

#### **IBA WEBSITE PRIVACY POLICY**

Last updated on 18 October 2021

Ion Beam Applications, SA, on behalf of itself and its affiliates as well as its subsidiaries (altogether "IBA," "us," "we," or "our") is committed to protecting personal data ensuring transparency on the way personal data is processed while safeguarding the confidentiality of the User ("You," "Your," or "User") of the IBA Campus Website .

This Website Privacy Policy governs IBA's use of data collected by us, including any and all personal data referred to in this Policy. Personal data is any information relating to an identified or identifiable natural person. We use Your personal data in line with all applicable laws. For these reasons, this Policy explains which personal data of You we process, how we process it, why we process it, and how long we intend to store your personal data.

This policy describes the types of information we may collect from you or that you may provide when you visit the IBA Campus Website and our practices for collecting, using, maintaining, protecting, and disclosing that information. This Policy is not applicable to any information collected offline or via channels other than the IBA Campus Website.

The main topics of this Policy include the following:

- About IBA, its activities, and contact information
- About the data collected by IBA
- Security, data transfer, data sharing and data retention
- Children and sensitive data
- Your Rights
- Cookies
- Third-Party Privacy Policies
- Updating this Policy

# 1. About IBA, its activities, and contact information

#### About IBA

Ion Beam Applications SA (IBA) is registered at 3 Chemin du Cyclotron, 1348 Louvain-la-Neuve, Belgium and registered with the Crossroads Bank of Enterprises (RPM Brabant Wallon) under number 0428.750.985. IBA also has numerous offices around the world.

As a data controller, IBA is responsible for ensuring that the processing of personal data complies with applicable data protection laws, and specifically with the General Data Protection Regulation.

#### IBA's activities

IBA (Ion Beam Applications S.A.) is a high-technology medical company that concentrates its activities on proton therapy, dosimetry, solutions for radio-pharmacies, and particle accelerators for industrial applications. IBA is the world leader in particle accelerator technology. The company is the leading



supplier of equipment and services in the field of proton therapy, considered to be the most advanced form of radiation therapy available today. IBA is also a leading player in the fields of industrial sterilization, radiopharmaceuticals and dosimetry.

Since its creation, IBA has always put the purpose of the company and its project at the heart of its activities, as expressed in our mission to "Protect, Enhance and Save Lives". As a company, we are focused on striking the right balance between our stakeholders: increasing our market share and the return for our shareholders, improving the quality of life of our customers, patients and employees, and contributing to the well-being of our society, while also maintaining and restoring our planet's health.

This particular website is Campus, an interactive platform available to the proton therapy community in order to share content, discuss and exchange thoughts related to proton therapy.

#### Contact information

IBA regularly reviews its compliance with this Website Privacy Policy. Questions, comments, and requests regarding this Policy are welcome and should be addressed in the first instance to IBA's Data Protection Officer via <a href="mailto:data-protection@iba-group.com">data-protection@iba-group.com</a> or by mail to 3 Chemin du Cyclotron, 1348 Louvain-la-Neuve, Belgium.

If IBA does not satisfactorily answer Your questions, requests or concerns, You may also contact the following for advice, support or complaints:

- IBA's Data Protection Officer ("DPO") can be reached directly at <a href="mailto:data-protection@iba-group.com">data-protection@iba-group.com</a>;
- The Belgian Supervisory Authority (Autorité de protection de des données / Gegevensberschermingsautoriteit) via email at <u>contact@apd-gba.be</u>, via phone at +32 2 274 48 00 or via mail to Rue de la Presse 35, 1000 Brussels, Belgium;
- The Supervisory Authority of Your home country. For more information for EU residents click here.

# 2. About the data collected by IBA

A variety of (Personal) Data is needed for providing services, such as operating the IBA Website and the various functions thereof, like sharing content. As registration is a prerequisite to use Campus, many categories of personal data is collected and processed. This section explains the applicable data protection considerations, such as the categories of collected data or the purposes and legal bases of their processing. Regardless of the specificities of the services, IBA does not rely on any fully automated processing for decision-making.

## Purposes and Legal Bases of Data Processing

Users' personal data are collected, processed and shared fairly and lawfully for specified purposes. Specifically, we intend to provide and maintain a collaborative platform for experts, practitioners and other stakeholders in the domain of proton therapy.



To facilitate this collaboration, You are asked to consent IBA processing Your personal data, when Your user profile is created. Once You consent, IBA collects and processes Your personal data, solely for the abovementioned purpose.

Creating a user profile is a prerequisite to access Campus. However, there are different types of user accounts. Furthermore, some further aspects of the use of Campus require special attention. To that end, the following elements are described in detail:

- Registering as an IBA User i.e. affiliated to IBA or to an institution operating an IBA Proteus System
- Registering as a third party
- Using the Contact Form
- Processing Your image

### Registering as an IBA User

This section applies to (Personal) Data that IBA collects and processes when You register to Campus as an IBA User.

#### Information we collect

As soon as You access the Campus Website, some general information will be collected automatically. This data is stored in the so-called server log files and includes:

- Access status;
- Computer's operating system;
- Date and time of access;
- Domain name of Internet Service Provider;
- Web browser type.

After opening the page, you will be asked to create a user profile, to access the actual content of IBA Campus. You will be asked to provide the following information:

- Username
- First name
- Last name
- Professional email
- Profession / Title
- Company / Medical Centre name
- Country

The provision of this information is mandatory to be able to create the profile.

You are also asked to provide further information about you in your bio, add your personal and/or LinkedIn pages, define your personal interests, and upload your profile picture, should you wish to. Sharing such information is by no means mandatory and can be changed at any time.



### Registering as a third party

This section applies to (Personal) Data that IBA collects and processes when You register to Campus as a third party.

#### Information we collect

As soon as You access the Campus Website, some general information will be collected automatically. This data is stored in the so-called server log files and includes:

- Access status;
- Computer's operating system;
- Date and time of access;
- Domain name of Internet Service Provider;
- IP address of the requesting computer;
- Transferred data volume;
- Web browser type.

After opening the page, you will be asked to create a user profile, to access the actual content of IBA Campus. You will be asked to provide the following information:

- Username
- First name
- Last name
- Personal email
- Professional email
- Profession / Title
- Company / Medical Centre name
- Country

The provision of this information is mandatory to be able to create the profile.

You are also asked to provide further information about you in your bio, add your personal and/or LinkedIn pages, define your personal interests, and upload your profile picture, should you wish to. Sharing such information is by no means mandatory and can be changed at any time.

#### **Contact Form**

This section applies to both IBA Users and third-party visitors who registered on the Campus Website.

Should you wish to contact us through the Campus Website, you are provided with an interface with an option to add a subject and the message itself. As these may contain personal data, by sending it, you consent to its processing by us.

#### Processing Your image

This section applies to both IBA employees and third-party visitors who registered on the Campus Website.



As part of the non-compulsory information to be added to your profile, you can upload an image of Yourself. The primary goal of it is to complete your profile and facilitate collaboration with other Campus users. Furthermore, we also use your image in the following cases:

- When you are indicated as an author of a contribution on the Website;
- As part of a banner on the Website, to highlight Your active participation in the Campus community.

You are entitled to withdraw your consent should you wish your image not to appear on the Website. Please read Section 5 of this Policy which further describes your rights.

## 3. Security, data transfer, data sharing and data retention

### Security

IBA has a dedicated security team. Appropriate technical and organisational measures secure users' personal data against unauthorised or unlawful handling and accidental loss, destruction, or damage.

More concretely, data transfer from and to the Website is encrypted. IBA uses HTTPS as a transfer protocol for our internet presence, always combined with the latest encryption protocols.

#### Transfer of data

At IBA, we make sure that Your personal data is made available only to persons who need the data.

Your personal data will be transferred to third countries (i.e., non-member states of the European Union or the European Economic Area) only where and to the extent necessary for contract performance or required by law, or if You have given us Your consent to do so. When we transfer personal data from the European Economic Area (EEA) we will ensure that such transfers comply with relevant data protection laws, including, if applicable, EU Standard Contractual Clauses, or a European Commission positive adequacy decision.

In other words, Your rights and protections would remain at the same level, even if Your personal data is processed outside the EEA.

### Sharing and data retention

The retention period for each of the cookies IBA uses (whether our own or on our behalf by third parties) is stated in the cookies panel that opens when arriving on the Campus Website.

In case You are using the services of Campus, Your personal data will be retained on IBA's local servers for as long as necessary for the purpose it was collected or as required by law or contractual obligations. Please note that we may be obliged to store data for longer times due to numerous statutory retention periods. In the absence of longer legal retention periods, the data will be routinely deleted upon having fulfilled its intended purpose.

In addition, IBA may retain Your personal data if You have given us Your consent to do so, or if we want to use certain data as evidence in legal disputes within the statutory periods of limitation.

IBA maintains a Data Retention Policy that details the retention period for each specific category of personal data. When we no longer need personal data, we securely delete or destroy it. Aggregated



data, which cannot identify You (and is used for reporting and analysis purposes) is maintained for as long as commercially necessary.

## 4. Children and sensitive data

#### Children

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any personal data to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or through any of its features, register on the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us as set forth in Section 1.

#### Sensitive data

Sensitive data will be processed if it is manifestly made public by You. Otherwise, we do not aim to process sensitive data.

## 5. Your Rights

Each visitor of IBA's Campus Website is entitled to certain rights concerning the processing of his or her personal data under the applicable data protection laws. That being said, You can contact IBA and exercise Your rights. This means in particular:

- You can request information about the existence of the processing of Your personal data and details of the processing, such as:
  - o the purposes of the processing;
  - the categories of personal data;
  - the recipients or categories of recipient to whom the personal data have been or will be disclosed;
  - the envisaged period of storing Your data;
  - the existence of further rights You have;
  - about appropriate safeguards, should Your personal data be transferred to a third country;
  - the existence of automated decision-making, including profiling, its functioning and its foreseen consequences.
- You can ask IBA to rectify inaccurate personal data or complete it, should it be incomplete;
- You can ask the erasure of Your personal data in certain cases (for example, the personal data
  is no longer necessary to be processed, You withdrew Your consent or personal data has been
  unlawfully processed);
- In certain circumstances, You may wish to object to the processing of Your personal data, to
  restrict the processing of Your personal data and/or to request the portability of Your
  personal data (i.e., transfer and/or extract);



- Whenever IBA has collected and processed Your personal data based on Your consent, You
  may wish to withdraw Your consent at any time. Withdrawing consent will only apply to the
  future and will not affect any prior processing of personal data. Also, it will not affect the
  processing of Your personal data based on grounds other than Your consent;
- If You believe IBA has not sufficiently addressed a complaint or concern raised with regard to Your personal data, You have the **right to lodge a complaint with a Supervisory Authority** about IBA's collection and use of Staff Members' personal data. For more information, please get in touch with the data protection authority in Your country (contact details for EU Supervisory Authorities are available <a href="here">here</a>).

All requests to exercise any of the rights described above will be treated, and honoured whenever possible, in accordance with applicable data protection laws.

Such requests can be submitted to the following email address: <a href="mailto:data-protection@iba-group.com">data-protection@iba-group.com</a>.

Alternatively, You may use the other channels, listed in Section 1.

The Data Protection Officer is responsible for ensuring that Your request is addressed and responded to. IBA undertakes to respond to You without undue delay and in any event within one month of receipt of Your request. Taking into account the potential complexity and number of requests this deadline may be extended by an additional one month.

## 6. Cookies

Like any other website, IBA's Campus Website also uses 'cookies'. These cookies are used to store information including visitors' preferences, and the pages on the Website that the visitor accessed or visited. The information is used to optimize the users' experience by customizing our web page content based on visitors' browser type and/or other information.

For more information on cookies, please read the IBA Website Cookie Policy.

To learn which cookies are used by an IBA Website, please see the cookies panel when arriving on the Campus Website or under the 'Manage cookies' option at the bottom of the page.

# 7. Updating this Policy

This Website Policy may be updated from time to time. IBA will place a prominent notice that will be visible to You. Furthermore, IBA will always show the date of the latest modification of the Website Policy so You can tell when it was last revised.

This Website Privacy Policy was last updated on 18 October 2021.