



## Cantel General GDPR Privacy Policy

The protection of personal data is a top priority for Cantel Medical Corp. and its business segments (together, “Cantel”). This Cantel General Data Protection Regulation Privacy Policy (the “**Cantel General GDPR Privacy Policy**”) describes how the personal data of EU residents is collected, handled, shared, and stored to meet Cantel’s data protection standards and comply with (i) the EU General Data Protection Regulation (Regulation EU 2016/679) (the “**GDPR**”) and (ii) all other existing or new applicable laws relating to personal data protection (together “**Personal Data Protection Laws**”).

This Cantel General Privacy Policy applies to the processing of personal data pertaining to customers, suppliers, business contacts, employees, and other individuals who purchase Cantel products or services, utilize Cantel websites, are employed by Cantel, or otherwise interact with Cantel, and for which Cantel is the controller.

Personal data means any data relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier (e.g., name, address, online identifier, and etc.).

**1. Collection of Personal Data:** Cantel collects the personal data that you directly provide to us, including as part of the purchase of products and services, marketing activities, or other interactions. Depending on the type of interaction, Cantel may collect different types of personal data from you or may collect such data indirectly. Collected personal data may include, but is not limited to:

- a) Data that is necessary for us to provide products and services to you – if you purchase products or services from Cantel, we will collect certain data from you, including your name, address, email address, information about the product or service that you are purchasing, account balance, data about performed transactions, and etc.
- b) Data that is provided as part of the use of Cantel websites – for more information on the personal data that may be processed by Cantel websites, please consult Cantel’s website-specific **website privacy policies**. Such data may include IP address, browser type, pages visited, links clicked, and etc.
- c) Data that is necessary to establish employment within Cantel – personal data will be collected from Cantel’s employees for HR purposes, which includes, but is not limited to, data received for the purposes of career development, staffing, statistical analysis, consideration for appointment or promotion, performance review, internal investigations, law enforcement inquiries, benefits processing, or acquisitions and divestitures.

Such data may include name, address, email address, phone number, payroll data, and etc. Such data may also include special categories of data, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (for the purpose of uniquely identifying a natural person), health data, or data concerning a natural person's sex life or sexual orientation.

- d) Other Data – you may choose to provide other personal data directly to us, e.g., with respect to promotions, marketing initiatives, requests for support, provision of products or services to us, or for other legitimate business purposes. Cantel will process personal data in accordance with the purpose of



such communication. The type of personal data collected will be limited to that which is necessary to fulfill the purpose of such communication.

**2. Purposes of the Use of Personal Data:** Cantel will use your personal data for legitimate business purposes, including, but not limited to, the following:

- a) Establishing and managing a relationship with you;
- b) Provide you with purchased Cantel products and services, develop new Cantel products and services, and analyze and monitor your use, trends, and activities in connection with Cantel products and services as well as Cantel websites;
- c) Process your payment or prevent or detect fraud or other criminal activities;
- d) Provide personalized products and services and improve your experience with Cantel products and services as well as Cantel websites and other Cantel initiatives that require the processing of personal data;
- e) Help ensure the proper use of Cantel products and services to safeguard users;
- f) Provide you with the use of Cantel websites;
- g) Send you technical notices, updates, security alerts, invoices, and other administrative messages;
- h) Provide customer service;
- i) Communicate with you about products, services, offers, promotions, and events, and provide other news and information which may be of interest to you;
- j) Recruitment activities;
- k) Assessing your job application;
- l) Concluding, executing, and terminating employment agreements with you;
- m) Inform you and communicate with you in the context of your employment or job application;
- n) HR, personnel, and payroll management;
- o) Protecting your health and vital interests;
- p) Concluding, executing, and terminating agreements for the procurement of products or services with you;
- q) Operating and managing its business processes and IT infrastructure;
- r) Ensuring the security of its facilities, systems, and websites;



- s) In the context of a (potential) corporate transaction, such as a merger, sale, or change of control;
- t) Enforcing its legal rights;
- u) Protecting the rights of third parties;
- v) Comply with any applicable laws and regulations, court orders, or the requests of an authority; and
- w) As stated otherwise in this Cantel General GDPR Privacy Policy, pertinent Cantel privacy-related policies, codes, or procedures, in relevant notices or documentation provided to you prior to or, ultimately, at the time of the collection of personal data, or as otherwise permitted by applicable laws and regulations.

Depending on the relationship Cantel has with you, your personal data may be processed for different purposes. Cantel will not use your personal data for purposes that are incompatible with the purposes for which you have been informed, unless it is required or authorized by law to do so.

**3. Legal Grounds of the Use of Personal Data:** Cantel processes your personal data for one or more of the following reasons: (a) because you have consented to the use of your personal data, (b) because the use of your personal data is necessary to ensure compliance with Cantel's legal obligations, (c) because the use of your personal data is necessary to perform or enter into a contract with you, (d) because the use of your personal data is necessary for the purposes of Cantel's legitimate interests or those of a third party, or (e) where necessary to protect the vital interests of any person.

Cantel has a legitimate interest in collecting and processing personal data, for example: (a) to ensure that its networks and information are secure, (b) to ensure proper communication with you, (c) to administer, improve, and generally conduct business, (d) to prevent fraud, and (e) to avoid non-compliance and enforce its rights.

Where Cantel processes your personal data on the basis of your consent, you have the right to withdraw your consent at any time. Such withdrawal will not affect the lawfulness of the processing based on consent before its withdrawal.

**4. Sharing of Personal Data:** Cantel will not share, sell, or give away your personal data to third parties, unless one of the following circumstances applies:

- a) We may share personal data (and will attempt to provide you with prior notice, to the extent legally permissible) in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, legal process, or governmental requests;
- b) We may share personal data between and among Cantel's business segments and affiliated companies, in accordance with Personal Data Protection Laws and other applicable laws and regulations;
- c) We may share personal data subject to Cantel's policies, codes, and procedures, in accordance with Personal Data Protection Laws and other applicable laws and regulations; and
- d) We may share personal data with your consent, at your direction, to serve Cantel's legitimate interests, or as otherwise allowed under Personal Data Protection Laws and other applicable laws and regulations.



Based on the above, Cantel may transfer your personal data to the following categories of recipients:

- a) Third-party service providers;
- b) Professional advisors (for example, lawyers and accountants);
- c) Third parties in connection with a (potential) corporate or commercial transaction;
- d) Affiliated companies;
- e) Governmental or administrative authorities;
- f) Financial institutions; and
- g) Insurance companies.

Cantel may also share aggregated or anonymized information, which cannot reasonably be used to identify you.

**5. Transfer to Other Countries:** Personal data may be transferred to and processed by recipients within as well as outside of the European Economic Area. Additionally, Cantel may subcontract processing to, or share your personal data with, third parties located in countries other than your home country.

Specifically, Cantel may transfer collected personal data to the U.S. to serve its legitimate interests or as otherwise provided for in this Privacy Policy. In the case of such transfer, note that Cantel participates in, and has self-certified its adherence to the principles of, the EU – U.S. Privacy Shield Framework. For more information on the Cantel Privacy Shield Policy, click [here](#).

**6. Security:** Cantel takes reasonable technical and organizational measures to help protect personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

Cantel's websites may, from time to time, contain links to and from the websites of its partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that Cantel does not accept any responsibility or liability for these policies or websites. Please check these policies before you submit any personal data to these websites.

**7. Children:** Cantel does not knowingly collect personal data from children under the age of 16 (the "Age Limit"). If you are under the Age Limit, please do not communicate with Cantel or provide us with any personal data.

**8. Data Retention:** Cantel will retain personal data only for as long as is necessary for the purposes included in this Privacy Policy. The criteria used to determine the retention periods include: if you have an agreement with Cantel, your personal data shall be retained for as long as needed to provide the products and/or services to you; Cantel retains your personal data as long as it has an ongoing relationship with you; and Cantel retains your personal data as needed to comply with its global legal and contractual obligations.

**9. Your Data Subject Rights:** As a data subject (the "Data Subject"), you have the right to request access to and rectification or erasure of your personal data or the restriction of or objection to the processing of your personal



data as well as the right to data portability. Further, you have a right to lodge a complaint with an appropriate data protection authority.

**10. Contact Us:** Should you have any questions regarding the processing of your personal data, including the exercise of your rights, please contact Cantel by e-mail at [privacy@cantelmedical.com](mailto:privacy@cantelmedical.com).

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