

Fisher & Paykel Healthcare

Global Privacy Statement

(updated 31st March 2021)

As part of a global organisation which manufactures, markets and distributes a range of quality healthcare products throughout the world, Fisher & Paykel Healthcare Corporation Limited and each of our subsidiaries (“**F&P Healthcare**”) recognise the importance of the personal information you trust us with.

We are committed to doing the right thing by respecting and protecting the privacy rights of our end-users, customers, employees, shareholders, research participants and prospective employees who seek to join our company, by design and by default. We ensure that the approach we take to privacy reflects and upholds our values. Care drives our commitment to privacy.

At F&P Healthcare, we endeavour to provide transparency and choice in relation to the collection and processing of personal information. Our products and services may require personal information in order to provide you with the service or product you requested. If you choose not to provide all the information requested, you may not be able to use the product or service as it was intended.

This Global Privacy Statement outlines how and why we collect, use, share and protect personal information at F&P Healthcare. It applies to all interactions you may have with F&P Healthcare and our products and services, whether you are an end-user, customer, shareholder, research participant or prospective employee. This statement reflects our group business activities involving personal information, therefore some processing activities, third party recipients and retention periods (to the extent that it is generally retained for a shorter period) may vary or not be applicable to you. This depends on which region you interact with us in and local legal requirements. If you have any concerns or would like to confirm how we handle your personal information in your region, please [contact us](#).

We update this statement regularly so please check our online Global Privacy Statement for the most recent version.

We may provide courtesy translations for some languages to better serve our customers. If any discrepancies exist, the English version will prevail.

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I. General information

Personal information we collect

As a medical device manufacturer, we collect information, including personal information, about you in order to provide you, as an End-user, Participant, Customer, Employee or Shareholder, with the quality products, services and support you request from us.

For the purposes of this statement, "Personal information" is any information which directly or indirectly relates to an identified or identifiable individual. It includes names, unique identifiers, location information, financial information, IP addresses, or one or more factors specific to the physical, physiological, genetic, mental, economic, social or cultural identity of an individual.

We recognise other special categories of personal information may put your privacy at greater risk if combined with your personal information, such as information which reveals or infers physical or mental health, racial or ethnic origin, political opinions, religious or political beliefs, genetic information, biometric information, sex life or sexual orientation, criminal information, trade union membership.

Categories of individuals

The personal information we manage generally relates to one of the following groups:

1. **End-users** – includes end-users of F&P Healthcare medical devices and products that receive treatment from Customers in a hospital or clinical context or personal use of F&P Healthcare products in a homecare setting.
2. **Participants** – includes voluntary participants in clinical trials, usability studies or research projects that F&P Healthcare contributes to or sponsors. Participants may include End-users, Customers and Employees, as well as individuals who have no other relationship with us.
3. **Employees** – includes current and past F&P Healthcare employees and contractors who are or have been employed by F&P Healthcare.
4. **Applicants** – includes prospective employees and any persons who inquire about employment opportunities with F&P Healthcare.
5. **Customers** – individuals or entities that purchase, use or distribute F&P Healthcare medical devices and products. Customers can generally be classified as:
 - a. **Healthcare Professionals** – includes all individuals who purchase and use F&P Healthcare medical devices and products. Our Customers include healthcare professionals, homecare providers, sleep laboratories and entities (e.g. hospitals, general practices (GPs), intermediaries).
 - b. **Distributors**: includes all individuals who purchase and distribute F&P Healthcare medical devices and products.
6. **Shareholders** – includes all entities and identifiable individuals who have a shareholding in Fisher & Paykel Healthcare Corporation Limited.

Categories of information we collect

F&P Healthcare needs to collect and process a range of information. Common categories of information, and examples of specific information that may be involved, include:

Name and contact information. Name, title, email address, postcode, address, phone number etc.

Demographic information. Age, date of birth, gender, ethnicity, nationality, country, preferred language etc.

Financial information. Payment information, such as credit card information, bank account details, salary/income information, insurance, sales and transaction history, sales interactions with our F&P Healthcare representatives etc.

Medical and health information. National Health Identifiers (NHIs), medical and health records, medical therapy progress, medical/health monitoring, history and conditions, lifestyle information, insurance identifiers etc.

Information collected by F&P Healthcare Medical Devices. Medical device identifiers, therapy settings, usage and efficacy information relating to therapy etc.

Product investigations information. Complaints, investigations, images, health information, device information, contact information and communications etc.

Research and clinical information. Information gathered from participation in research and clinical trials, images, video, contact information, related medical and health information, dietary, lifestyle or other personal information relevant to the research or clinical trial etc.

Online/technology information. IP address, device identifier, device information, session IDs, cookie information, browser history, preferences and interests, log-in information (username and password), website forms, other communications etc.

Marketing information. Information about F&P Healthcare conferences and events you may be interested in, contact information, email addresses, email marketing subscriptions, preferences, product/therapy interests, cookies and web beacons etc.

Feedback and survey information. Feedback and survey information including, personal details you choose to provide such as contact, health, and complaint information etc.

Employee information. Recruitment information, current employees and past F&P Healthcare employees, including name, contract, role, performance, job history, education and qualification information, financial information, workplace information, training, background, criminal and financial checks, shares, trade union affiliations, timesheets etc.

Applicant information: including name, email address, CV, cover letter information, job history, phone number, qualifications and certifications, references, criminal and financial checks etc.

How we collect and use your personal information

We will collect and use your personal information to provide you with high-quality services and products, in a way that reflects our core values. We recognise that the way we handle your personal information is crucial to earning and maintaining your trust. We are committed to upholding the following privacy principles embodied in our Global Privacy Policy:

<p>Purpose</p> <p>i. Personal information supports a specific, legitimate purpose</p>	<p>Respect & Care</p> <p>i. Personal information is used for a <i>lawful basis</i>*</p> <p>ii. Personal information respects individual dignity, autonomy and right to privacy</p>	<p>Data Minimisation</p> <p>i. Only use personal information you need</p> <p>ii. De-identify high risk personal information before processing or sharing</p> <p>iii. Keep personal information only as permitted by law</p>
<p>Transparency</p> <p>i. Be open about <i>what</i> personal information we collect, process and share</p> <p>ii. Be open about <i>how</i> we collect, process and share personal information</p>	<p>Choice & Control</p> <p>i. Provide choice about what personal information is collected and how it is used where possible</p> <p>ii. Respect individuals' rights to control and access their personal information where appropriate</p>	<p>Confidentiality Integrity & Availability</p> <p>i. Use technical and organisational safeguards to protect personal information</p>

We will use your personal information when it is lawful, necessary and fair.

* We will collect and use personal information if:

- it is necessary for the performance a contract for products or services you requested.
- you have given us consent.
- compliance with our legal obligations.
- it is for a necessary and legitimate business interest, which we believe you may benefit.
- it is in the public interest.
- it is required to protect the vital interests and health of our End-users, Participants, Customers, Employees or Shareholders.

We endeavour to provide as much transparency and choice as possible over the collection and use of your personal information.

Many of our products and services require some personal information to provide you with the service or product you requested. If you choose not to provide information necessary to provide you with a service, you may not be able to use the product or service as it was intended.

We aim to provide you with transparent explanations as to how we collect and protect your information and why the collection is necessary. You can learn more about the F&P Healthcare Activities which May Involve Processing of Personal Information at F&P Healthcare.

Sharing your personal information and international transfers

We may share your information with other F&P Healthcare group companies and with our trusted third parties to provide the products and services you requested. F&P Healthcare will apply suitable safeguards to protect the security of your personal information.

We may also share information when required by law or regulation or to respond to legal processes; to protect our Customers, End-users and Employees; to fulfil a legitimate interest; to maintain security of our products; and to protect the rights and property of F&P Healthcare and its Employees.

As a global organisation, with our headquarters based in Auckland, New Zealand, we take care that your personal information is transferred in accordance with our international legal and regulatory obligations and ensure that cross-border transfers occur in a safe, lawful and secure way. We use standard data protection clauses and other contractual arrangements to ensure appropriate safeguards are in place for the safe transfer of information.

We not sell any of your personal information to third parties.

Security of your personal information

To help protect your personal information, we use technical and organisational safeguards to secure information which we hold about you. We use de-identification, encryption, pseudonymisation and password protection, among other security measures, to ensure personal information is kept secure and conduct regular testing of the effectiveness of technical and organisational measures.

While we will endeavour to take reasonable, appropriate steps to keep secure information which we hold about you and prevent unauthorised access, we cannot provide absolute assurance regarding the security of your personal information. However, our security measures are continuously improved in line with technological developments and good practice to ensure personal information is adequately protected.

Storage and retention of your personal information

Your personal information is securely stored by F&P Healthcare on its servers and with our trusted third party cloud-based database management services providers. Personal information collected by F&P Healthcare may be stored and processed in your region and in any other country where F&P Healthcare or its affiliates and subsidiaries or services providers operate facilities.

We will retain your personal information for as long as necessary to fulfill the purposes for which it was collected and to comply with our legal obligations.

If you would like to know more about where and how long your personal information is stored, and for more information on your rights of deletion and portability, please contact our Privacy Team at privacy@fphcare.com.

Children's privacy

We are committed to protecting the privacy of children. We will collect personal information from minors only with express consent of their parent/guardian or as required by your Healthcare Professional or Distributor if you have provided them authority to share it with us for a specific purpose.

Parents and guardians can exercise privacy rights on their children's behalf, however we may need to verify that they authorised to act on their behalf and collect additional information.

If you would like to know more about children's privacy, contact us at privacy@fphcare.com.

Your privacy rights

F&P Healthcare recognises you have rights over your personal information. In particular, you have the right to request for more information about what information we collect and process about you, and request a copy of it, to correct your information, and you may have the right to ask us to erase your information in some circumstances. You may also have a right to tell us if you want us to stop using it in certain ways. To make a privacy request, contact us by emailing or writing to our Privacy Team. You may also contact your local Data Protection Officer (refer to section VI. Contact Us), for additional support or queries relating to your personal information and privacy rights.

You have a right to request:

1. Access (or 'know')

You have the right to request what information we hold about you, why, how we use and process it, who has access to it and who we may share it with, and how long we may keep your information. .

2. Data portability

You have the right to request a copy of the information we hold about you. This can be provided in a PDF or CSV format.

3. Correction

If you believe personal information that we hold about is incorrect, and you are unable to access and correct this yourself, you can ask us. We may be required to verify some of the information before we are allowed to update it. This may mean we request additional information from you. If we are unable to update your personal information as you have requested, we will record your request against the information you have disputed.

4. Erasure

In special circumstances, you may have the right to request your personal information to be deleted. You may be able to delete some information we hold about you yourself within your online profiles and accounts you register with us on our apps or websites. If the information you want to delete cannot be found, or you are unable to delete it yourself, you can request it be deleted by contacting us. We may not be able to delete everything, but we will let you know if there is any information we can't delete. For example, we may need to keep some product investigation information to meet our regulatory recording obligations.

5. Objection or restriction of information

We recognise that you should have a say in how your information is collected and used. In some circumstances, you may have the right to ask us to stop using your personal information in certain ways. To do this, contact the Privacy Team and we will try our best to stop using your personal information in ways that you aren't comfortable and respect your rights over your personal information, taking measures to limit the collection, access or use of your information to protect your privacy where possible.

We will respond to your privacy requests as soon as we can, and no later than 20 working days from the date of a request. Please understand some requests may require further verification, require additional time to process or may not be able to fully be completed as you requested due to our legal obligations, necessary, legitimate business interests or technical limitations. When this happens, we will let you know.

If you purchased a F&P Healthcare medical product or service from a Healthcare Professional or Distributor, you may need to submit your privacy request to your Healthcare Professional or Distributor to process your request. We will then work together to support your Healthcare Professional or Distributor as necessary.

If you are not satisfied about how we managed your privacy request, you may have a right to lodge a complaint with a supervisory authority.

How to contact us

F&P Healthcare is headquartered in Auckland, New Zealand, and has appointed a global Privacy Officer.

You may also contact your local Data Protection Officer or privacy representative for additional support or queries relating to your personal information and privacy rights.

Jurisdiction	Email	Contact
New Zealand & Other (not listed below)	privacy@fphcare.com	Fisher & Paykel Healthcare Limited 15 Maurice Paykel Place East Tamaki, Auckland New Zealand

United Kingdom & Ireland	dpo@fphcare.co.uk	Fisher & Paykel Healthcare Unit 16, Cordwallis Park Clivemont Road Maidenhead, Berkshire SL6 7BU United Kingdom
France, Italy, Spain, Belgium, Norway, Netherlands, Austria, Finland, Denmark, Sweden	dpo@fphcare.fr	Fisher & Paykel Healthcare 10 Avenue du Québec Bâtiment F5 BP 512 Villebon-Sur-Yvette, 91946 Courtaboeuf CEDEX
Germany, Poland, Switzerland, Czech Republic	datenschutz@fphcare.de	Fisher & Paykel Healthcare Wiesenstrasse 49 73614 Schorndorf Germany
United States & Canada	USCAprivacy@fphcare.com	Fisher & Paykel Healthcare 173 Technology Drive Ste 100 Irvine CA 92618 USA Toll-free phone (US): 877-541-0483
Hong Kong, India, Taiwan, Australia, China, Sri Lanka, Bangladesh	HITACprivacy@fphcare.com	Fisher & Paykel Healthcare 19-31 King Street, Nunawading, Victoria Australia 3131 PO Box 159, Mitcham, Victoria Australia 3132

I. Updates to this Privacy Statement

We may update this Privacy Statement from time to time. If we modify our Privacy Statement, we will post the revised version here, with an updated revision date. You should visit these pages periodically to see the current Privacy Statement that is in effect and any changes that may have been made to it.

Talk to our centralised Privacy Team - for any privacy related concerns or queries, please email us at privacy@fphcare.com.

Supervisory authorities

You have a right to lodge a complaint with the appropriate data protection or privacy supervisory authority if you have concerns about how F&P Healthcare processes your personal information.

The contact details for the privacy and data protection authority in New Zealand is:

Office of the Privacy Commissioner

PO Box 10 094,
The Terrace,
Wellington 6143

Phone: +64 (09) 3028680

Website: <https://www.privacy.org.nz/>

If you would like to make a complaint in any other jurisdiction, a list of the key supervisory countries in which we operate are outlined below:

Names and contact details of the supervisory authorities of some of our key F&P Healthcare entities

New Zealand

Office of the Privacy Commissioner
PO Box 10 094,
The Terrace,
Wellington 6143

Phone: +64 (09) 3028680

Website: <https://www.privacy.org.nz/>

Canada

Office of the Privacy Commissioner
of Canada
30, Victoria Street
Gatineau, Quebec
K1A 1H3

Toll-free: 1-800-282-1376

Phone: (819) 994-5444

Website: <https://www.priv.gc.ca/en>

France

Commission Nationale de l'Informatique et des Libertés
3 Place de Fontenoy
TSA 80715
75334 PARIS CEDEX 07
France

Phone: +33 (0)1.53.73.22.22

Website: <https://www.cnil.fr/en/home>

Germany (Baden-Württemberg)

LfDI Baden-Württemberg
PO Box 10 29 32
70025 Stuttgart

Phone: 0711/61 55 41 - 0

Fax: 0711/61 55 41 - 15

Website: <https://www.baden-wuerttemberg.datenschutz.de/>

Spain

Agencia Española de Protección de Datos
C/ Jorge Juan, 6
28001
Madrid
Spain

United Kingdom

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Phone: 0303 123 1113
Website: <https://ico.org.uk>

United States

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
Phone: (202) 326-2222
Website: <https://www.ftc.gov/>

II. F&P Healthcare activities which may involve the processing of personal information

This section outlines how and why we collect, use, share and protect personal information at F&P Healthcare. It reflects our group business activities involving personal information, therefore some processing activities, third party recipients and retention periods (to the extent that it is generally retained for a shorter period) may vary or not be applicable to you. This depends on which region you interact with us in and local legal requirements. If you have any concerns or would like to confirm how we handle your personal information in your region, please [contact us](#).

1. Sales & distribution of F&P Healthcare Products

1.1 What we collect

We may collect your identification and contact information if you are a Customer, such as your name, email address, phone number, customer code, delivery address and invoice address to facilitate the requested sale and distribution of our products and services. For Customers who represent or act on behalf of a business or organisation, the contact information we collect will generally be your business email, phone and address. We may also collect information about your role and notes relevant to past and present inquiries and sales from you. To facilitate the payment of products and services, we may collect Customers' financial information such as bank details, creditworthiness, credit limits, payment terms, tax jurisdiction etc.

F&P Healthcare largely operates business to business sales and distributions to Customers who provide our services and products to End-users. However, we may distribute some products directly to End-users in some instances and may collect and process End-user information, in each case as a service to our Customers. Therefore, we may collect End-user contact information, such as email, phone, home or postal address, and financial information relating to payment to sell and deliver to End-users directly.

1.2 Why we need to collect it

We collect your personal information to provide the products or services you request, maintain our Customer relationships and respond to Customer inquiries. We also collect this information to comply with our financial reporting and accounting obligations, including the management of invoices and recovery of debt.

1.3 How we collect and use it

We generally collect this personal information directly from you as a Customer during your interaction with F&P Healthcare, through contact forms on our website, or events and conferences F&P Healthcare

are involved with. However, we may also collect your information through our affiliated sales partners which our Customers may liaise with.

We use your personal information to process requested quotes and sales orders, to supply and deliver to you the products and services you requested, keep a record of our Customers' purchase history, to respond to Customer queries, to maintain business relationships, and to perform any other legal and contractual obligations we may have.

We endeavour to keep personal information collected under a contract for 7 years after the term of the contractual relationship or as long as required to comply with our legal obligations or support our necessary business interests.

1.4 What we share

We may share your personal information within F&P Healthcare and our F&P Healthcare entities to provide you with the products and services you requested, for Customer support, sales and distribution support, supply chain activities and reporting. We also may need to share some of your contact information with our third party Distributors, service providers, delivery services and freight companies. We do not sell your personal information to any third parties.

It is possible we may need to disclose some personal information to meet our legal obligations to regulatory bodies, law enforcement bodies or government agencies. When this happens, we are careful to make sure that this is both lawful and necessary.

For more information about the types of information we may collect, how we use and share it, and to learn more about your privacy rights, ask us at privacy@fphcare.com.

2. F&P products

Our products fall into two main categories: hospital devices and homecare devices. Hospital devices are generally multi-user devices that do not collect any identifiable information. These devices collect anonymised operational data only. Homecare devices generally relate to single-user owned medical devices that can be used in the personal home and may collect End-user health information which is stored on the device.

2.1 What we collect

Our hospital devices generally collect anonymised health information for multiple individuals and do not record identifiable personal information. The devices may log operating data such as temperatures, air flows and device alarms. This information will not be collected by F&P Healthcare alongside any personally identifiable information or matched to other identifiable records.

Our monitored homecare devices collect health information from End-users while they are using their device at home. They record health and medical information relating to the efficacy of an End-user's therapy which may be shared with their authorised Healthcare Professional or homecare provider or sleep laboratory (collectively known as "Healthcare Providers").

If you are an End-user, we may collect your personal information to assist effective use of your monitored homecare device. Your Healthcare Provider will assist you to register your device on our InfoSmart Web™ web-based software platform. The information we collect during the registration process may include your name, contact details, date of birth, phone number, email address, login details, IP address, your device's serial number, personalised settings and the date your device was set up. This information will be linked with the health information collected by the monitored homecare device. After your device is registered for use with InfoSmart Web™, if you consent, data relating to the usage of your device and the efficacy of your therapy will be collected and stored. This data will include health information, such as times and dates of use of your monitored homecare device, personalised settings, details of mask leak and other sleep therapy information, including your sleep hours and your Apnoea Hypopnea Index.

You may also download and use the F&P SleepStyle™ mobile phone application to access and view your personal information, usage of the device and efficacy of the therapy which is held on the InfoSmart

Web™ platform. When you choose to download F&P SleepStyle™, we will request that you provide us with your identity and contact information, serial number of your device and details of your mask. You will also be asked to create a username and password to access your account in the application. You can also choose to subscribe to our email marketing lists through the application and provide your preferences and interests so that we can send you email communication that you are interested in.

2.2 Why we need to collect it

We collect anonymised health information relating to our hospital devices for diagnostic purposes only and to provide medical therapies. The information collected on F&P Healthcare hospital devices is only kept for a limited period before being automatically deleted on each device.

We collect your personal information relating to monitored homecare devices to ensure the efficacy of your device and your treatment as part of the therapy treatment you have requested from your Healthcare Provider. We may also collect and process information for the purpose of providing your Healthcare Provider with the InfoSmart Web™ platform, providing you with the F&P SleepStyle™ mobile phone application, and any other information or services we make available to you via the F&P SleepStyle™ mobile phone application.

2.3 How we collect and use it

Information is generated and collected by the hospital device itself for diagnostic purposes only. The anonymised information that may be logged on any of our devices will be automatically deleted within 2-3 days. Diagnostic information generated on the hospital device can be downloaded onto a USB device (the process is password protected) for use by Healthcare Providers.

End-user information collected in relation to a monitored homecare device may be collected through your interactions with your Healthcare Provider, through InfoSmart Web™, through the device modem, a USB connected to the device or through the F&P SleepStyle™ mobile phone application. If you are an End-user, we use your therapy information to inform your Healthcare Provider with information about the usage and efficacy of your treatment. Your contact, health, device and account information is stored and managed by F&P Healthcare. Information uploaded to InfoSmart Web™ and the F&P SleepStyle™ mobile phone application will be encrypted in transit and storage.

Your personal information will be held in secure servers according to applicable laws and requirements including, but not limited to, France, the Netherlands, Japan, Australia and New Zealand. We will only retain your information for as long as necessary to fulfil the purposes for which the information was initially collected. We will delete your information once your account becomes inactive.

2.4 What we share

The information recorded on our hospital devices are used and shared by our Customers to effectively treat End-users. Healthcare Providers may provide details of hospital devices and its diagnostic information to F&P Healthcare alongside identifiable personal information for post market monitoring, product support and complaint information. For more information on how we collect post market monitoring information, please see the Customer Care section of this statement.

If you are an End-user using our monitored homecare products, we may share your medical device and health information with your authorised Healthcare Providers so that they can provide you with the health treatment and services you have requested. In some cases, we may also share information with your insurers as required by your insurer to enable payments to be made for the use of your device. All insurer authorisation requests are vetted and an identification process is followed before an insurer of a Healthcare Provider is approved through InfoSmart Web™. We do not sell your personal information to any third parties.

It is possible we may need to disclose some personal information to meet our legal obligations to regulatory bodies, law enforcement bodies or government agencies. When this happens, we are careful to make sure that this is both lawful and necessary.

For more information about the types of information we may collect, how we use and share it, and to learn more about your privacy right, ask us at privacy@fphcare.com.

3. InfoSmart Web™

3.1 What we collect

InfoSmart Web™ is an online platform that allows authorised Healthcare Professionals, homecare providers or sleep laboratory (collectively known as “Healthcare Providers”) to access and view their End-users’ therapy information related to their use of our monitored healthcare devices. It is available in selected countries only.

If you are a Healthcare Provider registering to use the InfoSmart Web™ platform, we will collect your contact and login information in order to create an account. If you are an End-user, we will collect and process your personal information on behalf of your authorised Healthcare Provider(s). This information may include name and contact information, national health identifiers, device information, medical therapy progress, medical/health monitoring, therapy history and lifestyle information.

3.2 Why we need to collect it

We collect Healthcare Provider and End-user personal information to provide you with InfoSmart Web™ services. To provide an account, we need to collect and store End-user information relating to the End-user’s name, contact information, device information and therapy details. Information relating to the use of the monitored homecare device is collected to ensure the efficacy of the monitored homecare device and therapy treatment to provide Healthcare Providers with information relevant to providing End-users with requested healthcare services.

3.3 How we collect and use it

We collect End-users’ personal information from their authorised Healthcare Providers, as they interact with the F&P SleepStyle™ mobile application, through the Infosmart Web™ platform, and our monitored homecare devices. Information collected by F&P Healthcare monitored homecare devices are transmitted to InfoSmart Web™ electronically or directly from the device using its USB data transfer functionality. We may also collect and use information relating to your preferences and interests in order to provide you with marketing communication that you have requested through the F&P SleepStyle™ application. Personal information is kept for as long as necessary to provide the services requested from F&P Healthcare and to comply with our legal obligations.

Your personal information will be held in secure servers according to applicable laws and requirements including, but not limited to, France, the Netherlands, Japan, Australia and New Zealand. We will only retain your information for as long as necessary to fulfil the purposes for which the information was initially collected in accordance to the Terms and Conditions you agreed to when requesting InfoSmart Web™ services. We will delete your information after 7 years once your account becomes inactive (between 6 to 12 months of inactivity) or when your Healthcare Provider requests your account become inactive, depending on your location and our agreement with your Healthcare Provider.

3.4 What we share

We may share End-users’ personal information with their authorised Healthcare Provider(s) as part of the healthcare services they have requested from them. In some cases, we may also share information with your insurers as required by your insurer to enable payments to be made for the use of your device. All insurer authorisation requests are vetted and an identification process is followed before an insurer of a Healthcare Provider is approved through the InfoSmart Web™. We do not sell your personal information to any third parties.

We may also share your personal information within our F&P Healthcare entities for InfoSmart Web™ service provisioning and support, Customer support, and to enable effective management and efficacy of our monitored homecare devices and therapies in order to provide you with the products and services you requested.

It is possible we may need to disclose some personal information to meet our legal obligations to regulatory bodies, law enforcement bodies or government agencies. When this happens, we are careful to make sure that this is both lawful and necessary.

For more information about the types of information we may collect, how we use and share it, and to learn more about your privacy rights, ask us at privacy@fphcare.com.

4. Training and education

4.1 What we collect

We may collect personal information you provide us with as a Customer to register an account to access our learning program and materials, including your name, email, role/time and place of work. We may collect information about your learning progress, use of the learning platform, any feedback you provide us and any other interactions with us relating to our training and education services.

4.2 Why we need to collect it

We need to collect your personal information to register the account you requested and to provide you with relevant learning and educational services and resources. We provide these services and resources for our Customers to help them feel more comfortable using our products and to help ensure products are correctly set up for their intended use.

4.3 How we collect and use it

We collect your personal information through our online learning platforms, feedback you provide directly to us through our website or interactions with F&P Healthcare representatives. We use your personal information to provide you with an account for our online training and education services, provide effective learning and education experiences and provide training and education support. We may use information about your learning progress, use of the learning platform, feedback you provide us and interactions with us to improve our services and provide more relevant, effective training and education content.

We will generally retain your personal information for 2 years after you complete our online or mobile training or education products or services. For ongoing training and education support provided for F&P Healthcare products purchased, we may retain information relating to your training or education as a Customer employee for up to 7 years as part of our Customer records.

4.4 What we may share

We may share your personal information Healthcare Provider or your employer. We may also share your personal information within our F&P Healthcare entities for training and education service provisioning and support in order to provide you with the products and services you requested. In some circumstances, we may also share information with service providers who help support us to provide or onboard you, your customers or employees to use our training and education services. We do not sell your personal information to any third parties.

It is possible we may need to disclose some personal information to meet our legal obligations to regulatory bodies, law enforcement bodies or government agencies. When this happens, we are careful to make sure that this is both lawful and necessary.

For more information about the types of information we may collect, how we use and share it, and to learn more about your privacy rights, ask us at privacy@fphcare.com.

5. Customer care

5.1 What we collect

To provide our customer care services, we may collect your personal contact information such as your name, email address, phone number, city, zip code and country of residence. If you contact Customer Care on behalf of your employer, we will collect information about your place of work, your role, specialty and reason(s) for contacting us.

For support relating to product use and incidents, we may also collect End-user information including name, age, contact information (e.g. email, phone, address), information about lifestyle, medical or health conditions before and after product incident, pathology, specialist reports and images, video and audio relating to the applicable product, End-user or Customer and reported incident. We may also collect information you share about your experience with our products publicly online or in other media.

5.2 Why we need to collect it

We collect your personal information to ensure timely response to Customer or End-user feedback, complaints or inquiries you may have. We monitor post-market feedback and incidents on our products to identify whether product issues may exist that require a recall, for areas of product improvement and to comply with our legal obligations as a medical device provider.

5.3 How we collect and use it

We may collect your personal information directly from our interactions with you or through our F&P Healthcare representatives, our product and distributor enquiry forms, contact forms on our website, or any other interaction you have with us through email, post or telephone.

Generally, we collect and use personal information to identify, investigate and/or report product incidents to relevant authorities and comply with our regulatory and legal obligations. We may also use your information to contact you regarding complaints or queries you have submitted to F&P Healthcare. We will retain your information for as long as necessary to answer your queries and to comply with any regulatory or legal obligations.

If you participate in any of our surveys or provide us any feedback, we use your personal information for product development, product improvement and Customer support. If you provide personally identifiable information or contact information, we may use your information to respond to requests and meet our legal or regulatory obligations.

5.4 What we share

We share your personal information internally to manage feedback, complaints and inquiries you may have. We may share information with other F&P Healthcare entities for support, to manage product investigations, for reporting and support to manage our compliance obligations. We do not sell your personal information to any third parties.

It is also possible we may need to disclose some personal information to various regulatory bodies, law enforcement bodies or government agencies to meet our legal and regulatory obligations. When this happens, we are careful to make sure that this is both lawful and necessary.

For more information about the types of information we may collect, how we use and share it, and to learn more about your privacy rights, ask us at privacy@fphcare.com.

6. Events and conferences

6.1 What we collect

F&P Healthcare hosts and sponsors educational events throughout the year. These include in-person conferences and education events around the globe. If you register for these events, we may collect your name, email address and contact information to provide access, catering and updates about the event. For some educational events which are eligible for continuing professional education (CPE)

credit, we may collect your necessary industry or professional membership details to administer this. We may also ask for your relevant dietary requirements or special assistance needs to cater the event. This may infer, or reveal, information about your health or religious, political or philosophical beliefs.

If F&P Healthcare attends an event or conference provided by a third party, we may receive your name, role, organisation and contact information as an attendee if you have authorised the third party to share it with us. We may also receive your industry or professional membership details. Otherwise, we may request this from you during the event. During or after the event or conference, we may use this information for your feedback about the event you participated in, to provide additional information requested or ask if you are interested in learning more from us, or administer CPE credits.

6.2 Why we need to collect it

We need to collect your personal information to register your interest and attendance in our events or conferences, to provide you relevant information about the event, further information you requested or which we believe you would find relevant. If you choose, we collect information relating to your dietary requirements or special assistance needs to ensure we can appropriately cater for you and provide an enjoyable experience.

We may collect your information to request your feedback about our event, products or services or to provide the opportunity to receive educational and marketing information that may be of interest to you.

6.3 How we collect and use it

We may collect your registration information through your F&P Healthcare representatives or Clinical Educators, through an online events portal, over the phone or by email. We may use trusted third party tools to facilitate this. We collect your information to register you for the event, to provide you with information and services associated with the event, and request feedback. In some cases, we may receive your information from third party events providers who you have authorised to share your information with us.

We use your feedback to identify whether we can improve our events next time, for product improvement, product development and Customer support. We may use your name and contact information to provide additional information we believe is relevant to you after the event, or a one-off opportunity to receive educational and marketing information that may be of interest to you.

We store your information in our database(s) and third party technology platforms on the cloud. We will endeavour to retain your information up to 7 years to support record keeping relating to CPE training or other education services we may provide, unless otherwise agreed with education organisers.

6.4 What we share

Your information will only be shared within F&P Healthcare and with our relevant trusted third parties to support and cater for the event or conference. We do not sell any of your personal information and only share information with third parties as required and necessary for the purposes for which it was collected.

It is possible we may need to disclose some personal information to meet our legal obligations to regulatory bodies, law enforcement bodies or government agencies. When this happens, we are careful to make sure that this is both lawful and necessary.

For more information about the types of information we may collect, how we use and share it, and to learn more about your privacy rights, ask us at privacy@fphcare.com.

7. Clinical trials and research

7.1 What we collect

We collect your personal and health information if you volunteer to participate in a clinical trial, usability study or research project. Participation in clinical trials and research is completely voluntary. We collect this information with your express consent only.

During the trial or research process, we will collect information relating to the clinical trial or research, as outlined in the privacy notice and consent form relating to each clinical trial or research, including the investigators' name and surname, telephone number, email and resume. We will also collect End-user information involved with the clinical trial or research which may include their identification data, name, surname, date of birth, gender, patient code and other information relating to the purpose of the clinical trial or research. This often includes information which may infer or reveal medical or health information, and may include the End-user's medical condition(s), weight, height, BMI, medications, surgical operations, changing medical condition(s) throughout the clinical trial, psychological conditions, therapies and therapy effectiveness. Information may include observations about you and your use of our products, medical notes, audio and video recordings, interview notes, photos, videos and clinical outcomes. We may also collect other personal information, such as dietary requirements and lifestyle if relevant.

We recognise personal information relating to clinical trials and research can be sensitive and we endeavour to anonymise, de-identify or pseudonymise trial and research information where possible.

With your express consent, we may record your contact information, and other relevant information you may consent to us storing, so that we may contact you and pre-screen you for upcoming opportunities to participate in our clinical investigations.

7.2 Why we need to collect it

We collect your information as Participant in relation to your participation of our clinical trials and research with your explicit consent. Your participation is voluntary and you can withdraw at any time. We conduct clinical and trials to improve and develop our products with the aim of better health outcomes the End-users of our products, to test the quality and safety of our products, to comply with our regulatory obligations and, most importantly, to ensure your health and welfare during our clinical trials and research at all times.

With your express consent, we record and use your contact information, and other relevant information you consent to us storing, so that we may contact you and pre-screen you for upcoming opportunities to participate in our clinical investigations which you have volunteered to be part of. You may decline to participate in any of the clinical investigations we offer you.

7.3 How we collect and use it

We collect personal information directly from you and through our trusted third party clinical or research partners, such as research agencies, Healthcare Professionals and homecare providers you have authorised to share access to hospital records, medical notes and observations, images, videos and audios, or other information with your consent. We may also collect information from surveys or questionnaires you participate in, medical devices and any other communications with you. We will use your information according to the purposes we notify you of the clinical trial or research, including what information will be collected, how it be used and shared, before giving you the option to participate. We will not use your information for any other purposes than what we have notified you at the time you provided consent. You can withdraw your participation at any time.

We may keep a record of your participation in any F&P Healthcare clinical trial or research project and your contact information in case we need to contact you after the trial or research has concluded or if we identify any additional purposes which we may need to use your personal information for additional consent. You can withdraw consent to the use of your information in this way at any time.

We have to comply with regulatory requirements to keep the results of clinical trials for at least 15 years after the trial has been completed. Following the legal retention period, we will destroy the data, keeping only de-identified information and any published results or outcomes.

Information we collect to contact and invite you to participate in future clinical investigations and research is collected directly from you. With your consent, we may collect additional information from you or your authorised Healthcare Providers. This information is used only for the purpose of evaluating your eligibility to participate in clinical investigations, when you have provided this information, or to contact you to invite you to participate and a pre-assessment of your suitability where necessary.

7.4 What we share

We share information with relevant Ethics Boards, District Health Boards, Healthcare Professionals or other auditors, regulatory or governmental bodies as necessary to perform and facilitate a clinical trial or research project and ensure the welfare of the Participants. Where possible, we endeavour to anonymise your information, de-identify or pseudonymise it. We do not sell your personal information to any third parties.

We may publish papers or articles detailing the outcome of the clinical trial or research project. We may also share results of any research of clinical trial at conferences or other F&P Healthcare events. We will not identify you in any publication of the clinical trial or research project. Generally, all published clinical trial or research data will be de-identified. However, in some cases, we may pseudonymise data in published reports or media. If you have any concern and would like to object to the use your information in this way, please email us at privacy@fphcare.com.

We may share your personal information with our other F&P Healthcare entities for clinical trial and research support, product development and improvement, and for support to comply with our legal and regulation obligations.

It is also possible we may need to disclose some personal information to various regulatory bodies, law enforcement bodies or government agencies to meet our legal and regulatory obligations. When this happens, we are careful to make sure that this is both lawful and necessary.

For more information about the types of information we may collect, how we use and share it, and to learn more about your privacy rights, ask us at privacy@fphcare.com.

8. Marketing

8.1 What we collect

We may collect your personal information such as first name, surname, email address, city, country, professional identifying number, company name (i.e. organisation, hospital name and department), role and communication preferences to provide you with relevant information about our products and services or the clinical application of our products that we believe will be relevant and interesting to you when you make a request to receive marketing and event information from F&P Healthcare. We generally do this with your explicit consent, however in some countries*, we may do this when we believe you are interested in learning more about our products, events or relevant information about the clinical application of our products based on previous interactions we have had with you in accordance with local law.

When you use our website, or subscribe to email marketing, we may collect your IP address, device identifiers and information, browser information and cookies about your online use and preferences. More information about online technologies and information we collect on our website is in Section 9.

**Countries may include: United States, New Zealand, India, Indonesia, South Korea, Taiwan, Columbia, Mexico*

8.2 Why we need to collect it

We collect and use your personal information to provide you with relevant information about our products and services or the clinical application of our products about therapies our products may support which we believe will be relevant and interesting to you. We do this to process your requests for marketing or promotional communications, or when we legitimately believe you are interested in this type of communication based on prior interactions with you.

8.3 How we collect and use it

We collect your personal information when you request and subscribe for marketing or information about our products and services or relevant information about the clinical application of our products that we believe you will find interesting and relevant, download resources from our website, interact with us at

education events or conferences or one of our F&P Healthcare representatives. We usually collect this directly from you or from information you provide us during your interactions with us. We may collect your information, or collect additional information, about you from third parties who host educational events conferences (refer to section 6. Events and Conferences).

We collect information regarding your marketing preferences only if you choose to provide this when you subscribe to our marketing channels or to update your marketing preferences. We use this information, and information about your role, to identify what content may be relevant to you. You can manage your email marketing subscriptions and preferences and can unsubscribe to our mailing list at any time using the links provided within each email.

Your information may be collected and kept for up to two years from our last interaction with you, or your last interaction with our email marketing, before we ask whether you want to continue store your information to continue receiving marketing communications from us.

8.4 What we share

We may use trusted third party tools to collect or manage information about you and your requests for marketing subscriptions, but do not sell or share your personal information with any third parties for any purpose unless you have consented for us to do so, or what is necessary to manage your subscriptions. We endeavour to implement and use our third party tools with privacy by design principles and have technical, organisational and legal safeguards to protect your personal information and use it respectfully.

We share personal information with other F&P Healthcare entities to manage and support your email and marketing subscriptions.

It is possible we may need to disclose some personal information to various regulatory bodies, law enforcement bodies or government agencies to meet our legal and regulatory obligations. When this happens, we are careful to make sure that this is both lawful and necessary.

For more information about the types of information we may collect, how we use and share it, and to learn more about your privacy rights, ask us at privacy@fphcare.com.

9. Use of online & web technologies

9.1 What we collect

We may collect personal information about your use and interactions with our website, online services, surveys, and online customer experience tools. This may include your IP address, device identifier and information, session ID, browsing history and activity, online preferences, and information relating to cookies. Information relating to cookies may include functional information to support the operations of the website, your preferences so that you can have a more efficient, personalised online experience (e.g. remembering your name, email and other form data), and analytical information about users who visit our website and how they use it.

The use of some cookies is necessary for us to provision our website and other online F&P Healthcare medical products and services. You may prevent the use of analytical cookies by disabling these in your browser.

Information collected from our online and web technologies may or may not be identifiable. Please see section 9.3 How we collect and use it to learn more.

9.2 Why we need to collect it

We want to give you a good experience while visiting our website, using our other online F&P Healthcare medical products and services, such as our applications or e-learning platforms. To do this, we need to understand how users generally use and interact with our website, online services, surveys, and online customer experience tools.

Some of our cookies are necessary to provide our website and other online F&P Healthcare medical products and services. You may stop the use of analytical cookies by disabling these in your browser.

Cookies may also be used to collect analytical information relating to your online activity, behaviour and preferences which informs ongoing improvements to our online products and services.

9.3 How we collect and use it

Information relating to our website and online F&P Healthcare medical products and services

We collect information relating to your online activity and preferences on our website using cookies, web beacons and tracking technologies. We use this information to try make your online experience more enjoyable and relevant in the future. This information is designed to be anonymous unless you have subscribed to receive, or have downloaded, marketing or educational material from us, have submitted any of your personal information on our website (e.g. via an inquiry form) or have an account with one of our online F&P Healthcare medical products or services. In this case, information we have previously collected about you up to 24 months ago may be associated to your account and for as long as we have a record of you as a subscriber to our marketing communications (refer to section 8. Marketing).

Information relating to marketing subscriptions and activities

When you subscribe to receive email marketing from us, we may collect information relating to your interaction with our marketing communications using cookies, web beacons and tracking technologies to understand how our email campaigns have performed and what actions you, as a subscriber, may have taken in response to it. This information may be identifiable and is used to inform marketing and sales operations so that we can continue to provide relevant, engaging content to you. This information may be kept for up to 2 years from when you last interacted with our marketing communications (refer to section 8. Marketing).

Information to support sales and advertising

We may use your information relating to your website use, activity and other online F&P Healthcare medical products and services to inform our advertising operations and sales activity. We may also use or combine information collected using online and web technologies with information relating to your interactions with our marketing communications. This information is designed to be anonymous unless you have subscribed to receive, or have downloaded, marketing or educational material from us, have submitted any of your personal information on our website (e.g. via an inquiry form) or have an account with one of our online F&P Healthcare medical products or services. In this case, information we have previously collected about you up to 24 months ago may be associated to your account and for as long as we have a record of you as a subscriber to our marketing communications (refer to section 8. Marketing) or a current or potential Customer who interacts with our F&P Healthcare representatives (refer to section 1. Sales & distribution of F&P Healthcare Products).

Clearing or deleting your cookies from your browser will not delete the information we may have about you. You have a right to request the erasure of your identifiable information in special circumstances, so if you are concerned please ask us at privacy@fphcare.com.

9.4 What we share

We use a number of third party tools to collect the information above so we can provide you with content that we believe you might be interested in and enjoyable online services. We endeavour to implement and use our third party tools with privacy by design principles and have technical, organisational and legal safeguards to protect your personal information and use it respectfully.

We share personal information with other F&P Healthcare entities to manage and provision the use of our online and web technologies. We do not sell or share your personal information with any other external third parties.

It is possible we may need to disclose some personal information to various regulatory bodies, law enforcement bodies or government agencies to meet our legal and regulatory obligations. When this happens, we are careful to make sure that this is both lawful and necessary.

For more information about the types of information we may collect, how we use and share it, and to learn more about your privacy rights, ask us at privacy@fphcare.com.

10. Job applicants

10.1 What we collect

During our recruitment process we may collect your personal information as a prospective Employee, including your name(s), surname, address, email address, phone number, education degree(s) and transcript(s). We may also collect information in connection with your professional life that you provide us, such as your CV, current and previous job position(s), contact details of former Employees for references, and any other information you choose to provide as part of your application for employment. This may include information about personal life. We may also collect some information which is publicly available, such as on professional media sites e.g. LinkedIn. Depending on the role you have applied for, we may also collect information relating to your background relating to a criminal background check and/or a personal financial/credit check.

We will only collect information relating to your references and contact them with your consent. We will also only perform background checks with your express consent.

10.2 Why we need to collect it

We need to process your personal information in order to review and process your application as a prospective employee in line with our recruitment process and assess whether you would be a good fit for the role you have applied for and F&P Healthcare's culture and values.

10.3 How we collect and use it

Prospective employees' applicant information is collected directly from you wherever possible. However, we may also collect it from a trusted third party whom you have authorised to share your personal information, such as:

- Recruitment agencies.
- Public information sources, including professional networking sites e.g. LinkedIn.
- Previous and current employers, colleagues and customers to confirm your employment or as a reference
- Agencies which perform background checks e.g. financial/credit, criminal.

Your personal information is kept for as long necessary to complete the recruitment process for the role you have applied for. Applicant information for successful individuals will be retained as part of the applicants' new Employee record and kept in accordance to our internal Employee Privacy Statement and HR policies and procedures.

With your consent, unsuccessful applicant information may be retained for up to two years (depending on local requirements). We use your information to see whether you could be a good fit for other roles at F&P Healthcare which you may be interested in, and to contact you about these vacancies. We may also use applicant information, and your feedback relating to it, to review our recruitment processes to assess whether our recruitment processes are fair and effective. It is possible F&P Healthcare may retain unsuccessful applicant information for longer than two years if we have legal requirement to do so or have a necessary and legitimate business need.

10.4 What we share

We may share personal information within our F&P Healthcare group entities to support our recruitment process and to assess whether you would be a good fit for the role you have applied for. Information may be shared with other F&P Healthcare entities for unsuccessful applicants who have consented to F&P Healthcare retaining their information in case there are vacancies within our other entities which they may be suitable for and are interested in. We do not sell your personal information to any third parties.

It is also possible we may need to disclose some personal information to various regulatory bodies, law enforcement bodies or government agencies to meet our legal and regulatory obligations. When this happens, we are careful to make sure that this is both lawful and necessary.

For more information about the types of information we may collect, how we use and share it, and to learn more about your privacy rights, ask us at privacy@fphcare.com.

11. Shareholders

11.1 What we collect

We may collect personal information relating to shareholder identity and contact information, as well as information relating to prospective shareholders that have expressed an interest in investing in F&P Healthcare. We may have access to information regarding the number of shares a shareholder may hold and previous history of shares purchased and sold. We do not collect or hold any bank account details or financial information of Shareholders who are not employed by F&P Healthcare.

11.2 Why we need to collect it

We collect contact information relating to our Shareholders to provide regular, relevant company updates and information about the company's performance.

11.3 How we collect and use it

We may collect Shareholder and prospective shareholder information to respond to any Shareholder queries and to communicate with Shareholders as necessary.

We use trusted third parties to manage Shareholder dividends and to perform investor and market analysis. We use information gathered by these third parties to provide company updates, annual reports and to hold Shareholder meetings.

If you are a current Employee who owns shares, please see our internal Employee Privacy Statement to see how we collect and use your personal information as a Shareholder.

11.4 What we share

We may share contact personal information relating to our Shareholders with our trusted third parties to facilitate the management of their shareholding. We do not sell your personal information to any third parties.

We will keep your information for as long necessary to fulfil the purposes for which the information was collected and in accordance with our legal requirements.

It is possible we may need to disclose some personal information to meet our legal obligations to regulatory bodies, law enforcement bodies or government. When this happens, we are careful to make sure that this is both lawful and necessary.

For more information about the types of information we may collect, how we use and share it, and to learn more about your privacy rights, ask us at privacy@fphcare.com.

12. Visiting our F&P Healthcare offices and manufacturing, warehouse or distribution sites

12.1 What we collect

We may collect personal information relating to your name, contact information, role and employer (if visiting for a business purpose), image (photo) for identification purposes, car registration and the day and time you are onsite if you visit any of our F&P Healthcare offices, manufacturing, warehouse or distribution sites. We may also collect CCTV footage of you.

12.2 Why we need to collect it

As a medical device manufacturer and distributor, we have global obligations to record information relating to any visitors or non-authorised individuals on our premises, including their name, role, employer, car registration and image for identification purposes.

We also have health and safety obligations for individuals on our premises and require information relating to who you are in the event of an emergency.

Finally, we need to protect our facilities, our Employees and our business. This means we need to provide appropriate security measures, which may include the use of CCTV, on our premises.

12.3 How we collect and use it

We may collect your name, contact information, information about your role and employer (if visiting for a business purpose), car registration and image directly from you when you arrive at one of our F&P Healthcare offices, manufacturing, warehouse or distribution sites and sign in at reception. This is used to support our obligations as a global medical device manufacturer, visitor health and safety, and security. This information is stored securely and kept up to 12 months. In some cases, this may be kept longer where we have a necessary and legitimate business purpose until it is no longer needed.

We may collect CCTV recordings or images of you at any time while you are on our business premises. Where CCTV may be used, appropriate signage will generally be available either on entry to our premises or in more specific locations within our premises. In line with our policies and procedures, there may be some cases where CCTV signage may not be visible to support our other obligations or necessary and legitimate business interests. This information is stored securely and kept up to 12 months. In some cases, this may be kept longer where we have a necessary business purpose until it is no longer needed.

12.4 What we share

We may share information relating to your visit to F&P Healthcare offices, manufacturing, warehouse or distribution sites between F&P Healthcare group entities as necessary to support our global compliance obligations and security needs. We do not sell your personal information to any third parties.

It is possible we may need to disclose some personal information to meet our legal obligations to regulatory bodies, law enforcement bodies or government. When this happens, we are careful to make sure that this is both lawful and necessary.

For more information about the types of information we may collect, how we use and share it, and to learn more about your privacy rights, ask us at privacy@fphcare.com.