

How we handle personal data

This notice explains what personal data Eastwest Medico ApS collects, why we collect it, how long we keep it and what rights you have. It covers three groups: our customers and their staff, contact persons named in public tenders, and visitors to our website.

Version 1.0 · 28 July 2026 · Applies to ewmedico.com and to all commercial correspondence with Eastwest Medico ApS.

1. Who is responsible for your data

The data controller is:

Eastwest Medico ApS

Kronprinsessegade 6, 1306 Copenhagen K, Denmark

CVR 33860862

Enquiries about personal data: GDPR@ewmedico.com

We are not required to appoint a data protection officer, and we have not appointed one. Write to the address above and your enquiry will reach the person responsible.

2. Customers and business contacts

We sell to organisations, not to consumers, so the data we hold about you is ordinarily your professional contact information rather than anything private. We do not process special categories of personal data, and we do not profile you or take automated decisions about you.

What we process	Why	Legal basis
Name, job title, employer, work email, work telephone, delivery address	Quoting, order handling, delivery, support and the everyday administration of our agreement	Article 6(1)(b), performance of a contract, or 6(1)(f), our legitimate interest in serving the organisation you work for
Correspondence, complaints, quality notifications and their outcome	Documenting product quality and corrective action under our ISO 13485 quality management system	Article 6(1)(c), legal obligation under the Medical Devices Regulation, and 6(1)(f)
Invoices, order confirmations and payment records containing your name	Bookkeeping and accounts	Article 6(1)(c), legal obligation under the Danish Bookkeeping Act

We collect this data from you directly, or from a colleague at your organisation who names you as the contact for an order or a delivery.

3. Contact persons in public tenders

When we take part in a public procurement, we obtain the contact details of the contracting authority's named staff from the tender portal or the tender documents themselves. We use them to ask clarification questions, submit our bid and handle the award and any resulting framework agreement.

The legal basis is Article 6(1)(f), our legitimate interest in participating in the procurement, and, once a contract is signed, Article 6(1)(b). We do not use tender contact data for marketing, and we do not add it to any mailing list.

Because this data comes from a third party rather than from you, Article 14 applies: this notice is how we inform you of it, and you may ask us at any time what we hold about you.

4. Website visitors

Our website sets no cookies of its own and runs no advertising or tracking scripts. We measure traffic with Umami Cloud, a privacy-focused analytics service hosted in the European Union that works without cookies: it stores no identifier on your device and does not follow you between websites.

Umami records the page visited, the referring page, and coarse technical information such as browser, operating system, screen size and country. Your IP address is used only in transit to derive that country and is not stored. The result is aggregate statistics that cannot be traced back to you, so under Danish rules no consent banner is required.

Our hosting provider serves the site through a content delivery network, which sets one cookie of its own, named `__cf_bm`. It is used to tell automated traffic from people, lasts about thirty minutes, and carries no identifier that follows you to other websites. It is strictly necessary for the security of the site, so it does not require consent. We set no other cookies, and none for analytics or advertising.

Our web server keeps ordinary technical logs, which include IP addresses, for security and operational purposes. The legal basis is Article 6(1)(f), our legitimate interest in keeping the site available and secure. Logs are kept no longer than needed for that purpose.

We do not run a newsletter at present. If we introduce one, subscription will be by your explicit consent under Article 6(1)(a), and every email will carry a one-click unsubscribe.

5. Who else sees your data

We do not sell personal data and we do not share it for anyone else's marketing. We use a small number of established suppliers as data processors, each under a written data processing agreement that permits them to act only on our instructions:

- Microsoft 365, for email, documents and calendars
- Dropbox, for document storage and file exchange
- DigitalOcean, for website hosting
- Umami Cloud, for website statistics

We also disclose data where we must: to our auditor and to public authorities where the law requires it, to freight forwarders and customs authorities so that a shipment can be delivered and cleared, and to our advisers if a dispute arises.

6. Transfers outside the EU and EEA

Our systems are configured to store data in the European Union wherever the supplier offers it. Some of these suppliers are nonetheless part of United States groups, and support or administration may involve access from outside the EEA. Where that happens, the transfer is covered by the European Commission's standard contractual clauses, by the supplier's own EU data boundary commitments, or by the EU-US Data Privacy Framework where the supplier is certified under it.

Shipping and customs documents are necessarily shared with authorities and forwarders in the destination country, which may be outside the EEA. That transfer is necessary to perform the delivery contract under Article 49(1)(b).

Write to GDPR@ewmedico.com for a copy of the safeguards that apply to a particular transfer.

7. How long we keep it

We keep personal data only as long as it serves the purpose it was collected for, or as long as the law requires, whichever is longer.

Data	Retention period
Accounting records: invoices, order confirmations, payment records	Five years from the end of the financial year the record relates to, as required by section 12 of the Danish Bookkeeping Act
Quality and complaint records for medical devices	Ten years after the last device of the batch was placed on the market, as required for Class I devices under the Medical Devices Regulation
Tender and framework agreement documentation	For the term of the agreement and five years after it ends, so that the award and its performance remain documented
Customer contact details in our systems	For as long as the commercial relationship is active, and reviewed within three years of the last contact
General enquiries that lead nowhere	Deleted no later than two years after the last message
Website statistics	Aggregate figures only, retained for trend analysis; no personal data is stored

8. Your rights

Under the General Data Protection Regulation you have the right to ask us for access to the data we hold about you, to have inaccurate data corrected, to have data erased, to have processing restricted, to object to processing we base on legitimate interest, and to receive data you have given us in a portable form. Where we process on the basis of your consent, you may withdraw it at any time, which does not affect processing carried out before you withdrew it.

Write to GDPR@ewmedico.com. We reply within one month. If your request is complex we may extend that by a further two months and will tell you why. There is no charge unless a request is manifestly excessive. We may ask you to confirm your identity before we disclose data.

9. Complaints

If you are unhappy with how we handle your data, please tell us first so we can put it right. You are also entitled to complain to the Danish Data Protection Agency:

Datatilsynet

Carl Jacobsens Vej 35, 2500 Valby, Denmark

Telephone +45 33 19 32 00 · datatilsynet.dk

10. Changes to this notice

We review this notice at least once a year and whenever we change a system or a supplier that handles personal data. The current version is always published at ewmedico.com/documents. Material changes are dated here rather than made quietly.

Version 1.0, 28 July 2026. Approved by the management of Eastwest Medico ApS. Supersedes no earlier version.