

## INSULET EU PRIVACY NOTICE

This privacy notice describes how **Insulet International Limited ('we', 'us')** collects and processes personal information about you; how we use and protect this information, and your rights in relation to this information.

We respect the importance of your privacy. You have a right to make your own choices about how your personal information is used. We know that when you provide personal information to us you are showing you trust us and we take that seriously. We will only use your personal information in the way we explain in this Privacy Notice.

This privacy notice applies to all personal information we collect or process about you. Personal information is information, or a combination of pieces of information that could reasonably allow you to be identified. **Please read this Notice carefully.**

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### 1. **PERSONAL INFORMATION WE USE**

We will collect personal information about you from a variety of sources, including information we collect from you directly (e.g. when you contact us and provide information to us), information we collect on [www.omnipodeurope.com](http://www.omnipodeurope.com) or other Insulet websites (the "**Websites**"), the My Omnipod® mobile application or other mobile applications we make available or accessible for download (the "**Applications**") and information we collect about you from other sources, such as other web-based communication channels or services we create, use, offer or operate.

#### 1.1 **Information we collect directly from you**

The categories of information that we may collect directly from you include the following:

- (a) personal details (e.g. name, date of birth);
- (b) contact details (e.g. phone number, email address, postal address or mobile number);

- (c) technical device information (e.g. the Internet Protocol address for your device or device identifier);
- (d) medical information – any information about your past, present or future physical or mental health or condition and related health care services (e.g. your previous type of treatment, health insurance coverage).

## 1.2 Information we collect from other sources:

The following are examples of the categories of information we may collect from other sources:

- (a) personal details (e.g. name, date of birth);
- (b) contact details (e.g. phone number, email address, postal address or mobile number);
- (c) medical insurance information from health insurance companies where required; and
- (d) medical records from your physician where required.

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

We may use your personal information for the following purposes:

- Identification and authentication: We use your identification information to verify your identity when you access and use our services and to ensure the security of your personal information. We rely on the legitimate interest legal basis to do so in order to provide you with a secure service.
- Operating the services: We process your personal information to provide the services and products you have requested. We rely on the legitimate interest legal basis to do so in response to your requests.
- Responding to your requests and inquiries: We use your personal information to respond to any requests and inquiries you make to us. We rely on the legitimate interest legal basis to do so in order to provide an efficient response to your request.
- Improving our services: We analyse information about how you use our services to provide an improved experience for our customers. It is in our legitimate business interests to use the information provided to us for this purpose so we can understand any issues with our services to improve it.
- Exercising our rights: We may use any of the categories of your personal information to exercise our legal rights where it is necessary to do so, for example to detect, prevent and respond to fraud claims, intellectual property infringement claims or violations of law or the contract. It is in our legitimate interests to respond to any such claims in order to defend our legal rights.

- Marketing: We may use your personal information to personalize the marketing messages we send to you and to make them more relevant and interesting, including 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 necessary, we will obtain your consent first. You always have the right to opt-out.

### 3. HOW WE USE YOUR MEDICAL INFORMATION AND THE BASIS ON WHICH WE USE IT

We may use your medical information when you wish to use or are using our products and/ or services for the following purposes:

- Treatment, payment and health care administration: We may use your Medical Information for treatment, to obtain payment or reimbursement for treatment from your healthcare provider, for administrative purposes, and to evaluate the quality of care that you receive. We rely on your **explicit consent** as the lawful basis for this purpose.
- Appointment Reminder and Other Communications: We may use or disclose your Medical Information to provide you or others with, among other things, (i) appointment reminders; (ii) product/supply reorder notifications; and/or (iii) information about treatment alternatives or other health-related products and services that we provide. We rely on your **explicit consent** as the lawful basis for this purpose.
- Emergencies: If you require emergency treatment and we are unable to obtain your consent, we may disclose your Medical Information to a family member or relative who is involved in your care. We rely on the vital interests lawful basis for this purpose.
- Improving our services: We analyse information about how you use our services to provide an improved experience for our customers. Where the information is your medical information, we will only use your medical information for this purpose where we have obtained your **explicit consent**.
- Marketing: We will only send you marketing about our products and services or provide your contact details to third parties who send you marketing about their products and services where we have obtained your **explicit consent**.
- Legal Claims: We may use or disclose your Medical Information to the extent necessary to establish, exercise or defend legal claims when it is in our legitimate interests. You will be notified of any such uses or disclosures to the extent permitted by law.
- Public Health: We may disclose your Medical Information for public health activities and purposes in the public interest (including to protect against serious cross-border threats to health) where permitted by law and according to our legitimate interests. The disclosure will be made for the purpose of preventing or controlling disease, injury or disability. We may also disclose your Medical Information, if directed by the public health authority and permitted by law, to a foreign government agency that is collaborating with the public health authority.

- Health Regulators: We may disclose Medical Information to health regulators for activities authorised by law, such as audits, investigations, and inspections where necessary in the public interest for the quality and safety of medical devices and according to our legitimate interests or where required under a legal obligation. Health regulators seeking this information include government agencies that oversee the healthcare system and other government regulatory programmes.
- Research: We may disclose your Medical Information to researchers for scientific research purposes where permitted under law and according to our legitimate interests.
- Criminal Activity: We may disclose your Medical Information where we consider the disclosure is in accordance with our legitimate interests and necessary for reasons of substantial public interest as permitted by law such as to prevent or lessen a serious and imminent threat to the health or safety of a person or the public (including to a law enforcement authority where required by law).

When we rely on your explicit consent to use your Medical Information **you always have the right to withdraw your consent**. Please contact us using the details below if you wish to withdraw your consent.

#### 4. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

You have certain rights regarding your personal information (including your Medical Information), subject to local law. These include the following rights to:

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

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.

Please note that 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.

#### 5. 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 and other business operations for us. For example, we may partner with other companies to process secure payments, fulfil orders, optimize our services, send newsletters and marketing emails, support email and messaging services and analyse information.
- Insulet Group companies. Insulet International Limited is owned by Insulet Corporation, 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 and other Insulet companies for business operations and marketing purposes.
- Law enforcement agency, court, regulator, government authority or other third party. 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.
- 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. Should such a sale or transfer occur, 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.

## 6. INFORMATION SECURITY AND RETENTION

We implement technical and organisational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

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. We may also retain records to investigate or defend potential legal claims.

We will retain your personal information in accordance with our data retention policy which sets out data retention periods required or permitted by applicable law.

## 7. INTERNATIONAL DATA TRANSFER

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.

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.

## 8. CONTACT US

Insulet International Limited is the controller responsible for the personal information we collect and process.

If you have questions or concerns regarding the way in which your personal information has been used, please contact [DataPrivacy@insulet.com](mailto:DataPrivacy@insulet.com) or address your enquiries in writing to Privacy Officer, 600 Technology Park Drive, Suite 200, Billerica, MA, 01821, USA.

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 relevant data protection authority.

## 9. CHANGES TO THE NOTICE

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

Our commitment to be the leading provider of innovative insulin delivery systems means that our business will continue to evolve as we introduce new services and features. Because of this, from time to time, our policies will be reviewed and may be revised. We reserve the right to change this Privacy Notice at any time and notify you by posting an updated version of the Privacy Notice on the Websites. It is your responsibility to periodically check the Websites so that you are aware of what information we collect, how we process and use it, and under what circumstances we might disclose it. Where we are required to do so, we will collect new explicit consents from you.

We may modify or update this privacy notice from time to time. 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. Please review this privacy notice from time to time to check whether we have made any changes to the way in which we use your personal information.

Revision: November 8, 2017