NOT TRACK**

We do not support Do Not Track (DNT). Do Not Track is a web browser setting that informs websites that you do not want to be tracked.

## **SECURITY OF YOUR PERSONAL INFORMATION**

We implement and maintain reasonable security measures to protect the personal information we collect and maintain. These security measures include access controls and Secure Sockets Layer (SSL) website encryption. However, no security measure or modality of data transmission over the Internet is 100% secure and we are unable to guarantee the absolute security of the personal information we have collected from you.

#### **AGE RESTRICTION**

The Services are not intended for individuals under the age of eighteen (18). If we learn that we have collected or received personal information from a child under the age of eighteen (18), we will delete that information. If you believe we might have information from or about a child under the age of eighteen (18), please contact us at [info@minnetronixmedical.com](mailto:info@minnetronixmedical.com).

#### **CHANGES TO THIS PRIVACY POLICY**

We may amend this Privacy Policy in our sole discretion at any time. If we do, we will post the changes to this page, and will indicate the date the changes go into effect. We encourage you to review our Privacy Policy to stay informed. If we make changes that materially affect your privacy rights, we will notify you by prominent posting on the Website and/or via email. If required by law, we will obtain your consent for these changes.

#### **CONTACT US**

If you have any questions regarding this Privacy Policy, please contact us at:

Minnetronix Medical  
1635 Energy Park Drive  
St. Paul, MN 55108  
P: 651-917-4060  
[info@minnetronixmedical.com](mailto:info@minnetronixmedical.com)

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