

# Privacy Policy

*Last Updated: 2025-09-15 – v2.0*

This "Privacy Policy" governs the processing of your personal data by Hippocreates bv, Kempische Steenweg 303 Bus 200, 3500 Hasselt, Belgium, registered under company number BE0748.949.371, which is the Data Controller (hereinafter referred to as "Hippo Dx" or "We").

We value your right to privacy and make every effort to protect your personal data in accordance with the applicable data protection laws, including the General Data Protection Regulation (EU) 2016/679 ("GDPR") and national implementing legislation. In this Privacy Policy, we explain what personal data we collect from you, for what purposes we will process this data, on what legal basis we base this processing, to whom your personal data may be transferred, how long we keep your data, how we protect your data and what rights you have in relation to the processing of your personal data.

This Privacy Policy applies to the processing of your personal data through our website [www.hippo-dx.com](http://www.hippo-dx.com) (hereinafter referred to as "the Website"), during sales talks with potential customers at congresses, appointments or any other sales occasions. Please read this Privacy Policy carefully as it contains essential information about how we process your personal data.

Note that we also process other data, based upon a separate agreement (e.g. customer or supplier contracts). Unless stipulated differently in the separate agreement, the clauses of this privacy policy apply.

All concepts not explicitly defined in this Privacy Policy have the same meaning as in the GDPR.

## 1. From whom do we collect personal data?

In the course of our business, we may collect personal data from customers, prospects, suppliers, applicants, (potential) business partners, visitors to our Website, persons who provide their business card or otherwise their contact details to us, and persons who contact us e.g. by e-mail, phone, or our social media.

## 2. What personal data do we process and why?

"Data processing" means any operation or set of operations performed on personal data, such as collecting, using, organizing, storing, modifying, updating, retrieving, consulting, disseminating, archiving, erasing, managing, destroying, or disclosing.

Please find below an overview of the data we process:

PURPOSE	CATEGORIES OF PERSONAL DATA	LEGAL BASIS	RETENTION PERIOD
To evaluate your job application	Contact data (Name, email address, phone number, ...), CV	Legitimate Interest	1 year
To send you periodic updates on Hippo Dx	Contact data (name, email address, phone number, ...)	Informed Consent	5 years or until you unsubscribe
To respond to contact forms	Contact data (name, email address, phone number, ...)	Legitimate Interest	5 years
To keep our website secure	Contact data (browser, IP address, ...)	Legal Obligation	1 year

### 3. How do we secure your personal data?

We have implemented appropriate technical and organisational measures to ensure the secure processing of your personal data. These measures are in line with the nature of the personal data and proportionate to the potential severity of the risk. The risk of accidental or unauthorised destruction, loss, alteration, or access to and any other unauthorised processing of the data is minimised.

Unfortunately, no risk can be completely avoided. If unauthorised access to our IT systems occurs, we will immediately take all possible measures to minimise the damage and/or theft of the data and inform the parties concerned.

More information on our security measures is available upon request.

### 4. With whom do we share your personal data?

We will not sell, rent, distribute, or otherwise commercially disclose your personal data to third parties, except as described in this Privacy Policy, or based on a legal obligation or your prior consent.

However, we may disclose your personal data to the following parties:

- **With law enforcement/when required by law:** in certain cases, we may be required to disclose your personal data pursuant to a court order or to comply with other mandatory laws or regulations. We will reasonably attempt to inform you in advance unless such action is subject to legal limitations.

- **With third parties that take over business activities:** in the event of a total or partial reorganisation or transfer of activities of Hippo Dx, including the restructuring, transfer, or cessation of its business activities, or in the event of Hippo Dx's bankruptcy, it may be necessary to transfer your data to new entities or third parties that take over the business activities of Hippo Dx in whole or in part. We will reasonably attempt to notify you in advance of the disclosure of your data to these mentioned third parties, but you also acknowledge that this may not be technically or commercially feasible under all circumstances or may not be permissible in certain cases.
- **With our service providers and partners:** Hippo Dx may disclose certain personal data to our service providers, partners, and subcontractors with whom we collaborate, such as freelancers or IT providers, to provide the services you have requested. These third parties assist us with various tasks, including data hosting and maintenance, analytics, customer care, marketing, advertising, payment processing and security operations. We also share information with partners who distribute and assist us in advertising our services.

If and to the extent that we engage data processors located outside the European Economic Area (EEA) for the processing of your personal data, we do so based on an adequacy decision or the Standard Contractual Clauses. Hippo Dx guarantees to always verify, on a case-by-case basis, whether an adequate level of protection is in place for transfers to processors located outside the EEA.

## 5. Which rights do you have as a data subject?

With regard to your personal data, you also have certain rights.

**Right of access:** you have the right to access the personal data collected by Hippo Dx about you. This means that you can request information on whether we collect personal data about you, what data that is, the purposes for which Hippo Dx processes it and why, as well as the categories of third parties with whom we may share it.

**Right to rectification:** you have the right to obtain a correction of your personal data or to request that we complete your personal data if you notice that we are processing incorrect or incomplete data about you.

**Right to erasure:** you have the right to obtain data erasure in certain specific cases.

**Right to restriction:** you have the right to have the processing of your personal data restricted in certain specific cases.

**Right to object to the processing of your data:** you have the right to object, without giving any reason, to the processing of your personal data if the processing is carried out on the legal basis of a legitimate interest. You also have the right to object to the processing of your personal data for direct marketing purposes. This right is absolute - we will always comply with it.

**Right to data portability:** you have the right to obtain your personal data processed by us in a structured, commonly used, and machine-readable format and/or to transfer it to other controllers.

**Right to withdraw consent at any time:** to the extent that the processing is based on your prior consent, you always have the right to withdraw that consent.

**Automated decisions and profiling:** the processing of your personal data does not include profiling, and you will not be subject to automated decision-making by us.

You can exercise your rights by contacting us using the contact data below. The exercise of these rights is in principle free of charge. Only in case of unreasonable or repeated requests may we charge a reasonable administrative fee. We always try to answer your requests or questions as quickly as possible, and at most within 30 days. It is possible that we will first ask you for proof of identity to verify your identity.

For further information and advice on the above rights, please visit the Website of the Belgian Data Protection Authority: [www.gegevensbeschermingsautoriteit.be](http://www.gegevensbeschermingsautoriteit.be), which is the supervisory authority of Hippo Dx. You also have the right to lodge a complaint with the Data Protection Authority, Drukpersstraat 35, 1000 Brussels, Tel +32 (0)2 274 48 00, Fax +32 (0)2 274 48 35, email: [contact@apd-gba.be](mailto:contact@apd-gba.be).

## 6. References to other websites

Our Website may contain links to other websites that are not operated by us. If you click on a third-party link, you will be redirected to that third-party website. We strongly recommend that you review the Privacy Policy of each site you visit.

We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third-party websites.

## 7. Changes to the Privacy Policy

From time to time, it may be necessary to amend this Privacy Policy. When we post changes to the Privacy Policy, we will change the "last updated" date at the top of the document. The most recent version of this Privacy Policy will be available on our Website at all times.

## 8. Information for patients – secondary use of data for scientific purposes

Hippo Dx has launched S.P.A.T., a new device designed to simplify and improve allergy testing using skin prick tests. As the manufacturer of this new medical device, Hippo Dx is required by European medical device legislation (Medical Devices Regulation or MDR) to monitor whether the device continuously works correctly and safely. We therefore need anonymised test results, such as measurement results, images of skin reactions and the allergens tested. After

performing a skin prick test, Hippo Dx will anonymise the test results for monitoring the device's performance and safety. The anonymous data can further be used for scientific research purposes to examine how the device functions in daily clinical practice and gain new insights into the prevalence of certain types of allergies.

#### 9. Questions?

If you have any questions, would like more information about our Privacy Policy, or have complaints regarding your privacy, including the exercise of your rights, you can contact Hippo Dx's DPO via e-mail to [privacy@hippo-dx.com](mailto:privacy@hippo-dx.com) or by mail to Hippo Dx – DPO, Kempische Steenweg 303 Bus 200, 3500 Hasselt, Belgium