

## Putting you first - ViCentra’s privacy statement

Your privacy is important to us. We know that’s what all privacy statements say but we mean it. Putting people first is one of our most important principles - we treat others as we want to be treated and look out for each other. That includes protecting and ensuring you have control over your own personal data.

This statement explains (hopefully in a clear and straightforward way) how we collect, transfer, process, use, disclose and look after any personal data you give us (regardless of where you are from or how you provide it). This statement also tells you about our security practices, your privacy rights (including how you can get access to your personal data) and how the law protects you. We’ve also added a definitions section (Glossary) to explain the meaning of some of the terms used.

For ease you can click on the below headings to go straight to a part which interests you or you can download a pdf version of this policy here.

It’s important to add that we might need to update this statement from time to time. When we do update we’ll always let you know what’s changed, or what is new, on this page. As such it’s good to check this page from time to time to read and understand our statement as well as any other privacy or fair processing notice we may give you when we’re collecting or processing your data. It’s equally important that the personal data we hold about you is accurate and up to date. As such we ask that you keep us informed if your personal data changes during your relationship with us.

This privacy statement supplements any other privacy notices we give you and is not intended to override them.

### Third-party links

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

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## Who are we?

ViCentra B.V. is made up of different legal entities ("ViCentra Group"), see Contact details below. This privacy statement is issued on behalf of the ViCentra Group so when we mention "ViCentra", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the ViCentra Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product with us. ViCentra B.V. is the controller responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy statement. If you have any questions about this privacy statement, including any requests to exercise your legal rights, please contact our DPO using the details set out below. We highlight that the DPO is bound by law to maintain confidentiality with regard to any questions and/or issues you may present.

## Contact details

Our full details are:

The ViCentra group comprises of ViCentra B.V. (a limited liability company having its registered office in Amsterdam, The Netherlands listed in the Trade Register of the Chamber of Commerce in Amsterdam under file number 57237662) and its wholly owned subsidiary ViCentra Manufacturing B.V. (a limited liability company having its registered office in Amsterdam, The Netherlands listed in the Trade Register of the Chamber of Commerce in Amsterdam under file number 68604084).

Title of DPO: Tim Hardy

Email address: [dpo@vicentra.com](mailto:dpo@vicentra.com)

Postal address: ViCentra B.V. attn. DPO, Kanaalweg 17B2, 3526 KL Utrecht, The Netherlands.

You have the right to make a complaint at any time to the Dutch Data Protection Authority (Dutch DPA), the Netherlands supervisory authority for data protection issues (<https://autoriteitpersoonsgegevens.nl>). Hopefully though you will give us the chance to listen and address your concerns before you approach the Dutch DPA so if you have any concerns or queries please contact us via [dpo@vicentra.com](mailto:dpo@vicentra.com).

## What type of data do we collect about you?

Personal data, or personal information, means any information about an individual identifying said individual or from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes your first name, last name, username or similar identifier, title, date of birth, gender, social security information.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes health insurance information for payment purposes.

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests and preferences regarding our products and related marketing activities, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences (see Third-party marketing below).
- **Medical Data** includes information about you that may identify you and relates to your past, current, or future health or condition and related health care provision regarding ViCentra's or similar products.

We also collect, use and share **Aggregated Data** with THIRD PARTIES such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific product feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions or trade union membership. Nor do we collect any information about criminal convictions and offences.

#### **If you don't want to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you don't provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a product or service). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

#### **How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial and Medical Data by filling in forms or by contacting us by post, phone, email, social media, in person at a trade fair or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - provide your contact details via our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a promotion or survey; or
  - give us some feedback.

- **Automated technologies or interactions.** As you interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from anonymized analytics providers such as Google based outside the EU
  - Contact, Financial, Transaction and Medical Data from our partner providers of technical, payment, delivery and healthcare services e.g. your health care provider (so we provide your tailored product and service), your data upload service provider (e.g. scanned medical data from Glooko Inc. formerly known as Diasend A.B. outside the EU), your health insurance provider (e.g. for a health insurance claim to collect payment) and our distributors, (such as Bosman Medische Hulpmiddelen B.V for our Netherlands customers inside the E.U.) to deliver your product, provide customer service, product and process improvements.

**How we use your personal data**

We will only use your personal data when the law allows us to. With the exception of the disclosures outlined in this privacy statement we will obtain your written authorization before using your personal data or disclosing it to any third parties.

We will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your explicit consent (N.B. you have the right to withdraw consent at any time by contacting us).

See **LAWFUL BASIS** to find out more about the types of lawful basis that we will rely on to process your personal data.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

It’s important to note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact our DPO if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below. Also, whenever you provided an explicit consent for any of the purposes and/or activities as set out below, we note that you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer/ potential customer	(a) Identity (b) Contact (c) Medical	(a) Performance of a contract with you (b) Explicit Consent

<p>To process and deliver your order including:</p> <p>(a) to provide your tailored product and related services</p> <p>(b) Manage payments, fees and charges</p> <p>(c) Collect and recover money owed to us</p> <p>(d) Respond to your questions including troubleshooting and performance issues</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p> <p>(f) Medical</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p> <p>(c) Explicit Consent</p>
<p>To manage our relationship with you and ensure quality of product and service which will include:</p> <p>(a) Notification e.g. product/supply reorder notifications, changes to our terms or privacy policy</p> <p>(b) Asking you to take a feedback survey</p> <p>(c) Evaluate product and service quality, performance and usage e.g. using scanned, uploaded data (via Glooko Inc., formerly Diasend A.B., outside the EU)</p> <p>(d) to prepare and send you tailored marketing and communication information where you have consented for such communication</p> <p>(e) for process improvements and validation including software updates and security purposes</p> <p>(f) for research and development, data/ statistical analysis purposes, new functionality, features and product development following established protocols to ensure the privacy of your Medical Data</p> <p>(g) Health Oversight/ Legal e.g. disclosure to government agency for health benefits processing or disclosure to report adverse events (or similar)/ product issues as</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p> <p>(e) Medical</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services, to develop them and grow our business)</p> <p>(d) Explicit consent</p>

required by law		
To administer and protect our business and this website (including troubleshooting, data analysis involving aggregated data, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To make suggestions and recommendations related to diabetes to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	(a) Necessary for our legitimate interests (to develop our products/services and grow our business)  (b) Explicit consent

### Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

#### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have explicitly consented to receive that marketing.

#### Third-party marketing

We will get your express consent before we share your personal data with any company outside the ViCentra group of companies for marketing purposes.

#### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose, such as protecting your vital interest, or in compliance with a legal obligation for ViCentra. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our DPO.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so or ask your explicit consent when need may be.

### **Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If such a change happens to our business, then the continuity of our business will require the new owners use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions based on proper processing agreements, including appropriate confidentiality clauses.

### **International transfers**

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. We ensure your personal data is protected by requiring all our third party partners to follow the same rules when processing your personal data.

Whenever we transfer your personal data out of the EEA, we also ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data for processing purposes to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: [Adequacy of the protection of personal data in non-EU countries](#)
- Where we use certain service providers outside the EU, we will use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: [Model contracts for the transfer of personal data to third countries](#)

- Where we use providers based in the US, we will only transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: [EU-US Privacy Shield](#)

Please contact our DPO if you want further information on the specific mechanism used by us when transferring your personal data out of the EU or the EEA.

### **Data security & Integrity**

We have put in place industry standard, appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered, disclosed or destroyed. We also work to ensure and maintain the accuracy and reliability of your personal data.

We will explain when you provide us with your personal data what that data will be used for, request your consent when, how and as required by law and we will remind you of your right to withdraw consent. Additionally if we then want to use this personal data for an unrelated purpose we will inform you. In short we will remain open and transparent throughout our relationship and once our relationship has ended.

Additionally, we will only collect data that is adequate, relevant and limited to what is necessary for the intended purpose of the data collection. We also use security procedures and business systems to limit your personal data to those authorized employees, agents, contractors and other third parties who have a business need to know and who are bound by appropriate contractual arrangements. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Likewise, we have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. If a personal data breach is likely to result in a high risk to your rights, we shall communicate the personal data breach to you without undue delay.

### **Data retention**

#### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting [dpo@vicentra.com](mailto:dpo@vicentra.com).

In some circumstances you can ask us to delete your data: see **Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.** below for further information.

### **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. to your personal data.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Error! Reference source not found.**Object to processing** of your personal data.
- **Request restrict**Error! Reference source not found.**ion of processing** your personal data.
- **Request transfer** of your personal data.
- **Right to withdraw consent.**

If you wish to exercise any of the rights set out above, please contact us via [dpo@vicentra.com](mailto:dpo@vicentra.com).

#### **No fee usually required**

You will not have to pay a fee to access your personal data or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or to exercise any of your other rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Explicit consent** means not only consent which is given freely, specifically and on an informed basis but which is a very clear and specific statement of consent.

### THIRD PARTIES

#### Internal Third Parties

Other companies in the ViCentra Group than ViCentra B.V. acting as joint controllers or processors with ViCentra B.V. and who are based inside the EU.

#### External Third Parties

- Service providers acting as processors (e.g. Bosman Medische Hulpmiddelen B.V based in The Netherlands who provide distributor services and Glooko Inc., formerly Diasend A.B., based in the United States who provide scanned medical data storage management services for our products).
- Professional advisers acting as processors or joint controllers including bankers, auditors and insurers based inside the EU who provide consultancy, banking, insurance and accounting services.
- Legal, regulatory and other authorities acting as processors or joint controllers based inside the EU who require reporting of processing activities in certain circumstances.
- These processors shall all protect your rights and shall all act in such a manner that processing will meet the requirements of the law.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.