

Additional Disclosures for the EEA

Last Revised: July 1, 2018

These disclosures (the “**Disclosures**”) supplement the [Hologic Privacy Notice](#). All terms not defined in these Disclosures have the same meaning as in the Hologic Privacy Notice.

The Disclosures apply only to our processing of personal data within the scope of the General Data Protection Regulation (“**GDPR**”) as follows:

- Processing of personal data by a Hologic company located in one or more of the European Union Member States plus Iceland, Lichtenstein and Norway (together known as the “**European Economic Area**” or “**EEA**”)and
- Processing of personal data by a Hologic company located outside of the EEA, but that is offering goods or services into the EEA or monitoring the behavior of individuals in the EEA, in which case the following Disclosures apply only to the processing of personal data of individuals located in the EEA.

Hologic is comprised of Hologic, Inc. and its group of subsidiary companies which are different legal entities. These Disclosures are issued on behalf of this group of entities so when we mention “Hologic”, “we”, “us” or “our” in this Privacy Notice, we are referring to the relevant company in the group responsible for processing your data. The controller for your data will be identified when you purchase a product or service or interact with us.

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Data Retention

We retain personal data pursuant to our records retention program, for as long as is necessary for the purposes set out in the Hologic Privacy Notice, unless a longer period is required under applicable law or is needed to resolve disputes or protect our legal rights, in accordance with the principles set forth in Article 5(1) of the GDPR.

The criteria used to determine the period for which personal data about you will be stored varies depending on the legal basis under which we process such personal data:

Legitimate Interests	For a reasonable period of time based on the particular interest, taking into account the fundamental interests and the rights and freedoms of the data subjects.
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Contractual Necessity	For the duration of the contract plus some additional limited period of time that is necessary to comply with law or that represents the limitation period for legal claims that could arise from the contractual relationship.
Legal Obligation	For the duration of time we are legally obligated to keep the information.
Consent	For the period of time necessary to fulfill the underlying agreement with you, subject to your right, under certain circumstances, to have certain personal data about you erased (see Data Subject Rights below).

We may face any threat of legal claim and in that case, we may need to apply a “legal hold” that retains information beyond our typical retention period. In that case, we will retain the information until the hold is removed, which typically means the claim or threat of claim has been resolved.

Transfers of information across borders

Any information that you provide to us is stored and processed in, and transferred between, any of the countries in which Hologic and its agents, contractors and affiliated organizations have offices, in order to enable Hologic to use that information as set out in this Privacy Notice. [This includes countries such as the United States, Austria, Australia, Belgium, Brazil, Canada, China, Costa Rica, France, Germany, Hong Kong, Italy, Japan, Morocco, Netherlands, Portugal, Republic of Korea, Singapore, Spain, Sweden, Switzerland, the United Arab Emirates, the United Kingdom, and New Zealand.]

Not all of these countries have data protection laws equivalent to those in force in the EEA. In order to ensure the protection of your personal data outside of the EEA we have put in place or ensured at least one of the following safeguards:

- European Commission approved Standard Contractual Clauses between each of the Hologic entities processing personal data under within the scope of the GDPR.
- Transfer of personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use data processors based in the US, we use, when appropriate and applicable, processors that are certified under the Privacy Shield framework, which requires them to provide similar protection to personal data shared between the EEA and the US.

Data Security

We seek to use reasonable organizational, technical and administrative measures to protect personal data within Hologic. Unfortunately, no data transmission or storage system can be guaranteed to be secure at all times. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contact Us” section below.

Data Subject Rights

Individuals whose personal data we process subject to the GDPR have certain rights as required by law, including the right of access, erasure and data portability, as well as the right to rectification, to restrict processing, to withdraw consent, and to object to processing as follows.

Access: Individuals have the right to know if we are processing personal data about them and, if so, to access and obtain a copy of personal data about them, as well as information relating to the processing of that data.

Rectification: Individuals have the right to have us correct or update any personal data about them that is inaccurate or incomplete without undue delay.

Restriction: Individuals have the right to restrict or limit the ways in which we process personal data about them where the accuracy of the personal data is contested by them, where data has been obtained by us unlawfully, where the individual has objected to our processing of the data (see right of objection below) and we are considering whether to cease processing, or where we no longer need to process the personal data.

Objection: Individuals have the right to object to our processing of their personal data where we are relying on legitimate interests as our legal basis and their rights override our legitimate interests in processing their personal data. Individuals also have the right to object to our processing of their personal data for direct marketing purposes.

Withdrawal of Consent: Where we rely on consent as the basis for processing personal data, individuals have the right to withdraw their consent.

Erasure: Individuals have the right to request deletion or erasure of their personal data in a number of circumstances where required by law. These include where we no longer require the personal data for the purposes for which it was collected, the individual has withdrawn consent, or where we are relying on legitimate interests as a legal basis and the individual's rights override our legitimate interests.

Portability: Individuals have the right to obtain a copy of the personal data we hold about you in a structured machine-readable format and to have it transmitted to another controller. This right only occurs where we are relying on your consent or performance of a contract as our legal basis and the processing is carried out automatically.

Make a Complaint: Individuals also have the right to make a complaint about our personal data handling practices to their local Supervisory Authority.

Contact Us

To assert one of your legal rights described in these Disclosures, or if you have questions about these Disclosures or our data handling practices, please email to data.privacy@hologic.com