

Primordial Privacy Statement

This Privacy Statement (“Statement”) describes the personal data that Primordial collects, how we use it, and when we share it, as we interact with you, deliver our products and services, and conduct our business operations.

This Statement applies to Primordial Design, Inc., its affiliates and any wholly owned subsidiaries worldwide, referred to in this Statement as “Primordial.” When we refer to Primordial products, we mean all Primordial products and services.

For the purposes of applicable data privacy legislation, the Primordial affiliate or subsidiary responsible for the collection and use of your personal data is either the affiliate or subsidiary with which you contract or engage, or the affiliate or subsidiary located in the country in which you reside.

What Personal Data Do We Collect?

Primordial collects personal data when we deliver our products, conduct marketing, and run our business operations. The personal data we collect varies based upon whether the data is collected (i) through our websites or applications, including <http://www.primordialdesigninc.com> (“Sites”), or (ii) through our products and services, including but not limited to our software, support services, and medical information products (“Products”).

We may collect personal data directly in the following situations:

- When you purchase, download, or register Primordial software, or use Primordial software support services, we may collect contact information such as your name, email address, physical address, telephone number, and financial and payment details, together with information on the Primordial Products you buy, download, or register.
- If you engage with Primordial for marketing purposes, such as by expressing interest in Primordial Products through a web form, participating in a promotion, or attending a Primordial or other marketing event, we will collect the information you submit to us, such as your contact details (including name, email address, phone number, organization and job title) and the Primordial Products that interest you.
- We may also collect other electronic data from your use of our Sites automatically. This data may include your IP address, date/time stamp, data about your interaction with our Sites and data collected from our use of cookies and similar tracking tools.

Through our Products, we may collect personal data directly in the following situations:

- If you use a Primordial medical information sharing Product, we will collect the personal data and healthcare information that you submit.
- We may also collect other electronic data derived from your use of our Products. This data may include your IP address, usage data, and data showing your registration, installation and use of Primordial software Products. Except for IP address and unique device identifiers, we generally collect this data on an aggregate and non-identifying basis.

Primordial may collect personal data indirectly in certain situations, in particular:

- We obtain contact information, including name, email address, phone number, organization, and job title, from our resellers and distributors, from public sources, and from third-party mailing lists.

Cookies

Primordial and its partners use cookies and similar tracking tools to distinguish you from other users. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

How We Use Personal Data

General Business Operations

We use contact information to market, sell, and service Primordial Products, subject to your consent where required by law. This choice does not apply to transactional service communications that are part of our business solutions or informational communications that have their own unsubscribe option included in the message.

We use your financial or payment information, and your contact details, to support, establish, and conduct customer relationships if you were to purchase a Primordial Product or service. For example, your data would be necessary for the performance of our terms of service with you (including, for example, completing purchase transactions, fulfillment of an order, order confirmations, responding to requests for information about products and services, and the provision of purchased products and services). If you fail to provide the personal data we need, we may be unable to complete your transaction.

We use personal data of individuals associated with proposed resellers, co development partners, and distributors to conduct reference and background checks before entering into a contract and as necessary for compliance with legal obligations to which we are subject.

Data Processed Within Our Products

We use the personal data that is processed within our Products, medical data within medical data products, personal data processed in communications products, to deliver our Products sold to Primordial customers. Our processing of personal data for these purposes includes both automated and manual (human) methods of processing. Our automated methods often are related to and supported by our manual methods. For example, our automated methods include artificial intelligence (AI), which we think of as a set of technologies that enable computers to perceive, learn, reason, and assist in decision making to solve problems in ways that are similar to what people do. To build, train, and improve the accuracy of our automated methods of processing (including AI), we manually review some of the predictions and inferences produced by the automated methods against the underlying data from which the predictions and inferences were made.

We never use this data, referred to as “Product Personal Data,” for marketing purposes; and we never sell, share or transfer your data to third parties for the third party’s own purposes.

We use aggregated, non identifying, electronic data collected from use of our Sites and Products to operate, analyze, improve, and develop our Sites and Products. This information is not used to inform decisions about specific individuals; rather, it is processed to understand how different categories of users interact with our Sites and Products so that we can consistently provide our Products.

Why We Use Personal Data

We collect, process, use and store your personal information for the following business and commercial purposes in accordance with our legitimate business interests and legal requirements or with your consent where required:

- to provide you with information in response to your requests;
- to maintain the accuracy of the information we collect;
- to help us develop new Products or features that meet your needs;
- to manage language preferences and connect you with your nearest account manager;
- to maintain contact data about you or a third party (such as, your employer);
- where necessary to protect or conduct our business and pursue our, or our affiliates', legitimate business interests, which include the security of our systems and our operations and the exercise or defense of legal claims;
- to comply with privacy laws and other regulations such as to manage consent requirements;
- to give you a customized interactive experience;
- to measure interest in our various Products;
- to inform you about new Products or features and functionalities;
- to keep you up-to-date with latest product and solution offerings and other business related items from Primordial or third parties which may be of interest to you;
- to occasionally send you push notifications, which you may opt-out of by turning them off at the device level through your settings.

When We Share Personal Data

We do not sell your personal data.

Primordial does not sell your personal data. However, we may share certain personal data for a business purpose. If we share your personal data (including Product Personal Data) with affiliates, co-development partners, or with vendors acting on our behalf, we do so under binding agreements that require the third party to use and protect the personal data in accordance with the principles described in this Privacy Statement. These third parties are authorized to use your personal data only as necessary to provide services to us.

We may share Personal Data in the following situations:

- With our affiliates and subsidiaries and with vendors acting on our behalf to perform services for Primordial for a specific business purpose, support the Sites or the delivery of Products;
- With the customer on whose behalf and at whose direction we are processing the data; and
- When we have your consent to use your Personal Data for a specific purpose.

We may share personal data with our affiliates, co-development partners, subsidiaries, resellers, suppliers, and distributors, and with vendors acting on our behalf, to service our customers and perform any contract we enter with you.

We may also share aggregated, anonymous, or non-identifiable electronic data with our affiliates, co-development partners and with vendors acting on our behalf.

We share personal data derived from Site usage (excluding Product Personal Data), with analytics and search engine providers that assist us in the improvement of our Sites, subject to the cookie section of this Privacy Statement.

We may also share personal data to comply with law and legal process, to respond to governmental inquiries and lawful requests from by public authorities (including to meet national security or law enforcement requirements), and to protect life, property, or the security of Primordial or its customers. If Primordial enters any merger, acquisition, or asset sale of all or any part of its business, personal data held by Primordial may be transferred to a buyer or successor entity.

We do not share personal data with third parties for cross-context behavioral advertising.

Security and Retention

We follow generally accepted standards to protect the personal data submitted to us, both during transmission and once it is received. Information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. If Primordial has issued you a password, you are responsible for keeping the password confidential.

We store personal data to the extent necessary to provide Products to our customers. Different retention of personal data may be necessary under contractual terms with the data controller for whom we provide services, for fraud prevention, to identify technical problems, or to resolve legal proceedings.

We may retain non personally identifiable aggregate information beyond this time for research purposes and to help us improve and further develop our Products. You cannot be identified from aggregate information retained or used for these purposes. Where we process personal information for marketing or business analytic purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data so that we can respect your request in the future.