

MEDIFACTIA AB — CTT REPORTING SYSTEM

Privacy Statement

PLEASE READ THIS PRIVACY STATEMENT CAREFULLY.

Medifactia AB (hereinafter “Medifactia”, “we”, “us”, or “our”) cares about your privacy and wants you to be familiar with how we collect, use, and disclose information. This Privacy Statement describes our practices in connection with information that we or our service providers collect through the CTT Reporting System and associated website (hereinafter the “Tool” or “Service”) operated and controlled by us from which you are accessing this Privacy Statement. By providing personal information to us or by using the Tool, you acknowledge that you have read and understood this Privacy Statement.

This Privacy Statement was last revised on June 11, 2026. We may change this Privacy Statement at any time and for any reason. Any change will become effective when we post the revised statement on the Service. Your continued use of the Tool following such changes constitutes acceptance of the revised Privacy Statement. We encourage you to review this Privacy Statement periodically.

IMPORTANT NOTICE REGARDING THE NATURE OF THE TOOL

The CTT Reporting System is a calculation and reporting aid intended exclusively for use by qualified healthcare professionals. It calculates and reports total and segmental colonic transit time from a clinician-entered radiopaque marker count using a published formula. It does not acquire, process, or analyse medical images or physiological signals, and does not provide a diagnosis, prognosis, or treatment recommendation.

Importantly, the Tool is designed to minimise the collection of personal or patient data. Users are not required to enter patient names, national identification numbers, dates of birth, or other directly identifying patient information in order to use the Tool. The marker count entered by the clinician is a single integer derived from the clinician’s own review of the radiograph; no image data is transmitted to or processed by the Tool.

Medifactia does not receive or store patient-level data through normal use of the Tool. Any personal information collected through the Tool relates to the registered user (the healthcare professional) rather than to the patient whose transit time is being calculated.

INFORMATION COLLECTION

The information we receive, and how we use it, depends on what you do when visiting our website or using the Tool. We collect and use non-personal information differently to personal information.

If you submit any personal information relating to another individual, you represent that you have authority to do so and to permit us to use the information in accordance with this Privacy Statement.

Personal Information

Personal information is information that can specifically identify you, such as:

- name and surname;

- home address, telephone number, email address, or other contact information;
- professional credentials and qualifications;
- date of birth or age;
- social media username or profile; and
- Internet Protocol (IP) address.

We collect personal information about users in two ways:

- when you directly provide information to us by entering personal information on the website (e.g., when filling out a registration form, participating in a survey, or completing a contact form); and
- using automated means, specifically through cookie ID.

We may use information you share with us (other than sensitive information, discussed separately below) for the following purposes:

- to respond to your requests;
- to provide the services or information you request;
- to allow you to register for certain services or enhance their functionality;
- to resolve and track the status of any consumer, product, or service issues;
- to manage our relationship with you and facilitate any necessary follow-up;
- to enter into or perform a contract with you;
- to enable you to participate in online communities, including social media and blogs; and
- to contact you with information that might be of interest to you (see the Marketing and Education section below).

Medifactia may also use your personal information to the extent necessary to achieve the following legitimate interests, so long as compatible with your rights and privacy expectations:

- for analytical purposes in order to research, develop, and improve programs, products, services, and content;
- to anonymise your information by removing personal identifiers so that it may be used for other purposes (anonymised information no longer identifies you and may be treated as non-personal information);
- to enforce this Privacy Statement and other rules about your use of the Tool; and
- to protect our rights or property.

Medifactia also has legal grounds to use your personal information as necessary to protect someone's health, safety, or welfare, and in order to comply with a law or regulation, court order, or other legal process. Where required by law, we will ask you to opt in or affirmatively consent to the processing of your personal data for a particular purpose.

PATIENT DATA AND THE CTT REPORTING SYSTEM

The CTT Reporting System is designed so that patient-identifying information is not required for the Tool to function. The only clinical input required is a single integer (the retained radiopaque marker count), which is entered manually by the clinician. No patient name, date of birth, national identification number, or other directly identifying patient information is required or collected by Medifactia through the Tool.

In the event that a user voluntarily includes patient-identifying information in any free-text field or communication with Medifactia, such information will be treated as sensitive information in

accordance with applicable data protection law and the Sensitive Information section of this Privacy Statement, and will be handled with the highest degree of confidentiality.

Users are responsible for ensuring that their use of the Tool complies with applicable patient privacy and data protection obligations in their jurisdiction, including but not limited to GDPR (EU), HIPAA (US), and any applicable national health data regulations. Medifactia accepts no liability for any breach of patient confidentiality arising from information voluntarily entered by users into the Tool.

SENSITIVE INFORMATION

Unless we specifically request or invite it, we ask that you not send us, and you not disclose, sensitive personal information on or through the Tool or otherwise to us. Sensitive information is personal information revealing or relating to health (such as Social Security numbers, genetic or biometric data, racial or ethnic origin, religious or philosophical beliefs, sex life or sexual orientation, political opinions, or trade union membership).

Medifactia will only collect and process sensitive information:

- in ways for which you have given your explicit consent;
- to protect the vital interests of you or another person where explicit consent cannot be given or reasonably requested;
- in accordance with applicable laws which include suitable and specific measures to safeguard your fundamental rights and interests;
- where the processing is necessary for medical purposes and we are under a duty of confidentiality equivalent to that of a health professional; or
- to establish, exercise, or defend a legal claim.

For example:

- we may collect sensitive information directly from you when you voluntarily provide it for a particular purpose (e.g., when you contact us with a question or suggestion about our products and services);
- we may collect sensitive information as required by the U.S. Food and Drug Administration, European, or other governmental authorities in order to ensure safe and effective use of our products and services; and
- we may collect sensitive information about participants who have explicitly consented to participate in clinical trials, studies, and other research initiatives.

NON-PERSONAL INFORMATION

We use cookies to monitor and improve our website and provide you with the best possible experience. A “cookie” is a small text file placed and stored on your computer, smartphone, or other device by websites or apps that you visit. Cookies allow small amounts of non-personal information about your device to be passed to our web server.

If you do not want to receive cookies from our website, please update the cookie settings in your browser options. You can also delete individual cookies or all cookies stored by your browser. If you refuse cookies, please be aware that certain website functionality may be affected.

Cookies allow us to collect non-personal information such as:

- the type of web browser software you use;
- the name of the domain from which you access the Internet;

- the Internet address of the website from which you linked to our website;
- the date and time you access our website;
- which pages you have visited on our website;
- the search terms you use; and
- the links on which you click.

We will use non-personal information to make our website more useful to visitors and may also use it for other business purposes, for example to create internal reports, adapt or improve information or services, and provide traffic statistics and response rate data.

LEGAL BASIS FOR PROCESSING PERSONAL DATA (EU/EEA USERS)

For users located in the European Union or European Economic Area, Medifactia processes personal data on the following legal bases under the General Data Protection Regulation (GDPR):

- Contract performance: where processing is necessary to provide the Tool or services you have requested;
- Legitimate interests: where processing is necessary for our legitimate business interests, such as improving the Tool, ensuring security, and preventing fraud, provided these interests are not overridden by your rights;
- Legal obligation: where processing is required to comply with applicable law or regulation; and
- Consent: where we have obtained your explicit consent, for example for direct marketing communications. You may withdraw consent at any time without affecting the lawfulness of processing carried out prior to withdrawal.

DIRECT MARKETING AND EDUCATIONAL MATERIALS

From time to time we may wish to provide you with educational materials or other information about our products and services, as well as information about clinical studies or the products and services of others that might be of interest to you, based on information you have shared with us and information collected through cookies regarding your use of our website and social media.

If you no longer wish to receive marketing communications from us, you may opt out by contacting us as explained in the Contacting Us section below. Please provide your name, identify the form(s) of marketing communications you no longer wish to receive, and include the address(es) to which they are sent. You may also opt out of marketing emails by following the unsubscribe instructions provided in any such message.

If you previously opted in to receiving marketing communications from our affiliates or third-party partners, you may opt out of our sharing of your personal information with those parties for their direct marketing purposes by contacting us as explained in the Contacting Us section below.

Please note that if you opt out of receiving marketing messages, we may still send you relevant information for other lawful purposes, such as to administer your account, respond to your requests, or provide information we are required by law to provide.

SURVEYS

We may invite you to participate in surveys to determine satisfaction levels, identify areas for improvement, or carry out market research. We may send you a specific invitation on the basis of

our legitimate interests or on the basis of your prior opt-in consent, in accordance with applicable laws. You may opt out of future communications in the manner described in the Direct Marketing section above.

Personal data collected for survey purposes may include your email address, phone number, survey results, and any free-text message you have written. We process this information for carefully considered and specific business purposes in our legitimate interests, which we believe also benefit you. Specifically, we process survey data to:

- reply to survey feedback where an issue requires action;
- gain further insight into the experience you have described; and/or
- inform you of any action we might take internally to resolve your issue or enhance your experience.

SHARING PERSONAL DATA

We do not share personal data with third parties except as described in this Privacy Statement. We do not provide information to third parties for their own marketing purposes and we do not undertake mailings on behalf of third parties. Personal data is only shared with third parties when we are legally permitted to do so.

We may provide personal data to third-party organisations that assist in the daily running of our business, such as vendors or suppliers who ship products you order, service providers who administer newsletter or informational mailings, or warehousing partners who process orders. In all cases we will not share more information than is necessary, and we will not authorise any third party to keep, disclose, or use your information except to provide the requested services in line with the purposes set out above.

Where required by applicable law, we will obtain your consent to our use of your personal information at the point of collection. In the unlikely event that all or part of our business is acquired by a third party, your information may be transferred to the new corporate owner insofar as relevant and subject to appropriate safeguards. We may also use and disclose your personal data to third parties if necessary to:

- enforce this Privacy Statement and other rules about your use of the Tool;
- protect our rights or property;
- protect someone's health, safety, or welfare;
- comply with a law or regulation, court order, or other legal process; and/or
- investigate or take action in cases of suspected fraud or illegal activities.

RETENTION PERIOD

We will retain your personal information for as long as needed or permitted in light of the purpose(s) for which it was obtained, and in accordance with applicable legal and regulatory retention requirements. Where personal information is no longer required for these purposes, we will securely delete or anonymise it.

CROSS-BORDER TRANSFER

In certain cases Medifactia may transmit personal information collected through the Tool to our affiliates or third-party service providers in other countries, but only in furtherance of the purposes set out in this Privacy Statement. Where personal information is transmitted from Europe to other countries, we will ensure that safeguards equivalent to those provided by European data protection

law are in place, such as Standard Contractual Clauses approved by the European Commission or other appropriate transfer mechanisms.

USE BY MINORS

The Tool is intended exclusively for use by qualified healthcare professionals and is not directed at individuals under the age of 18. We will not intentionally collect personal information from individuals under the age of 16 without the consent of someone holding parental responsibility. If you believe that a child has disclosed personal information, please contact us as explained in the Contacting Us section below.

SECURITY

We seek to use reasonable organisational, technical, and administrative measures designed to protect personal information under our control. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please notify us immediately in accordance with the Contacting Us section below.

YOUR RIGHTS

At any time, you may exercise your right to access, rectify, and, as the case may be, erase any personal information relating to you, or restrict the processing of your personal information, in compliance with applicable laws. You also have the right to object, based on your particular situation, to any use or processing of your personal information which we have based on our legitimate interests.

Where we process your personal information in an automated manner as part of a service to you or based on your consent, you also have the right to request a copy of your information in a structured, commonly used, and machine-readable format (the right to data portability).

Such requests can be sent to info@medifactia.com or in writing to:

Medifactia AB
Kungsgatan 60
111 22 Stockholm
Sweden

Please note that we may ask you to provide proof of identity before complying with your request. If we have based our collection or use of your personal information on your consent, you also have the right to withdraw your consent at any time in the same way it was given, or by sending a request in the manner described above.

You may also at any time, free of charge and without providing any justification, opt out of any direct marketing campaigns and request to no longer receive any promotional material.

If you are not satisfied with our handling of your request, you may contact the applicable Data Protection Authority. For Europe, please refer to: https://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

CONTACTING US

Medifactia AB, Kungsgatan 60, 111 22 Stockholm, Sweden, is the company responsible for the collection, use, and disclosure of personal information under this Privacy Statement. If you have questions or comments about this Privacy Statement or our data practices, please contact us at:

Email: info@medifactia.com

Post: Medifactia AB, Kungsgatan 60, 111 22 Stockholm, Sweden

Phone: +46 (0)8 460 072 06 (weekdays 08:00–17:00, excluding Swedish public holidays)
