Privacy Notice for Visitors and Users of the Provet.com Website (US Edition)

This privacy notice ("Privacy Notice") describes how Nordhealth Finland Oy ("Nordhealth") processes the personal data of the Service Users of the provet.com website when they visit the site or use the search and booking service.

Last updated: 16 June 2025

Introduction

Definitions used in this privacy notice:

<u>Customer</u>: Veterinaries and other healthcare professionals, as well as representatives and contacts of customer organisations such as clinics, who are customers of Nordhealth.

End User: The Customer's own clients, such as pet owners

End User Data: Personal data as defined in the contract between the Customer and Nordhealth, e.g. pet owner's data.

Service: provet.com search and booking service.

Service Users: Anyone who visits or uses the Service.

This Privacy Notice does **not** apply to Customers or End Users. We process End User Data on behalf of our Customers as a data processor. If you are an End User and have questions about how our Customers process your data, or if you wish to exercise your rights in relation to such data, you should contact the Customer with whom you booked your appointment.

For visitors located in the United States, Nordhealth processes website and booking-related personal data in accordance with applicable U.S. federal and state privacy laws, to the extent they apply. This Privacy Notice supplements, and does not limit, any non-waivable rights under those laws.

This Privacy Notice applies to visitors and individual users of the Service. It does not apply to veterinary professionals or clinics acting as Nordhealth's business customers, whose privacy notice is available [here]. For U.S. users, this Notice governs personal data collected through the website and booking interface only.

The Privacy Notice for Customers (i.e. healthcare professionals and customer organizations) can be found here:

https://www.provet.com/clinics/documents/privacy-notice-b2b-us.pdf.

1. Data Controller¹

Nordhealth Finland Oy (Business ID: 1733917-4) Bulevardi 21 00180 Helsinki, Finland Tel. +358 19 425 1610 (hereinafter "we")

Nordhealth Finland Oy is the data controller for the processing described in this Privacy Notice on a global basis. No U.S. subsidiary currently acts as a separate controller or service provider for these activities.

2. Contact Details

Email: dpo@nordhealth.com

3. Purpose and Legal Basis for Processing, and Categories of Data Processed²

Purpose	Personal Data	Legal Basis
Creating and maintaining a user account. From your user account, you can view your previous bookings at different locations and make new appointments with clinics or professionals who use the provet.com service. The clinics own the data related to the bookings and act as the data controller for this information.	We do not request Social Security numbers or similar national identifiers for account creation by U.S. users. Contact details (telephone number, email address)	Contract

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¹ **U.S. role.** For purposes of applicable U.S. state privacy laws, Nordhealth acts as a "business" (CA) and "controller" (CO/CT/VA/OR/TX) with respect to personal information collected through this website and booking interface. This Notice does not apply to End User Data we process on behalf of our Customers as a processor/service provider.

² **U.S. categories.** For California and other U.S. state laws, the data elements described in this Section fall within the following categories of personal information: identifiers (e.g., name, contact details), internet or other electronic network activity information (e.g., browsing and usage data), and limited geolocation data (general location derived from IP address). We do not collect sensitive personal information (as defined by applicable law) via this Service, nor do we collect Social Security numbers or similar national identifiers.

Development of our Service and website	Data collected through cookies and forms, such as IP address, language preference, browser and device type, country of browsing, operating system, search terms, search history, pages visited, frequency of visits, and information about on-site activities	Legitimate interest in improving and providing better Services and website experience
Prevention and correction of technical problems and errors in our Service and website	Data collected through cookies and forms, such as IP address, language preference, browser and device type, browsing country, operating system, and information about on-site activities	Legitimate interest in ensuring the proper functioning of our Service and website
Ensuring the security of our Service and preventing misuse	Log data Data collected through cookies, such as IP address, browser and device type, browsing country, and operating system.	Legitimate interest in maintaining the integrity of our Service

Note for U.S. users. We do not collect or request Social Security numbers or similar national identifiers from U.S. visitors or users. We also do not collect sensitive personal information (as defined by applicable U.S. state privacy laws) for the purposes described in this Notice.

4. Sources of Data

We collect personal data directly from you in connection with your use of the Service.

We may also collect or verify professional contact details from publicly available sources and reputable data providers for business outreach, in compliance with applicable law.

5. Disclosures and International Transfers

We use service providers (sub-processors) for hosting, analytics, communications, support, and security. Core systems are hosted in the EU/EEA, and certain providers may process limited personal data in the United States or other jurisdictions. Where personal data is transferred outside the EU/EEA, Nordhealth implements appropriate safeguards (including the EU Standard Contractual Clauses) and, where relevant,

additional transfer protections to ensure an adequate level of protection. A list of key sub-processors is available on request. Where required, we conduct transfer risk assessments and implement supplementary measures to protect personal data transferred to the United States and other third countries.

6. Data Security and Retention

Only employees who, by virtue of their duties, are authorized to process data are permitted to access systems containing personal data. The data is technically protected, and access requires appropriate user rights. Firewalls and other technical safeguards also prevent unauthorized use. Only designated individuals are authorized to process and maintain the data, and employees are bound by confidentiality obligations. The information system is securely backed up and can be restored if necessary. Security audits are carried out regularly.

We retain data as required by applicable legislation. The necessity of retaining personal data is reviewed on a regular basis in accordance with applicable laws.

In addition, we take reasonable steps to ensure that no incompatible, outdated, or inaccurate personal data is stored in the register, considering the purpose of the processing. We correct or delete such data without delay.

While we apply administrative, technical, and organizational safeguards, no method of transmission or storage is 100% secure. We periodically review and update our controls.

We retain website-interaction data for as long as needed to provide and improve the Service and for a reasonable period thereafter for security, legal, and recordkeeping purposes, unless a longer retention period is required or permitted by law. We may retain minimal records (for example, your email address and opt-out status) to comply with legal obligations and to maintain suppression lists, ensuring that we do not send you marketing communications after you opt out.

7. Your Rights as a Data Subject

- Right of access to your personal data and to obtain a copy.
- Right to rectification or, in some cases, erasure.
- Right to modify or delete your own profile data.
- Where processing is based on consent, right to withdraw or amend consent (without affecting prior lawful processing).
- Right to data portability and restriction of processing in certain situations.
- Right to object to processing based on legitimate interest, by specifying your particular situation.
- Absolute right to object to processing for direct marketing.
- U.S. state privacy rights (where applicable). Depending on your U.S. state of residence and to the extent such laws apply to Nordhealth's processing, you may have rights to access, correct, delete, or obtain a copy of certain personal information, and to opt out of certain processing. You can submit a request using the contact details in Section 2³.

³ How to exercise U.S. rights; verification; appeal. You may submit a request to exercise applicable U.S. privacy rights by emailing dpo@nordhealth.com with "U.S. Privacy Request" in the subject line and your name, email

- Browser signals. We will honor browser-based opt-out signals to the extent required by applicable law.
- "Sale"/"Sharing". Nordhealth does not sell personal information and does not engage in cross-context behavioral advertising for this Service.
- Sensitive personal information. We do not use or disclose sensitive personal information (such as health data, financial information, or precise geolocation) for purposes beyond those reasonably necessary to provide the Service.
- No automated decision-making or profiling with legal or similarly significant effects.
- Right to lodge a complaint with the Finnish Data Protection Ombudsman (<u>www.tietosuoja.fi</u>). U.S. residents may also contact us first via Section 2 if they have questions or concerns about our handling of personal information. We will review and respond in accordance with applicable law.

Children. This Service is not directed to children under 13, and we do not knowingly collect personal information from children under 13. If we learn that we have collected such information, we will delete it.

8. Updates to This Privacy Notice

We regularly review the compliance of this privacy notice and update it as necessary. The privacy notice may be updated, for example, if our processing activities change or if applicable data protection laws or guidelines are amended. The updated version of the Privacy Notice will be published on our website. If we make material changes to this Privacy Notice, we will provide notice before or as soon as the changes take effect (for example, by email or a website banner). This ensures transparency consistent with applicable U.S. and international privacy laws.

9. Contact

All contacts and requests relating to this privacy notice should be sent to the address in Section 1 or the email in Section 2.

California residents. If you are a California resident and wish to contact the California Department of Consumer Affairs about this notice or our data practices, you may reach them at 1625 North Market Blvd., Suite N-112, Sacramento, CA 95834, or +1 (800) 952-5210.

10. Cookies

Further information on cookies and their use in the Service is available in our Cookie Policy: https://provet.com/clinics/documents/cookie-policy-us.pdf

address, and the right(s) you wish to exercise. We will take reasonable steps to verify your identity and may request limited additional information. Where permitted, you may authorize an agent to submit a request on your behalf if we can verify your identity and receive the agent's written authorization. We will not discriminate against you for exercising any rights provided by law. If we deny your request in whole or in part, you may appeal by replying to our decision email with "Appeal" in the subject line. We will review and respond within the timeframe required by law.