

## Data Privacy

OSI Systems is dedicated to protecting the confidentiality and privacy of information entrusted to it. As part of this fundamental obligation, OSI is committed to the appropriate protection and use of personal information.

This Privacy Policy (the "Policy") sets out how OSI Systems, Inc. and our subsidiaries (including Spacelabs Healthcare, Inc., Rapiscan Systems, Inc., S2 Global, Inc., OSI Optoelectronics, Inc., OSI Electronics, Inc., and American Science and Engineering, Inc.) collect and process information about you when you visit any website operated by that entity ("Website") or when you otherwise provide your personal information to that entity, as described in this Policy.

The data controller for all personal information collected through a Website is the OSI group entity that operates that Website, as indicated in the terms of use related to that Website. For products and services contracted offline, the data controller is the OSI group entity that contracts with you, as identified in the terms and conditions applicable to the purchase or use of the relevant product or service.

References in this Policy to "we", "us" or "our" are references to the OSI group entity that is operating the relevant Website that you visit or to which you otherwise provide personal information as described in this Policy.

### 1. Information collected

**General:** You may give us information, including information that can identify you ("personal information"), when you make enquiries about a Website, our products or services or about career opportunities with us or when you otherwise communicate with us (whether via a Website or otherwise). For example, we may ask you to provide specific information set out in an online inquiry form. You may choose to provide additional information to us when you communicate with us or otherwise interact with us, including in any free text box contained in an online inquiry form.

**Joining our talent network:** In order to stay up-to-date with the latest jobs and career-related information, you will need to register with the talent network operated by OSI Systems, Inc via a Website. In order to do so, we collect information necessary for us to contact you by various means and to assess whether you are likely to be interested in a particular role. When you refer someone who you think you would like to join our team, we ask for your name, email address and phone number. We also ask for your friend's name, phone number and email address.

#### **Personal Information that we collect when you do business with us:**

We may process your personal information when you conduct business with us (whether through the Website or otherwise) as, or on behalf of, a customer or prospective customer, or as, or on behalf of, a vendor, supplier, consultant, professional adviser or other third party. In this context, we process

- business contact information that is necessary to understand your role within your organization and to communicate with you;
- financial information that is necessary to take payment or fulfil contractual obligations or for related purposes;

- personal opinions/insights included in any feedback necessary to evaluate our performance and that of our suppliers or other business partners; and
- personal information necessary to conduct business effectively with you or the organization that you represent.

**Access to online resources:** For access to certain resources on a Website (e.g. eLearning modules and Product Manuals) we may ask you to register as a customer/customer representative in order to create an online account. If so, as well as the business contact information referred to above, we will ask you to create a username and password.

**Providing feedback:** Customers may also have the option of providing online feedback via a Website (e.g. in relation to OSI group company products, services or distributors) and we may request certain personal information via any online feedback form, such as name and contact details of the relevant customer representative. Customer representatives may choose to provide additional information in the context of such feedback, e.g. via free text boxes.

**Supplier change requests:** Suppliers may make a change request via a Website. In such circumstances, we may request via the relevant online form personal information that is necessary to process such change request.

**Personal Information that you provide about another person:** If you provide us with information about another person, for example, if you refer someone to us via the Website who you think would be interested in joining our team, you confirm that you have informed them of our identity and the purposes (as set out in this Policy) for which their personal information will be processed and that you have obtained their consent to such processing.

**Information we obtain from other sources:** We also may periodically obtain both personal and non-personal information about you from our group companies, business partners and other third party sources and add it to the information we already hold about you, such as:

- updated business address information;
- purchase history;
- demographic information;
- credit information from credit reference agencies about customers or business partners;
- information obtained from employment and recruitment agencies to whom you provide your information in connection with a career opportunity with us.

**Information we collect automatically:** We may also collect certain information by automated means, such as IP address, browser type and operating system, referring URLs, information about your visit including the URL clickstream to, through and from our Websites, download errors, number of Website visits, average time spent on the Website, length of visits to certain pages and page interaction. We collect this information automatically through the use of various technologies including through "cookies".

A cookie is a data file containing small amounts of information that a website can send to your browser (and many websites do), which may then be stored on your computer as a tag that distinguishes your computer but does not name you.

**Personal Information for which we act as a data processor:** We may process personal information on behalf of our customers in the context of supporting our products. We do so in accordance with the instructions of our customers. While our customers are in control of what personal information is processed by our products it will typically include personal information about individuals who are being monitored by such products. For further information about how such information is handled by our customers, please refer to the privacy policies of those customers.

## **2. Use of personal information**

We process your personal information for the following purposes:

- To deal with your inquiries and requests;
- To create and administer records about any online account that you register with us;
- To provide you with information, and access to resources that you have requested from us;
- To provide our products and services;
- To otherwise maintain our relationship with you, including requesting/processing your feedback;
- Research and development and to improve our products and services (subject to your prior consent, which will be obtained separately from this Policy);
- Website and system administration and security;
- To improve the navigation and content of the Website (please see our Cookies Policy for information about opting out of the cookies that are used for this purpose);
- To assess financial, credit or insurance risks arising from any relationship or prospective relationship with a customer, supplier, distributor or other business partner;
- To alert you to updates to the Websites, and any to any news and events in which we think you may be interested (should you opt in to receiving such updates);
- (In the case of your job application information): For recruitment purposes – if you have given your prior consent by means other than this Policy, any resume submitted by you (whether on your own behalf of or on behalf of a third party) whether in connection in with a job or otherwise, may be kept for a period of 6 months to assess suitability for jobs which become available from time to time.

## **3. Information we share**

We will only disclose personal information to other companies within our group of companies for the purposes outlined in this Policy. We may also share your information with third parties when:

(1) it is necessary to involve third party service providers such as software product/support providers on a "need-to-know" basis in order to support the provision of our products and services and business operations; (2) explicitly requested by you (e.g. with social media networks or to other employers); (3) required by a court order or any legal or regulatory requirement; (4) in connection with the sale or transfer of a business; (5) to enforce our Terms of Use; (6) to ensure the safety and security of our users, customers and third parties; (7) to protect our rights and property and the rights and property of our customers, website users and

third parties (e.g. to debt collection and tracing agencies); (8) in response to lawful requests by public authorities, including for the purposes of meeting national security or law enforcement requirements; and (9) to credit reference agencies (name only) to establish creditworthiness, to the extent permitted by applicable law.

#### **4. Your choices in relation to direct marketing**

We may use the information that you give to us to contact you by mail, telephone, fax email or electronic messaging service to alert you to updates to the Websites, and any news and events in which we think you may be interested (should you opt in to receiving such updates). We will also offer you the opportunity to unsubscribe in every communication sent.

#### **5. Links to Other Websites and social media**

Websites may contain links to other websites which are outside our control and are not covered by this Policy. While we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the content, security or privacy practices employed by other websites. If you access other websites using the links provided, the operators of these websites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

On some Website pages, third parties that provide content, applications or plug-ins through our Websites may track your use of content, applications and plug-ins or customize content, applications and plug-ins for you. For example, when you share a webpage using a social media sharing button on our Websites (e.g., Facebook, Twitter, or Google Plus), the social network that has created the button will record that you have done this. For more information on social media plug-ins on our Websites, see our Cookies Policy.

#### **6. Data Retention**

We will not retain your information for longer than is necessary for our business purposes or for legal requirements. However, please be advised that we may retain some information after you have closed any online account with us, for instance if doing so is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

#### **7. Security**

We maintain reasonable and appropriate safeguards to protect the personal information you provide to us through a Website against unauthorized disclosure, use, alteration, or destruction. Please note, however, that perfect security does not exist on the Internet. Therefore, while we endeavor to protect your personal information, when data is transferred over the Internet it may potentially be accessed and used by unauthorized parties.

Where you have a password, which enables you to access a Website, you are responsible for keeping this password secure and confidential.

## **8. Your rights**

If you are from certain territories (such as the EEA), you may have the right to access the personal information that we hold about you, or to correct, amend or delete such information. If you wish to make such a request, please contact us at the address below. Before responding to your request, we may ask you to verify your identity and to provide further details about your request. We will endeavor to respond within an appropriate timeframe and, in any event, within any timescales required by law or, where applicable, within the timescales required by the EU-U.S. Privacy Shield Framework.

You may also update your personal information by contacting us, using the contact details provided below.

## **9. International transfers**

We belong to an international group of companies. Consequently, we may transfer your personal information outside your country of residence to countries or jurisdictions where we have facilities or engage third parties to provide services to us for the purposes outlined in this Policy. The countries to which we may transfer your personal information are in the following regions: USA, Europe, or Asia. Such countries may not have the same level of data protection as within your country. If we do make such a transfer, we will, take steps in accordance with applicable laws to protect your personal information and will obtain your prior consent separately from this Policy, if required to do so by applicable law.

## **10. EU-U.S. Privacy Shield**

OSI Systems Inc. and its controlled U.S. subsidiaries (including Spacelabs Healthcare, Inc., Rapiscan Systems, Inc., S2 Global, Inc., OSI Optoelectronics, Inc., OSI Electronics, Inc., and American Science and Engineering, Inc.) (together "OSI US") comply with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Economic Area ("EEA") to the United States. In doing so, OSI US has certified that, in respect of all personal information it receives from the EEA, it will adhere to the Privacy Shield Principles of: Notice, Choice, and Accountability for Onward Transfers, Security, Data Integrity and Purpose Limitation, Access and Recourse, Enforcement and Liability. If there is any conflict between the terms in this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To access the Privacy Shield List, and to find details of OSI US's certification, please visit [www.privacyshield.gov](http://www.privacyshield.gov).

OSI US's participation in the Privacy Shield applies to all personal information that is subject to this Policy and is received from the EEA. OSI US will comply with the Privacy Shield Principles in respect of such personal information.

Where OSI US transfers personal information from the EEA to its third-party agents and service providers, it will require such third parties to process the information only for the purposes described in this Policy and to provide the same level of protection for the information as required by the Privacy Shield Principles. OSI US remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal information on its behalf do so in a manner inconsistent with the Principles, unless OSI US proves that it is not responsible for the event giving rise to the damage.

If you believe that OSI US is processing your personal information within the scope of its Privacy Shield certification, you may direct any inquiries or complaints concerning its Privacy Shield compliance in the following ways:

(1) In the first instance, please send your inquiry or complaint to [privacy@osi-systems.com](mailto:privacy@osi-systems.com) or by writing to:

OSI Systems, Inc.  
Attention: Data Privacy Officer  
Corporate Compliance Department  
12525 Chadron Avenue  
Hawthorne, California 90250  
United States of America

OSI US will respond within 30 days.

(2) If you are not satisfied with OSI US's response, or for complaints that cannot be resolved with OSI US directly, OSI US has chosen to cooperate with EU data protection authorities (DPAs) and comply with the information and advice provided to it by an informal panel of DPAs in relation to such unresolved complaints (as further described in the [Privacy Shield Principles](#)). EU DPAs are available here: [http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm)

(3) Further, the European DPAs may refer your complaint to the US Department of Commerce or the Federal Trade Commission for further investigation.

OSI US's commitments under the Privacy Shield are subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

## **11. Updates to this Policy**

From time to time we may update this Policy. If material changes are made to this Policy, we will notify you by e-mail or by placing a prominent notice on our Websites for a period of 30 days. By continuing to use the Websites, you confirm your acceptance to the relevant changes.

## **12. Who to contact**

For any questions or comments in relation to this Policy, or our privacy practices, or to request access to your personal information, please contact us via email at [privacy@osi-systems.com](mailto:privacy@osi-systems.com) or write to:

OSI Systems, Inc.  
Attention: Data Privacy Officer  
Corporate Compliance Department  
12525 Chadron Avenue  
Hawthorne, California 90250  
United States of America