



## Privacy Policy

### **Policy regarding the collection, use and disclosure of personal information at Immunotec Inc.**

At Immunotec Inc. ("Immunotec"), we are committed to respecting the privacy of our customers. In the spirit of this commitment, we have developed and implemented a policy regarding the protection of personal information.

This document contains information about our policy regarding the protection of personal information and about your rights with regards to the collection, access, use, retention, correction and communication of personal information in our possession.

### **Personal information**

"Personal information" refers to any information about a private individual or information that makes it possible to identify said individual. This includes but is not limited to your name, mailing address, telephone numbers, email address, credit card numbers, social security number, and other information relating to billing records and accounts.

### **Reasons for collecting personal information**

The personal information that we retain about our customers serves primarily to open a file and process orders. Personal information about our Consultants is used for payment of commissions and for fiscal requirements.

Occasionally, this personal information will be used (a) for statistical purposes (b) to respond to your questions about your account and file (c) to contact certain customers in the event of credit or inventory problems (d) to offer our customers information about Immunotec's products and services and (d) to satisfy legislative and regulatory requirements.

### **Personal information we retain about our customers**

At Immunotec, we only retain personal information that you submit when you make a request for automatic shipment of Immunotec products, when you purchase online or when you submit a request to become a Consultant. These forms ask for your consent for us to use your personal information in accordance with the uses set out in our policy regarding the protection of personal information. This information includes: your name, email address, address, credit card number, phone numbers, social security number (Consultants only), and business identification number (Consultants only).

## Personal information and our website

It is possible to visit our website without revealing your identity. However, our web server may register the IP address and the domain that you used to access the site, the type and version of web browser and operating system that you use, the number, duration and frequency of visits made to our site, as well as the previous and next websites that you visit. This anonymous information cannot be associated with a particular user. This information is useful to us to monitor the performance of the site for system administration purposes, to make the site more user-friendly, to improve our services and to collect summary information (e.g.: the number of visitors who accessed the site).

**USE OF SITE BY CHILDREN:** The Site is not directed to individuals under the age of thirteen (13), and we request that these individuals not provide Personal Information through the Site.

**COOKIES:** We use cookies, which are small files that your web browser installs on your computer's hard drive, to memorize the user code, password and preferences of users who visit our website, and to facilitate their navigation of the site. Cookies allow us to adapt a website or advertisement according to your interest and preferences. Rest assured that cookies are safe to use. You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies. If you turn cookies off, some features will be disabled.

Our website includes security mechanisms that protect the information that you entrust to us against loss, abuse and modification. Our servers use Secure Socket Layer (SSL), a state-of-the-art encryption technology. This technology protects your personal information and ensures its confidentiality. Personal information, in particular credit card numbers, names and addresses are encrypted and cannot be read by anyone while it is being transferred over the Internet.

**THIRD PARTY LINKS:** Our website contains links to websites operated by third parties. Our policy regarding the protection of personal information does not cover these websites, and we recommend that users read the personal information policies that affect these sites. We cannot be held responsible for the content of websites operated by third parties or for the practices of third parties in terms of protecting personal information. The inclusion of a link on the Site does not imply endorsement of the linked site by us.

## Access to your personal information

You, your Consultant and the sponsoring Consultants of your Consultant have access to your personal information. However, authorized access for Consultants and their sponsors is strictly limited to your name, address, phone number and purchasing history.

We are committed to not disclose your personal information to third parties other than those mentioned in this policy or unless we are required to do so by law or regulation. As well, we will seek your consent should we decide to disclose your personal information to third parties other than those mentioned here.

## Protecting your personal information

Immunotec is serious about protecting the personal information of our customers and our employees are trained to ensure all personal information is respected, protected and handled appropriately. Only employees who have a legitimate need to access your personal information to fulfill their duties are authorized to do so. Finally, all our service providers that require access to our facilities or our computing services are contractually obligated to neither divulge nor use personal information that we retain about our customers.

We limit the length of time we retain personal information about our customers to a period that allows us to supply our products and services, that allows us to respect the timeframes imposed by laws and regulations and that allows us to fulfill legal requirements. At the end of this period, we close each file, and we ensure that all personal information in our possession is destroyed.

We use our best efforts to keep the contents of your personal file up to date. This means that we rely on you to inform us of any changes. You can also help us maintain up-to-date information by periodically verifying the personal information about you in our possession and by informing our Chief Privacy Officer of any changes to the personal information in our possession.

## Your rights

You have the right to:

- have access to the personal information that we retain (please allow for a minimal charge for each request for access)
- deny consent to the disclosure of your personal information or to limit this disclosure (however, this could affect our ability to offer you our products by mail or to allow you to become a Consultant) and
- request that we correct any errors contained in your personal information file.

To ensure that your personal information is well protected, we are required to request adequate proof of your identity. This obligation applies to all requests for access, use, retention, correction, modification of consent and communication of any of your personal information in our possession. This proof of identity will be used only for this purpose.

## Immunotec reserves the right to refuse your request for access to your personal information if the information:

- is protected by attorney-client or physician-client privilege
- was gathered for the purposes of detecting or preventing a criminal act
- would reveal confidential commercial information
- disclosure is likely to reveal personal information about a third party and its communication is likely to risk compromising the life or the security of the third party.

To have access to, modify or limit the use of your personal information, please contact our Chief Privacy Officer in writing at the address found at the end of this document.

## **Excellent sources of information are available to you from these websites:**

For U.S. residents: [Federal Trade Commission](#)

For Canadian residents outside Quebec: [Office of the Privacy Commissioner of Canada](#)

For Canadian residents of Quebec: [Commission d'accès à l'information du Québec](#)

## **Cross-border transfer**

Your Personal Information may be stored and processed in any country where we have operations, and by interacting with us and providing us with any Personal Information, you consent to the transfer of information to countries outside of your country of residence, which may provide for different data protection rules than in your country.

## **Amendments to this Policy**

Immunotec reserves the right to modify this policy at any time and to issue the new policy amendments through its websites or other means. Any amendments will be made according to the law in effect. Continuing to provide personal information to Immunotec or to use its websites or place orders after amendments to the policy have been posted will be considered an implicit agreement with modifications made to the policy.

## **Contact us**

To send us your comments, questions, complaints or for any request for access, correction or modification of your consent for the use of your personal information, please contact us by email at [infopriv@immunotec.com](mailto:infopriv@immunotec.com) or in writing to the Chief Privacy Officer at 300 Joseph Carrier, Vaudreuil-Dorion, Quebec, Canada, J7V 5V5. We will respond within 30 days of our receipt of your request.