

# Patient Support Coach Privacy Policy

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## 1. Introduction

The protection and confidentiality of your personal data is important to us! Your personal data will be treated as strictly confidential and will only be used for the purposes of our services, unless you decide otherwise.

Aptar Digital Health, LLC and its affiliates Voluntis SAS and Noble (hereinafter “ADH,” “our” “we” or “us”) own or control the **mobile application named “Patient Support Coach”** (the “App”), available on mobile devices (iOS & Android), that provides demonstration device trainings to individuals who are experiencing injection for the first time so they can navigate through self-injection at home. The App is not intended to provide any medical advice and if you have any questions about your personal health information, please contact your healthcare professional.

**Please read this privacy policy carefully** as it explains how your personal data are used by ADH and how to exercise your rights. This privacy policy supplements any documents or notices that may refer to this privacy policy (i.e Terms of Use).

**A Special Note about Minors:** If you are UNDER THIRTEEN (13) YEARS OLD, you are not allowed to use the App.

Should you have any questions about the treatment of your personal data, you may directly contact ADH by sending an email to [informationgovernance@aptardigitalhealth.com](mailto:informationgovernance@aptardigitalhealth.com).

## 2. Who is the Data Controller of your personal data?

**ADH is the data controller** of your personal data to the extent that it determines the purposes of the processing related to the App.

**ADH also acts as the data controller** of your personal data:

- when it operates personal data processing in order to comply with its legal and regulatory obligations as legal manufacturer,
- when it operates personal data processing in order to improve the App and/or its services.

## 3. What does our Privacy Policy include?

This Policy describes how ADH collects, uses and shares information about you through the App. Please read this Policy carefully to understand what we do. If you do not understand any aspects of our Privacy Policy, please feel free to contact us as described at the top of this Policy. This Privacy Policy applies only to information we collect through the App.

## 4. What information ADH collects?

ADH automatically collects the following information when you access the App (via cookies<sup>(1)</sup> and other trackers):

Type of Data	Data collected
<b>Location data<sup>(2)</sup></b>	Geolocation Information (country, location)
<b>Mobile Device Data<sup>(3)</sup></b>	Mobile device name, mobile device access type (bluetooth, other), mobile device ID (serial number, model, and manufacturer), operating system or platform, version information and system configuration information, device and application identification numbers, mobile device type, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server)
<b>Traffic data<sup>(3)</sup></b>	IP address, browser and device characteristics, language preferences, referring URLs, information about how and when you use our Services (date, time)
<b>Information from cookies and trackers<sup>(4)</sup></b>	Use of the Platform (pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings), compile reports on activity, demographic data, analyze performance metrics, Services usage

<sup>(1)</sup> Cookies are small packets of data that a website stores on your computer's or mobile device's hard drive so that your device will "remember" information about your visit.

<sup>(2)</sup> How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

<sup>(3)</sup> These data are necessary for the proper functioning of the App, as well as internal analytics purposes.

<sup>(4)</sup> These data are necessary for marketing purposes.

## 5. For what purposes does ADH use your personal data?

**As data controller**, ADH processes your personal data for the following purposes:

Purposes	Examples of use of your Personal Data	Legal Bases
<b>Providing services App's</b>	<ul style="list-style-type: none"> <li>to facilitate personal use of the App training kit in connection with your treatment and care.</li> </ul>	<b>Legitimate interest</b> of ADH
<b>Improving efficiency and operation of the App</b>	<ul style="list-style-type: none"> <li>Analysis of reports on activity</li> </ul>	<b>Legitimate interest</b> of ADH
<b>Marketing</b>	<ul style="list-style-type: none"> <li>Analysis of feedbacks</li> <li>&amp;S</li> </ul>	<b>Legitimate interest</b> of ADH
<b>Compliance with legal and regulatory obligations</b>	<ul style="list-style-type: none"> <li>to respond to legal obligation</li> <li>to prevent fraud and cyberattacks</li> <li>to investigate or remedy potential violations of our policies</li> <li>to manage any dispute or litigation</li> </ul>	<b>Legal and regulatory obligations</b> to which ADH is subject

## 6. Who can access your Personal Data?

ADH will not sell or rent your Personal Data. Your personal data may be transmitted to the following recipients when you use the App and the services it provides:

Recipients	Purposes
<b>ADH and its duly authorized employees</b>	Exclusively for administrative, operational and technical purposes related to the management of the App and its services
<b>ADH affiliates and their duly authorized employees</b>	Exclusively for analytics purposes for improvement of services
<b>ADH's service providers (hosting provider, IT service providers, etc.)</b>	Exclusively for operational and technical purposes related to the management of the App and its services
<b>Administrative or judiciary authorities</b>	Exclusively in the case of an express and justified request or in case of an alleged violation of legal or regulatory provisions
<b>Lawyers and all interested parties</b>	Exclusively in the case of the management of possible disputes and other legal matters where appropriate
<b>Other third parties</b>	Following or during a restructuring, reconstitution, acquisition, debt financing, merger, sale of assets of ADH or a similar transaction, as well as in case of

Recipients	Purposes
	insolvency, bankruptcy or receivership where personal data are transferred to one or more third parties as assets of ADH

## 7. What are your rights regarding your Personal Data ?

If you have any questions about the treatment of your data, you may directly contact ADH by sending an email to [informationgovernance@aptardigitalhealth.com](mailto:informationgovernance@aptardigitalhealth.com).

If needed (fraud, scams, rip-off, bogus product, etc.), you may report a complaint to your national data protection agency, the Federal Trade Commission 'FTC'.

To do so, you may:

- directly use the FTC complaint form [available on their website: ftc.gov/complaint](http://available on their website: ftc.gov/complaint)
- or call 1-877-FTC-HELP (1-877-382-4357)

## 8. How is your Personal Data protected?

ADH has implemented technical and organizational measures in order to protect your personal data, in particular against potential data breaches likely to cause, either by accident or unlawfully, the destruction, loss, modification, unauthorized access or divulgation of your personal data. These measures will guarantee a level of security adapted to the data and will take into account the state of the art and the cost of implementation in relation to the risks and nature of the data to be protected.

ADH also guarantees that all members of its personnel and any other person processing your personal data will respect the internal rules and procedures related to the processing of personal data, including the technical and organizational security measures put in place to protect your personal data. In this context, ADH reviews and updates its practices regularly to enhance your privacy and ensure that its internal policies are followed.

However, even with these safeguards, ADH cannot guarantee, ensure, or warrant the security of any information you transmit to us. There is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. Please note that e-mails and other communications you send to [informationgovernance@aptardigitalhealth.com](mailto:informationgovernance@aptardigitalhealth.com) are not encrypted, and we strongly advise you **NOT TO COMMUNICATE ANY CONFIDENTIAL INFORMATION** through these means.

If you have found a vulnerability or would like to report a security incident, you may send an email to [informationgovernance@aptardigitalhealth.com](mailto:informationgovernance@aptardigitalhealth.com) or contact your national data protection agency FTC (as described in section 7).

## 9. Where and how long will your Personal Data be maintained?

The App data are hosted and managed on servers located within the United States. By using and accessing The App, you agree and consent to the transfer to and processing of Personal Information on servers located in the United States, even when you travel outside the United States and you recognize that the protection of such information may be different than required under the laws of any location that you visit.

In the absence of applicable exceptions, your personal traffic data will be kept for a period of thirteen (18) months from the connection date.

## **10. How will you know if this Policy changes?**

This Privacy Policy may be amended from time to time, in particular to reflect the changes in the services provided by The App or the applicable regulations. Any revised version of the Privacy Policy will be posted on the App and at other places deemed appropriate.

## **11. How can you contact ADH if you have questions?**

If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy or otherwise need to contact us, please email our Data Protection Officer at [informationgovernance@aptardigitalhealth.com](mailto:informationgovernance@aptardigitalhealth.com).

In the event of any fraud or scams, you may report a complaint to your national data protection agency (the FTC) as described in section 7.