

# CONTOUR™ DIABETES APP

## Privacy Policy

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### Introduction

The protection and security of your personal data are important to Ascensia. This Privacy Policy tells you how we collect, use, share and protect your personal data and, together with the End User Licence Agreement (EULA), applies to your use of the Contour™ Diabetes App (Contour App).

The Contour App has been developed and is operated by Ascensia Diabetes Care Holdings AG (“Ascensia,” “we,” or “us”), based in Peter Merian-Strasse 90, P.O. Box, 4052 Basel, Switzerland. Ascensia is the controller of your personal data processed via the Contour App pursuant to the Swiss Federal Act on Data Protection of 19 June 1992.

The Contour App is a secure cloud-based diabetes management service that is a part of the Ascensia Diabetes Care portfolio of diabetes management products and services. The Contour App is compatible with the Contour™ portfolio of blood glucose meters (“Contour™ Connected Meter”) and other Bluetooth enabled devices or other products designated to be compatible with the Contour App.

Residents of the European Economic Area and Switzerland: Ascensia relies on the legal basis of consent to process your health-related information for the purpose of providing you with the Contour App and the Contour Cloud Account. You may withdraw your consent at any time by using the “Delete Account” option in the Contour App.

**Please read this Privacy Policy before consenting to create a Contour Cloud account.**

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### 1. Using the Contour App

You must create a Contour Cloud account in order to use the Contour App. When creating your account, you will be asked to select your country and language so that we can provide you with the correct version of the Privacy Policy and the EULA. You will also be asked to accept the EULA terms and conditions before being able to use the Contour App.

## 2. Creating a Contour Cloud Account

Once you complete your registration for a Contour Cloud account, your personal data will be backed up to the cloud. You will be able to access the data stored in your Contour Cloud account, including your blood glucose readings, on multiple devices. Creating a Contour Cloud account will ensure that the Contour Connected Meter you pair with the Contour App can sync information and settings, such as Target Ranges.

Upon creating a Contour Cloud account, you will be asked to consent to the processing of your health-related information as described in this Privacy Policy. You can withdraw your consent at any time by deleting your account (see “Contour Cloud Account Deletion” below). Please do not create a Contour Cloud account if you do not wish for your health-related information to be processed by us.

## 3. Diabetes Management

The Contour App and Contour Cloud services are designed to help you manage your diabetes by automatically syncing and logging your blood glucose results so you can understand how your activities impact upon them. The Contour App and Contour Cloud account require Wi-Fi and/or data connectivity for syncing and retrieving your blood glucose (BG) results via your smartphone. The Contour App and Contour Cloud services simplify the management of your diabetes but the services are not a substitute for medical advice. Ascensia recommends that you seek regular advice from your health care provider regarding your diabetes. Ascensia does not provide medical advice to users. We recommend that you contact your health care provider or your local emergency services if you suspect you may have a medical emergency. The members of our customer support team are not authorised to provide medical advice relating to the substance, meaning, or possible consequences of any BG results uploaded to the Contour App or Contour Cloud account.

## 4. Collection

Ascensia will process your personal data when you submit it in the following ways:

- **Contour Cloud Account Registration and Profile Details:** When you create a Contour Cloud account, the following information will be stored: your name, gender, email address, date of birth, country, authentication details and other registration information. Where a user is a child, we will request and collect the email address of a parent/guardian for verification purposes. The Contour App can be used to capture information about your diabetes management, condition of health and your Contour Connected Meter. This may include your diabetes type, medications, insulin, food consumption and exercise regime, your hospital address and hospital attendance dates, health care practitioner reports, blood glucose readings, A1c data, meter model number, serial number and settings.
- **Access to Mobile Device System Services:** Depending on your mobile device operating system, the Contour App may automatically access, or you may be asked to allow access to, certain system services on your device, such as camera, photos and contact list. Access to these system services allows the Contour App to function properly, and does not result in Ascensia having access to, collecting or storing any information relating to such system services. You can manage the Contour App's access to these system services in your mobile device/the Contour App's settings.
- **Emergency Contact:** You may choose to include emergency contact information of someone you would want contacted in case of an emergency. The information about your emergency contact is only stored locally on your smartphone and is not collected or stored by us in your Contour Cloud account.
- **Customer Services:** If you contact us about the Contour App, your Contour Cloud account or for any other reason relating to customer services, we will keep a record of that contact. You may provide us with personal data by completing forms by e-mail as part of an order for products or services, where you have enquiries or requests or when you report a problem with the Contour App and similar situations where you choose to give us your information.
- **Device Information and Usage Details:** When you use the Contour App, we will automatically receive technical information, including the type of mobile device you use, a unique device identifier (such as your device IMEI number, MAC address of the device's wireless network interface, or the mobile phone number used by the device), mobile network

information, your mobile operating system and software version number, IP address, the type of mobile browser you use, the country and language code and time zone setting. We will also collect information about your use of the Contour App, such as any meter errors, log files and administration data so that we can ensure good operation of the Contour App.

- **Cookies and Similar Technologies:** We may use cookies and similar technologies to collect information about your interactions with certain services made assessable via the Contour App and other websites and applications. See the “Cookies and Similar Technologies” section below to learn more about the technologies we use, why we use them, and the choices you have.
- **Geo-Location Information:** Where you agree to and have turned on location services during the registration process for the Contour App, we will collect information about your precise or approximate location from information derived from your mobile device. We ask for your consent to this collection during the App registration process. You may withdraw your consent to our collection of your location information at any time by disabling the use of location services in the device’s settings menu. Ascensia may also collect this information when you are not using the Contour App if you have enabled the use of location settings through your device’s settings rather than through the Contour App settings. We use this information to improve our products and services, including to identify the distribution of Ascensia meters. If you are a child, we will seek the consent of your parent/guardian for the collection of your location information, as further described in the “Children” section below.
- **Apple HealthKit and Samsung Health:** When you grant Ascensia access to Apple Inc.’s (“Apple”) HealthKit app or the Samsung Health app on your device, we will share your personal data and health data for the purposes of enhancing and/or verifying the data processed within the Contour App. The amount of personal data and health data that is shared will vary depending on your specific selections. Ascensia will not use or disclose to third parties user data gathered from Apple HealthKit or Samsung Health for advertising or other use-based data mining purposes other than improving health. See the “Third Party App Connections” section below for further details.

## 5. How we use Your Personal Data

We process your personal data, including health-related information, in the following ways:

- with your consent to provide you with the Contour App and its services, functionalities, and to notify you of any changes
  - to permit you to send reports of your blood sugar, as described in the “Using the Contour App to Send Reports” section below
  - to connect to other apps, where available, as described in the “Third Party App Connections” section below
  - to understand the locations where the Contour App and our meters are used to help improve our products and services, including in connection with our meter placement strategy.
  - to present information to you about your blood glucose testing and measurements to help you understand patterns and trends relating to your diabetes so that you may better manage your diabetes, the “My Patterns” notifications and related functions and settings
  - to allow you to participate in interactive features of the Contour App, when you choose to do so
  - to provide you with cloud services if you choose to set up a Contour Cloud account
  - to respond to any request we may receive from you, such as requests for Contour App or Contour Cloud account support
  - if you are a parent or guardian of a child that uses the Contour App, to enable you to create a Contour Cloud account for use by your child, and to allow you to manage their use of the Contour Cloud account.
- for purposes related to public health related to medical devices, to conduct research and for our legitimate business interests including for statistical purposes to
  - continue to develop, test and improve the Contour App and Contour Cloud services, including to offer new functionality and features
  - better understand how you interact with the Contour App, including its functionality and features, as well as ensure that content is presented in the most effective manner

- help us fix any issues with the Contour App or Contour Cloud services, including where we respond to your questions or respond to your request for support, maintenance, troubleshooting, or other performance issues
- conduct data analysis, testing and research, including for statistical purposes
- develop and implement security tools and mechanisms as part of our efforts to keep the Contour App safe and secure
- issue a safety notice or corrective action related to the Contour App, our meters or your Contour Cloud account whenever necessary.
- for our legitimate business purposes relating to direct marketing, and where required, with your consent to:
  - invite you to participate in surveys or opinion groups or other promotional and marketing activities related to the operation and your use of the Contour App, the Contour Cloud account or concerning our products and services, including in conjunction with selected third parties
  - measure and understand the effectiveness of advertising we may serve and to deliver relevant advertising
  - make suggestions and recommendations about products or services that may interest you, including to receive such information from your local Ascensia company, as described in the “Marketing” section below.
- Where required by law, including legal requirements relating to the safety of medical devices.

For reasons of public interest in the area of public health relating to medical devices, to conduct scientific research and/or for our legitimate business purposes, Ascensia may use, analyse and disclose statistical, aggregated, anonymised or de-identified/pseudonymised information (this is information with which Ascensia will not identify you individually and cannot reasonably be used to identify you) to our local Ascensia affiliates, third party researchers or to governmental or regulatory authorities with oversight for medical devices and/or national authorities with responsibility for medical reimbursement and funding. We do this for the purposes of:

- determining and improving the effectiveness of diabetes management techniques, therapies, treatments and costs;
- researching and evaluating how the Contour App and the Contour Cloud account services are provided and used including in relation to marketing strategies;
- evaluating the performance, impact and experience of the Contour App and Contour Cloud account on users (including based on user demographics, such as geography);
- evaluating the performance and interface of the Contour App with blood glucose meters;
- enhancing the functionality and features of the Contour App and the Contour Cloud account services;
- testing and validating Contour App upgrades and improvement, including in relation to our medical devices, such as our diabetes meters and test strips;
- Ascensia’s operating and business strategy for research and development, distribution and business efficiencies and operations; and
- scientific research, statistical purposes and analysis, relating to diabetes, including publishing articles in medical and/or peer-reviewed publications and journals.

For reasons of public interest in the area of public health relating to medical devices and and/or for our legitimate business purposes, Ascensia may also collect and use technical information about your smartphone, mobile devices and related software, hardware and peripherals that are internet-based or wireless to improve our products and services and to provide with you the various functionalities of the Contour App.

## **6. Marketing**

We may contact you to tell you about products and services that we feel may be of interest to you or that are similar to those that you have already purchased or enquired about. You may also be contacted by your local Ascensia company, a distributor of Ascensia products, or one of our selected partners, in each case, where you have consented to receive these communications.

You may opt out of receiving our marketing communications at any time by contacting customer service by visiting <http://contact.ascensia.com> or by using the unsubscribe link in any of our communications.

We will continue to contact you for non-marketing related purposes where we need to send you information about the Contour App, your Contour Cloud account or where we need to issue a field corrective or safety notice. We may send information to you via Contour App notifications, reminders or alerts to inform you of new developments. You can manage push notifications in your mobile device settings.

We will not use parent emails provided for parental consent purposes to send marketing emails unless the parent has expressly opted into email marketing or has separately participated in an activity that allows for such email contact. (Please see the “Children” section below for more details).

## **7. Sharing Your Personal data**

We do not rent or sell your personal data to anyone. Ascensia may share your information with:

- third parties you direct us to share your information with;
- your local Ascensia company and Ascensia Diabetes Care US Inc. for purposes consistent with this Privacy Policy. The details of your local Ascensia company are listed on our website at <http://diabetes.ascensia.com/en/contact-us>;
- our service providers involved in the development, provision, troubleshooting or fixes relating to support, testing and maintenance of the Contour App, Contour Cloud services or the related services offered through the Contour App who process information for us, based on our instructions, and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures;
- distributors of our products, if you live in a country where we use a distributor;
- our selected partners where you have chosen to participate in surveys, contests, opinion groups or other marketing-related initiatives relating to your use of our products and services. The third parties will use the information we provide to them, along with any information you provide during your entry, request, or participation, in order to (i) notify you if you have won a prize in a contest or sweepstakes, and (ii) to fulfil, or facilitate fulfilment of, requests for products or services you may make in connection with your entry, request, or participation. These third parties are contractually obligated to keep all such information confidential and to only use it for the purposes for which it was provided; or
- a prospective seller or buyer in the event of a sale or purchase of any Ascensia business or asset so that the buyer can continue to provide you with information and services.

If you are a child, we will obtain parental consent before sharing your information with third parties (please see the “Children” section below for more details).

We may share your personal data with our distributors, business partners, or service providers, including for marketing purposes or where you have chosen to share your personal data through various features and functionality provided via the Contour App. In each case, we will only share your personal data with third parties so that we may provide, maintain, host and support the Contour App and Contour Cloud accounts.

We may disclose your personal data where required to respond to authorized requests from government authorities or where required by law, including for national security. Where we are required by law, we may also disclose your personal data where it is necessary to enforce or apply our EULA, this Privacy Policy or other agreements, to investigate or protect the rights, property or safety of Ascensia and our group companies, our products and services and our customers, distributors or business partners or to prevent or take action regarding illegal activities or fraud, situations involving potential threats to the safety of any person or as evidence in litigation. Your personal data may be subject to foreign laws and may be accessible by foreign governments, courts, law enforcement and regulatory agencies.

## **8. Using the Contour App to Send Reports**

The Contour App may allow you to create a blood sugar report based on the information stored in your Contour Cloud account. You may use the Contour App's functions to send a report by email to third parties such as a doctor, medical provider or other person of your choice. If you do choose to share your personal data with anybody, please do take care and make sure your personal data is only shared with intended people.

Please note that any sharing of your personal data is wholly at your own risk and Ascensia is not responsible for securing or protecting the information that you choose to send to other persons via the Contour App. You should be aware that there are risks involved in sharing information over the internet, including the potential for such information to be intercepted by unauthorised third parties. We recommend that you exercise caution when choosing to share your personal data.

## **9. My Patterns**

The Contour App may allow you to receive information about various blood glucose patterns and statistics to help you better manage your diabetes. These patterns relate to high and/or low levels of blood sugar, based on times of day, meal markers or days of the week. The "My Patterns" functionality will detect your blood glucose testing patterns and may suggest changes to improve testing times or frequency.

By using this function, you can set up reminders in the Contour App about when to test or retest your blood sugar levels or follow links to helpful information so that you may better manage your diabetes.

## **10. Third Party App Connections**

The Contour App may allow you to create a connection with mobile applications offered by third parties ("Third Party App"). If you choose to connect to a Third Party App, you will be asked to consent to the sharing of the personal data stored in your Cloud Account, which may include health-related information. Your personal data will only be shared with a Third Party App when you direct us to make the connection. The amount of personal data that is shared with the third party may vary depending on the Third Party App and your specific selections, and may include your blood glucose reading value, measurement date and time, target blood glucose ranges by meal marker, your meal markers and meal type, your activities, your medication and whether your reading was taken via your meter or manually.

You can find the list of Third Party Apps which are available for you to voluntarily connect to under Settings "App Connections". The App Connections function lists any Third Party Apps you have chosen to connect with and list Third Party Apps that you may choose to connect to. You can revoke your consent to share your personal data with any Third Party App at any time by clicking on the icon for the connected Third Party App icon and choosing to disconnect.

Please note that if you choose to create a connection with a Third Party App, the personal data that you share will be processed in accordance with, and governed by, the third party's privacy policy and terms and conditions. Ascensia does not accept any responsibility or liability for these policies. Please check these policies before you connect with any Third Party App.

If you are a child, we will obtain parental consent before sharing your information with third parties (please see the "Children" section below for more details).

## **11. Storing Your Personal data**

Your personal data in your Contour Cloud account may be stored and processed on servers located in one of our regional facilities which may include data hosted with one of our service providers. We endeavour to store your personal data within the region where you reside, but we may transfer your personal data outside of your country of residence, including to the United States, which may provide for different privacy or data protection rules than those that apply in your country to administer and provide you with support and technical services for your Contour Cloud account.

If you are a resident of a country with data localization laws, your personal data will be stored on servers located within your country with our cloud service provider who is our data processor for the hosting of Contour Cloud accounts.

We have implemented appropriate safeguards to protect your personal data when it is transferred, including the execution of data transfer agreements with recipients of the information. For access to copies of these agreements please contact Ascensia by email at [privacy@ascensia.com](mailto:privacy@ascensia.com) or by mail at Ascensia Diabetes Care Holdings AG, Peter Merian-Strasse 90, P.O. Box, 4052 Basel, Switzerland. We will process any request in line with any local laws and our policies and procedures.

## 12. Keeping Your Personal Data Secure

Ascensia implements appropriate administrative, technical and physical safeguards to protect the confidentiality, integrity and availability of your personal data. We will use strict procedures and security features, including cryptographic techniques, and take all steps reasonably necessary to ensure your personal data is processed securely and in accordance with this Privacy Policy.

You are responsible for protecting against unauthorised access to the Contour App and your Contour Cloud account. Ascensia recommends that you use strong password security, by using a mix of letters, numbers and symbols, and a different password for your Contour Cloud account than you use for any other accounts that you may have. You must keep your account information password confidential and not share it with anyone. Ascensia is not responsible for any lost, stolen or compromised passwords or for any access to your Contour Cloud account from unauthorised users where caused by you. If you think your account has been compromised, please contact us as soon as possible. For Customer Service please visit <http://contact.ascensia.com>.

Please note that the transmission of information via the internet is not completely secure. Although Ascensia will do its best to protect your personal data, we cannot guarantee the security of your information transmitted to the Contour App and any transmission is at your own risk.

## 13. Cookies and Similar Technologies

We may use information collection and tracking technologies for certain services and features made accessible to you via the Contour App to remember things about you so that we can provide you with a better experience. Below we provide information on the technologies we may use for automatic information collection, why we use them, and your choices.

### Use of Cookies

Cookies are small data files stored on your browser or device. They are designed to remember things that a user has done while on a website in the past, which can include logging in or clicking on links. Cookies may be set by the entity that operates the website you are visiting ("first-party cookies") or by other companies ("third-party cookies"). For example, for certain services and features made accessible to you via the Contour App, we partner with third-party analytics providers, like Google, to help us understand how you are using our services so that we can improve them. Where applicable, we use the following cookies to collect information about your interactions with certain services and other websites and applications:

- **Strictly necessary cookies:** Required for the operation of certain websites made accessible via the Contour App. They include, for example, cookies that enable you to log into secure areas of a website, to move around the website and to use its features.
- **Analytical/performance cookies:** Allows Ascensia to recognise and count the number of visitors and to see how visitors move around certain websites made accessible via the Contour App when they are using it. This helps us to improve the way such websites work, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies:** These cookies recognize you when you return to our websites or applications made accessible to you via the Contour App. This enables us to personalise our content for you.

Some of these are persistent cookies that may be used if you log on to restricted areas to remember who you are. Others are session cookies that may be used for anonymous identification of a website

visit for technical purposes only. Session cookies are stored only temporarily during the browsing sessions and are deleted once the browser is closed.

### How We Use These Technologies

We use cookies and similar technologies for the following purposes:

- Where required, to log you into the services we provide; enable us to show your account data; remember your settings and preferences, for example, your choice of language or region; and to help us personalize your experience and keep your data and the services we provide safe and secure.
- To collect anonymous statistical information on how visitors use our services so that we can make improvements to its usability and to improve content delivery value.

### Your Choices

- Although most browsers are set-up to accept cookies automatically, it may be possible to refuse to accept browser and device cookies by activating the appropriate setting on your browser or device. Please note that if you choose not to permit cookies some features of our services may not function properly or be accessible.
- To prevent your data from being used by Google Analytics, you can install Google's [opt-out browser add-on](#).
- You may use self-regulation programs available in your jurisdiction to manage the way that companies other than Google advertise to you, such as the EU-based [Your Online Choices](#).

### Do Not Track

Ascensia does not collect personal data about your online activities over time and across third-party websites or online services. We also do not allow third parties to collect personal data about your online activities over time and across other websites or online services when you use the Contour App. We do not respond to browser "Do Not Track" signals.

## **14. Data Storage**

Ascensia will continue to store your personal data while you have an active Contour Cloud account. The section on "Contour Cloud Account Deletion", below, explains how you can delete your Contour Cloud account and what happens to your personal data once your account has been deleted.

## **15. Contour Cloud Account Deletion**

If you would like to delete your Contour Cloud account, you may do so by using the "Delete Account" option in the Contour App or contacting us. For Customer Service please visit <http://contact.ascensia.com>. Please be aware that if you delete your account we will retain aggregated and de-identified information and we may need to retain certain personal data as required by law. Where we are not otherwise subject to a legal requirement to retain records, we will retain geo-location information for nine months from the date of collection. We retain all other data in your Contour Cloud account for two years from the date it is uploaded to enable you to access and export such data, if required, in connection with an insurance claim. We also retain de-identified/pseudonymized analytical information for five years from the date of de-identification/pseudonymization, for the purposes described in "The Reasons For Processing Your Personal Data" section above.

Once your Contour Cloud account and any associated personal data has been deleted, you will no longer have access to the account and deletion of your account may be irreversible. You may not therefore be able to reactivate your Contour Cloud account or retrieve any personal data, including health related information. You may want to download and save any required information before deleting your account or requesting that we delete your account.

If you have chosen to share your Contour Cloud account information with a third party such as your healthcare provider or other person and you delete your account, those persons will no longer be able to view your account information, including information about your BG readings.

Ascensia reserves the right to delete Contour Cloud accounts that remain inactive for an extended period of time. Where a Contour Cloud account remains inactive, we will notify you in advance so that you have an opportunity to ensure your account stays current and available for your use.

## 16. Exercising Your Rights

If you need to update your information, you can do this through the Contour App. If you are unable to access that information for any reason, you can notify Ascensia of any changes to (or errors in) your information and we will update it for you by submitting a written request for changes using the contact information provided below.

Residents of the European Economic Area (EEA) or Switzerland: You may have the right to: (a) access the personal data we hold about you; (b) request we correct any inaccurate personal data we hold about you; (c) request we delete any personal data we hold about you; (d) restrict the processing of personal data we hold about you; (e) object to the processing of personal data we hold about you; and/or (f) receive any personal data we hold about you in a structured and commonly used machine-readable format or have such personal data transmitted to another company.

Residents of the People's Republic of China, Taiwan, Hong Kong, Indonesia, South Korea, and Malaysia: You may have the right to: (a) access the personal data we hold about you; (b) request we correct any inaccurate personal data we hold about you; (c) request we delete any personal data we hold about you; and/or (d) restrict the processing of personal data we hold about you.

California Residents: If you are a California resident, with certain legal exceptions and limitations, you may exercise the following rights via our webform located on our [website](#) or by calling (800) 348-8100. If submitting a request via our webform, please indicate which right your request relates to in the "Message" section.

You may be required to verify your identity when you contact us to make a request to know or delete your personal data. We must verify your identity to ensure that you are the person about whom we may have collected personal data or a person who has been duly authorized to make the request on behalf of such person. If you are required to verify your identity, we may ask you to provide evidence that matches information maintained by Ascensia such as verifying name, email address, mailing address, telephone number and/or credit card information if maintained in our records.

You may use an authorized agent to exercise your rights on your behalf. You must provide your authorized agent with written permission to exercise your rights on your behalf and we must be able to verify your identity as described above. If you are an authorized agent, you must contact us at (800) 348-8100.

**Right to Know.** You have the right to request information about the categories and specific personal data we have collected about you, the sources of personal data, the purposes for collecting the personal data, the categories of third parties to whom we have shared personal data, and the purposes for which it was shared. If you need to export your information from the Contour App, you can do this through the App under the "My Care" section. If you would like to request additional information, please contact us as described above.

**Right to Delete.** You have the right to request that we delete your personal data.

**Opt Out of Sale.** We do not sell your personal data to third parties.

We will not discriminate against you, in any manner prohibited by applicable law, for exercising these rights.

Parents/Guardians: If you are the parent or guardian of a child that uses our services, please see the "Children" section below to understand and exercise your rights.

We may ask you for additional information to confirm your identity for security purposes before disclosing information requested to you.

Where you have been asked to consent to the processing of your personal data, we will provide you with an opportunity to withdraw your consent. You can withdraw consent, such as by contacting us using our contact details below. In each case you will be given information about how to withdraw consent. Any withdrawal of consent will not affect the lawfulness of the processing based on your consent before the withdrawal. Please also note that where you withdraw consent, we will only stop processing your personal data that relates to the withdrawal of consent.

To exercise any of your rights in connection with your personal data, please contact Ascensia by email at [privacy@ascensia.com](mailto:privacy@ascensia.com) or by mail to Ascensia Diabetes Care Holdings AG, Peter Merian-Strasse 90, P.O. Box, 4052 Basel, Switzerland. We will process any request in line with any local laws and our policies and procedures. If you are located in the EEA, you have the right to lodge a complaint about how we process your personal data with the supervisory authority in your country.

## **17. Children**

Special limitations and requirements apply to the collection, use and sharing of personal data of children under the laws of several jurisdictions where we operate (hereinafter, "Children Privacy Laws"). In some cases, these laws require us to obtain parental consent prior to collecting, using and sharing such personal data. The actual age at which a person is considered a child protected by Children Privacy Laws varies per jurisdiction (e.g. in the US, federal law requires parental consent for collection, use and sharing of data of children under 13). This section addresses our compliance with such requirements.

We collect, use, and share the personal data of children in compliance with applicable Children Privacy Laws and, where required, we obtain prior affirmative, verifiable consent from the child's parent/guardian.

Obtaining parental consent: We employ reasonable technological safeguards to prevent children from registering to use the Contour App where personal data may be collected without parental consent. We collect only as much information from children as is reasonably necessary to use the Contour App and to create and use a Contour Cloud account. At the point of registration, where a user's date of birth indicates that, given their age, applicable Children Privacy Laws require parental consent, we will ask for the contact email address of their parent/guardian. The parent/guardian will be sent an email requesting that they visit a web page to approve the creation of a Contour Cloud account and click to accept this Privacy Policy. A Contour Cloud account can only be registered once the parent/guardian has taken these steps.

Retention of children's information: In any instance where we collect information from a child under 13, we will retain that information only so long as reasonably necessary to provide our services, ensure security of our users and our services, or as required by law.

Rights of parents: Under applicable Children Privacy Laws, a parent/guardian may have the right at any time, to revise to permit us to collect further information from their children in association with a particular account and can request to view the information provided by their child and/or to require that it be deleted. Please keep in mind that a request to delete records may lead to the termination of an account or prevent us from providing our services. If you are a parent/guardian with any concerns regarding your child's personal data in connection with the Contour App, please contact Ascensia at [privacy@ascensia.com](mailto:privacy@ascensia.com) or by mail to Ascensia Diabetes Care Holdings AG, Peter Merian-Strasse 90, P.O. Box, 4052 Basel, Switzerland.

If you are located in the United States and have questions about Ascensia and the Children's Online Privacy Protection Act, you may also contact our U.S.-based subsidiary directly at Ascensia Diabetes Care US Inc., 5 Wood Hollow Rd, Parsippany, NJ 07054 USA or via telephone at +1 (862) 225-2902. Please be aware that if you contact our US subsidiary, we will keep a separate record of that contact.

## **18. Changes to this Privacy Policy**

Any changes to this Privacy Policy in the future will be posted on this page and, at our discretion, provided to you by e-mail or via a push notification on the Contour App.

## **19. Contact Us**

As a global company that is headquartered in Switzerland, Ascensia appointed Ascensia Diabetes Care Deutschland GmbH located at Marie-Curie-Straße 5, 51377 Leverkusen, Germany as its EU representative pursuant to Art. 27 GDPR

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to the Data Protection Officer at [privacy@ascensia.com](mailto:privacy@ascensia.com) or to Ascensia Diabetes Care Holdings AG, Peter Merian-Strasse 90, P.O. Box, 4052 Basel, Switzerland. If you contact us, we will do our utmost to address any concerns you may have about our processing of your Personal Data.

If you have a disability and would like to request this Privacy Policy in an alternative format, or if you would like to receive this Privacy Policy in a format that permits printing as a separate document, please contact us using the information above.