

INSULET EU PRIVACY NOTICE – HEALTH CARE PROFESSIONALS AND BUSINESS CONTACTS

This privacy notice describes how the Insulet entity that services your country ('we', 'us') (to access the details of your local Insulet entity please click [HERE](#)) collects personal information about health care professionals and business contacts (referred to as 'you' in this notice); how we use this information, and your rights in relation to this information.

We respect the importance of your privacy. We will only use your personal information in the ways we explain in this Privacy Notice, and you have a right to make your own choices about how your personal information is used. Please read this Notice carefully to understand more.

'Personal information' is information that relates to you, and alone or in combination with other information could reasonably allow you to be identified.

1. PERSONAL INFORMATION WE USE

The categories of information that we may collect about you include:

- personal details (e.g. name, title, area of practice, qualifications);
- contact details (e.g. phone number, email address, practice or hospital address);
- technical device information (e.g. the Internet Protocol address for your device or device identifier if you use our websites); and
- patient information – information about your past or present patients which use our products or services (e.g. their name, the fact you referred them to us, how long they used our products or services).

We collect this information either directly from you or from other sources, which may include your patients if they contact us directly before speaking to you, or we may obtain it from industry databases to whom you have consented to the sharing of your information or through publicly available sources such as your public profiles online. We require some of this information before entering into any contract with you (e.g. your name and details of your qualifications).

2. HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT

We use your personal information for the following purposes:

- Providing our services: we use your personal information to make deliveries of products, provide online product training and services which you can pass on to your patients, if requested. This is to meet our contractual obligations to you, or to meet our legitimate interests in providing our customers with products they have requested to be delivered to you;
- Responding to your requests and inquiries: We use your personal information to respond to any requests and inquiries you make to us, in order to make sure that we provide the best service to health care professionals that recommend our products;
- Marketing: We may use your personal information to send marketing messages to you, and to make them more relevant and interesting, and to invite you to participate in company events we feel are of interest to you. This may include providing you with information on any of our new and/or existing products. It is in our legitimate interest to carry out marketing in order to promote our business and, where required by law, we will obtain your consent first. You always have the right to opt-out of receiving marketing messages from us.
- Improving our product and/ or services: We analyse information about how you use our products and/ or services to provide an improved experience going forward (for example monitoring the sorts of questions we get asked to provide consistent responses). We also may use your personal information when you are invited to, and participate in, market research studies or

surveys. This is in our legitimate business interests in understanding any issues with our services in order to improve them where required by law, we will obtain your consent first.

- Exercising our rights or to comply with a legal or regulatory obligations: We may use any of the categories of your personal information to exercise our legal rights where it is necessary to do so to defend our business interests, for example to detect, prevent and respond to fraud claims, intellectual property infringement claims or violations of law or the contract. We may use your personal information to comply with a legal or regulatory obligation, for example when we collect product complaints and other safety information regarding our products or when we collect your personal information regarding any transfer of value to you.

3. **YOUR RIGHTS OVER YOUR PERSONAL INFORMATION**

You have certain rights regarding your personal information, subject to local law. In particular, you have the right to object to the uses of your personal information described above. In addition, you have the rights to:

- access your personal information;
- rectify the information we hold about you;
- erase your personal information;
- restrict our use of your personal information;
- receive your personal information in a usable electronic format and transmit it to a third party (the right to 'data portability').

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate. We will likely require additional information from you in order to honour your requests.

If you would like to discuss or exercise such rights, please contact us using the details below.

4. **INFORMATION SHARING**

We may share your personal information with third parties under the following circumstances:

- Service providers and business partners. We may share your personal information with our service providers and business partners that perform marketing services (e.g. sending marketing messages) and other business operations for us (e.g. conducting data analytics, providing online product training, market research and webinars);
- Insulet Group companies. We are owned by Insulet Corporation and our main European entity is Insulet Netherlands BV, so we work closely with other businesses and companies that fall under the Insulet family. We may share certain information about our business relationship with you including the products and services provided to you and your use of the same, your browsing history on our website, etc., with Insulet Corporation, Insulet Netherlands BV and other Insulet companies for business operations and marketing purposes.
- Law enforcement agencies, courts, regulators or government authorities. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party; and
- Asset purchasers. We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. In such a case, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this Privacy Notice.

Your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information under European Union law or by the European Commission, in particular to the USA, where Insulet Corporation is located.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

5. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will keep your personal information for as long as we have a relationship with you. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations, as well as how long we need to retain information to retain appropriate business records for audit purposes. We may also retain records to investigate or defend potential legal claims.

6. CONTACT US

If you have questions or concerns regarding the way in which your personal information has been used, please contact DataPrivacy@insulet.com

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority in your country of residence, using their website.

7. CHANGES TO THE NOTICE

You may request a copy of this privacy notice from us using the contact details set out above.

We may modify or update this privacy notice from time to time. Where we are required to do so, for example if we want to use personal information for different purposes to those described above, we will collect new explicit consents from you. You will be able to see when we last updated the privacy notice because we will include a revision date. Changes and additions to this privacy notice are effective from the date on which they are posted.

Version: 1 June 2020