

Hamilton Thorne Ltd., (“HT”, “Hamilton Thorne Ltd.”, “we”, “our” or “us”) respects individual privacy. If you have questions or concerns regarding this Policy, you should contact us by emailing [ir@hamiltonthorne.ltd](mailto:ir@hamiltonthorne.ltd), or write to us at 100 Cummings Center, Suite 465E, Beverly, MA 01915 USA.

This Privacy Policy sets forth Hamilton Thorne Ltd.’s practices regarding the collection, use and disclosure of information that you may provide through the site [www.hamiltonthorne.ltd](http://www.hamiltonthorne.ltd) (the “Site”). Please read this Privacy Policy before using the Sites or submitting information to Hamilton Thorne Ltd. through the Sites. By personal data, we mean any information which enables us to identify you, directly or indirectly, and includes any identifier, such as name, identification number, location data, IP address or online identifier. It does not include data which has been de-identified (anonymous data).

For the purposes of Regulation (EU) 2016/679 (“GDPR”), Hamilton Thorne Ltd. is the controller of your personal data.

## **COMPLIANCE WITH THE EU-US AND SWISS-US PRIVACY SHIELD FRAMEWORK**

Hamilton Thorne Ltd. complies with the EU-US and Swiss-US Privacy Shield Frameworks as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and from Switzerland. Hamilton Thorne Ltd. has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. Hamilton Thorne Ltd. is committed to applying those Principles to any and all personal data received from the EU and Switzerland. If there is any conflict between this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit [www.privacyshield.gov](http://www.privacyshield.gov).

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Hamilton Thorne Ltd. is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

In certain situations, Hamilton Thorne Ltd. may be required to disclose personal data in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the Privacy Shield website listed above, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

Under the Privacy Shield Framework, you have a right to access your personal data. Hamilton Thorne Ltd.’s policy for accessing your personal data is described below.

## VERIFICATION

Hamilton Thorne Ltd. has implemented internal mechanisms to verify ongoing adherence to this policy. Hamilton Thorne Ltd. periodically verifies that this policy remains accurate, comprehensive for its intended purpose, and is accessible in accordance with applicable law.

## DATA COLLECTION AND USE

We will use your personal data in the following circumstances:

- where we need to, to perform the contract we are about to enter into or have entered into with you; or
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- where we need to comply with a legal or regulatory obligation.

We may collect, use, store and transfer different kinds of personal data, as follows:

- **Information you provide to us.** Hamilton Thorne Ltd. collects the following information (identity and contact data) when you voluntarily submit it to us: your name, home or business address, telephone number and/or email address. We collect this information when you sign up for our Hamilton Thorne Ltd. email list or contact us using our “Contact Us” function. This information may be used by Hamilton Thorne Ltd. personnel to respond to or provide you with information that you have requested or additional information which Hamilton Thorne Ltd. believes may be of interest to you. Hamilton Thorne Ltd. may also use this information for performing marketing studies or internal business research or for other commercial purposes such as (where you have opted in to receive such information) to contact you about other products or services available from our affiliates or partners.
- If you send us personal correspondence, such as e-mails, we may keep a record of that correspondence. We also periodically ask users for feedback that we use to improve our service and products and add new features. If you respond to these requests, we may keep a record of your response. In each case, we will retain that correspondence and feedback in accordance with our current Records Retention Policy and Records Retention Schedule (please see “RETENTION” below for additional details).
- **Information we collect from automated technologies or interactions.** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies (see below for further details) and other similar technologies.
- **Information we collect from third parties.** We reserve the right to combine information from third parties to the information we collect about you or your device, for instance to research prospective clients. From time to time we may purchase marketing data from third parties and add it to our existing user database, to better target our advertising and to provide pertinent offers in which we think you would be interested.

To enrich our profiles of individual customers, we may tie this information to the personal data you have provided to us.

## COOKIES AND LOG FILES

Our Sites use “cookies” and “log files” so that we can recognize revisits to our Sites and provide a more personalized experience. Cookies are sent to your browser from our Sites and stored on your computer or device. Hamilton Thorne Ltd. uses cookies to track certain information about your usage and devices, such as host domain, IP address, pages accessed, clickstreams, time spent on our Sites and general browser statistics. Hamilton Thorne Ltd. uses this information to, among other things, identify broad demographic trends that may be used to provide information tailored to your interests. We also monitor customer traffic patterns and Site usage to help us refine and improve the design and layout of our Sites and the overall user experience. We may link the information we store in cookies to personal information you submit while on our Sites.

More specifically, Hamilton Thorne Ltd. may use cookies to:

- Estimate the number of visitors to our Sites. Each browser that accesses Hamilton Thorne Ltd. is given a unique cookie, which is used to calculate how many people return to our Site and evaluate customer interests and behavior to target our marketing.
- Track our promotions, contests, and sales. When a Hamilton Thorne Ltd.-hosted promotion uses cookies, the information written to the cookie tracks progress through the promotion (for example, entries, submissions, and registrations).
- Measure the traffic to various areas of the Sites. We measure the areas of the network of Web sites you visit and your visiting patterns in the aggregate. This research helps us understand the ways in which our customers are alike and the ways in which they differ. We may use this information to personalize the content and design in our Sites.

We may use Google Analytics, a web analytics service provided by Google, Inc. (“Google”) on our Sites. Google Analytics uses cookies, to help us analyze how users use the Sites. The information generated by the cookie about your use of the Site will be transmitted to and stored by Google on servers in the United States. Google uses this information to help us evaluate usage patterns on the Sites and providing other services to Hamilton Thorne Ltd. relating to Site activity and internet usage. You may delete or reject cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Sites. By using the Sites, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

**For users in the EEA.** You can visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.youronlinechoices.eu](http://www.youronlinechoices.eu) for comprehensive information on how to manage cookies.

## SHARING YOUR INFORMATION

We may share the information we collect about you in the following circumstances:

- With our subsidiaries and affiliates;

- With third parties or agents who perform services on our behalf or help us in the delivery of our own products and services to you (i.e., emailing or direct mail services, marketing services, Web analytics);
- With third parties who may contact you about their products or services (where you have opted in to receive such marketing information);
- We may disclose the information described above when required by law or regulation or in the good faith belief that such action is necessary in order to conform to the edicts of the law, comply with legal mandates, to prevent a crime or protect national security, to enforce our policies or agreements or terms and conditions, or to protect the rights, property, or personal safety of Hamilton Thorne Ltd., its employees, users and the public. Because Hamilton Thorne Ltd. is a US company and information collected on our Sites is stored in whole or in part in the United States, your information may become subject to U.S. law;
- We may disclose and transfer your information to a third party who acquires any or all of Hamilton Thorne Ltd., whether such acquisition is by way of merger, consolidation or purchase of all or a substantial portion of our assets. In addition, in the event Hamilton Thorne Ltd. becomes the subject of an insolvency proceeding, whether voluntary or involuntary, Hamilton Thorne Ltd. or its liquidator, administrator, receiver or administrative receiver may sell, license or otherwise dispose of such information in a transaction approved by the court; or
- When you otherwise consent.

Hamilton Thorne Ltd. is responsible for the treatment processing of personal data it receives directly under the Privacy Shield Framework, and remains liable for the treatment and processing of that data in the event of subsequent transfers of that data to a third party acting as an agent on its behalf. Hamilton Thorne Ltd. complies with the Privacy Shield Principles and all applicable data protection laws, for all onward transfers of personal data from the EU or Switzerland, including the onward transfer liability provisions.

## **HAMILTON THORNE LTD. MAILING LISTS**

Hamilton Thorne maintains an opt-in mailing list to provide interested parties with copies of press releases and other relevant information.

We collect and store the information you provide to us when you opt-in to the mailing list, and use such information to create a profile for you based on information that you have provided to us. Hamilton Thorne Ltd.'s policy is to not share such profile information with third parties, unless otherwise provided herein.

If you previously opted to receive newsletters, commercial e-mails or other communications from Hamilton Thorne Ltd. or third parties, but subsequently change your mind, you may opt-out by emailing Hamilton Thorne Ltd. at [info@hamiltonthorne.com](mailto:info@hamiltonthorne.com) to contact used. An archival copy of information may be retained only for as long as Hamilton Thorne Ltd. reasonably considers necessary for audit or other legitimate purposes. We will also retain logs, demographic, indirect, and statistical information that may relate to you but do not identify you personally.

## **YOUR CHOICES**

From time to time we send our visitors e-mail messages with announcements, enhancements, maintenance information and general updates. If you no longer wish to receive these promotional communications, you may opt-out of receiving them by following the instructions included in each communication or you may contact us at [ir@hamiltonthorne.ltd](mailto:ir@hamiltonthorne.ltd). If you are based within the EEA, you may have additional rights, as set out below (see Your Rights (EEA Only)).

## **YOUR RIGHTS (EEA ONLY)**

If you are located in the EEA, you have a number of rights in relation to how we process your personal data. These include:

- the right access the personal data that we may hold about you;
- the right to rectify any inaccurate personal data that we may hold about you;
- the right to have your personal data erased in certain circumstances, for example, where it is no longer necessary for us to process your personal data to fulfil our processing purposes; where you object to your data being processed on certain grounds (for example, for marketing purposes) or where your personal data is being unlawfully processed;
- the right to object to our processing of your personal data where we are relying on a legitimate interest and your interests override those interests;
- the right to restrict the processing of your personal data under limited circumstances; and
- the right to have your data ported to a new service provider if you no longer wish to use the Sites or our services.

Should you wish to exercise any of these rights, please contact us at [ir@hamiltonthorne.ltd](mailto:ir@hamiltonthorne.ltd).

## **WHAT WE MAY NEED FROM YOU.**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to safeguard against your personal data being disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request.

The Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these third party sites.

## **RETENTION**

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For further information on retention periods, please contact us using the details provided at the end of this Policy.

## **SECURITY**

Hamilton Thorne Ltd. has implemented appropriate technical and organizational measures to protect your information collected through the Sites, both during transmission and once we receive it. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know the same. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however, and we cannot guarantee its absolute security. In the event a data security incident does occur, Hamilton Thorne Ltd. has adopted a Data Security Incident Response Policy.

You are responsible for ensuring that your log-in credentials (your username and password) to the Community Portal are kept confidential.

If you have any questions about security on our Site or our Data Security Incident Response Policy, you can email us at [ir@hamiltonthorne.ltd](mailto:ir@hamiltonthorne.ltd)

## **YOUR CALIFORNIA RIGHTS**

A California resident who has provided personal information to a business with whom he/she has established a business relationship for personal, family, or household purposes ("California customer") is entitled to request information about whether the business has disclosed personal information to any third parties for the third parties' direct marketing purposes. In general, if the business has made such a disclosure of personal information, upon receipt of a request by a California customer, the business is required to provide a list of all third parties to whom personal information was disclosed in the preceding calendar year, as well as a list of the categories of personal information that were disclosed.

However, under the law, a business is not required to provide the above-described lists if the business adopts and discloses to the public (in its privacy policy) a policy of not disclosing customer's personal information to third parties for their direct marketing purposes unless the customer first affirmatively agrees to the disclosure, as long as the business maintains and discloses this policy. Rather, the business may comply with the law by notifying the customer of his or her right to prevent disclosure of personal information and providing a cost free means to exercise that right.

Hamilton Thorne Ltd. does not share, sell, trade, or rent your personal information to third parties for their direct marketing purposes unless you affirmatively agree to such disclosure.

California customers may request further information about our compliance with this law by e-mailing [info@hamiltonthorne.com](mailto:info@hamiltonthorne.com). Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this e-mail address.

In addition, under California law, website operators are required to disclose how they respond to Web browser “do not track” signals or other similar mechanisms. Currently, Hamilton Thorne Ltd.’s practice is to continue to track users after a consumer has enabled a “do not track” signal. This law also requires website operators to disclose whether third parties may collect personally identifiable information about their users’ online activities over time and across different Sites when the users use the operator’s website. Hamilton Thorne Ltd. does not knowingly permit third parties to collect personally identifiable information about an individual consumer’s online activities over time and across different Web sites when a consumer uses our Sites.

### **CHANGES TO THIS POLICY**

If we make material changes to our Privacy Policy, we will, where required, contact you via the email address that you have submitted to us. We may also post those changes through a prominent notice on the [www.HamiltonThorneLtd.nsystems.com](http://www.HamiltonThorneLtd.nsystems.com) so that you will always know what information we gather, how we might use that information, and to whom we will disclose it.

### **LINKS TO OTHER SITES**

Our Sites may contain links to other sites. Please be aware that we do not endorse and are not responsible for the privacy practices of such other sites. The Privacy Policy presented here does not apply to such sites. You should contact these sites directly for information on their privacy policies and data collection/distribution procedures.

### **CHILDREN'S PRIVACY**

Hamilton Thorne Ltd. does not knowingly collect information from children under the age of 13 and Hamilton Thorne Ltd. does not target its Sites or its products to children under the age of 13. If you are under 13 years of age, you may not use our Sites.