

ORTHO CLINICAL DIAGNOSTICS PRIVACY NOTICE

Last Updated January 3, 2020

Ortho Clinical Diagnostics (“ORTHO”) takes privacy and privacy concerns very seriously. The purpose of our Privacy Notice is to provide you with clear and transparent information about how we collect, use, and disclose your Personal Data. Our Privacy Notice also describes the rights you have regarding your Personal Data. It also guides you through the process of making requests regarding the Personal Data we maintain about you and provides answers to questions you may have about our privacy practices.

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1. What is Personal Data or Personal Information?



Personal Data or Personal Information means any information relating to an identified or identifiable natural person or Consumer.

A natural person or Consumer is one who can be identified, directly or indirectly, by 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 or Consumer.

2. What Personal Data does ORTHO collect?



ORTHO collects Personal Data about you directly and indirectly.

Direct Collection is Personal Data that you provide to us. This includes your:

Name	Company Name	Address
"Nickname" or Alias	Email Address	Country
Date of Birth	Telephone Number	Payment /Billing Information
Passport Number	Driver's License Number	Tax Identification Number
Military ID Number	License Plate Number	Social Security Number

ORTHO also collects Personal Data about you indirectly—from sources other than you. ORTHO uses a variety of technologies that may automatically collect certain information. These technologies include:

Cookies	Pixel tags	Web beacons
Clear GIFs	IP Addresses	Mobile ID Devices

3. What are Cookies, Beacons and Pixel Tags? How are they used?



Cookies are small text files (pieces of information) sent to your device and stored directly on the device you are using. Cookies allow us to collect information such as browser type, time spent on the website, pages visited, and language preferences. **Web Beacons** or **Pixel Tags** function through use of GIF or PNG files that open on a page or in an email. The information obtained from **Cookies** is used for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience while visiting a website. **Web Beacons** or **Pixel Tags** are used to determine patterns of behavior on websites, save preferences and deliver targeted advertising. You can control how websites use cookies by configuring your browser's privacy settings.

Strictly Necessary Cookies

These cookies are essential in order to carry out a transaction or request initiated by you. Such are completing an order or request or.

Functional Cookies

These cookies allow the website to remember choices you have made in order to provide functionality for your benefit. For example, functional cookies allow the website to remember settings specific to you, such as your country selection and persistent logged-in state if selected by you, and display prior shipments, packages tracked and other customized features.

Analytic Cookies

These cookies allow us to collect data relating to your use of the website, including the content on which you click while browsing the website, in order to improve the performance and design of the website. These cookies may be provided our Third-Party analytic tool provider but are only used for purposes related to our websites.

Targeting Cookies

These cookies remember information regarding your use of the website so that we can serve promotional and other targeted information to you on our website.

For More Information regarding Cookie choices and or our Cookie Notice and Disclosure please [click here](#).

How do I disable or remove Cookies?

Each type of web browser provides options to restrict and delete cookies. For more information on how to manage cookies visit the appropriate link below.

[Internet Explorer](#)
[Chrome](#)

[Firefox](#)
[Microsoft Edge](#)

[Google](#)
[Safari](#)

Web Beacons & Pixels



ORTHO uses these technologies to improve and tailor our website to suit your interests, research and analytics, and for anti-fraud monitoring and detection purposes. You may be able to turn off scripting functionality within your browser settings, however, disabling scripting functionality cause the website to not function properly.

Web Beacons and Pixel Tags (or "tags") are bits of programming code included in web pages, emails, and ads that notify us when those web pages, emails, or ads have been viewed or clicked on.



















4. Why does ORTHO collect Personal Data?



ORTHO collects your Personal Data for reasonable and necessary operational and business purposes such as, Auditing, Security, Debugging/Repair, Certain Short-term Uses, Performing Services, Research and for Quality and Safety Maintenance.

5. How does ORTHO use the Personal Data it collects? +

ORTHO uses the Personal Data it collects from you to:

-  Deliver and maintain our equipment, products and services
-  Establish and maintain your account and billing records
-  Provide account-related services and information
-  Provide Customer Service
-  Help you with service and technical support issues or questions
-  Manage and protect our computer networks, services and users
-  Detect security incidents, protecting against malicious deceptive, fraudulent or illegal activity and prosecuting those responsible for that activity
-  Authenticate and verify you or confirm your identity
-  Verify Customer Information
-  Process of Payments
-  Provide Analytics Services
-  Technological Development
-  Clinical Development
-  Engineering and Manufacturing Research and Development
-  Provide product and service education and training
-  Auditing, Regulatory Compliance and Legal Review
-  Market and Advertise new products and services
-  Predict content and marketing offers that may interest you
-  Deliver personalized content and offers to you
-  Improve and personalize your services

6. Does ORTHO sell the Personal Data it collects? +








No. ORTHO does not sell any of the Personal Data it collects from you.

7. Does ORTHO share the Personal Data it collects? +







Yes.

ORTHO utilizes vendors, contractors, consultants and partners (“third-party service providers / Service Provider”) and may share your Personal Data with Service Providers through written agreements and contracts to assist us in offering and providing business services. The written agreements explicitly limit the use of your Personal Data to an extent necessary for the performance of tasks the Service Provider conducts for us. Each ORTHO Service Provider is required to process and protect all Personal Data they receive from us or collect on our behalf only in the manner and purpose agreed by you and or directed by us. ORTHO does not Share your Personal Data for Marketing Purposes.

ORTHO shares Personal Data it collects and or receives with:

-  Third-Party Partners with whom we offer co-branded or co-marketed promotions
-  Service Providers that provide services such as website hosting and moderating, mobile application hosting and website data analysis
-  Service Providers that provide credit card and payment processing
-  Service Providers that provide order, delivery and fulfillment services
-  Service Providers that provide education, training and diagnostic services
-  Service Providers that provide, infrastructure provision, security and IT services
-  Third-Party customer service, e-mail and direct mail delivery and auditing services

ORTHO also shares and discloses Personal Data we believe to be necessary or appropriate:

-  To third parties in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings)
-  As permitted by applicable law, including laws outside your country of residence
-  To comply with legal process
-  To respond to requests from public and government authorities, including public and government authorities outside your country of residence and
-  To exercise or defend legal claims
-  To uphold and/or enforce our terms and conditions.

ORTHO shares your Personal Data with Service Providers through written agreements and contracts and the Service Providers that receive Personal Data from ORTHO are not permitted to share or disclose the Personal Data it may receive about you. Additionally, ORTHO takes additional steps to ensure the written agreements explicitly limit the use of your Personal Data to providing the specified services to ORTHO.

8. What are ORTHO’s legal bases for processing your Personal Data? †

ORTHO relies on legitimate interests to send you important information regarding our website, changes to our terms, conditions, and policies and/or other administrative

information. We use the following legal bases for fairly, lawfully, and transparently processing your Personal Data when:



Consent

You have agreed to our processing of your Personal Data for one or more specific purposes as defined in the individual notice.



Contractual Obligation

The processing of your Personal Data is necessary for the performance of a contract (e.g., commercial, procurement, employment); and at your request before entering into a contract (e.g., commercial, procurement, employment).



Legal Obligation

ORTHO processes your Personal Data to comply with the law (e.g. request for regulatory agency, submission of mandatory spend transparency reporting).



Legitimate Interests

Processing necessary for fraud prevention, network and information security

ORTHO understands those interests, individual rights and freedoms that require the protection of Personal Data, particularly when they apply to children that may override its legitimate interests.

9. Does ORTHO offer financial incentives for Personal Data? +

No. ORTHO does not maintain any programs, benefits, incentives, offerings or financial compensation associated with the disclosure, deletion, or sale of Personal Data.

10. International Transfers of Personal Data +

ORTHO is a global company with its headquarters in the United States. As such, we may transfer your Personal Data to the United States and to our affiliates and subsidiaries in the following regions:

- North America (e.g., United States, Canada)
- Latin America (e.g., Brazil, Colombia, Mexico)
- Europe Middle East and Africa (e.g., United Kingdom, Italy, Germany)
- Asia-Pacific (e.g., Australia, India, South Korea)
- China

- Japan

We also transfer your Personal Data to our third-party service providers and our third-party partners located in different countries. These countries may change from time-to-time and ORTHO can provide its customers and others with current list upon request. We transfer information to operate efficiently, to improve performance, and to create redundancies to protect data for business continuity and disaster recovery purposes. We process your Personal Data to meet this Privacy Notice's commitments and in compliance with all applicable laws, rules, and regulations.









For website users and customers whose use of ORTHO's website and products results in the transfer of Personal Data beyond the country-of-origin, we do so in compliance with applicable laws, rules, and regulations. We assess risks associated with transferring Personal Data to entities located within jurisdictions not having the "adequate level of data protection" as determined by a regulatory body (e.g., the European Commission). In these cases, Ortho will use contracts that include approved Standard Contractual Clauses (SCCs) as available and/ or consent of the individual. ORTHO has prepared and maintains Data Processing Agreements (DPAs) that include the necessary SCCs as applicable.

11. How long does ORTHO retain your Personal Data?



Retention periods can vary significantly based on the type of Personal Data, potential or pending litigation, ORTHO's intellectual property or ownership rights, contractual requirements, operational directives and needs, and legal retention requirements. We delete Personal Data using appropriate information security protocols so that it cannot be reconstructed or read when it no longer has a legal or a legitimate basis for retaining Personal Data.

ORTHO retains your Personal Data for the period necessary in order to:

-  Comply with individual consent
-  Comply with mandatory record retention or legal hold requirements
-  Comply with legal obligation such as maintaining opt-out lists
-  Fulfill this Privacy Notice's purposes, rights, and obligations
-  Fulfill individual advertising and marketing choices
-  Resolve disputes
-  Achieve ORTHO's genuine business needs
-  Achieve ORTHO's legitimate interests for collecting the Personal Data.

12. What are your individual rights and freedoms?



Under the appropriate circumstances, you have the



Right of Access

You are entitled to a copy of the Personal Data we hold about you and to learn details about how we use it. Your Personal Data will usually be provided to you digitally. We will require you to prove your identity before providing the requested information.



Right to Rectification

You have the right to request the updating or correction of inaccurate Personal Data concerning you. Considering the purposes of the processing, you shall have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement



Right to Erasure and to be Forgotten

You have the right to ask us to erase your Personal Data, for example where the Personal Data we collected is no longer necessary for the original purpose, where Personal Data has become obsolete or where you withdraw your consent. However, this will need to be balanced against other factors. For example, we may not be able comply with your request due to certain legal or regulatory obligations.



Right to Restriction of Processing

You are entitled to ask us to (temporarily) stop using your Personal Data, for example where you think that the Personal Data we hold about you may be inaccurate or where you think that we no longer need to use your Personal Data.



Right to be Notified

We must provide notification of any request for correction or erasure of your Personal Data or request for restriction of processing of your Personal Data to each recipient to whom your Personal Data has been disclosed



Right to Data Portability

You may have the right to ask that we transfer Personal Data that you have provided to us to a third party of your choice. This right can only be exercised when you have provided the Personal Data to us, and when we are processing that Personal Data by automated means on the basis of your consent or in order to perform our obligations under a contract with you.



Complaints

You have a right to lodge a complaint with a supervisory authority or regulatory body. We asked that you only do such after providing ORTHO an opportunity to work with you to address your concerns. You may contact ORTHO Privacy Office at privacy@ORTHOclinicaldiagnostics.com



Right to Object

You have the right to object to processing which is based on our legitimate interests. In case of the processing of Personal Data for marketing purposes, you have the right to object at any time. When you ask us to stop using your Personal Data for marketing purposes, ORTHO will implement actions to cease the use your Personal Data. For other purposes based on our legitimate interests, we will no longer process the Personal Data on that basis when you file an objection based on your grounds relating to your situation, unless we have a compelling legitimate ground for the processing. Note, however, that we may not be able to provide certain services or benefits if we are unable to process the necessary Personal Data for that purpose.



Right to Withdraw Consent

You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

These rights may be limited, for example if fulfilling your request would reveal Personal Data about another person, or if you ask us to delete information which we are required by law to retain or have compelling legitimate interests in retaining.

13. Supplementary Jurisdiction–specific Privacy Information +

[Click here to see the supplemental California Consumer Privacy Rights](#)
[Click here to see the supplemental Colombian Privacy Notice](#)

14. Does ORTHO Collect Personal Data from Children? +

ORTHO's website is not intended for visitation or use by children. ORTHO does not knowingly collect or use Personal Data from children. If we become aware that we have unknowingly collected Personal Data from a child under the age of 13 we will make reasonable efforts to delete the information from our database. In the event a child under the age of 13 may have disclosed Personal Data to us, the parent or guardian of the child can contact us at privacy@ORTHOclinicaldiagnostics.com for the deletion process. Additionally, ORTHO does not engage in marketing activities targeted to children and follows all applicable data protection laws with regards to the collection of Personal Data from children online.

15. Third-party sites, services, and links to other websites +

This Privacy Notice does not address the privacy, information, or other practices of any third parties, including any third party operating any site or web property that is available through this website or to which this website contains a link. The availability

of, or inclusion of a link to, any such site or property on the website does not imply endorsement of it by us or by our business units. We recommend that you review the Privacy Notice for all third-party websites that you may visit. Our website also contains links to several websites that may offer useful information to our visitors. This Privacy Notice does not apply to those sites. We recommend that you communicate with the third-party site directly for information regarding their privacy policies.

16. Choosing your Options, Preferences and Exercising your Rights +

You have options regarding how we communicate with you, collect your Personal Data, use your Personal Data and disclose your Personal Data. Additionally, you have certain rights regarding your Personal Data and the ability to request to exercise your rights regarding certain Personal Data we maintain about you. You may contact the Ortho Privacy Office at privacy@ORTHOclinicaldiagnostics.com if you have any questions about how we maintain your privacy, any of our Privacy Practices or how to exercise any of your privacy rights.

17. Privacy Notice Updates +

ORTHO updates its Privacy Notice annually, or more frequently, to reflect changes to our Personal Data processing activities. We encourage you to periodically review this page for the latest information on our privacy practices

18. How to Contact Us and Disability Accessibility +

If you have any questions about this Privacy Notice, please contact by:

Email

privacy@ORTHOclinicaldiagnostics.com

Writing to the following address:

ORTHO-Clinical Diagnostics, Inc.
Attn: Privacy Office/Global Compliance
1001 Route 202
Raritan, NJ 08869

Calling Toll Free (California Residents Only)

844.901.1832

For Disability Accessibility, please access our privacy notice in the printed versions below and or contact us toll free.

Print our Privacy Notice [here](#)

Obtain a Large Print Version of our Privacy Policy [here](#)

Call Us Toll Free for additional assistance

844.901.1832