



VERITAS

**Veritas and subsidiaries'  
Data Protection Policy  
2024**

 Artasan

  DISTICA

  MEDOR

  STOD

  vistor

## Scope

Veritas Group strives to protect our customers' personal data. This policy applies to all companies within our group, namely: Veritas, Artasan, Distica, MEDOR, Stoð, and Vistor. In this policy, you can read about which data about you is collected by Veritas Group, how that data is used, and how data safety is secured. This Personal Data Protection Policy bolsters our group's operations and aims to ensure that all personal data collection, processing, recording, protection, and access related to our operations are conducted in compliance with the provisions set forth in the Icelandic Act No. 90/2018 (Act on Personal Data Protection and Processing).

Data Protection Officer on behalf of Veritas group of companies and subsidiaries is Kristín Lára Helgadóttir, General Counsel.

E-mail: [personuvernd@veritas.is](mailto:personuvernd@veritas.is)

## Categories of personal data which are collected

The collection and processing of personal data are prerequisites for Veritas Group to provide the services required by you or by the companies you work for or have access to. Veritas may collect, record, use, store, or transfer individual personal data. Personal data or personal information covers all identifiable personal information or data. If it is not possible to link the data to a person (anonymous data), then the data is not considered personally identifiable data. Personal data collected by Veritas Group has been classified as follows:

### Identification data

Identification data covers, among others, forename, middle name, surname, passport number, username, or a similar identifier, title, date of birth or ID number or gender.

### Contact data

Contact data covers, among others, address, e-mail, and phone number.

### Professional data

Professional data covers, among others, information about an individual's workplace, specialty, and professional ID number.

### Financial data

Financial data covers, among others, bank information, credit or debit card information, or other payment information.

### Business history data

Business history data covers, among others, summaries of products purchased and invoices that have been issued.

### Technical data

Technical data covers, among others, IP number, log-in information, browser type and version information.

### User behaviour data

User behaviour data covers, among others, information on how websites, products, services are used.

### Marketing data

Marketing data covers, among others, information on whether an individual has opted to allow Veritas Group to send direct mail such as news on products, services, and events, offers, gleanings etc.

## Sensitive personal data

Services and products provided by Stoð are often directly related to our customers' health status, hence, we may eventually receive personal data which qualifies as sensitive personal data (among others, health status data). We only collect that sensitive data if they are provided in connection with the purchase of products or use of services, or if received from health care professionals or institutions which respective individual has authorised to provide such personal data on their behalf.

## Processing of personal data on children

Processing of personal data on children takes place at Stoð premises upon consent. Said consent must be specifically obtained from child's guardians. In case a customer is older than 16 years, pursuant to Article 25 in conjunction with Article 5 of the Icelandic Act No. 74/1997 (Icelandic Act on the Rights of Patients), consent from the guardians will not be obtained unless it is evident that the customer does not understand the information they are providing.

## Methods for collecting personal data

Veritas Group adopts different methods to collect personal data. The main methods are:

### Via direct contact

Most often, Veritas Group receives and collects identification and contact data directly from individuals, among others, customers, customers' contact persons, healthcare professionals, patients, patients' next of kin, employees, job applications etc. In other cases, professional information, financial data as well as special categories of data (e.g. health status information) are also requested. You may always refuse to provide personal data to Veritas Group whenever requested. If you decide not to provide the personal data requested by us for the purpose of complying with and fulfilling our legal duties or contractual obligations as per agreements in place or during negotiations, it may result in Veritas Group not being able, fully or in part, to provide you with the required services or to otherwise fulfill our contractual obligations. Healthcare professionals are specifically asked to sign an informed consent authorizing Veritas Group to send them information about education, congresses, and meetings deemed suitable for said professionals.

### Automatic technology or interaction

Veritas Group may also automatically collect your technical data when you visit or use Veritas Group's websites. Such data is collected by using cookies, event registration, and similar technologies.

### Applications

When you use our applications, e.g. web commerce, we collect data related to your use, including data which directly or indirectly identify you. We also collect information when you initially register or log in into our applications, as well as data on your use of our applications.

### Data collection from third parties

In certain cases, Veritas Group may receive personal data from third parties or obtain personal data from companies, institutions, or their contact persons who share your personal data if said third parties are authorized to provide our group with such data, or when such data is indispensable for Veritas Group for any specific purpose. The same applies to personal data that is publicly available, such as healthcare professionals' personal data available from public repositories or websites, since the processing of such data is lawful.

## Personal data processing legal framework

The Icelandic Act on Personal Data Protection restricts how personal data processing can be conducted. Nevertheless, restrictions do not prevent the processing of personal data. Instead, their aim is to secure that personal data are processed in a fair and lawful way and only for specific purposes.

Veritas Group only processes your personal data if such processing is authorized pursuant to the Icelandic Act on Personal Data Protection. Processing of general personal data within the framework of Veritas Group's operations only takes place when at least one of the following prerequisites is met:

- 1) The data subject has given their consent for processing their personal data for one or more specific purposes.
- 2) The processing of personal data is deemed necessary to fulfil contractual duties set forth in an agreement to which the data subject is a party, or to take actions upon request of the data subject prior to entering into an agreement.
- 3) The processing of personal data is deemed necessary to comply with a legal obligation.
- 4) The processing of personal data is deemed necessary to protect fundamental interests of the data subject or of any other subject.
- 5) The processing of personal data is deemed necessary vis-à-vis Veritas group of companies', their customers', or any other third parties' lawful interests, i.e. whenever said interests outweigh the data subject's fundamental interests or rights requiring personal data protection.

The processing of sensitive personal data by Veritas group of companies only takes place when you have granted your consent for said processing, or if such processing is deemed necessary to comply with any legal obligations, or to safeguard your or another subject's fundamental interests, or only if at least one of the legal prerequisites for the processing of sensitive personal data is present pursuant to Article 11 of the Icelandic Act on Personal Data Protection (Icelandic Act No. 90/2018).

## What are Veritas group of companies' purposes when collecting data

Veritas Group processes personal data for clear and defined purposes compliant with the Icelandic Act on Personal Data Protection, Veritas Group's guidelines, and Veritas Group's Personal Data Protection Policy. Personal data are always processed for clearly defined objective purposes and never for unrelated secondary purposes, except when our group is authorized to do so and you have been informed of the secondary purposes. The processing of personal data is always limited to the data deemed necessary and appropriate vis-à-vis the specific purpose for such data processing. Please find below a list of the main aspects and further description of when Veritas Group may process your personal data and the legal framework or consent for such processing.

### Personal data processing during visits to Veritas group of companies' websites

Veritas group of companies owns and hosts the following websites:

[www.veritas.is](http://www.veritas.is)

[www.artasan.is](http://www.artasan.is)

[www.distica.is](http://www.distica.is)

[www.medor.is](http://www.medor.is)

[www.vistor.is](http://www.vistor.is)

[www.brjostapudar.is](http://www.brjostapudar.is)

[www.nicotinell.is](http://www.nicotinell.is)

Veritas group of companies owns the following websites which are hosted by third parties:

[www.stod.is](http://www.stod.is)

[www.femarelle.is](http://www.femarelle.is)

[www.biokult.is](http://www.biokult.is)

Veritas Group may automatically collect your technical data, which may qualify as personal data, when you visit or use Veritas Group's websites. Such data is collected by using cookies, event registration, and similar technologies. Examples of such data include IP address, device ID, language settings, technical settings, operating system type, browser type, search history, and visited pages. The collection of personal data in this context is warranted both by the consent granted by the data subject and by Veritas Group's lawful interests, i.e., to provide a good user experience on our websites and to advance further development of our websites.

### Processing of personal data on companies/institutions contact persons

Given Veritas Group's varied operations, our employees interact with a broad group of contacts on behalf of companies and/or institutions. During these interactions, you may be requested to provide personal data such as identification and contact information (your name, workplace, position, phone number, e-mail, or bank information, as applicable) to Veritas Group, as needed. Such collection and receipt of personal data is deemed necessary vis-à-vis Veritas Group's lawful interests, i.e., to conduct business and maintain good relationships with both business partners and customers. While all personal data collected are only retained for as long as necessary, their period of retention may vary depending on the nature of the specific interactions.

### Processing of personal data related to queries and complaints

Due to the varied nature of Veritas Group's operations, our group may receive diverse queries and/or complaints related to products or services supplied by us. If it is not possible to immediately respond to those queries and/or complaints, the person submitting the query and/or complaint may need to provide their personal data, such as identification or contact information, to Veritas Group to allow further communication regarding case processing, completion, and follow-up.

### Processing of personal data related to medicinal products' safety and quality reports

Veritas Group's employees working for pharmaceutical product manufacturers are mandated to report all adverse effects/adverse events and technical complaints related to medicinal products to the respective manufacturer. Veritas Group encourages healthcare professionals and others to report medicinal products' adverse effects directly to The Icelandic Medicines Agency. However, if an individual prefers to report adverse effects/adverse events directly to Veritas Group, we have an obligation to process such reports pursuant to Articles 94 to 95 and 102 of The Icelandic Regulation No. 545/2018 on Marketing Authorisations, Labelling, and Patient Information Leaflets for Proprietary Medicinal Products. Therefore, we need to collect and process personal data on the individuals who submit such reports. The specific personal data collected and recorded depends on the nature and contents of those reports.

Patients' personal identification data (such as name, phone number, e-mail) are not disclosed to any third parties by Veritas Group. As a general rule, information concerning patients is not recorded/retained by Veritas Group, except if the respective individual has directly reported adverse effects or if such information has been part of the documents and data received. Personal identification and contact data are not disclosed by Veritas Group either, except in the case of healthcare professionals who have directly provided their personal information in the documents to be forwarded to marketing authorisation holders.

The collection and processing of personal data on individuals reporting adverse effects and on patients whose cases are reported is deemed necessary to comply with our legal obligations concerning the reporting of adverse events related to the safety and quality of medicinal products to regulatory authorities.

## Processing of personal data related to safety reports on medical devices

Veritas Group has a legal obligation pursuant to Article 35 of Icelandic Act No. 132/2020 (Act on Medical Devices) to report any deviations, defects, and failures of medical devices to The Icelandic Medicines Agency. Our group may need to collect and process personal data of individuals submitting such reports in order to comply with the requirements set forth in laws and regulations. The personal data necessary to collect and record in specific cases depends on the nature and content of the case. The collection and processing of personal data are deemed necessary to comply with our legal obligations pursuant to Article 36 of the Icelandic Act on Medical Devices, which may require Veritas Group to submit all documents and data the Icelandic Medicines Agency considers necessary on a case-by-case basis for the purpose of conducting an investigation and verifying medical device safety.

## Processing of personal data during supervision of clinical studies

Veritas Group provides services consisting of the control and supervision of clinical studies conducted in Iceland. During the supervision of clinical studies, our clinical operations specialist verifies whether a clinical study is properly conducted to ensure full adherence to the study protocol, standard operational procedures, good clinical practices, and guidelines, as well as Icelandic laws and regulations. This work is executed pursuant to Regulation (EU) No. 536/2014 of the European Parliament and of the Council, Icelandic Regulation No. 1311/2021 (Icelandic Regulation on Clinical Trials on Medicinal Products for Human Use), Regulation (EU) No. 2016/679 of the European Parliament and of the Council, and Good Clinical Practices. Certain personal data is collected when those services are executed, such as the names of the institutions or individuals conducting the studies, education, phone numbers, and email addresses of healthcare professionals conducting the study, and the names of the study's main investigators, co-investigators, and research partners. The collection and processing of personal data in the context of clinical studies are necessary to allow Veritas Group to fulfill their contractual obligations towards the study sponsor and main investigator, as well as to ensure that all data collected within a clinical study are accurate. While all personal data collected are only retained for as long as necessary, their period of retention may vary depending on the nature of the specific interactions.

## Processing of e-commerce customers' personal data

You need to provide general personal data to create an account on e-commerce websites operated by Veritas Group, and, as a registered user, to confirm an order/purchase and become a Veritas Group customer. Name, ID number, address, e-mail, and phone number are some of the personal data you need to provide. When you use a chat or a query form, you are asked to provide your e-mail and name. The purpose is to facilitate communications and increase the level of services provided by Veritas Group. Such processing of personal data is deemed necessary to allow Veritas Group to fulfill service agreements entered into with respective parties or due to actions to be undertaken upon respective individual's request before an agreement may be entered into by and between said parties.

## Cookies

Veritas Group may automatically collect your technical data when you visit or use Veritas Group's websites. Such data is collected by using cookies, event registration, and similar technologies. Veritas Group uses Google Analytics for website metrics purposes. To obtain these metrics, our websites use cookies.

During each visit to any of our group's websites, Google Analytics automatically collects and processes specific data on the user's visit. Data collected by Google Analytics includes search terms used to find the respective website, data on the user's location, device, browser, operating system, and screen resolution. Google Analytics also collects data on which pages the user visits within the website, how often, and for how long each time. Additionally, Google Analytics collects data on the number of visits, number of users, and the date and time of the visits. No attempts are made to link

this data with identifiable personal data. Veritas Group only uses cookies to improve user experience and analyze website use, aiming to customize websites to the user's needs. Temporary retention of data collected by using cookies may also be deemed necessary for security reasons, e.g., to ensure data traceability in case of unauthorized access to Veritas Group's web servers. Cookies do not collect data such as the user's name, e-mail, phone number, or ID numbers, and Veritas Group's purpose when using cookies is not to identify website users. Nevertheless, it cannot be ruled out that cookies collect such a volume of other types of data that might eventually identify users directly or indirectly. If that is the case, such data qualifies as personal data pursuant to Icelandic Act No. 90/2018 (Icelandic Act on Personal Data Protection and Processing). The legal framework regulating the technical collection, use, and retention of personal data by using cookies is conditional upon user consent. You may always refuse the use of cookies on our group's websites.

### Processing of personal data of Veritas group's job applicants

Veritas Group collects, processes, and retains certain personal data on applicants for jobs at Veritas Group, as well as on individuals hired as contractors by our group. Name, ID number, e-mail, information on criminal records and driver's licenses, information on education, training, and professional experience, as well as information on knowledge and experience on a variety of subjects, are some of the information requested. In addition, Veritas Group may also collect and process other data that job applicants provide spontaneously (e.g., marital status and hobbies). The collection and processing of personal data for the purposes described above are deemed necessary in view of our group's legitimate interests in assessing whether a job applicant is suitable for the positions applied for and/or other open positions that are not advertised. Veritas Group does not use an individual's data provided as part of a job application for other unrelated purposes.

Data related to new registrations on Veritas Group's recruitment electronic platform are retained in Veritas Group's databases for six (6) months upon registration. Users may keep their registration active by logging into the platform regularly; otherwise, their registration may be cancelled after six (6) months. Submitted applications are retained in Veritas Group's application databank for six (6) months upon application. After six (6) months, applications are fully disposed of.

### Processing of personal data related to electronic surveillance and reception of visitors at Veritas group of companies' premises

Given the nature of Veritas Group's operations, we resort to electronic surveillance with the use of security cameras inside and around Veritas Group's premises. Surveillance data are retained for safety and safeguarding purposes, as well as for traceability, documentation, and quality assurance. All uses of said security cameras are compliant with the provisions set forth in the Icelandic Personal Data Protection Act and applicable regulations. All data collected during surveillance are deemed confidential. Data generated by security cameras is automatically disposed of no later than thirty (30) days after they are collected, except if necessary to retain such data for a longer period due to suspected acts, breaches committed by our staff, accidents, or similar circumstances. Please be advised that Veritas Group retains data generated by specific security cameras for up to ninety (90) days as set forth in Article 11 of Data Protection Regulation No. 50/2023 (Icelandic Regulation on Electronic Surveillance).

If you visit Veritas Group's premises, e.g., to take part in meetings or other events, you may be requested to provide certain ID data. The recording of personal data for that specific purpose is necessary for the legitimate interest of Veritas Group, consisting, among others, of security and safeguarding requirements.

### Processing of Stoð e-commerce customers' personal data

When you request a service from Stoð, including, among others, the manufacture and sale of braces, prosthetics, customized footwear, orthopaedic footwear, insoles, supportive devices such as wheelchairs, walking frames, CPAP devices, compression socks, and other related products, it is critical for Stoð to collect and process your personal data. This includes the collection, recording, and

retention of healthcare data you provide us with, e.g., measurements for socks, breast forms, or other adaptive or supportive devices. Your consent is the foundation for the processing of this data. We use such data only to provide you with customized and purposeful services meeting your needs and requirements.

### Processing of personal data related to product and service presentations

Verita Group collects and records personal data upon the informed consent of accredited healthcare professionals who have received product or service presentations from our group. The purpose of data collection in this case is to keep a log of which educational materials and/or presentations respective healthcare professionals have received, as well as to provide information to them on forthcoming educational events, conferences, and/or meetings that might be useful for them.

## Personal data retention

We will only retain your personal data for as long as necessary to serve the purposes for which your data were collected, including fulfilling the requirements set forth in laws and regulations, as part of audits or regulatory reporting. We may retain your personal data for longer in case of complaints or if we can reasonably expect litigation concerning our business relationship with you.

Decisions regarding the data retention period are made considering the volume, nature, and sensitivity of the personal data, as well as the possible losses which might occur in case of unauthorized use or disclosure of such personal data, the purpose of personal data processing, and whether it is possible to fulfill the same purposes in other ways, and finally the requirements set forth in laws and regulations, as part of audits, regulatory reporting, etc.

In certain circumstances, we may anonymize your personal data (i.e., make them unidentifiable) for research and statistical purposes. In those cases, we may use such anonymized data for an unlimited period without notifying you.

## Your rights

The Icelandic Act on Personal Data Protection grants you right among others to receiving education and information on whether Veritas group of companies processes your personal data and how such data is processed in the context of our group of companies' operations. Please send us an e-mail to [personuvernd@veritas.is](mailto:personuvernd@veritas.is) to submit requests concerning the following:

### Access to your own personal data

You have the right to get a confirmation from Veritas group on whether they process your personal data and, in case positive, to have access to your personal data. You also have the right to receive specific minimum information on how our group of companies processes your personal data. Some of said minimum information is provided in this policy.

### Transfer of personal data

You may request that specific personal data you provided Veritas group are transferred to third parties nominated by you provided such transfer is technically feasible. This only applies to personal data collected by Veritas group based on your consent or on contractual clauses or are processed using automatic technologies. Upon data transfer, any nominated third parties are responsible for data you have requested to be transferred to those third parties.

### Correction or disposal of personal data



You may at any time request that incorrect or unreliable personal data on you are corrected. In specific cases, you also have the right to have certain personal data on you disposed of.

## Restriction or objection to processing of your personal data

You may at any time object to the processing of your personal data (including customization) executed as part of direct marketing actions and may refuse promotional materials on fringe benefits, products, and services offered by Veritas Group. You may also object to the processing of your personal data if special circumstances are present. Finally, you may also, in certain cases, request that the processing of your personal data is temporarily restricted.

Veritas Group accepts all requests concerning your rights described above free of charge, except in cases where the request is unfounded, excessive, or if delivery of more than one copy of your personal data is requested. Individuals have to identify themselves when submitting requests concerning the above-described rights.

You also have the right to file a complaint with The Icelandic Data Protection Authority in case of disagreements on how your personal data is processed by Veritas Group. Nevertheless, we hope that you ask us in the first place for assistance concerning the protection of your personal data. You can send an e-mail to [postur@personuvernd.is](mailto:postur@personuvernd.is) if you prefer to contact The Icelandic Data Protection Authority directly.

## Sharing of personal data

Veritas Group does not sell personal data to third parties. Nevertheless, our group may be obliged or committed to share or provide your personal data to third parties, such as regulatory authorities, government authorities, or other Veritas Group business partners. This sharing or provision of personal data will only take place if legally authorized, and under all circumstances, caution is taken to ensure that such personal data are handled as confidential information.

Veritas Group's service providers, acting as processors and trusted with processing personal data on behalf of Veritas, may receive personal data to fulfill a service agreement entered into by and between the respective parties. These processors can be either service providers, legal representatives, or contractors acting on behalf of our group. Nevertheless, we only resort to processors who are able to provide sufficient assurance that the processing of personal data and observance of the rights of individuals meet the requirements set forth in the Icelandic Act on Personal Data Protection. Veritas Group provides its processors only with personal data that is necessary for the purpose of the processing. Such processing is always conducted pursuant to a service agreement entered into with the processor, in which the processor commits to the obligation of securing data safety and using the data they receive for the purposes set forth in the service agreement they are signatory to.

Veritas Group requires all third parties to secure personal data safety and to process your personal data as set forth in the law and regulations. We do not authorize third parties acting as our service providers to use your personal data for their own purposes, and we only authorize them to process your personal data for specific purposes and pursuant to our guidelines and standards.

## Personal data safety

We have adopted appropriate safety measures to prevent that your personal data is accidentally lost, used, or disclosed by any unauthorised parties, or unlawfully adulterated. We also restrict access to your personal data to staff, representatives, contractors or other third parties who have legitimate business reasons to gain access to your data. Those individuals will only process your personal data in accordance with our guidelines and are bound confidentiality.

We have adopted measures to respond to any suspected safety breaches related to the processing of personal data and will inform you and respective regulatory authorities whenever legally obliged to do that.

## Review

Veritas group of companies reserves the right to regularly update this policy.

*Approved by Veritas Executive Board.*

*Garðabær, 09 April 2024*