

# Edwards Lifesciences privacy statement

(Effective April 2023 – India)

Edwards Lifesciences Corporation, Edwards Lifesciences LLC, and their affiliated group companies, including Edwards Lifesciences (India) Private Limited (collectively “Edwards Lifesciences,” “our,” “we” or “us”) recognize the importance of online privacy and are committed to protecting the privacy and privacy choices of our online visitors and others whose Personal Information we receive. This Privacy Statement describes our policies and practices on the collection, use, disclosure, storage and security of information on "[www.edwards.com/in](http://www.edwards.com/in)" or any website owned, operated or controlled by us (“Sites”), and also applies to Personal Information which we obtain through any individual and process other than through the Sites (for example, including but not limited to personal information about our employees, customers, end-users, vendors and service providers or any other individual having any association with us in the course of our business activities).

Please note that our websites might offer links to other websites that are owned or controlled by third parties. This Privacy Statement applies only to Edwards Lifesciences. We do not control or endorse the content of any third-party sites and cannot accept responsibility for the privacy practices of any websites not controlled by us. We encourage you to review the privacy policies of any third-party sites you visit.

This Privacy Statement hereinafter deals with the following aspects:

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## Information we collect on our sites

We have designed our Sites so that visitors can navigate and view Site content without having to provide any personal contact details to us, such as their name, address, e-mail or telephone number.

This section describes information that visitors might choose to provide voluntarily, as well as our practices for the automatic collection and use of visitors' device-related information and analytics information, such as visitors' IP addresses and information about how visitors navigate through the Sites.

## Information you provide

Through your use of the Sites, you may choose to provide us with personal information that identifies you or your family members. This personal information may include a person's name, postal or email address, phone number, national identifying number, information about your health or medical condition, or any other information that would allow Edwards Lifesciences to identify or contact you. For example, a patient who has received one of Edwards Lifesciences' products may choose to share their experiences with us. A person seeking employment may choose to apply for a job online or request additional information about job opportunities. A health care professional might register to attend an event we are hosting, might ask that we send information about one or more of our products, or they might report information about a specific patient. A charitable organization might request a donation.

In addition, some aspects of our Sites may be restricted to use only by licensed health care professionals, and access to those portions of the Sites may require personal information to facilitate registration and verification.

In these instances, in order to fulfil your request to use the features of our Sites, we may ask for personal information such as your name, postal or email address, phone number, and perhaps a medical license number or other information to verify eligibility to view certain restricted content or to allow you to register for an event. In limited circumstances, such as an adverse event with one of our products, we may also be required to obtain personal information about your medical condition to enable required reporting to government regulatory agencies. Health care professionals should ensure that they have obtained their patient's consent (where required) before submitting personal or medical information about their patients.

### **Information we collect automatically**

In order to improve the online experience, we routinely collect certain device-related and analytics information about our visitors and their use of our Sites. For example, we record the IP address of each computer that logs onto our Sites. This IP address does not enable us to identify you by name or contact details, but it does allow us to maintain communication with your device during your visit. It also allows us to identify the location and country you are visiting from, so that we may direct you automatically to the content that is appropriate for your country.

We also use "cookies" and similar tracking technologies. These are small data files that are placed on your computer which enable us and our third party partners to identify your navigation of the Sites and any specific pages or information that you visit. You can set your browser to reject certain cookies, but the Sites may not function properly without them.

We may also place advertisements on third parties' websites. These third parties may track website usage information, as well as information on "click throughs" from an advertisement to our Sites. This helps us understand the effectiveness of our advertising.

Certain other information may also be collected from your device automatically, if so permitted by you through your internet browser settings, which would be used to display the Sites correctly on your device.

### **Information provided to us outside the Sites**

We recognize that we might receive Personal Information in ways other than through our websites in cases where the individual chooses to provide such information to us or otherwise provides us with their consent to collect such information from them directly or through another source, either by reason of having some form of contractual arrangement / association with us or by reason of an applicable law.

For example, we collect information about our customers and potential customers for the purposes of providing our products and services – such as contact information, financial/billing information, and any other information that is provided to us during the course of doing business. For example, many physicians notify us when a specific valve has been implanted, so that we can maintain a database of the patient that received a valve with a specific serial number. Physicians also notify us of complaints or adverse events with our products, and may inadvertently include information about the patient's health. Job applicants may submit paper applications. We maintain records of purchases by our physician customers and their attendance at educational and other events we host.

We also collect information from our vendors, suppliers, consultants, professional advisors and other third parties for the purposes of managing and operating our business. For example, we will collect business contact information, financial information and other information necessary to engage our suppliers and other business partners and to evaluate their performance.

Personal Information is given the same protection by us, whether we receive it through a website or by other means. The descriptions below apply to Personal Information collected or received by us, no matter how or from whom the information was received.

We will not retain personal information that we have collected for a duration longer than is required for the purposes for which the information was collected to be used or is otherwise required to be retained under any law for the time being in force.

### **How we use the information we collect**

If you choose to provide personal information to us, we will use that information for a range of purposes, including:

- To respond to your specific inquiry or request, and to provide you with information and access to resources that you have requested from us.
- To provide, operate and maintain the Sites;
- To improve the navigation and content of our Sites, system administration and security;
- To process and complete transactions, including event registrations;
- To manage our customer relationships, including to respond to inquiries and comments and providing customer service and support;
- To provide our products and services;
- To carry out research and development to improve our products and services;
- To assess financial, credit or insurance risks arising from any relationship or prospective relationship with a customer, supplier, distributor or business partner;
- To carry out any legal or contractual obligations with the provider of the information;
- To carry out other legitimate business purposes, and other purposes about which we will notify our users and customers.

We will also give you an opportunity to tell us whether we may use your personal information to send you other information about Edwards Lifesciences' products, activities, or opportunities. If at any time you wish to "unsubscribe" from these communications, you may do so by following the instructions in the e-mail communications we send to you or by reaching out to us at the contact information provided below. Edwards Lifesciences does not sell or otherwise provide personal information to third parties for the third parties' marketing purposes.

We may use the device-related and analytics information we and our partners collect (about your computer's IP address, through the use of cookies, etc.) during your future visits. This information allows us to ensure the Site is displayed correctly on your device, direct you to specific content on the Sites that may be of interest and to remember your computer the next time you visit. If you visit multiple Edwards Lifesciences Sites, we may aggregate the information from your visits to better understand usage of our Sites.

We may also aggregate this device-related and analytics information we collect from all visitors, which helps us to improve our Sites by monitoring interest in the various Site content and understanding how our visitors navigate the Sites. This information may also help us diagnose any problems with our Sites.

If you choose to provide personal information to us, we may combine that information with the non-personal information collected through IP address recognition and cookies, to help us understand your specific interests and to deliver pertinent information to you.

## **International processing in the U.S. and elsewhere**

Any information that you provide or we collect, may be disclosed to Edwards Lifesciences affiliates and to our third party service providers around the world for purposes that are consistent with this Privacy Statement. This includes transfers to the United States, where much of our electronic data are stored. If you choose to provide your personal information to us via the Sites, this provision of information constitutes your acknowledgement of and consent to such transfers.

This means that your information may be communicated to a country other than your country of residence for processing or storage, and it may also be communicated / disclosed / transferred to third parties hired by us to provide services such as website hosting, database management, analytics services, travel and event registration. Some of these countries may not have data protection laws that are equivalent to the laws of the country where you reside, but we have taken measures to ensure your personal information remains protected to the standards adhered to by us and as described in this Privacy Statement, wherever it is processed.

## **Disclosure of information to third parties**

Edwards Lifesciences uses third parties that perform services for us, including data processing services, and those third parties have agreed to maintain the privacy and security of any personal information they receive from us.

In some instances, we may be required by law, subpoena, or court order to disclose information. For example, if you use a Site to report an adverse product experience, we may be required to report that information to the U.S. Food and Drug Administration (FDA) or to similar regulatory agencies in other countries. We may also disclose information where we believe necessary in order to protect the vital interests of any person, or exercise, establish or defend our legal rights.

If a third party buys any of our group members or their assets, then we may disclose / transfer information to that third party in connection with the sale. We will make clear to the third party purchaser that it may only use personal information it receives from us for the purposes for which it was originally obtained.

Finally, we may request your consent to share your personal information with some other third parties. In those circumstances, we will only share your personal information with your consent.

Please note that under certain circumstances, we may be required to disclose your personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## **Your privacy choices**

In your use of the Sites, you will be given opportunities to make choices about the personal information we receive and how we use it.

**Receive information about Edwards.** If you provide personal information to us, you may be asked to confirm whether you would like to receive future communications, including e-mail communications. If you confirm, we may from time to time send you information about products or services. Even if you confirm that Edwards to send you additional information, you may change your mind at any time by following the instructions in any email communications we send you or by reaching out to us at the contact information provided below. **Cookies.** Please refer to your browser settings for information about how to accept or refuse cookies and similar tracking technologies.

**Accessing, correcting or changing your personal information.** If you wish to access, update or correct, amend or delete the personal information you have previously given us, please reach out to us at the contact information provided below. We will consider your request in accordance with any applicable laws.

**Do not track signals/online tracking.** Some Web browsers may be set to send a “Do Not Track” (DNT) signal to the websites you visit. This signal instructs the website to not collect information about your activities across different websites. We currently do not respond to DNT signals.

However, Edwards Lifesciences does not track your activities on any third-party websites or applications (except for monitoring of your interactions with any of our advertisements on third-party sites), and we do not select content based on your activities on third-party sites or applications. If you visit more than one Edwards Site, we do track your activities on all Edwards-run websites, so that we can improve your overall experience with Edwards.

**Removing your personal information.** You may request that Edwards Lifesciences delete your personal information by reaching out to us at the contact information provided below.

## **Children's privacy**

The Sites are not intended or designed to attract or be otherwise used by children under the age of 18 years. By using the Sites, you confirm that you are either 18 years of age or more, or an emancipated minor, or possess legal parental or guardian consent, and are fully able and competent to enter into, comply with and be bound by the terms, conditions, obligations, affirmations, representations, and warranties set forth in this Privacy Statement. Edwards Lifesciences does not intend to collect personal information from children under the age of 18 years, without consent from the child’s parent or legal guardian. We do not share personal information of anyone under 18 years of age with anyone outside of Edwards (except where required by law, and to our agents who have committed to maintain data privacy).

Children under 18 years of age should not submit any personal information to us without the express permission of their parent or legal guardian. If you believe that your child has submitted personal information and you would like to

request that their information be removed from our systems, please reach out to us at the contact information provided below. We will make reasonable efforts to comply with your request.

## **Our commitment to data security and protection**

Edwards Lifesciences understands that the security of your personal information is of the utmost importance, and we work to maintain your trust. We use industry-standard technological and organizational measures to protect the security of the information that we collect and that which you provide to us. In this regard, we have implemented the International Standard IS/ISO/IEC 27001 on “Information Technology – Security Techniques – Information Security Management System – Requirements”.

Despite these reasonable efforts to safeguard personal information from loss, theft, alteration, or other types of misuse, we cannot guarantee that such loss will never occur. There is always a risk that a third party, without our authorization, might unlawfully access our systems or otherwise access personal information. We are also not responsible for the authenticity of any information which is provided by you or otherwise collected from your use of the Sites, whether personal or otherwise.

## **If you have concerns about your personal information**

If you have any questions or grievances about this Privacy Statement or about your personal information, you may contact us at the below mentioned details:

Mr. Malcolm Dsouza, Grievance Office  
Edwards Lifesciences (India) Private Limited  
Regd. Office: 4th Floor, Commerz II, International Business Park,  
Oberoi Garden City, Off. Western Express Highway,  
Goregaon (East), Mumbai 400 063, India.  
Email: [Malcolm.Dsouza@edwards.com](mailto:Malcolm.Dsouza@edwards.com)  
Tel: +91 22 61931301

If you wish to receive a response by email, please be sure to include your name, postal address, and email address. If we do not receive an email address, we will respond by postal mail.

All grievances shall be redressed in an expeditious manner. Subject to complete details in relation to the grievance being provided, the Grievance Officer shall redress all grievances within a maximum period of 30 days from the date of receipt of the grievance.

## **Governing law**

This Privacy Statement is governed by the laws of India. Any action, suit, or other legal proceeding, which is commenced to resolve any matter arising under or relating to this Policy website, shall be subject to the exclusive jurisdiction of the courts at Mumbai, India.

## **Your consent to this privacy statement**

By using the Sites or otherwise providing us with your personal information pursuant to or for the purposes of any agreement entered into with us, you consent to the terms of this Privacy Statement.

## **Changes to our privacy statement**

From time to time, we may revise our Privacy Statement. When we do so, we will post the updated policy and change the "last revised" date below. You are encouraged to check back on this page on occasion in order to remain up to date with our practices. Your use of the Sites following any revision of this Privacy Statement will signify your acceptance of its revised terms for all previously collected information and information collected from you in the future.

Our intention is to use personal information in accordance with the Privacy Statement in place at the time the information was collected. If we intend to materially change the way in which we use or share personal information, we will inform you in advance and you will be given an opportunity to choose whether to allow us to use your information in those new or different ways.

*Last updated April 2023.*