

# Edwards Lifesciences Privacy Statement

*Last Updated March 31, 2024*

## Who We Are

Edwards Lifesciences Corporation, Edwards Lifesciences LLC, and their affiliated companies (collectively “Edwards Lifesciences,” “our,” or “we”) recognize the importance of online privacy and are committed to respecting your privacy. This Privacy Statement describes our policies and practices on the collection, use, disclosure, and storage of Personal Information and the steps we take to protect it from unauthorized use or disclosure.

## Purpose and Reach of This Privacy Statement

This Privacy Statement applies to all Edwards Lifesciences websites, online or digital services activities, and mobile applications, including, but not limited to [www.edwards.com/gb](http://www.edwards.com/gb), in which this Privacy Statement is posted or linked (collectively our “Sites”) and, where applicable, will apply to Personal Information that we obtain and process other than through the Sites (for example, Personal Information about our customers, vendors, or service providers in the course of doing business).

Edwards Lifesciences is a global company and any information that you provide or we collect will be available to Edwards Lifesciences affiliates and vendors around the world. By using this Site, you consent to the collection, use, storage, and processing of your Personal Information in the United States and in any country to which we may transfer your Personal Information in the course of our business operations. For more information, please see [Transfer of Personal Information to Other Countries](#).

If your Personal Information is processed in the European Economic Area (“EEA”), please see our [Supplemental European Privacy Statement](#), which we have developed pursuant to European data protection laws.

If you are a consumer residing in a U.S. state with a comprehensive privacy law, please see our [Supplemental U.S. Privacy Statement](#), which we have developed pursuant to relevant U.S. state laws, such as the California Consumer Privacy Act (“CCPA”). The Supplemental U.S. Privacy Statement includes general information regarding our collection, use, and disclosure of Personal Information of consumers in those states, as well as information regarding data subject rights requests. If you are a consumer residing in a U.S. state with a comprehensive consumer health data privacy law, such as the state of Washington, please review our [Consumer Health Data Privacy Policy](#) for our privacy practices related to consumer health data.

If you are a resident of California interacting with us as an applicant for a job posting or in a professional capacity—for example, if you are a healthcare provider or an employee of a company with which we do business, or when we undertake employment recruiting activities of California residents—please see the [Supplemental U.S. Privacy Statement](#) for information regarding the processing of your Personal Information.

If you are a resident of California interacting with us as an employee or former employee, or a dependent or beneficiary of an employee or former employee, this Privacy Statement does not apply to you. Please refer to our [California Employee Privacy Notice](#) for information regarding the processing of your Personal Information. Please email [privacyrights@edwards.com](mailto:privacyrights@edwards.com) to request a copy of this Notice.

Please note that our Sites might offer links to other websites that are owned or controlled by third parties. This Privacy Statement applies only to Edwards Lifesciences’ Sites. 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 prior to providing them with any of your Personal Information.

Please review this Statement carefully. To the extent permitted by applicable law, by providing us your Personal Information or otherwise interacting with us, you are agreeing to this Statement.

Click on any of the links below to visit the specific area of this Privacy Statement, or continue scrolling to read this Privacy Statement in its entirety.

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## **Information We Collect on Our Sites**

This section describes information that individuals might choose to provide to us 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 related to the use and navigation of our Sites.

### **Information You Provide**

We define Personal Information as information that can (directly or indirectly) identify, locate, or be used to contact you or communicate with you, such as your name, address, telephone number, e-mail address, characteristics, or descriptions (such as gender and date of birth), and other similar and associated information ("**Personal Information**"). Personal Information includes certain subsets of Personal Information that are considered "sensitive" pursuant to applicable laws, such as information about health or medical status, and healthcare products used or services received ("**Sensitive Personal Information**").

In most cases, we collect Personal Information directly from you. We will ask you for Personal Information, for example, when you interact with us, such as registering on our Sites, using any interactive features or applications, signing up to receive a newsletter, or, a patient who has received one of Edwards Lifesciences' products may choose to share his or her 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 ask that we send information about one or more of our products. Before providing Sensitive Personal Information to us, we urge you to carefully consider whether to disclose it. If you do provide Sensitive Personal Information to us, you are consenting to its use and disclosure for the purposes and in the manner described at the time of collection and as set forth in this Privacy Statement.

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, Social Security or 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 his or her 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 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 fulfill 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**

Additionally, through your use of the Sites, we collect information related to your use by automated means, such as the date and time of your website sessions, movements across our Sites, and the browser information and operating system you use and other system settings, as well as the language your system uses and the country, region, and time zone where your device is located (collectively, “**Usage Data**”).

Usage Data also includes the IP Address of the device you use to connect to the Internet that is collected by our Site server logs. An IP address is a unique identifier that devices use to identify and communicate with each other on the Internet. In certain circumstances, where we link Usage Data and Personal Information, Usage Data may be considered Personal Information. Usage Data may also allow us to identify the country you are visiting from, so that we may direct you automatically to the content that is appropriate for your country.

### **Digital Advertising, Cookies and Other Data Collection Technologies**

When you use our Sites, we collect different types of Usage Data by automated means, using technologies such as APIs, web services, scripts, cookies, pixels, tags, web beacons, browser analysis tools, and server logs. Using these technologies, we may also collect data about the website you were visiting before you came to our Site, and the website you visit after you leave our Site. We may also use vendors, such as Adobe and Google, to place cookies and collect data to enable certain services we use, including advertising, visitor tracking, personalization, site analytics and security services, including reCAPTCHA, and the data may be disclosed to our vendors for these purposes.

Other data may be disclosed to vendors providing additional services integrated into our Sites, including performance monitoring, user experience components such as user interface frameworks, images and web fonts, maps, and ecommerce functionality. When we send email communications, we may place a web beacon or similar tracking technology in the email to know whether your device is capable of receiving HTML emails, or to collect data on whether the email or an attachment or link in the email has been opened or forwarded.

When you use our Sites, we may place cookies on your computer. Cookies are small text files that websites or mobile apps send to your computer or other Internet-connected device to uniquely identify your browser or to store data or settings in your browser. Cookies allow us to recognize you when you return. They also help us provide a customized experience and enable us to detect certain kinds of fraud. Some of our Sites may use Web Storage instead of cookies.

We may use or request to use cookies from third-party advertising companies that may place an advertising tag on your web browser. The advertising tag allows third parties to serve our ads to you on other websites and digital services. These companies may use information obtained from cookies and other data collection tools in order to measure advertising effectiveness and to provide advertisements of interest to you on these other websites.

You can also opt-out of receiving targeted advertising from Network Advertisers by clicking the “Ad Options” icon on the advertisements or by going to [www.networkadvertising.org](http://www.networkadvertising.org). In addition, the Digital Advertising Alliance maintains a web site where consumers can opt out from receiving interest-based advertising from some or all of the network advertising companies participating in the program ([www.AboutAds.info/choices](http://www.AboutAds.info/choices)).

In many cases, the data we collect using cookies and other tools is only used in a non-identifiable way, without any reference to Personal Information. However, under some privacy and data protection laws, this data could be considered Personal Information. This Privacy Statement governs how we use this data when it is considered your Personal Information.

### **Information Provided to Us Outside the Sites**

We recognize that we might receive Personal Information in ways other than through our Sites. 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 also 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 the information was received.

## **How We Use the Information We Collect**

If you choose to provide Personal Information to us, Edwards Lifesciences may use your Personal Information for a range of business, operational, and legal 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 provide you with general health information (such as information on certain health conditions) as well as information about our products and services;
- To provide you with marketing communications and offers for products and services and to deliver advertising (including targeted advertising) to you on this and other websites;
- To process and complete transactions;
- 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 create anonymized or de-identified data so that it is no longer Personal Information; 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; or
- To carry out other legitimate business purposes, and other purposes about which we will notify our users and customers.

We will 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. In most circumstances, you will be able to “unsubscribe” from these communications by following the instructions provided at the time you sign up for the communications or that are included in such communications. Edwards Lifesciences does not sell Personal Information to third parties for the third parties’ marketing purposes.

We may use the Usage Data we and our partners collect during your future visits. This information allows us to direct you to specific content on the Sites that may be of interest and to remember your computer/device the next time you visit. If you visit multiple Edwards Lifesciences Sites, we may aggregate the Usage Data from your visits to better understand usage of our Sites.

We may use the device-related and analytics information we and our partners collect (about your computer’s IP address and through the use of cookies) during your future visits. This information allows us to 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.

## **Transfer of Personal Information to Other Countries**

Edwards Lifesciences is a global company and any information that you provide or we collect will be available to Edwards Lifesciences affiliates and vendors around the world for purposes that are consistent with this Privacy Statement. This means that your information may be communicated to a country other than your country of residence for use, processing, or storage, and it may also be communicated to third parties hired by us to provide services such as website hosting, database management, or analytics services. Some of these countries may not have data protection laws that are equivalent to the laws of the country where you reside and governments of some of these countries, such as the United States, may have access to your Personal Information, but we have taken measures to ensure your Personal Information remains protected to the standards described in this Privacy Statement, wherever it is processed.

If you choose to provide your Personal Information to us via the Sites, this provision of information and your continued use of our Sites constitutes your acknowledgement of and consent to such transfers.

In addition, where necessary and applicable, Edwards Lifesciences may transfer Personal Information relating to individuals in the European Economic Area, the United Kingdom, and Switzerland to other countries in reliance on the [Standard Contractual Clauses](#) or other similarly approved contractual language.

## **Disclosure of Information to Third Parties**

While we do not directly sell, rent, or loan your Personal Information, we may share your information with companies, organizations, and individuals outside of Edwards Lifesciences as described below. Please note that certain state laws have adopted a broad definition of a “sale” and may treat certain of these disclosures as “sales” under their definitions. Please see our “[Supplemental U.S. Privacy Statement](#)” for additional information.

We may share your Personal Information with Edwards Lifesciences’ affiliates, with our business collaborators, and our product co-promotion and co-development partners, marketing and advertising agencies, and social media companies and platforms for the purposes set forth above and elsewhere in this Privacy Statement.

We may share Personal Information with our service providers, who are bound by law or contract to protect Personal Information and only use Personal Information in accordance with our instructions or the agreements we have signed. For example, we may share Personal Information with service providers who provide data processing or fulfilment services for us.

We may disclose Personal Information for legal and law enforcement purposes. This includes in response to legal process, for example, in response to a court order or a subpoena, or in response to a law enforcement agency's request. 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 also may disclose such information to third parties: (i) in connection with fraud prevention activities, (ii) where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, (iii) in situations that may involve violations of our terms of use or other rules, (iv) to protect our rights and the rights and safety of others, (v) as needed to support external auditing, compliance and corporate governance functions, and (vi) as otherwise required by law.

We may also disclose your Personal Information to a third party in connection with the sale, assignment, or other transfer of an Edwards Lifesciences’ asset(s), which may include associated Sites to which the information relates. We will make it clear to the third party purchaser that it may only use Personal Information that is received from us for purposes consistent with this Privacy Statement. However, in the event of a sale or merger, your continued use of this

Site signifies your agreement to be bound by the Privacy Statement and other applicable terms of the subsequent owner or operator.

Please note that we may also disclose data about you that is not personally identifiable. For example, we may publish reports that contain aggregate and statistical data about our customers.

Finally, we may alternatively request your consent to share your Personal Information with some third parties. In those circumstances, we will only share your Personal Information with your consent.

## **How We Protect Information**

Consistent with applicable laws and requirements, we have put in place reasonable physical, technical, and administrative safeguards designed to protect Personal Information from loss, misuse, alteration, theft, unauthorized access, and unauthorized disclosure consistent with legal obligations and industry practices. However, as is the case with all websites, applications, products, and services, we unfortunately are not able to guarantee security for data collected through our Products and Services.

We are not responsible for any interception or interruption of any communications or for changes to or losses of data through the internet. Users of the Sites are responsible for maintaining the security of any password, user ID, or other form of authentication involved in obtaining access to password protected or secure areas of the Sites. It is your responsibility to safeguard any passwords, ID numbers, or similar individual information associated with your use of the Products and Services. Any access to the Sites through your user ID and password will be treated as authorized by you. If we believe it is necessary or advisable to help protect your Personal Information and/or the integrity of the Sites, we may suspend your use of all or part of the Sites, without notice.

Unauthorized access to any of the Sites is prohibited and may lead to criminal prosecution.

## **How Long We Retain Personal Information**

We retain information as long as it is necessary and relevant for our business, operational, and legal purposes. In addition, we retain Personal Information to comply with applicable law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Terms of Service, and other actions permitted by law. When your Personal Information is no longer needed for Edwards Lifesciences' business, operational, and legal purposes, we dispose of it subject to applicable law. Whenever possible, we aim to de-identify the information or otherwise remove some or all information that may identify you from records that we may need to keep for periods beyond the specified retention period.

## **Your Privacy Rights**

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

### **Opting Out of Communications**

If you provide Personal Information to us, we may from time to time send you communications, including electronic communications about products or services. You may change your mind at any time and opt out of communications by following the instructions in any email communications we send you.

### **Cookie Preferences**

We use first party and third-party cookies for several reasons, as described above. Some cookies are required for technical reasons in order for our Sites to operate, and we refer to these as "essential" or "strictly necessary" cookies. These cookies are required. Other cookies (including third party cookies) enable us to track the interests of our users in order to help us deliver more relevant marketing communications and to improve the features of our Sites. The specific types of first- and third-party cookies served through our Sites and the purposes they perform are described in the Cookie Preference Center.

Your Web browser settings allow you to change your cookie settings, and you may modify your cookie preferences by clicking “Cookie Preferences” in the website footer of the site you are visiting. Please be aware that if you choose to reject cookies, you may still use our Sites though your access to some functionality and areas of our Sites may be restricted. You also have the options described above in the [Digital Advertising, Cookies and Other Data Collection Technologies](#) section of this Privacy Statement.

## **Data Privacy Rights - U.S. States with Privacy Laws**

U.S. consumers residing in a state with a comprehensive privacy law, such as California, should visit the [Supplemental U.S. Privacy Statement](#) for more information regarding their privacy rights and the designated methods for making data subject rights requests under their respective state laws.

If you are a consumer residing in a U.S. state with a comprehensive consumer health data privacy law, such as the state of Washington, please review our [Consumer Health Data Privacy Policy](#) for our privacy practices related to consumer health data.

## **Data Privacy Rights – EEA**

Consumers whose data is processed in the EEA should visit our [Supplemental European Privacy Statement](#) for more information regarding their privacy rights and choices.

## **Children's Privacy**

Edwards Lifesciences does not intend to collect Personal Information from children under age the age of majority without consent from the child’s parent or legal guardian. We do not share Personal Information of anyone under the age of majority with anyone outside of Edwards (except where required by law, with consent, or to our agents who have committed to maintain data privacy).

Children under the age of majority should not submit any Personal Information to us without the express permission of their parent or legal guardian. If Edwards Lifesciences learns that a child under the age of majority has provided us with personal information about themselves or that another user has provided such information without appropriate parental or guardian consent, we will delete such information from our active databases in accordance with applicable law, unless we are required by law to retain it. 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 use the contact information in the [Contact Us](#) section below. We will make reasonable efforts to comply with your request.

## **Supplemental European Privacy Statement**

This Supplemental European Privacy Statement (“**European Statement**”) supplements this Privacy Statement and addresses legal obligations and rights arising from European privacy laws, such as the General Data Protection Regulation (“GDPR”) and UK General Data Protection Regulation (“UK GDPR”). This Supplemental European Privacy Statement only applies to individuals whose personal data is processed within the EEA.

## **Controller**

The data controller means the person who determines the purposes and means of the processing of your personal data. For the processing activities described in this notice, Edwards Lifesciences Limited is data controller.

Edwards Lifesciences Limited  
Cannon Place, 78 Cannon Street,  
London EC4N 6AF, United Kingdom.  
Tel: (+44).1635.277300

## **Data Protection Officer**

We have appointed a Data Privacy Officer for certain countries, including France, Germany, Italy, the Netherlands, Spain, and the United Kingdom. The Data Protection Officer may be contacted at:

## Facebook Custom Audiences / Conversion (“Facebook Pixel”)

Our website uses the so-called "Facebook Pixel" of the social network "Facebook" for the following purposes:

### 1. Facebook (website) Custom Audiences

We use the Facebook pixel for remarketing purposes to be able to contact you again within 180 days. This allows us to display interest-based advertisements ("Facebook Ads") to users of the website when they visit the social network "Facebook" or other websites also using this tool. In this way, we pursue the interest in displaying advertisements that are of interest to you in order to make our website or offers more interesting for you.

### 2. Facebook conversion

We also use the Facebook Pixel to ensure that our Facebook Ads match the potential interest of users and are not annoying. With the help of the Facebook Pixel, we can track the effectiveness of Facebook ads for statistical and market research purposes by seeing whether users were redirected to our website after clicking on a Facebook ad (so-called "conversion"). Due to the marketing tools used, your browser automatically establishes a direct connection with the Facebook server as soon as you have agreed to the use of cookies requiring your consent. Through the integration of the Facebook pixel, Facebook receives the information that you have called up the corresponding website of our internet presence or clicked on an advertisement from us. If you are registered with a Facebook service, Facebook can assign the visit to your account. The processing of this data by Facebook takes place within the framework of Facebook's [data policy](#). Special information and details about the Facebook pixel and its functionality can also be found in the Facebook [help area](#).

We are jointly responsible with Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (Facebook) for the collection and transfer of data in this process. This applies to the following purposes:

- The creation of individualized or suitable ads, as well as for their optimization
- Delivery of commercial and transaction-related messages (e.g. via Messenger)

The following processes are therefore not covered by joint controllership:

- The process that takes place after the collection and transmission is within the sole responsibility of Facebook
- The preparation of reports and analyses in aggregated and anonymized form is carried out as a Processor and is therefore within our responsibility.

We have concluded a corresponding agreement with Facebook for joint controllership, which can be accessed here: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum). This agreement defines the respective responsibilities for fulfilling the obligation under the GDPR with regard to joint controllership.

The contact details of the Controller and the data protection officer of Facebook can be found here: <https://www.facebook.com/about/privacy>.

We have agreed with Facebook that Facebook can be used as a contact point for the exercise of data subject rights (see [Section 1.3](#)). Without prejudice to this, the jurisdiction of the Rights of Data Subjects is not limited. Further information on how Facebook processes personal data, including its legal basis and further information on the rights of data subjects can be found here: <https://www.facebook.com/about/privacy>. We transfer the data within the scope of joint controllership based on the legitimate interest pursuant to Art. 6 (1) f GDPR.

The “Facebook Custom Audiences” function can be deactivated in the [cookie statement at privacy policy](#) and for logged in users at <https://www.facebook.com/settings/?tab=ads#>.

Cookie lifetime: up to 180 days after last interaction (this applies only to cookies which have been set by this website)

Legal basis: Art. 6 (1) a GDPR (consent)

## Do Not Track Signals



Some web browsers incorporate other "do-not-track" ("DNT") or similar features that signals to websites with which the browser communicates that a visitor does not want to have their online activity tracked. As of the Effective Date, not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, Edwards Lifesciences Sites along with many other digital service operators do not respond to all DNT signals.

## **Our Commitment to Data Security and Protection and Your Privacy Rights:**

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.

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.

You have or might have the following data protection rights:

- **Right of access:** You have the right to obtain information on the processing of your personal data and to receive a copy of these data.
- **Right to rectification:** You have the right that we correct or complete your inadequate, incomplete, or inaccurate personal data.
- **Right to erasure:** Under certain circumstances, you have the right that we delete your personal data.
- **Right to restriction of processing:** Under certain requirements, we restrict the processing of your personal data upon your request.
- **Right to data portability:** You might have the right to receive your personal data in a structured, common, and machine-readable format and request that these data are transferred to another data controller.
- **Right to object:** If we base processing on our legitimate interest, you may have the right to object on grounds relating to your particular situation at any time to the processing of personal data concerning you.
- **Right to lodge a complaint with a supervisory authority:** You have the right to lodge a complaint with a supervisory authority against the processing of your personal data if you believe that the processing of your personal data violates data protection regulations.

## **If You Want to Exercise Your Privacy Rights or If You Have Concerns about Your Personal Information**

If you have any questions about this Privacy Statement or about your personal information or if you want to exercise your privacy rights, you may contact us using the information below:

- By completing this [form](#)
- Privacy Office  
Edwards Lifesciences LLC  
One Edwards Way  
Irvine, California 92614 USA
- Email: [privacyrights@edwards.com](mailto:privacyrights@edwards.com)

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.

## **Supplemental U.S. Privacy Statement**

This Supplemental U.S. Privacy Statement ("U.S. Statement") supplements this Privacy Statement and addresses legal obligations and rights arising from U.S. state privacy laws, such as those in California and Virginia. **This Supplemental U.S. Privacy Statement only applies to residents of states with comprehensive privacy laws.** If you are a consumer residing in a U.S. state with a comprehensive consumer health data privacy law, such as the state of Washington, please review our [Consumer Health Data Privacy Policy](#) for our privacy practices related to your consumer health data.

## **Definition of Personal Information**

“Personal Information” is any information—as electronically or otherwise recorded—that can be used to identify a person or that we can link to or associate with a specific individual. Personal Information may include information considered sensitive in some jurisdictions, such as biometric information, genetic information, health information, financial account information, specific geolocation, ethnic or racial origin, information concerning your sex life or your sexual orientation, social security number, driver’s license, state identification card, passport number, and other similar information. Some of the Personal Information we collect may be considered “**Sensitive Personal Information.**” For more information about how we collect, disclose, and share your Personal Information, please see the dropdowns below that represent your relationship with Edwards. **Data that could be considered Sensitive Personal Information is noted with an asterisk (\*) in the dropdowns below.**

We will process any Personal Information we collect in accordance with applicable law and as described in this Statement (unless, as explained above, a separate policy or notice governs). In some circumstances, if you do not provide us with your Personal Information, certain Products and Services may be unavailable to you.

This U.S. Statement provides the information required under applicable U.S. state laws and applies to both Edwards Lifesciences’ online and offline activities relative to our processing of your Personal Information. This U.S. Statement and the relevant U.S. state laws do not apply to information that has been de-identified or aggregated. **Some of the Personal Information that we collect, use, and disclose may, pursuant to provisions in the relevant laws, be exempt because it is regulated by other federal and state laws that apply to us.**

## **Notice on Collection of your Personal Information**

### **FOR CONSUMERS**

(Including those interested in our products or services, patients, caregivers, facility visitors, etc.): The following table provides you with a notice of the Personal Information we may collect from or about you, including Sensitive Personal Information, as well as information about how we will use it and the manner in which it will be processed and information about the categories of third parties with whom it is shared.

Some of this will depend on the nature of our interaction with you but can include the following with respect to Personal Information categories that we may have collected in the preceding twelve (12) months:

## **Contact Information**

### **Category and Sources of Personal Information**

We may collect this type of information from:

- You
- Third parties, such as ad delivery companies who place cookies containing advertising IDs on your devices for us
- Healthcare providers
- Health insurance companies (health plans) and other payors
- Authorized/legal representatives, family members, and caregivers
- Consumer reporting agencies and other third parties who verify the information you provide
- Third parties who help us maintain the accuracy of our data and data aggregators that help us complete and enhance our records
- Third parties who provide digital marketing and analytics services for us using cookies and similar technologies that contain a unique identifier, such as an advertising ID

### **Representative Data Elements**

Data elements in this category include:

- Full name, or unique pseudonym
- Honorifics and titles, preferred form of address
- Postal address
- Email address
- Phone number

- Fax number
- Contact information for related persons, such as authorized users of your account
- Company ID number (e.g., customer number, account number, subscription number)
- System identifiers (e.g., usernames or online credentials)

## **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:

- To identify you and communicate with you
- To send transactional messages such as confirmations or responses for assistance
- To send marketing communications, surveys, and invitations
- To personalize our communications and provide customer service
- To administer and manage events
- To identify you or your device, including to associate you with different devices that you may use
- For record-keeping and reporting, including for data matching
- For metrics and analytics
- To track your use of products, services, websites, including for ad delivery and personalization
- To troubleshoot product issues
- To determine and verify program, product, and service eligibility and coverage
- To enroll you in our programs and provide our products and services to you
- To administer, manage, analyze, and improve our programs, products, and services
- To procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations
- To analyze and better understand your needs, preferences, and interests, as well as those of other consumers
- To conduct internal business analysis and market research
- Advertising and product promotion, including to contact you regarding programs, products, services, and topics that may be of interest or useful
- To engage in joint marketing initiatives
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To provide access to, monitor, and secure our facilities, equipment, and other property
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with programs, products, services, and advertisements for such purposes
- To evaluate a potential employment or contractor relationship with you
- To perform background checks and verify past employment, educational history, and professional standing and qualifications
- To evaluate, determine, and arrange compensation, payroll, and benefits
- To assess your fitness for work
- To contact you regarding your application and potential employment or contractor relationship with us
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service Providers, including to social media companies such as Facebook, which use the data only to identify which of our customers use their platforms so that we can deliver ads to you on the platform
- Service providers such as companies who help manage and coordinate events
- Service providers, including those who help administer our call center hosting platforms and phone systems
- Service providers, including those who host websites, and companies who assist with our information technology and security programs
- Third parties who deliver our communications, such as the postal service and couriers

- Other third parties (including government agencies) as required by law, such as pursuant to legally binding subpoenas, court orders, and similar instruments
- Service providers, including companies who assist with our information technology and security programs
- Third party advertising network companies, when you opt-in via our cookie banner to have such Personal Information disclosed for advertising (see Third Party Advertising below)
- Third parties who assist with fraud prevention, detection, and mitigation Healthcare providers (including specialty pharmacies)
- Health insurance companies (health plans) and other payors
- Authorized/legal representatives, family members, and caregivers
- Third parties with whom we have joint marketing and similar arrangements
- Third parties who provide benefit verification, program enrollment, and product fulfillment services in connection with our products and services
- Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention
- Other third parties as necessary to complete transactions and provide our products/services, including delivery companies, agents, and manufacturers
- Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors
- Consumer reporting agencies
- Our lawyers, auditors, and consultants
- Legal and regulatory bodies and other third parties as required by law

## **Other Unique Identifiers**

### **Category and Sources of Personal Information**

We may collect this type of information from:

- You
- Healthcare providers
- Health insurance companies (health plans) and other payors
- Authorized/legal representatives, family members, and caregivers
- Third parties, such as ad delivery companies who place cookies containing advertising IDs on your devices for us
- Consumer reporting agencies and other third parties who verify the information you provide
- Third parties who help us maintain the accuracy of our data and data aggregators that help us complete and enhance our records
- Third parties who provide digital marketing and analytics services for us using cookies and similar technologies that contain a unique identifier, such as an advertising ID
- Service Providers who provide benefit verification, program enrollment, and product fulfillment services in connection with our products and services

### **Representative Data Elements**

Data elements in this category include:

- Government issued identifiers, such as Social Security Numbers,\* Birth Certificate Number,\* Driver's or Operator's license number,\* Passport Number,\* Alien Number or I-94 Number\*
- Device identifier
- Advertising ID
- Customer number
- IP address
- Service Request ID number
- Cookie ID
- Online User ID

### **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:

- To identify you and communicate with you
- To send transactional messages such as confirmations or responses for assistance
- To send marketing communications, surveys and invitations
- To personalize our communications and provide customer service
- To administer and manage events
- To identify you or your device, including to associate you with different devices that you may use
- For record-keeping and reporting, including for data matching
- For metrics and analytics
- To track your use of products, services, websites, including for ad delivery and personalization
- To troubleshoot product issues
- To determine and verify program, product, and service eligibility and coverage
- To enroll you in our programs and provide our products and services to you
- To administer, manage, analyze, and improve our programs, products, and services
- To procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations
- To analyze and better understand your needs, preferences, and interests, as well as those of other consumers
- To conduct internal business analysis and market research
- Advertising and product promotion, including to contact you regarding programs, products, services, and topics that may be of interest or useful
- To engage in joint marketing initiatives
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To provide access to, monitor, and secure our facilities, equipment, and other property
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with programs, products, services, and advertisements for such purposes
- To evaluate a potential employment or contractor relationship with you
- To perform background checks and verify past employment, educational history, and professional standing and qualifications
- To evaluate, determine, and arrange compensation, payroll, and benefits
- To assess your fitness for work
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service Providers, including to social media companies such as Facebook which use the data only to identify which of our customers use their platforms so that we can deliver ads to you on the platform
- Service providers such as companies who help manage and coordinate events
- Service providers, including those who help administer our call center hosting platforms and phone systems
- Third parties who deliver our communications, such as the postal service and couriers
- Other third parties (including government agencies) as required by law, such as pursuant to legally binding subpoenas, court orders, and similar instruments
- Service providers, including those who host websites, and companies who assist with our information technology and security programs
- Third party advertising network companies
- Third parties who assist with fraud prevention, detection and mitigation
- Healthcare providers
- Health insurance companies (health plans) and other payors
- Authorized/legal representatives, family members, and caregivers
- Third parties with whom we have joint marketing and similar arrangements

- Third parties who provide program enrollment, and product fulfillment services in connection with our products and services
- Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention
- Other third parties as necessary to complete transactions and provide our products/services, including delivery companies, agents, and manufacturers
- Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors
- Consumer reporting agencies
- Our lawyers, auditors, and consultants
- Legal and regulatory bodies and other third parties as required by law

## **Characteristics or Description of Individuals**

### **Category and Sources of Personal Information**

We may collect this type of information from:

- You
- Healthcare providers
- Health insurance companies (health plans) and other payors
- Authorized/legal representatives, family members, and caregivers
- Third parties who provide program enrollment, and product fulfillment services in connection with our products and services
- Third parties that provide access to information you make publicly available, such as social media platforms
- Third parties who provide us with supplemental consumer data or data analytics and market research services, such as data aggregators

### **Representative Data Elements**

Data elements in this category include:

- Height
- Weight
- Hair & eye color
- Age/Date of Birth\*
- Gender\*
- Race and Ethnicity\*
- Citizenship Status\*
- Religion\*
- Information concerning sexuality or sex life\*
- Disability\*
- Personal characteristics and preferences, marital and family status,\* shopping/product preferences, languages spoken
- Other similar data elements

### **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:

- To help manage emergency incidents that occur on the premises or involve company property
- To determine and verify program, product, and service eligibility and coverage
- To administer, manage, analyze, and improve our programs, products, and services
- To analyze and better understand your needs, preferences, and interests, as well as those of other consumers
- To conduct internal business analysis and market research
- To comply with legal and regulatory obligations
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Emergency personnel
- Service Providers which use the data only to assist in incident management and reporting
- Service providers, including those who help administer our call center hosting platforms and phone systems
- Service providers, including those who host websites, and companies who assist with our information technology and security programs
- Healthcare providers
- Health insurance companies (health plans) and other payors
- Authorized/legal representatives, family members, and caregivers
- Third parties with whom we have joint marketing and similar arrangements
- Third parties who provide program enrollment and product fulfillment services in connection with our products and services
- Other third parties as necessary to complete transactions and provide our products/services
- Our lawyers, auditors, and consultants
- Legal and regulatory bodies and other third parties as required by law

## **Health Insurance Data**

### **Category and Sources of Personal Information**

We may collect this type of information from:

- You
- Healthcare providers
- Health insurance companies (health plans) and other payors
- Authorized/legal representatives, family members, and caregivers
- Third parties who provide benefit verification, program enrollment, and product fulfillment services in connection with our products and services

### **Representative Data Elements**

Data elements in this category include:

- Policy Number\*
- Reimbursement Data\*
- Co-pay data\*
- Coverage amount data\*
- Health values, sensor reading data (e.g., HBA1C, blood glucose, etc.)\*
- Subscriber or Account identification number\*
- Claims history\*
- Benefits information\*
- Medicare/Medicaid number,\* other government payer number

### **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:

- When you utilize health tests
- For billing support
- To determine and verify program, product, and service eligibility and coverage
- To administer, manage, analyze, and improve our programs, products, and services

- To procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations
- To analyze and better understand your needs, preferences, and interests
- To conduct internal business analysis and market research
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service Providers, including to companies assisting in program administration
- Healthcare providers (including specialty pharmacies)
- Health insurance companies (health plans) and other payors
- Authorized/legal representatives, family members, and caregivers
- Third parties who provide benefit verification, program enrollment, and product fulfillment services in connection with our products and services
- Other third parties as necessary to complete transactions and provide our products/services
- Our lawyers, auditors, and consultants
- Legal and regulatory bodies and other third parties as required by law

## **Commercial Information**

### **Category and Sources of Personal Information**

We may collect this type of information from:

- You
- Third parties that provide access to information you make publicly available, such as social media
- Third parties that provide information that helps us understand our customers, including data aggregators and public records providers
- We may also infer information about you based on information that you have given us and your past interactions with us and other companies
- Healthcare providers
- Health insurance companies (health plans) and other payors
- Consumer reporting agencies
- Third parties who provide program enrollment, and product fulfillment services in connection with our products and services
- Other third parties who facilitate, process, and complete transactions for us, such as resellers, sales agents, and program partners

### **Representative Data Elements**

Data elements in this category include:

- Propensity scores obtained from third parties, such as likelihood that you may be interested in certain purchases or may be experiencing life events
- Products or services you have purchased
- Records of products or services purchased, obtained, reviewed, or considered
- Records of program enrollment and activity

### **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:



- To better understand you and to understand our customers generally
- To design products, services and programs including subscription and special offer programs
- To identify prospective customers
- For internal business purposes, such as quality control, training, and analytics
- To enroll you in our programs and provide our products and services to you
- To administer, manage, analyze, and improve our programs, products, and services
- To communicate with you regarding our programs, products, and services
- To procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations
- To analyze and better understand your needs, preferences, and interests, as well as those of other consumers
- To conduct internal business analysis and market research
- To engage in joint marketing initiatives
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Third parties with whom we have joint marketing and similar arrangements
- Service Providers, including companies who assist us in program administration
- Our lawyers, auditors, and consultants
- Healthcare providers (including specialty pharmacies)
- Health insurance companies (health plans) and other payors
- Authorized/legal representatives, family members, and caregivers
- Third parties with whom we have joint marketing and similar arrangements
- Third parties who provide benefit verification, program enrollment, and product fulfillment services in connection with our products and services
- Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention
- Other third parties as necessary to complete transactions and provide our products/services
- Third party network advertising partners
- Consumer reporting agencies
- Legal and regulatory bodies and other third parties as required by law

### **Transaction and Interaction Information**

#### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Third parties that provide access to information you make publicly available, such as social media
- Automatically, such as when you interact with our websites or mobile apps

#### **Representative Data Elements**

Data elements in this category include:

- Personal characteristics and preferences, such as your age range, marital and family status,\* languages spoken
- Subscription program data
- Household demographic data
- Data from social media profiles, such as Facebook, Twitter, LinkedIn, and similar platforms
- Education information

- Professional information
- Hobbies and interests

## **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- To fulfill our business relationship with you, including customer service
- For recordkeeping and compliance, including dispute resolution
- For internal business purposes, such as finance, quality control, training, reporting and analytics
- For risk management, fraud prevention, and similar purposes
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Third parties with whom we have joint marketing and similar arrangements
- Service providers, including third parties as needed to complete the transaction, including delivery companies, agents, and manufacturers
- Our lawyers, auditors, and consultants
- Customers, in connection with their audits of Company
- Other third parties as required by law

## **Inferred and Derived Information**

### **Category and Sources of Personal Information**

- We create inferred and derived data elements by analyzing our relationship and transactional information
- We draw inferences from the information we collect from and about you, such as your preferences, characteristics, attributes, and abilities

We also may collect this type of information from:

- Service Providers
- Third parties with whom we have joint business agreements for marketing and development and similar agreements
- Third party network advertising partners

### **Representative Data Elements**

Data elements in this category include:

- Propensities, attributes and/or scores generated by internal analytics programs and used for marketing
- Propensities, attributes and/or scores generated by internal analytics programs and used for information security and fraud purposes
- Preferred language
- Inferences reflecting a consumer's wellness, health, preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes, or other inferred data\*

## **Purpose for Collecting and Sharing the Personal Information**

We combine inferred data with other relationship information and use this type of information:

- To better understand you and to understand our customers generally
- To design products, services and programs that interest our customers, including subscription programs
- To identify prospective customers

- For internal business purposes, such as quality control, training, and analytics
- To administer, manage, analyze, and improve our programs, products, and services
- To analyze and better understand your needs, preferences, and interests, as well as those of other consumers
- For advertising and product promotion, including to contact you regarding programs, products, services, and topics that may be of interest or useful
- To engage in joint marketing initiatives
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To comply with legal and regulatory obligations
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers, including those who analyze data on our behalf and who help execute programs
- Our lawyers, auditors, and consultants
- Third parties with whom we have joint marketing and similar arrangements
- Legal and regulatory bodies and other third parties as required by law

### **Internet and Online/Electronic Technical Information**

#### **Category and Sources of Personal Information**

We collect this type of information from:

- You and from your computer or devices when you interact with our platforms, websites, and applications; for example, when you visit our websites, our server logs record your IP address and other information
- Automatically, via technologies such as cookies, web beacons, when you visit our website or other websites
- Third parties, including computer security services and advertising partners
- We also associate information with you using unique identifiers collected from your devices or browsers
- Third parties who provide website and online security services

#### **Representative Data Elements**

Data elements in this category include:

- IP Address
- MAC Address, SSIDs or other device identifiers or persistent identifiers
- Online user ID
- Password
- Device characteristics (such as browser information)
- Web Server Logs
- Application Logs
- Browsing and search history
- Viewing Data (site and app usage)
- First Party Cookies
- Third Party Cookies
- Web beacons, clear gifs and pixel tags Internet service provider
- Referring/exiting URL Request/response date and time
- Clickstream data
- Ads and web pages viewed
- Time spent on a web page or mobile app
- Other information regarding your interactions with our websites, applications, emails, and advertisements

#### **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- For system administration, technology management, including optimizing our websites and applications
- For information security and cybersecurity purposes, including detecting threats
- For recordkeeping, including logs and records that are maintained as part of Transaction Information
- To better understand our customers and prospective customers and to enhance our Relationship Information, including by associating you with different devices and browsers that they may use
- For online targeting and advertising purposes, subject to choices made via the Cookie Banner or Cookie Preference Center
- To administer, manage, analyze, and improve our programs, products, and services
- To conduct internal business analysis and market research
- For advertising and product promotion, including to contact you regarding programs, products, services, and topics that may be of interest or useful
- To engage in joint marketing initiatives
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with programs, products, services, and advertisements for such purposes
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers including companies who assist with our information technology and security programs, including companies such as network security services who retain information on malware threats detected
- Service providers who assist with fraud prevention, detection, and mitigation
- Third party advertising network companies
- Our lawyers, auditors, and consultants
- Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors
- Legal and regulatory bodies and other third parties as required by law

### **Audio Visual Information**

#### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Automatically, such as when we record calls to our call center and use CCTV cameras in our facilities
- Companies conducting research such as market research companies
- Third parties that provide access to information you make publicly available, such as social media

#### **Representative Data Elements**

Data elements in this category include:

- Photographs
- Video images
- CCTV recordings
- Call center recordings and call monitoring records
- Voicemails

## **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- For internal business purposes, such as call recordings used for training, coaching or quality control
- For relationship purposes, such as use of photos and videos for social media purposes
- For premises security purposes and loss prevention
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers, including companies who assist with our information technology and security programs, and our loss prevention programs
- Service providers, including companies who conduct market research on our behalf
- Our lawyers, auditors, and consultants
- Other third parties as required by law

## **Financial Information**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Payment processors and other financial institutions
- Healthcare providers
- Health insurance companies (health plans) and other payors
- Authorized/legal representatives, family members, and caregivers
- Third parties who provide program enrollment and product fulfillment services in connection with our products and services
- Third parties who assist with fraud prevention, detection, and mitigation

### **Representative Data Elements**

Data elements in this category include:

- Bank account number and details (if you use automated payments)\*
- Payment card information\*
- Debit or credit card number\*
- Bank account number and routing information\*
- Payment and reimbursement amounts

## **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- To fulfill our business relationship with you, including processing payments, issuing refunds and collections
- For recordkeeping and compliance, including dispute resolution
- For internal business purposes, such as finance, audits, training, reporting and analytics
- For risk management, fraud prevention and similar purposes
- To determine and verify program, product, and service eligibility and coverage
- To enroll you in our programs and provide our products and services to you
- To administer, manage, analyze, and improve our programs, products, and services
- To issue invoices and collect payments
- Reimburse customers, satisfy warranty obligations, and fulfill payment obligations

- To procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers, including payment processors, financial institutions and others as needed to complete the transactions and for authentication, security, and fraud prevention
- Our lawyers, auditors, and consultants
- Customers, in connection with their audits of Company Healthcare providers
- Health insurance companies (health plans) and other payors
- Authorized/legal representatives, family members, and caregivers
- Third parties who provide program enrollment, and product fulfillment services in connection with our products and services
- Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention
- Other third parties as necessary to complete transactions and provide our products/services
- Consumer reporting agencies
- Legal and regulatory bodies and other third parties as required by law

## **Health Information**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Healthcare providers
- Health insurance companies
- Authorized/legal representatives, family members, and caregivers
- Third parties who provide benefit verification, program enrollment, and product fulfillment services in connection with our products and services

We may also infer health information about you based on other information, including lifestyle factors.

### **Representative Data Elements**

Data elements in this category include:

- Information about physical or mental health, disease state, medical history or medical treatment or diagnosis, medicines taken\*
- Name/Contact of a patient's healthcare providers
- General disease or product interest\*
- Health insurance company Insurance account number\*
- Information on payment for healthcare services (EOB forms, HSA statements, claims data, claims assistance records)\*
- Health plan beneficiary names/numbers\*
- Information needed to accommodate disabilities\*
- Information about workplace accidents and occupational safety\*
- Medical record information, such as medical diagnosis, disease information, and treatment history\*
- Health values and sensor readings data, such as steps taken, blood glucose levels, heart rate, and blood pressure\*

- Drug allergies\*
- Prescriptions and dosing\*
- Medical appointment dates\*

## **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- To determine and verify program, product, and service eligibility and coverage
- To enroll you in our programs and provide our products and services to you
- To administer, manage, analyze, and improve our programs, products, and services
- To procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations
- To analyze and better understand your needs, preferences, and interests, as well as those of other consumers
- To conduct internal business analysis and market research
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Healthcare providers
- Health insurance companies (health plans), other payors and others as needed to provide the contemplated services or transactions involving the data, such as for processing health care payments
- Our lawyers, auditors, and consultants
- Other third parties as permitted by HIPAA and/or CMIA for treatment, payment, and authorization
- Authorized/legal representatives, family members, and caregivers
- Third parties who provide program enrollment, and product fulfillment services in connection with our products and services
- Other third parties as necessary to complete transactions and provide our products/services
- Legal and regulatory bodies and other third parties as required by law

## **Electronic and Sensor Data**

### **Category and Sources of Personal Information**

We collect this type of information automatically when you use our internet-enabled products such as mobile apps and connected devices from:

- You
- When you contact or visit us (automatically), such as when we record calls to our call center or use CCTV cameras in our facilities
- Your mobile devices and other internet-connected devices and applications (automatically)
- Third parties that provide access to information you make publicly available, such as social media platforms

### **Representative Data Elements**

Data elements in this category include:

- Smart device records
- Health values and sensor readings data, such as steps taken, movement information, data collected by our mobile apps, blood glucose levels, heart rate, and blood pressure\*
- Recording of a customer service call

- Recording from a CCTV camera in our facilities

## **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- To enable product functionality
- For internal business purposes, such product development, security, and quality control
- To administer, manage, analyze, and improve our programs, products, and services
- To analyze and better understand your needs, preferences, and interests, as well as those of other consumers
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To provide access to, monitor, and secure our facilities, equipment, and other property
- To comply with legal and regulatory obligations
- To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with programs, products, services, and advertisements for such purposes
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers, including companies who host our data, assist with our information technology and security programs, including network security services and cybersecurity
- Service providers, including companies who assist with fraud prevention, detection, and mitigation
- Third party network advertising partners
- Our lawyers, auditors, and consultants
- Healthcare providers, health insurance companies (health plans), other payors and others as needed to provide the contemplated services or transactions involving the data, such as for processing health care payments
- Authorized/legal representatives, family members, and caregivers
- Third parties who provide program enrollment, and product fulfillment services in connection with our products and services
- Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors
- Third parties who assist with our information technology and security programs
- Third parties who assist with fraud prevention, detection, and mitigation
- Other third parties as necessary to complete transactions and provide our products/services
- Other third parties as required by law

## **Geolocation Data**

### **Category and Sources of Personal Information**

We may collect this type of information automatically from your mobile device and computer when you visit or interact with our websites, applications, and online platforms.

### **Representative Data Elements**

Data elements in this category include:

- Precise location data\*
- Geofencing data

## **Purpose for Collecting and Sharing the Personal Information**



We may use this type of information:

- To provide the information, products or services requested
- For information security and fraud prevention
- For our everyday business purposes
- To administer, manage, analyze, and improve our programs, products, and services
- To conduct internal business analysis and market research
- For advertising and product promotion, including to contact you regarding programs, products, services, and topics that may be of interest or useful
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Third parties who assist with our information technology and security programs
- Third parties who assist with fraud prevention, detection, and mitigation
- Our lawyers, auditors, and consultants
- Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors
- Legal and regulatory bodies and other third parties as required by law

## **Compliance Data**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Third parties, including companies that help us conduct internal investigations
- Third parties, such as consumer reporting agencies and data aggregators who conduct background screening for us

### **Representative Data Elements**

Data elements in this category include:

- Compliance program data, including signed consent forms, data subject request forms, customer screening records, and other records maintained to demonstrate compliance with applicable laws
- Occupational and environmental safety records
- Records relating to complaints and internal investigations, including compliance hotline reports
- Records of privacy and security incidents, including any security breach notifications

### **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- To comply with and demonstrate compliance with applicable laws
- For legal matters, including litigation and regulatory matters, including for use in connection with civil, criminal, administrative, or arbitral proceedings, before regulatory or self-regulatory bodies, including service of process, investigations in anticipation of litigation, execution or enforcement of judgments and orders
- For internal business purposes, such as risk management, audit, internal investigations, reporting, analytics
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Our lawyers, auditors, and consultants
- Customers, in connection with their audits of Company
- Other third parties (including government agencies, courts and opposing law firms, consultants, process servers and parties to litigation) in connection with legal matters

## **Professional Information**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You

### **Representative Data Elements**

Data elements in this category include:

- Employer and job title
- Medical license
- Employer location
- Information included in an IRS 1040 form

### **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- To determine and verify program, product, and service eligibility and coverage
- To conduct internal business analysis and market research
- To comply with legal and regulatory obligations
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Third parties who provide benefit verification, program enrollment, and product fulfillment services in connection with our products and services
- Our lawyers, auditors, and consultants
- Legal and regulatory bodies and other third parties as required by law

## **Biometric Identifiers**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Healthcare providers
- Health insurance companies (health plans) and other payors
- Authorized/legal representatives, family members, and caregivers
- Third parties who provide benefit verification, program enrollment, and product fulfillment services in connection with our products and services

## **Representative Data Elements**

Data elements in this category include:

- Your digital or electronic signature on a patient consent form or program enrollment form
- Biometric information, such as full face, fingerprint, voice print, retina or iris image, or other unique physical representation\*

## **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- To determine and verify program, product, and service eligibility and coverage
- To enroll you in our programs and provide our products and services to you
- To procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations
- To engage in joint marketing initiatives
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Healthcare providers, health insurance companies (health plans), other payors and others as needed to provide the contemplated services or transactions involving the data, such as for processing health care payments
- Authorized/legal representatives, family members, and caregivers
- Third parties with whom we have joint marketing and similar arrangements
- Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention
- Other third parties as necessary to complete transactions and provide our products/services
- Our lawyers, auditors, and consultants
- Legal and regulatory bodies and other third parties as required by law

### **CALIFORNIA PROFESSIONALS.**

The following table provides detail for residents of California who interact with us in a professional capacity, such as (i) health care providers and their staff, (ii) clinical investigators and their staff, (iii) employees of companies with whom we conduct business, including employees of service providers, with respect to the category of Personal Information collected, the source of that information, the purposes for collection and sharing/disclosure, and the categories of third parties to whom the category of Personal Information is shared.

## **Contact Information**

### **Category and Sources of Personal Information**

We may collect this type of information from:

- You
- Consumer reporting agencies and other third parties who verify the information you provide
- Third parties who provide us with supplemental consumer data or data analytics and market research services, such as data aggregators

## **Representative Data Elements**

Data elements in this category include:

- Full name, or unique pseudonym
- Honorifics and titles, preferred form of address
- Postal address
- Email address
- Phone number
- Fax number
- Contact information for related persons, such as authorized users of your account
- Company ID number (e.g., customer number, account number, subscription number)
- System identifiers (e.g., usernames or online credentials)

### **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:

- To identify you and communicate with you
- To send transactional messages such as confirmations or responses for assistance
- To send marketing communications, surveys, and invitations
- To personalize our communications and provide customer service
- To administer and manage events
- To identify you or your device, including to associate you with different devices that you may use
- For record-keeping and reporting, including for data matching
- For metrics and analytics
- To procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations
- To conduct internal business analysis and market research
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To provide access to, monitor, and secure our facilities, equipment, and other property
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with programs, products, services, and advertisements for such purposes
- To evaluate a potential employment or contractor relationship with you
- To perform background checks and verify past employment, educational history, and professional standing and qualifications
- To evaluate, determine, and arrange compensation, payroll, and benefits
- To assess your fitness for work
- To contact you regarding your application and potential employment or contractor relationship with us
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers such as companies who help manage and coordinate events
- Service providers, including those who help administer our call center hosting platforms and phone systems
- Service providers, including those who host websites, and companies who assist with our information technology and security programs
- Third parties who deliver our communications, such as the postal service and couriers
- Other third parties (including government agencies) as required by law, such as pursuant to legally binding subpoenas, court orders, and similar instruments
- Service providers, including companies who assist with our information technology and security programs
- Third party advertising network companies, when you opt-in via our cookie banner to have such Personal Information disclosed for advertising (see Third Party Advertising below)

- Third parties who assist with fraud prevention, detection, and mitigation Healthcare providers (including specialty pharmacies)
- Health insurance companies (health plans) and other payors Authorized/legal representatives, family members, and caregivers
- Third parties with whom we have joint marketing and similar arrangements
- Third parties who provide benefit verification, program enrollment, and product fulfillment services in connection with our products and services
- Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention
- Other third parties as necessary to complete transactions and provide our products/services, including delivery companies, agents, and manufacturers
- Service Providers who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors
- Consumer reporting agencies
- Our lawyers, auditors, and consultants
- Legal and regulatory bodies and other third parties as required by law

## **Other Unique Identifiers**

### **Category and Sources of Personal Information**

We may collect this type of information from:

- You
- Consumer reporting agencies and other third parties who verify the information you provide
- Third parties who provide us with supplemental consumer data or data analytics and market research services, such as data aggregators

### **Representative Data Elements**

Data elements in this category include:

- Government issued identifiers, such as Social Security Numbers,\* Birth Certificate Number,\* Driver's or Operator's license number,\* Passport Number,\* Alien Number or I-94 Number\*
- Device identifier
- Advertising ID
- Customer number
- IP address
- Service Request ID number
- Cookie ID
- Online User ID

### **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:

- To identify you and communicate with you
- To send transactional messages such as confirmations or responses for assistance
- To send marketing communications, surveys, and invitations
- To personalize our communications and provide customer service
- To administer and manage events
- To identify you or your device, including to associate you with different devices that you may use
- For record-keeping and reporting, including for data matching
- For metrics and analytics
- To procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations
- To conduct internal business analysis and market research

- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To provide access to, monitor, and secure our facilities, equipment, and other property
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with programs, products, services, and advertisements for such purposes
- To evaluate a potential employment or contractor relationship with you
- To perform background checks and verify past employment, educational history, and professional standing and qualifications
- To evaluate, determine, and arrange compensation, payroll, and benefits
- To assess your fitness for work
- To contact you regarding your application and potential employment or contractor relationship with us
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers such as companies who help manage and coordinate events
- Service providers, including those who help administer our call center hosting platforms and phone systems
- Service providers, including those who host websites, and companies who assist with our information technology and security programs
- Third parties who deliver our communications, such as the postal service and couriers
- Other third parties (including government agencies) as required by law, such as pursuant to legally binding subpoenas, court orders, and similar instruments
- Service providers, including companies who assist with our information technology and security programs
- Third party advertising network companies, when you opt-in via our cookie banner to have such Personal Information disclosed for advertising (see Third Party Advertising below)
- Third parties who assist with fraud prevention, detection, and mitigation Healthcare providers (including specialty pharmacies)
- Health insurance companies (health plans) and other payors Authorized/legal representatives, family members, and caregivers
- Third parties with whom we have joint marketing and similar arrangements
- Third parties who provide benefit verification, program enrollment, and product fulfillment services in connection with our products and services
- Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention
- Other third parties as necessary to complete transactions and provide our products/services, including delivery companies, agents, and manufacturers
- Service Providers who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors
- Consumer reporting agencies
- Our lawyers, auditors, and consultants
- Legal and regulatory bodies and other third parties as required by law

### **Characteristics or Description of Individuals**

#### **Category and Sources of Personal Information**

We may collect this type of information from:

- You
- Third parties that provide access to information you make publicly available, such as social media platforms

- Third parties who provide us with supplemental consumer data or data analytics and market research services, such as data aggregators

## **Representative Data Elements**

Data elements in this category include:

- Height
- Weight
- Hair & eye color
- Age/Date of Birth Gender
- Race and Ethnicity\*
- Citizenship Status\*
- Religion\*
- Information concerning sexuality or sex life\*
- Disability\*
- Personal characteristics and preferences, marital and family status,\* shopping/product preferences, languages spoken
- Other similar data elements

## **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:

- If you visit our physical site, to help manage emergency incidents that occur on the premises or involve company property
- To determine and verify program, product, and service eligibility and coverage
- To administer, manage, analyze, and improve our programs, products, and services
- To analyze and better understand your needs, preferences, and interests, as well as those of other consumers
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To conduct internal business analysis and market research
- To comply with legal and regulatory obligations
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Emergency personnel
- Service Providers which use the data only to assist in incident management and reporting
- Service providers, including those who help administer our call center hosting platforms and phone systems
- Service providers, including those who host websites, and companies who assist with our information technology and security programs
- Third Party Advertising companies (See Third Party Advertising below)
- Third parties with whom we have joint marketing and similar arrangements
- Other third parties as necessary to complete transactions and provide our products/services Our lawyers, auditors, and consultants
- Legal and regulatory bodies and other third parties as required by law

## **Commercial Information**

### **Category and Sources of Personal Information**

We may collect this type of information from:

- You
- Third parties that provide access to information you make publicly available, such as social media
- Third parties that provide information that helps us understand our customers, including data aggregators and public records providers
- We may also infer information about you based on information that you have given us and your past interactions with us and other companies
- Consumer reporting agencies and third parties who assist with fraud prevention, detection, and mitigation
- Payment processors and other financial institutions
- Other third parties who facilitate, process, and complete transactions for us, such as resellers, sales agents, and program partners

## **Representative Data Elements**

Data elements in this category include:

- Propensity scores obtained from third parties, such as likelihood that you may be interested in certain purchases or may be experiencing life events
- Products or services you have purchased
- Records of products or services purchased, obtained, reviewed, or considered Records of program enrollment and activity

## **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:

- To better understand you and to understand our customers generally
- To design products, services and programs including subscription and special offer programs
- To identify prospective customers
- For internal business purposes, such as quality control, training and analytics
- To enroll you in our programs and provide our products and services to you
- To fulfill our business relationship with you, including processing payments, issuing refunds, billing support, and collections
- For recordkeeping and compliance, including dispute resolution
- To administer, manage, analyze, and improve our programs, products, and services
- To communicate with you regarding our programs, products, and services
- To procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations
- To analyze and better understand your needs, preferences, and interests, as well as those of other consumers
- To conduct internal business analysis and market research
- To engage in joint marketing initiatives
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Third parties with whom we have joint marketing and similar arrangements Service Providers, including companies who assist us in program administration
- Our lawyers, auditors, and consultants
- Third parties with whom we have joint marketing and similar arrangements
- Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention
- Other third parties as necessary to complete transactions and provide our products/services
- Third party network advertising partners



- Consumer reporting agencies
- Legal and regulatory bodies and other third parties as required by law

## **Transaction and Interaction Information**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Third parties that provide access to information you make publicly available, such as social media
- Automatically, such as when you interact with our websites or mobile apps

### **Representative Data Elements**

Data elements in this category include:

- Personal characteristics and preferences, such as your age range, marital and family status,\* languages spoken
- Subscription program data
- Household demographic data
- Data from social media profiles, such as Facebook, Twitter, LinkedIn, and similar platforms
- Education information
- Professional information
- Hobbies and interests

### **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- To fulfill our business relationship with you, including customer service
- For recordkeeping and compliance, including dispute resolution
- For internal business purposes, such as finance, quality control, training, reporting, and analytics
- For risk management, fraud prevention and similar purposes
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Third parties with whom we have joint marketing and similar arrangements
- Service providers, including third parties as needed to complete the transaction, including delivery companies, agents, and manufacturers
- Our lawyers, auditors, and consultants
- Customers, in connection with their audits of Company
- Other third parties as required by law

## **Inferred and Derived Information**

### **Category and Sources of Personal Information**

- We create inferred and derived data elements by analyzing our relationship and transactional information
- We draw inferences from the information we collect from and about you, such as your preferences, characteristics, attributes, and abilities

We also may collect this type of information from:

- Service Providers
- Third parties with whom we have joint business agreements for marketing and development and similar agreements
- Third party network advertising partners

## **Representative Data Elements**

Data elements in this category include:

- Propensities, attributes and/or scores generated by internal analytics programs and used for marketing
- Propensities, attributes and/or scores generated by internal analytics programs and used for information security and fraud purposes
- Preferred language
- Inferences reflecting a consumer's wellness, health, preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes, or other inferred data\*

## **Purpose for Collecting and Sharing the Personal Information**

We combine inferred data with other relationship information and use this type of information:

- To better understand you and to understand our customers generally
- To design products, services and programs that interest our customers, including subscription programs
- To identify prospective customers
- For internal business purposes, such as quality control, training, and analytics
- To administer, manage, analyze, and improve our programs, products, and services
- To analyze and better understand your needs, preferences, and interests, as well as those of other consumers
- For advertising and product promotion, including to contact you regarding programs, products, services, and topics that may be of interest or useful
- To engage in joint marketing initiatives
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To comply with legal and regulatory obligations
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers, including those who analyze data on our behalf and who help execute programs
- Our lawyers, auditors, and consultants
- Third parties with whom we have joint marketing and similar arrangements
- Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors
- Legal and regulatory bodies and other third parties as required by law

## **Internet and Online/Electronic Technical Information**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You and from your computer or devices when you interact with our platforms, websites and applications; for example, when you visit our websites, our server logs record your IP address and other information
- Automatically, via technologies such as cookies, web beacons, when you visit our website or other websites
- Third parties, including computer security services and advertising partners

- We also associate information with you using unique identifiers collected from your devices or browsers
- Third parties who provide website and online security services

## **Representative Data Elements**

Data elements in this category include:

- IP Address
- MAC Address, SSIDs or other device identifiers or persistent identifiers
- Online user ID
- Password
- Device characteristics (such as browser information)
- Web Server Logs
- Application Logs
- Browsing and search history
- Viewing Data (site and app usage)
- First Party Cookies
- Third Party Cookies
- Web beacons, clear gifs and pixel tags
- Internet service provider
- Referring/exiting URL Request/response date and time
- Clickstream data
- Ads and web pages viewed
- Time spent on a web page or mobile app
- Other information regarding your interactions with our websites, applications, emails, and advertisements

## **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- For system administration, technology management, including optimizing our websites and applications
- For information security and cybersecurity purposes, including detecting threats
- For recordkeeping, including logs and records that are maintained as part of Transaction Information
- For online targeting and advertising purposes subject to choices made via the Cookie Banner
- To administer, manage, analyze, and improve our programs, products, and services
- To conduct internal business analysis and market research
- To engage in joint marketing initiatives
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with programs, products, services, and advertisements for such purposes
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers including companies who assist with our information technology and security programs, including companies such as network security services who retain information on malware threats detected
- Service providers who assist with fraud prevention, detection, and mitigation
- Third party advertising network companies
- Our lawyers, auditors, and consultants
- Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors

- Legal and regulatory bodies and other third parties as required by law

## **Audio Visual Information**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Automatically, such as when we record calls to our call center and use CCTV cameras in our facilities
- Companies conducting research such as market research companies
- Third parties that provide access to information you make publicly available, such as social media

### **Representative Data Elements**

Data elements in this category include:

- Photographs
- Video images CCTV recordings
- Call center recordings and call monitoring records
- Voicemails

### **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- For internal business purposes, such as call recordings used for training, coaching or quality control
- For relationship purposes, such as use of photos and videos for social media purposes
- For premises security purposes and loss prevention
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers, including companies who assist with our information technology and security programs, and our loss prevention programs
- Service providers, including companies who conduct market research on our behalf Our lawyers, auditors, and consultants
- Other third parties as required by law

## **Financial Information**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Third parties that provide access to information you make publicly available, such as social media
- Third parties that provide information that helps us understand our customers, including data aggregators and public records providers
- Consumer reporting agencies and third parties who assist with fraud prevention, detection, and mitigation
- Payment processors and other financial institutions

- Other third parties who facilitate, process, and complete transactions for us, such as resellers, sales agents, and program partners

## **Representative Data Elements**

Data elements in this category include:

- Bank account number and details (if you use automated payments)\*
- Payment card information\*
- Debit or credit card number\*
- Bank account number and routing information\*
- Payment and reimbursement amounts

## **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- To better understand you and to understand our customers generally
- To design products, services, and programs, including subscription and special offer programs
- To communicate with you regarding our programs, products, and services.
- To fulfill our business relationship with you, including processing payments, issuing refunds and collections
- For recordkeeping and compliance, including dispute resolution
- For internal business purposes, such as finance, audits, training, reporting and analytics
- For risk management, fraud prevention and similar purposes
- To determine and verify program, product, and service eligibility and coverage
- To enroll you in our programs and provide our products and services to you
- To administer, manage, analyze, and improve our programs, products, and services
- To issue invoices and collect payments
- Reimburse customers, satisfy warranty obligations, and fulfill payment obligations
- To procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers, including payment processors, financial institutions and others as needed to complete the transactions and for authentication, security, and fraud prevention
- Our lawyers, auditors, and consultants
- Customers, in connection with their audits of Company
- Third parties who provide program enrollment, and product fulfillment services in connection with our products and services
- Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention
- Third Party Advertising partners
- Other third parties as necessary to complete transactions and provide our products/services
- Consumer reporting agencies
- Legal and regulatory bodies and other third parties as required by law

## **Electronic and Sensor Data**

### **Category and Sources of Personal Information**

We collect this type of information automatically when you use our internet-enabled products such as mobile apps and connected devices from:

- You
- When you contact or visit us (automatically), such as when we record calls to our call center or use CCTV cameras in our facilities
- Your mobile devices and other internet-connected devices and applications (automatically)
- Third parties that provide access to information you make publicly available, such as social media platforms

### **Representative Data Elements**

Data elements in this category include:

- Smart device records
- Health values and sensor readings data, such as steps taken, movement information, data collected by our mobile apps, blood glucose levels, heart rate, and blood pressure\*
- Recording of a customer service call
- Recording from a CCTV camera in our facilities

### **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- To enable product functionality
- For internal business purposes, such product development, security, and quality control
- To administer, manage, analyze, and improve our programs, products, and services
- To analyze and better understand your needs, preferences, and interests, as well as those of other consumers
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To provide access to, monitor, and secure our facilities, equipment, and other property
- To comply with legal and regulatory obligations
- To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with programs, products, services, and advertisements for such purposes
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers, including companies who host our data, assist with our information technology and security programs, including network security services and cybersecurity
- Service providers, including companies who assist with fraud prevention, detection, and mitigation
- Third party network advertising partners
- Our lawyers, auditors, and consultants
- Healthcare providers, health insurance companies (health plans), other payors and others as needed to provide the contemplated services or transactions involving the data, such as for processing health care payments
- Authorized/legal representatives, family members, and caregivers
- Third parties who provide program enrollment, and product fulfillment services in connection with our products and services
- Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors
- Third parties who assist with our information technology and security programs
- Third parties who assist with fraud prevention, detection, and mitigation
- Other third parties as necessary to complete transactions and provide our products/services
- Other third parties as required by law

## **Geolocation Data**

### **Category and Sources of Personal Information**

We may collect this type of information automatically from your mobile device and computer when you visit or interact with our websites, applications, and online platforms.

### **Representative Data Elements**

Data elements in this category include:

- Precise location data\*
- Geofencing data

### **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:

- To provide the information, products or services requested
- For information security and fraud prevention
- For our everyday business purposes
- To administer, manage, analyze, and improve our programs, products, and services
- To conduct internal business analysis and market research
- For advertising and product promotion, including to contact you regarding programs, products, services, and topics that may be of interest or useful
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Third parties who assist with our information technology and security programs
- Third parties who assist with fraud prevention, detection, and mitigation
- Our lawyers, auditors, and consultants
- Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors
- Legal and regulatory bodies and other third parties as required by law

## **Compliance Data**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Third parties, including companies that help us conduct internal investigations
- Third parties, such as consumer reporting agencies and data aggregators who conduct background screening for us

### **Representative Data Elements**

Data elements in this category include:

- Compliance program data, including signed consent forms, data subject request forms, customer screening records, and other records maintained to demonstrate compliance with applicable laws
- Occupational and environmental safety records
- Records relating to complaints and internal investigations, including compliance hotline reports
- Records of privacy and security incidents, including any security breach notifications

### **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- To comply with and demonstrate compliance with applicable laws
- For legal matters, including litigation and regulatory matters, including for use in connection with civil, criminal, administrative, or arbitral proceedings, before regulatory or self-regulatory bodies, including service of process, investigations in anticipation of litigation, execution or enforcement of judgments and orders
- For internal business purposes, such as risk management, audit, internal investigations, reporting, analytics
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Our lawyers, auditors, and consultants
- Customers, in connection with their audits of Company
- Other third parties (including government agencies, courts and opposing law firms, consultants, process servers and parties to litigation) in connection with legal matters

### **Professional Information**

#### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Our business partners and other third parties that provide access to information you make publicly available, such as social media platforms
- Third parties who provide us with supplemental data or data analytics and market research services, such as data aggregators
- Your employer or principal

#### **Representative Data Elements**

Data elements in this category include:

- Employer and job title
- Medical license
- Employer location
- Information from a resume or CV, including education and certification credentials
- Information included in an IRS 1040 form

### **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- To provide you with our Products and Services
- To communicate with you
- To administer our relationship with your organization
- To send you updates



- To administer and manage your registration and participation at events
- To fulfill business relationships with you, including processing payments and notifying you of your order status or any associate order status issues
- To identify and authenticate you
- To ensure the appropriate use of our Products and Services
- To improve our Products and Services and our Online Services
- For short-term, transient use
- For administrative purposes
- For quality assurance
- For marketing, internal research, and development
- To customize content for you
- To procure vendor/supplier products and services, including to manage and satisfy related vendor/supplier contractual obligations
- Advertising and product promotion, including to contact you regarding programs, products, services, and topics that may be of interest or useful
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To determine and verify program, product, and service eligibility and coverage
- To conduct internal business analysis and market research
- To comply with legal and regulatory obligations
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Third parties who provide benefit verification, program enrollment, and product fulfillment services in connection with our products and services
- Our lawyers, auditors, and consultants
- Other Healthcare Providers
- Your patients
- Third parties who assist with fraud prevention, detection, and mitigation
- Third parties who assist with our information technology and security programs
- Partners that assist us in providing the Products and Services or help us improve our marketing or administration
- Legal and regulatory bodies and other third parties as required by law

### **CALIFORNIA JOB APPLICANTS**

The following table provides detail for residents of California who interact with us applicants for jobs, with respect to the category of Personal Information collected, the source of that information, the purposes for collection and sharing/disclosure, and the categories of third parties to whom the category of Personal Information is shared

## **Contact Information**

### **Category and Sources of Personal Information**

We may collect this type of information from:

- You
- Your employer or principal
- Service providers such as companies that provide employment recruiting services to us, including third parties that provide access to information you make publicly available, such as via social media platforms
- Consumer reporting agencies and other third parties who verify the information you provide
- Third parties who help us maintain the accuracy of our data and data aggregators that help us complete and enhance our records

### **Representative Data Elements**

Data elements in this category include:

- Full name, or unique pseudonym
- Honorifics and titles, preferred form of address
- Postal address
- Email address
- Phone number
- Fax number
- Contact information for related persons, such as authorized users of your account
- Company ID number (e.g., customer number, account number, subscription number)
- System identifiers (e.g., usernames or online credentials)

### **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:

- To identify you and communicate with you
- For our internal business, administrative, and candidate recruiting and employment-related purposes
- For record-keeping and reporting, including for data matching, metrics, and analytics
- To conduct marketing of the company and market research
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- If you visit our physical sites, to provide access to, monitor, and secure our facilities, equipment, and other property
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers such as companies who help manage recruiting events and activities
- Third parties who deliver our communications, such as the postal service and couriers
- Other third parties (including government agencies) as required by law, such as pursuant to legally binding subpoenas, court orders, and similar instruments
- Service providers, including those who host our data centers, help administer our call center hosting platforms and phone systems, and provide parts of our physical and electronic infrastructure
- Third Party Advertising companies (see Third Party Advertising below)
- Third parties who assist with fraud prevention, detection, and mitigation
- Other third parties as necessary to complete transactions and provide our products/services, including delivery companies, agents, and manufacturers
- Service providers who provide employment recruiting services, data analytics services, and third parties such as business and social media platforms used to deliver our ads, website/email optimization providers, and email marketing vendors
- Consumer reporting agencies
- Our lawyers, auditors, and consultants

### **Other Unique Identifiers**

#### **Category and Sources of Personal Information**

We may collect this type of information from:

- You
- Your employer or principal

- Service providers such as companies that provide employment recruiting services to us, including third parties that provide access to information you make publicly available, such as via social media platforms
- Consumer reporting agencies and other third parties who verify the information you provide Third parties who help us maintain the accuracy of our data and data aggregators that help us complete and enhance our records

## **Representative Data Elements**

Data elements in this category include:

- Government issued identifiers, such as Social Security Numbers,\* Birth Certificate Number,\* Driver's or Operator's license number,\* Passport Number,\* Alien Number or I-94 Number\*
- Device identifier
- Advertising ID
- Customer number
- IP address
- Service Request ID number
- Cookie ID
- Online User ID

## **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:

- To identify you and communicate with you
- For our internal business, administrative, and candidate recruiting and employment-related purposes
- For record-keeping and reporting, including for data matching, metrics, and analytics
- To conduct marketing of the company and market research
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- If you visit our physical sites, to provide access to, monitor, and secure our facilities, equipment, and other property
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers such as companies who help manage recruiting events and activities
- Third parties who deliver our communications, such as the postal service and couriers
- Other third parties (including government agencies) as required by law, such as pursuant to legally binding subpoenas, court orders, and similar instruments
- Service providers, including those who host our data centers, help administer our call center hosting platforms and phone systems, and provide parts of our physical and electronic infrastructure
- Third Party Advertising companies (see Third Party Advertising below)
- Third parties who assist with fraud prevention, detection, and mitigation
- Other third parties as necessary to complete transactions and provide our products/services, including delivery companies, agents, and manufacturers
- Service providers who provide employment recruiting services, data analytics services, and third parties such as business and social media platforms used to deliver our ads, website/email optimization providers, and email marketing vendors
- Consumer reporting agencies
- Our lawyers, auditors, and consultants

## **Characteristics or Description of Individuals**

## **Category and Sources of Personal Information**

We may collect this type of information from:

- You
- Service providers such as companies that provide employment recruiting services to us, including third parties that provide access to information you make publicly available, such as via social media platforms
- Third parties who help us maintain the accuracy of our data and data aggregators that help us complete and enhance our records

## **Representative Data Elements**

Data elements in this category include:

- Height
- Weight
- Hair & eye color
- Age/Date of Birth
- Gender
- Race and Ethnicity\*
- Citizenship Status\*
- Religion\*
- Information concerning sexuality or sex life\*
- Disability\*
- Personal characteristics and preferences, marital and family status,\* shopping/product preferences, languages spoken
- Other similar data elements

## **Purpose for Collecting and Sharing the Personal Information**

We may use this type of information:

- If you visit our physical site, to help manage emergency incidents that occur on campus or involve company property
- To determine and verify program eligibility
- For our internal business, administrative, and candidate recruiting and employment-related purposes
- To analyze and better understand your needs, preferences, and interests
- For our company marketing and market research purposes
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To conduct internal business analysis and market research
- To comply with legal and regulatory obligations
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Emergency personnel
- Service Providers which use the data only to assist in incident management and reporting
- Service providers, including those who help administer our call center hosting platforms and phone systems
- Service providers, including those who host websites, and companies who assist with our information technology and security programs
- Service providers who provide employment recruiting services, data analytics services, and third parties such as business and social media platforms used to deliver our ads, website/email optimization providers, and email marketing vendors.
- Our lawyers, auditors, and consultants

- Legal and regulatory bodies and other third parties as required by law

## **Inferred and Derived Information**

### **Category and Sources of Personal Information**

We collect this type of information from:

- Inferred and derived data elements we create by analyzing our relationship and transactional information
- We draw inferences from the information we collect from and about you, such as your preferences, characteristics, attributes, and abilities
- Third parties who provide digital marketing, and analytics services for us

### **Representative Data Elements**

Data elements in this category include:

- Propensities, attributes and/or scores generated by internal analytics programs and used for marketing
- Propensities, attributes and/or scores generated by internal analytics programs and used for information security and fraud purposes
- Preferred language
- Inferences reflecting a consumer's wellness, health, preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes, or other inferred data\*

### **Purpose for Collecting and Sharing the Personal Information**

We combine inferred data with other relationship information and use this type of information:

- For company marketing and market research purposes, such as quality control, training, and analytics
- For our internal business and administrative purposes, candidate recruiting and employment-related purposes
- To analyze and better understand your needs, preferences, and interests, as well as those of other applicants
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- For internal business purposes, such as quality control, training, and analytics
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To comply with legal and regulatory obligations
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers, including those who analyze data on our behalf and who help execute programs
- Our lawyers, auditors, and consultants
- Service providers who provide employment recruiting services, data analytics services, and third parties such as business and social media platforms used to deliver our ads, website/email optimization providers, and email marketing vendors
- Legal and regulatory bodies and other third parties as required by law

## **Internet and Online/Electronic Technical Information**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You and from your computer or devices when you interact with our platforms, websites and applications; for example, when you visit our websites, our server logs record your IP address and other information
- Automatically, via technologies such as cookies, web beacons, when you visit our website or other websites
- Third parties, including computer security services and advertising partners
- We also associate information with you using unique identifiers collected from your devices or browsers
- Third parties who provide website and online security services

## **Representative Data Elements**

Data elements in this category include:

- IP Address
- MAC Address, SSIDs or other device identifiers or persistent identifiers
- Online user ID
- Password
- Device characteristics (such as browser information)
- Web Server Logs
- Application Logs
- Browsing and search history
- Viewing Data (site and app usage)
- First Party Cookies
- Third Party Cookies
- Web beacons, clear gifs and pixel tags
- Internet service provider
- Referring/exiting URL Request/response date and time
- Clickstream data
- Ads and web pages viewed
- Time spent on a web page or mobile app
- Other information regarding your interactions with our websites, applications, emails, and advertisements

## **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- For system administration, technology management, including optimizing our websites and applications
- For information security and cybersecurity purposes, including detecting threats
- For recordkeeping, including logs and records that are maintained as part of Transaction Information
- For online behavioral advertising purposes and general advertising and company promotion
- For our internal business, administrative, and candidate recruiting and employment-related purposes
- For company marketing and market research purposes
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To administer, provide access to, monitor, and secure our information technology systems, websites, applications, databases, and devices
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements
- To comply with legal and regulatory obligations
- To identify you and your device(s) for any/all purposes identified above, including to monitor your use of and interactions with programs, products, services, and advertisements for such purposes
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers including companies who assist with our information technology and security programs, including companies such as network security services who retain information on malware threats detected

- Service providers who assist with fraud prevention, detection, and mitigation
- Third party advertising network companies
- Our lawyers, auditors, and consultants
- Service providers who provide employment recruiting services, data analytics services, and third parties such as business and social media platforms used to deliver our ads, website/email optimization providers, and email marketing vendors
- Legal and regulatory bodies and other third parties as required by law

## **Audio Visual Information**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Automatically, such as when we record calls to our call center and use CCTV cameras in our facilities
- Companies conducting research such as market research companies
- Service providers such as companies that provide employment recruiting services to us, including third parties that provide access to information you make publicly available, such as via social media platforms

### **Representative Data Elements**

Data elements in this category include:

- Photographs
- Video images CCTV recordings
- Call center recordings and call monitoring records
- Voicemails

### **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- For internal business purposes, such as call recordings used for training, coaching or quality control
- To identify and authenticate you
- For relationship purposes, such as use of photos and videos for social media purposes
- For premises security purposes and loss prevention
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal and regulatory requirements.
- For our everyday business purposes

### **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers, including companies who assist with our information technology and security programs, and our loss prevention programs
- Service providers, including companies who conduct market research on our behalf
- Our lawyers, auditors, and consultants
- Other third parties as required by law

## **Professional Information**

### **Category and Sources of Personal Information**

We collect this type of information from:

- You
- Your employer or principal
- Service providers such as companies that provide employment recruiting services to us, including third parties that provide access to information you make publicly available, such as via social media platforms

## **Representative Data Elements**

Data elements in this category include:

- Employer and job title
- Medical license Employer location
- Information included in an IRS 1040 form

## **Purpose for Collecting and Sharing the Personal Information**

We use this type of information:

- For our internal business, administrative, and candidate recruiting and employment-related purposes
- To identify and authenticate you
- For company marketing, market research purposes
- To monitor, investigate, and enforce compliance with our policies, product/service terms and conditions, and legal
- To comply with legal and regulatory obligations
- For our everyday business purposes

## **Categories of Third Parties to Whom This Type of Personal Information Is Shared or Disclosed for a Business Purpose**

We may disclose this type of information to our Affiliates and Service Providers and to:

- Service providers such as companies who help manage recruiting events and activities
- Third parties who deliver our communications, such as the postal service and couriers
- Other third parties (including government agencies) as required by law, such as pursuant to legally binding subpoenas, court orders, and similar instruments
- Service providers, including those who host our data centers, help administer our call center hosting platforms and phone systems, and provide parts of our physical and electronic infrastructure
- Third Party advertising companies (see Third Party Advertising below)
- Third parties who assist with fraud prevention, detection and mitigation
- Service providers who provide employment recruiting services, data analytics services, and third parties such as business and social media platforms used to deliver our ads, website/email optimization providers, and email marketing vendors
- Consumer reporting agencies
- Our lawyers, auditors, and consultants
- Legal and regulatory bodies and other third parties as required by law

## **Other Uses of Personal Information**

**Mergers and Acquisitions.** In addition to the uses set forth above, in certain circumstances, we will use and disclose your Personal Information to facilitate a merger, consolidation, transfer of control or other corporate reorganization in which Edwards Lifesciences participates, or pursuant to a financial arrangement undertaken by Edwards Lifesciences and your Personal Information will be disclosed to the buyer, assignee, or transferee.

**Data Retention.** We will retain your Personal Information for as long as needed or permitted to fulfill the purpose(s) for which it was collected or obtained, and as outlined in this Privacy Statement. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject that affects the Personal Information; and (iii) whether retention is determined to be necessary or advisable for Edwards Lifesciences due to applicable statutes of limitations, litigation, or other legal or



regulatory obligations. We take reasonable steps to dispose of Personal Information upon the expiration of retention periods taking into consideration these litigation, legal, or regulatory obligations.

**De-Identification.** We may de-identify your Personal Information, which means it will remove certain data from your Personal Information, such as Contact Information, such that the resulting data would not be able to identify you or anyone else as the subject of the data. The de-identified data will no longer be Personal Information and may no longer be subject to data protection laws. We will not attempt to re-identify you or anyone else from this de-identified data and if we disclose it to third parties, we will require that they commit to not attempting to re-identify you or anyone else from the de-identified data. We will use de-identified data for our business purposes.

## Third Parties

**Third Party Advertising:** We disclose Personal Information about you (as set forth in the table above) to third-party advertising network companies. We use third-party advertising network companies to place ads on other websites, including network advertising companies with whom we work who place their own cookies on your browser when you visit our Site. This enables these third-party advertising network companies to collect and use data from their cookie on your browser, which may include information about your visits to this and other websites. These advertising companies use and further disclose this information in order to deliver advertisements about our goods and services to you when you are on other websites. These advertisements will often be tailored to you. These advertisers may in turn disclose the information about you collected from their cookies to other advertisers to allow those advertisers to display ads to you as well.

In some jurisdictions, these cookies are disabled until you opt-in; in others, these are enabled by default, but you may have the right to opt out. You may opt-out of our disclosure of your Personal Information for these purposes as set forth below.

For additional information about how else we use cookies and other digital technologies, please see the [Digital Advertising, Cookies and Other Data Collection Technologies](#) section of the Privacy Statement.

**Service Providers:** Service providers acting on our behalf must execute agreements requiring them to maintain confidentiality and to process Personal Information as necessary to perform their functions in a manner consistent with this Statement, other applicable privacy notices, and as explicitly permitted or required by applicable laws, rules, and regulations.

**Combination of Data with Data Received from Third Parties:** We may combine information we collect, including Personal Information, with Personal Information that we may obtain from third parties.

**Links to Other Websites:** Our Products and Services may contain links to other websites, applications, products, or services that are not owned or operated by Edwards Lifesciences, such as social media websites and applications like Facebook and Twitter. You should carefully review the privacy policies and practices of other websites, products, and services as we cannot control and are not responsible for privacy policies, notices, or practices of third-party websites, applications, products, and services.

## Do Not Track Signals and Global Privacy Control

Some web browsers incorporate other "do-not-track" ("DNT") or similar features that signals to websites with which the browser communicates that a visitor does not want to have their online activity tracked. As of the Effective Date, not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, Edwards Lifesciences Sites along with many other digital service operators do not respond to all DNT signals.

Certain web browsers and other programs may transmit "opt-out" signals, such as the Global Privacy Control (or GPC) signal (we refer to these as "GPC Signals"), to websites with which the browser communicates. In most cases you will need to change your web browser's settings or add an application to your web browser to enable your browser to send a GPC Signal. Our websites will recognize GPC Signals for website users differently based on the location of the user when they access our websites. For users that access our websites from U.S. states that have laws requiring recognition of GPC Signals, we will recognize and apply the GPC Signal to inactivate all but essential cookies for that website. (Essential cookies are necessary for the website to operate). Regardless of your location, you may modify your cookie

settings for the website you are visiting by clicking on the “Cookie Preferences” link in the website footer. For more information about the Global Privacy Control, please visit <https://globalprivacycontrol.org>.

## **Your Data Privacy Rights Regarding Your Personal Information**

Please note that in many circumstances, we cannot effectively do business with you without processing some Personal Information about you (e.g., your contact information). For example, when you contact our customer service representatives, we may require you to provide information to authenticate your identity to assist you with your request. If you are unable to provide this information, we may be unable to process your request.

To the extent that the state in which you live has a data protection law that requires us to offer some or all of the following rights to you, we will provide the following rights to you based on your state’s law:

- To opt-out of sharing your Personal Information for cross-context behavioral advertising or, in other states, to opt-out of targeted advertising,
- To request access to and a copy of your Personal Information and/or your Sensitive Personal Information, including a request to provide a copy directly to another organization (i.e., a right to data portability),
- To request to confirm or know about the Personal Information we process about you or, in other states, to request to acknowledge our processing of your Personal Information,
- To request that we correct your Personal Information,
- To request that we delete your Personal Information (and notify any affiliates, processors, contractors, or other third parties with which we shared to delete it as well),
- To request that we limit the processing of your Sensitive Personal Information,
- To opt-out of processing of Sensitive Personal Information,
- To withdraw consent to the collection or sharing of your Sensitive Personal Information,
- To appeal the denial of a request, and
- To lodge a complaint with the data protection authority in your jurisdiction.

To learn which rights are provided in the state in which you live and to exercise any of these rights with respect to your Personal Information, please see the following section on *How to Submit a Data Privacy Rights Request*. We will not discriminate against you for exercising any of the rights described above, although we may not be able to continue to provide you Products and Services, or it may otherwise affect the way we are able to interact with you.

## **How to Submit a Data Privacy Rights Request**

To submit a request to opt-out of targeted advertising, you may complete the form below, or you may also click “Your Privacy Choices” in the footer of the website you are visiting.

To submit a request pursuant to your data privacy rights under U.S. state privacy laws, we have designated the following two options for you to submit a data privacy rights request:

- by completing and submitting this online [form](#), or
- by contacting us at (888) 570-4014.

We will make reasonable efforts to respond promptly to your requests in accordance with applicable laws. We may, after receiving your request, require additional information from you to honor your request and verify your identity. Please be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.

You may designate an authorized agent to assist you in exercising any of your rights stated above. When you use an authorized agent to submit a request to exercise your rights, you must provide the authorized agent with written permission to do so, and, in certain circumstances, we may ask you to verify your own identity directly with us. We may deny a request from an authorized agent that does not submit proof that they have been authorized by you to act on your behalf.

In the event you wish to make a complaint about how we process your Personal Information or appeal a response to your request, please contact us using the information in the [Contact Us](#) section below, and we will handle your request

as soon as possible in accordance with applicable laws. Even if you make a complaint to us, you may always lodge a complaint with the relevant authority in your location.

When we receive your Personal Information from our customers and process your Personal Information on their behalf, we do so at their request and subject to their instructions. We do not have control over our customers' privacy and security practices and processes. If your Personal Information has been submitted to us by an Edwards Lifesciences customer and you wish to exercise any of the above-mentioned rights, please contact the relevant customer directly.

### **Right of Non-Discrimination for Exercise of Your Privacy Rights**

We or Edwards Lifesciences will not discriminate against any person exercising his or her rights under applicable state data protection laws, as described above. Discrimination, in this context, includes that, as a result of exercising any of your data privacy rights, you are denied goods or services, charged different prices for goods or services, or provided a different level of quality.

Residents of U.S. states with comprehensive privacy laws who are unable to review or access this Supplemental U.S. Privacy Statement due to a disability may contact us to request access to this Statement in an alternative format. Please call (888) 570-4014 or email us at [privacyrights@edwards.com](mailto:privacyrights@edwards.com).

### **Nevada Residents**

Edwards Lifesciences' does not sell Covered Information as defined under Nevada law. If you would like to make a further inquiry regarding the selling of your Covered Information as defined under Nevada law, please send an email to the Privacy Office at the email address provided below.

### **Contact Us**

If you have any questions or concerns about this Privacy Statement or about your Personal Information, you may contact us as follows:

Privacy Office Edwards Lifesciences Legal Department  
One Edwards Way Irvine, California 92614  
Email: [privacy@edwards.com](mailto:privacy@edwards.com)

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.

### **Changes to Our Privacy Statement**

We may update this Privacy Statement from time to time. When we do update it, for your convenience, we will make the updated statement available on this page. Our intention is to use Personal Information in accordance with the Privacy Statement in place at the time the information was collected.