

PRIVACY POLICY

PERSONAL DATA PROCESSING POLICY MEDIXANT MACIEJ FRANKIEWICZ

On 25 May 2018, the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC ("GDPR") will enter into force.

Therefore, we would like to inform you about the processing of your data and the rules under which it will be carried out after 25 May 2018.

ABOUT US

Controller

The controller of your personal data is **MEDIXANT MACIEJ FRANKIEWICZ with its registered office in Poznań, Promienista 25, Poland, REGON: 301679591, Tax No: 6652527251.**

Contact Us

If you have any questions about your personal data and its processing, please send us an e-mail to privacy@medixant.com or a letter to **MEDIXANT MACIEJ FRANKIEWICZ, Promienista 25, 60-288 Poznań, Poland.**

If your correspondence concerns the request to access your personal data, their rectification, erasure or restriction of processing or the right to object to the processing, as well as the right to transfer the data, **you may use the form available at <https://www.radiantviewer.com/privacy/request/>.**

WHAT PERSONAL DATA WE PROCESS AND FOR WHAT PURPOSE WE PROCESS THEM

We process personal data that we collect when placing orders for licenses for the RadiAnt DICOM Viewer software, i.e. in an online shop, completing a contact form, adding translations of the program.

Data are also transferred to our server during license activation and using RadiAnt DICOM Viewer - the following data are transferred: name, hardware identifier and IP address of the computer on which RadiAnt DICOM Viewer is installed, license identifier used to activate the program, unique installation identifier, information about the operating system.

We have made any and all endeavors to ensure that the principle of data minimization is respected in the processing, hence we process personal data only to the following extent:

- a) full name
- b) address for service
- c) e-mail
- d) tax ID
- e) history of your written or electronic communications with us
- f) your program translations
- g) your consents
- h) IP address from which you communicate with our service, as well as the IP address of the computer on which RadiAnt DICOM Viewer is installed, the name and hardware identifier of the computer, the license identifier used to activate the program, the unique identifier of the installation, information about the operating system (version, language, etc.).

These personal data are required to (**purpose**):

- a) **generate and activate a license for you** allowing to use RadiAnt DICOM Viewer (both trial and free as well as commercial and paid);
- b) **detect abuses** related to unauthorized or over-standard use of the software or in access to the activation service (hacking attempts, DoS attacks);
- c) enable you to **contact** us as a software developer of RadiAnt DICOM Viewer;
- d) send you a **marketing offer** with information about **updates**;
- e) enable you to add publicly available **translations** and to contact you back;
- f) **improve our offer and adapt it to the needs of users** (we do this on the basis of statistical analysis and reports containing aggregated data).

Cookies are small text files that are stored on your terminal that you can control yourself (cookies may be set to be accepted or blocked). Blocking cookies may result in an inability to purchase a license or the malfunction of the website itself.

We only use functional cookies that ensure the proper functioning of the website, for the following purposes:

- sending us messages through the contact form;
- posting messages on the discussion forum;
- purchasing licenses in the online store;
- logging into the License Management Service ("My Licenses");
- store of the display language and mobile view setting of the page;
- store of the consent to use cookies

Our website is intended for people over 16 years of age, hence we do not process data of people who do not meet this criterion. We do not process the sensitive data of persons either. In case of disclosure/notification of the fact that the aforesaid data were made available, they will be immediately deleted. Data processing will be carried out without an automated decision-making process on a case-by-case basis, including profiling.

LEGAL BASIS FOR DATA PROCESSING

The legal basis for processing your data depends on the purpose for which we process them.

Therefore:

- a) personal data provided to **order a commercial license** for RadiAnt DICOM Viewer in an online shop accessible via the website at www.radiantviewer.com/store/ and to make the purchased license key available and then to activate it are processed on the basis specified in Article 6(1)(b) of the GDPR (the processing is required to perform the license agreement and the agreement on the provision of services by electronic means to which the data subject is a party, or to take actions at the request of the data subject, prior to the conclusion of the agreement);
- b) personal data provided in connection with the activation of the **trial license** in RadiAnt DICOM Viewer are processed under Article 6(1)(b) of the GDPR (the processing is required to perform the license agreement and the agreement on the provision of services by electronic means to which the data subject is a party, or to take actions at the request of the data subject, prior to the conclusion of the agreement);
- c) we also process all your data that we have as a data controller for **marketing purposes**, with reference to the so-called legitimate interest of the data controller and on the basis of your consent given prior to the processing of data. Our legitimate interest is to provide you with offers and promotions that may be of interest to you, as well as other information that promotes our brand;
- d) we process your personal data provided to **contact us** as a software developer of RadiAnt DICOM Viewer, **add publicly available translations and contact you back** on the basis of your consent given prior to the processing of data;
- e) data in the form of: **IP addresses** in the server logs and sent from the installed program RadiAnt DICOM Viewer: the name and hardware identifier of the computer, the license identifier used to activate the program, the unique installation identifier, version and language of the operating system used by you are processed by us on the basis of the legitimate interest of the personal data controller. Our legitimate interest is to prevent abuse, to improve the offer and management of server resources, to maintain the failure-free functioning of the website and the license activation service and to fulfil the statutory obligations of the data controller in terms of ensuring the security of personal data protection.

RECIPIENTS OF PERSONAL DATA

We provide your data only if it is necessary for the performance of the services that you request. We do not share your information with any third parties commercially or in any other way.

We store your personal data with our partners, companies providing accounting services or server lease services for us, thanks to which we can run our website:

- a) at the moment this company is OVH sp. z o.o. with its registered office in Wrocław, which, however, has no knowledge of the type of data processed in this system and has not been

entrusted with any data according to the Act. Therefore, this company is subject to the provisions of Article 14 of the Act of 18 July 2002 on Rendering Electronic Services and its liability for processed data is limited under Articles 12-15 of that Act.

For each of these purposes, we only provide data that are necessary to achieve this goal. Where possible, we use anonymisation or pseudonymisation tools, i.e. activities that make it impossible for our partners and subcontractors to remain identifiable, and where we still have your data.

PERIOD OF DATA PROCESSING

The personal data obtained in connection with:

- a) purchase of a license and activation of paid licenses - we process them **during the term of the license agreement**;
- b) sent messages / e-mails - we process them for a period of **1 year**;
- c) sent translations - we process them for **the period during which they are made available to the public for download on the translation website**;
- d) activation of trial licenses (only the hardware identifier of the computer and its name) - we process these data for a period of **5 years**, however, only in exceptional cases they can be associated with a specific person (e.g. entering the first and last name as the computer name).

If you exercise the rights described in Articles 16-18 and 20-21 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repeal Directive 95/46/EC (Right of rectification; Right to erasure / Right to be forgotten;/ Right to data portability; Right to limit processing; Right to object to processing), the processing of such data may be shortened or suspended/limited as requested by you before the expiry of the aforesaid period. Following the period as set forth in the first or second sentence, we will process your data to the extent necessary for the purposes of accountability of our activities, which we are obliged to do under the provisions on personal data protection and, if it is necessary to establish, pursue or defend claims in court, administrative or other out-of-court proceedings, and to explain the circumstances of illegal use of the service, but for not longer than 10 years.

YOUR RIGHTS

Due to the fact that we process your data, among other things, on the basis of the data you have provided, you have the right to **revoke your consent at any time**.

GDPR gives you a number of rights that you can exercise at any time. If you do not abuse these rights or they are not excessive (e.g. endlessness of demands), then the use of them will be free of charge for you and should be easy to implement.

Your rights include as follows:

a) **Right of access to content of your personal data**

You can obtain confirmation from us whether your personal data are processed in our files and, if so, you can access them and the categories of information provided in this document in one of the commonly used formats (e.g. HTML, RTF, DOC, DOCX, etc.). You can also get information about the source of the data.

b) **Right of rectification, supplement or upgrade your personal data**

If we process incorrect, untrue, incomplete or out of date data, you have the right to request us to immediately correct incorrect personal data. Request us to correct them and we will be obliged to do so. In such a case, please provide us with an additional statement on personal data change.

c) **Right to erasure of data (“right to be forgotten”)**

This right means that you may require us to delete any information containing your personal data from our database systems and our records. Please note that we will not be able to do this, if we are required by law to process your data (e.g., to process your warranty claims, to establish, pursue or defend claims, to hold us accountable, to process accounting records for tax purposes). In each case, however, we will delete your personal data to the fullest extent possible and, where it is not possible, ensure its pseudonymisation (no possibility of identifying the data subject without an appropriate link key), hence your data will be accessible only to a very limited number of people in our organization.

d) **Right to restriction of data processing**

If you find that we process too much personal data about you for a specific process, we no longer need personal data for the purpose of processing or you question the accuracy of your data, you have the right to request us to restrict such scope. Unless your request conflicts with legal requirements or is necessary for the performance of the contract, we will comply with your request (for the period of considering your request or when regularities or irregularities can not be determined, processing of your data will be suspended except for storage, only with the consent of the data subject, or for the purpose of establishing, pursuing or defending claims, or to protect the rights of another natural or legal person, or on important grounds of public interest of the European Union or of a Member State of the European Union).

e) **Right to transfer to another data controller**

You can request us at any time to export the data you have provided to us during all our contacts and cooperation to a separate file for further transfer to another data controller.

f) **Right to object to data processing**

If you do not wish us to process your personal data for marketing purposes, you may provide us with such objection. In such a case, we will further process your data for other needs (purposes) and to the exclusion of the purpose for which you objected.

You can exercise the aforesaid rights by contacting us at the address as set forth in the beginning. Without undue delay, we will inform you in writing in paper or electronic form or via electronic means of communication about the actions taken in connection with your request or, if possible, provide the requested information.

Please be noted that the provision of personal data such as your full name, e-mail and address for service is a requirement of a license agreement and without providing such data it will not be possible to activate the purchased license for RadiAnt DICOM Viewer software for you. If you have already purchased a license for the software from us, the exercise of any rights such as the right to erasure (“right to be forgotten”) or similar ones will result in the termination of the license. In particular, the use of licensed software is not possible, if our data sets do not contain data enabling remote validation of the correct use of the licenses for the purchased software or if they are incomplete.

If you believe that in any way we have violated the rules of processing your personal data, **you have the right to file a complaint directly with the supervisory authority (since 25 May 2018 it has been the President of the Office for Personal Data Protection)**. In exercising this right, you should give a full description of the situation and indicate what action you consider to be infringing your rights or freedoms. The complaint should be lodged directly with the supervisory authority.

ADDITIONAL INFORMATION AND RECOMMENDATIONS

The data are transmitted by the HTTPS (TLS) protocol. It ensures the confidentiality of any data transmitted electronically. The users are completely certain that they securely connect to a proper server and are not exposed to the interception of any data provided to the <https://www.radiantviewer.com> website.

In order to maximize security, we recommend connecting to the shop's website from a computer protected by updated anti-virus and anti-spyware software, using a web browser that supports HTTPS (TLS) data transmission encryption protocol. We do not recommend making purchases through computers accessible to many people (Internet cafes, universities, libraries, etc.). We recommend that you check our SSL certificate on the Web browser bar before starting shopping and confirm that you have a reliable and secure connection to the website of RadiAnt Online Store (<https://www.radiantviewer.com/store/>).