

PRIVACY POLICY

I. Data controller

The data controller within the meaning of the General Data Protection Regulation (GDPR) and other data protection laws of the Member States, as well as other data protection regulations, is the

Actome GmbH

Georges-Köhler-Allee 103

79110 Freiburg, Germany

Phone: +49 (0)761 216305 00

E-mail: info@actome.de

You can reach our data protection officer at dsb@clarius.legal

II. General information on data processing

In principle, we collect and use personal data of our users only as far as this is necessary for the provision of a functional website as also our contents and services. The collection and use of personal data of our users are typically only carried out with the user's consent. An exception applies when it is not possible to obtain prior consent for practical reasons, and legal regulations permit the data processing.

Insofar as we obtain the consent of the data subject for processing operations involving personal data, Article 6 (1) (a) of the EU General Data Protection Regulation (GDPR) serves as the legal basis for the processing of personal data. When processing personal data that is necessary for the performance of a contract to which the data subject is a party, Art. 6 (1) (b) GDPR serves as the legal basis. This also applies to processing operations that are necessary for the performance of pre-contractual measures. If the processing of personal data is required for compliance with a legal obligation to which our company is subject, Art. 6 (1) c GDPR serves as the legal basis.

If processing is necessary to protect a legitimate interest of our company or a third-party and the interests, fundamental rights, and freedoms of the data subject do not override the former interest, Art. 6 (1) lit. f GDPR serves as the legal basis for the processing.

The personal data of the data subject will be deleted or blocked as soon as the purpose of storage ceases to apply. In addition, storage may take place if this has been provided for by the European or national legislator in Union regulations, laws, or other provisions (e.g., based on the German Tax Code in some instances for ten years) to which the controller is subject. Data will also be blocked or deleted if a storage period prescribed by the norms mentioned above expires unless there is a need to continue storing the data for the conclusion or fulfillment of a contract.

III. Website Provisioning

Each time our website is called up, our system automatically collects data and information from the computer system of the calling computer.

The following data may be collected:

- Information about the browser type and the version used.
- The operating system of the user
- The user's Internet service provider

- The IP address of the user
- Date and time of access
- Websites from which the user's system accesses our website
- Websites that are accessed by the user's system via our website

The legal basis for the temporary storage of the data is Art. 6 para. 1 lit. f GDPR. The temporary storage of the IP address by the system is necessary to enable the delivery of the website to the user's computer. For this purpose, the user's IP address must remain stored for the duration of the session. The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of the collection of data for the provision of the website, this is the case when the respective session has ended.

Cookies

Our website uses cookies. Cookies are text files stored in the Internet browser or by the Internet browser on the user's computer system. When a user accesses a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic string of characters that enables the browser to be uniquely identified when the website is called up again.

We use session cookies to make our website more user-friendly. Some website elements require that the calling browser can be identified even after a page change. (e.g., to store the language settings of a user).

The legal basis for processing personal data using necessary cookies is Art. 6 (1) lit. f GDPR. The purpose of using technically necessary cookies is to simplify the use of websites for users. Some functions of our website cannot be offered without cookies. For these, the browser must be recognized even after a page change. The user data collected through technically necessary cookies are not used to create user profiles.

In addition, we use third-party services and cookies to improve further and analyze interactions with our website. The legal basis for these technically unnecessary cookies is your consent according to Art. 6 (1) lit. a GDPR, which you give us via our cookie banner.

Cookies are stored on the user's computer and transmitted to our site. Therefore, you as a user also have full control over the use of cookies. By changing the settings in your Internet browser, you can disable or restrict the transmission of cookies. Cookies that have already been stored can be deleted at any time. This can also be done automatically. If cookies are deactivated for our website, it may no longer be possible to use all website functions in full.

IV. Publication of photos with personal reference

We publish photos of events or our customers on our website www.actome.de. Considering the exceptions according to §§ 22, 23 KUG, we publish photos relating to your person only with your prior express consent. If you wish to object to your photo's publication or revoke your consent, you can do so by sending an e-mail to info@actome.de or in writing to the address given in the imprint. Please inform us of the photo concerned and the place of publication (e.g., stating the link or "URL" concerned) so that we can comply with your request as quickly as possible. We will then remove your photo from our website as soon as possible and delete it from our internal database.

V. E-mail contact

You can contact us via the e-mail address provided in the imprint and under "Contact." In this case, we will store the user's personal data transmitted in the e-mail. The data will not be passed on to third parties but exclusively used for processing the conversation.

The legal basis for processing data transmitted while sending an e-mail is Art. 6 (1) lit. f GDPR. If the e-mail contact has the objective of concluding a contract, the additional legal basis for the processing is Art. 6 (1) lit. b GDPR.

VI. Data Transfer to QIAGEN

We work in close partnership with QIAGEN GmbH (QIAGEN). QIAGEN is the manufacturer of the QIAcuity dPCR systems, which are required to use Actome products and for which they have been optimized. In registering on our free platform, the AMULATOR software, you will be asked to give your consent to the transfer of your contact details to QIAGEN for promotional purposes, Art. 6 I 1 lit. a GDPR. Free use of the platform is subjected to the consent you have given. If you wish to revoke your consent to the disclosure of data, please get in touch with info@actome.de. By withdrawing your consent, the authorization to use the AMULATOR software will cease to apply. Your data will then not be made available to QIAGEN in the future. If you wish to object to advertising by QIAGEN, please contact QIAGEN directly at partnermarketing@qiagen.com. For more information about QIAGEN's privacy policy, please visit: <https://pvn.qiagen.com/privacy-policy.do>.

VII. Job advertisements

We also publish job advertisements on our website under "Jobs". Your personal data contained in the application is collected and processed exclusively to fill vacancies within our company. As a matter of principle, your data will only be forwarded to our company's internal departments and specialist departments responsible for the specific application procedure. Your application data will not be used for other purposes or passed on to third parties. Your personal application data will generally be deleted three months after completing the application process. This does not apply if legal regulations prevent deletion, if further storage is necessary to provide evidence, or if you have expressly consented to more extended storage.

VIII. Rights of the data subject

If personal data of yours is processed, you are a data subject within the meaning of the GDPR, and you are entitled to the following rights vis-à-vis the controller:

- You may request information from the data controller as to whether we are processing personal data concerning you.
- You have a right to rectification, completion, restriction, and deletion of your personal data against the controller.
- You have the right to receive the personal data concerning you that you have provided to the controller in a structured, common, and machine-readable format. (Right to data portability)
- You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you that is carried out based on Section 6(1)(e) or (f) of the GDPR.
- You may revoke the consent you have given at any time, in accordance to Art. 7 (3) GDPR.
- Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your residence, workplace, or the place of the alleged infringement, if you consider that the processing of personal data relating to you infringes the GDPR.

If you wish to assert any of your rights, you can contact info@actome.de or the contact persons indicated in the imprint.

Information on data security of ACTOME GmbH

I. AMULATOR Software

This information on data security refers exclusively to the data that registered users process using our online software AMULATOR.

II. General information on data processing

As a user, you upload your data independently to the servers of the service provider (IV. Google Firebase), for which you may create a new user account beforehand. These are forwarded by Firebase to the AMULATOR software, which is hosted on an ACTOME-owned virtual server at Heroku (V. Heroku). The calculated result is then stored on the server and visualized via a notebook provided by ACTOME (VI. Observable), from where users can download it to their own storage devices. Each user has a secured individual access only to their own data through their account at Firebase. The final result calculated by the AMULATOR software is stored on the Heroku server and is only accessible through the corresponding Firebase account. At no time (except at the express request of the user for the purpose of troubleshooting) will data be stored locally on other Actome GmbH hardware.

III. Maintenance

ACTOME has administrator rights on the respective cloud platforms of AMULATOR Software such as Firebase, Heroku and Observable, which are used to store and process the data. Access to the administrator's account is secured as follows:

- There is only one administrator (Managing Director Dr. Csaba Jeney).
- A minimum 12-digit randomized alphanumeric password is used for the account, which is known only by the administrator.
- Two-factor authentication is performed using a second device of the administrator.

IV. Google Firebase

Our app uses services provided by Google Firebase. Firebase is part of the Google Cloud Platform and offers many services for developers, which you can be viewed here: firebase.google.com/terms/ (<https://firebase.google.com/terms/>). Some Firebase services process personal data from end-users. This is necessary for the provision of Google services. Which data is processed for which purpose can be viewed under the item "Data processing information": firebase.google.com/support/privacy/ (<https://firebase.google.com/support/privacy/>). Google Firebase often uses "instance ID's" which, according to Google's information, are stored until the end customer makes an API call to delete the ID. After that, the data is deleted from the live and backup system 180 days after the call. More information is available at: firebase.google.com/support/privacy/manage-iids (<https://firebase.google.com/support/privacy/manage-iids>). These instance IDs are determined, for example, to know to which device messages should be transmitted.

ACTOME does not receive any personal data from Google Firebase and does not make any effort to personalize this data afterward. ACTOME does not guarantee the above information from Google and only refers to the information provided. Google is entitled to change or delete this information at any time, to delete or change the URL (link to Google web pages), or to provide the information on another page. As a data processor outside the European Economic Area (EEA), Google is subject to certain framework conditions that must be met to provide equivalent protection as within the EEA. This

protection is secured by the standard contractual clauses between Google and ACTOME (<https://policies.google.com/privacy/frameworks>).

Third-party provider information: Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001, or Google Analytics of Google Inc (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA).

User terms:

firebase.google.com/terms/ (<https://firebase.google.com/terms/%C2%A0>)

Privacy policy overview:

firebase.google.com/support/privacy/ (<https://firebase.google.com/support/privacy/>)

as well as the privacy policy:

policies.google.com/privacy/ (<https://policies.google.com/privacy/%C2%A0>)

V. Heroku

Heroku, a service provided by salesforce.com Inc. is used as another web hosting service. For the provision of cloud infrastructure services, ACTOME uses the services of Salesforce.com, Inc, Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, CA 94105, United States ("Salesforce"). Salesforce takes strict technical measures to protect personal data when necessary. Salesforce will not disclose your personal data to third parties unless the disclosure is necessary to perform the agreed services or Salesforce is required to do so to comply with the law or a valid and binding order of a governmental or regulatory authority. Data transferred for this purpose will be kept to the minimum necessary. Salesforce uses servers located in the EEA whenever possible. However, it cannot be ruled out that data may also be transferred to the USA. We have therefore concluded an order processing agreement with Salesforce together with standard data protection clauses.

Furthermore, Salesforce will take the necessary steps to ensure that an appropriate level of data protection is maintained. The legal basis for the processing of your data is Art. 6 para. 1 lit. f) GDPR. The purpose of the data processing is that Salesforce offers us the possibility to store data on Salesforce servers.

ACTOME stores the data, insofar as access has previously been granted by the user, for no longer than the statutory retention periods.

For more information on Salesforce's privacy policy, please visit:

<https://www.salesforce.com/company/privacy/>

For more information on the privacy policy of Heroku itself, please see <https://www.heroku.com/policy/salesforce-heroku-mrsa> and <https://devcenter.heroku.com/articles/security-privacy-compliance>.

VI. Observable

Furthermore, services from Observable, Inc, 215 2nd Street, San Francisco, CA 94105 United States, are used. Observable allows people to explore, collaborate, and communicate data through a single interface. It provides real-time, web-based collaboration that helps organizations make faster and better data-driven business decisions.

Observable collects data only with the consent of data subjects and in accordance with its terms of service (see <https://observablehq.com/@observablehq/terms-of-service>). Observable collects only the minimum amount of personal information necessary to fulfill the purpose of the interaction with Observable. Observable does not sell Personal Information to third parties and uses it only as agreed or as required by applicable law.

User-generated content is stored by Observable in internal databases hosted in the United States by third party vendors managed by Observable. Sensitive data (secrets, database credentials, and API keys) are encrypted in the internal database. For the data transfer e.g. to the USA, Observable has concluded so-called standard data protection clauses according to Art. 46 (2) lit. c) GDPR. For further details, please refer to Observable's privacy policy at <https://observablehq.com/@observablehq/privacy-policy>.

If you have any questions about this information on data security, please contact **info@actome.de** or the contact persons listed in the imprint.