

ABBOTT DIABETES CARE
Effective Date: February 4, 2018

Abbott LibreView Professional Online Privacy Notice

This Privacy Notice explains how we handle the personal information that you provide to us via the LibreView website located at [www.Libreview.com] (the "Site") controlled by Abbott Diabetes Care. This Privacy Notice supplements the notices provided on the LibreView website. It also sets out the information that you, as a Professional User, should provide to your patients.

This Privacy Notice applies to professional visitors to the Site and to professionals that create a LibreView system account as a Professional User. It does not apply to personal information collected through the use of other websites controlled by Abbott Laboratories (including its subsidiaries and affiliates), the use of FreeStyle software, the use of other third-party websites, or information collected off line.

Abbott Diabetes Care Inc. of 1420 Harbor Bay Parkway, Suite 290, Alameda, CA 94502, USA ("**Abbott**" or "**us**", "**our**", "**we**") is the developer of the FreeStyle Libre flash glucose monitoring system and other glucose test meters ("**Meters**") which may be compatible with the Site and the LibreView data management system ("**LibreView system**"). Abbott recognises the importance of data protection and privacy and is committed to protecting personal information, including health-related information. Abbott is the data controller of your LibreView system account that you create as Professional User.

Newyu, Inc. holds the marketing authorisations/registrations for the LibreView system and licenses the system to Abbott.

The LibreView system is a secure, cloud-based diabetes information management system that is intended for use by individuals to aid in the review, analysis and evaluation of their historical glucose data, glucose test results and ketone test results to support an effective diabetes health management program. The LibreView system permits Professional Users to create patient profiles, to remotely manage patients who have LibreView system accounts, and share patients' LibreView account information with other professional users within the same clinical practice.

"**Professional User**" includes only those medical providers (and their duly authorised representatives and agents) who have either registered a clinical practice or have registered as a professional user of the LibreView system.

Please read this Privacy Notice before creating an account in the LibreView system and consenting and agreeing to the submission of your, Professional Users, and patients' personal information, including health-related information (where applicable), to us.

THE LIBREVIEW SYSTEM IS NOT INTENDED FOR THE DIAGNOSIS OF OR SCREENING FOR DIABETES MELLITUS. USERS SHOULD BE AWARE THAT THE LIBREVIEW SYSTEM IS MERELY AN INFORMATION MANAGEMENT SERVICE AND IS NOT INTENDED AS A SUBSTITUTE FOR THE ADVICE YOU PROVIDE TO YOUR PATIENTS AS A HEALTHCARE PROFESSIONAL. THE LIBREVIEW SYSTEM IS NOT AN ELECTRONIC HEALTH RECORDS SYSTEM AND YOU MUST PRINT AND/OR DOWNLOAD PATIENT INFORMATION YOU DEEM RELEVANT TO YOUR PROVISION OF MEDICAL CARE, TREATMENT OR ADVICE.

YOU ACKNOWLEDGE AND AGREE THAT WHERE YOU ENTER PATIENT DATA INTO THE LIBREVIEW SYSTEM OR USE THE PERSONAL INFORMATION OF ANY INDIVIDUAL WITH A LIBREVIEW SYSTEM ACCOUNT FOR THE PURPOSE OF PROVIDING MEDICAL TREATMENT, YOU ARE THE DATA CONTROLLER AND ARE RESPONSIBLE FOR COMPLYING WITH APPLICABLE DATA PROTECTION AND PRIVACY LAWS.

AS A PROFESSIONAL USER YOU ARE RESPONSIBLE FOR (I) ANY PATIENT DATA YOU ENTER INTO THE LIBREVIEW

SYSTEM, (II) THE PERSONAL INFORMATION OF OTHER PROFESSIONALS YOU INVITE TO JOIN A PRACTICE ACCOUNT, AND (III) YOUR USE OF PERSONAL INFORMATION OF ANY INDIVIDUAL WITH A LIBREVIEW SYSTEM ACCOUNT. YOU ARE THEREFORE RESPONSIBLE FOR COMPLYING WITH APPLICABLE DATA PROTECTION AND PRIVACY LAWS AND FOR OBTAINING, WHERE REQUIRED, ANY CONSENTS (INCLUDING EXPLICIT CONSENT) NEEDED UNDER APPLICABLE LAW.

Where Abbott uses identifiable patient data you enter into the LibreView system for the purposes of analytics, system troubleshooting, system and/or customer support, research or reporting, Abbott will be the data controller and will comply with applicable local data protection and privacy laws. Where your patient has independently created a LibreView system account, either for their own use or for the use of a child or other person for whom they provide care, Abbott will be the data controller and will comply with applicable local data protection and privacy laws. Abbott will treat all such patient personal information for which it is a data controller, including health-information, in accordance with the Site Privacy Notice.

Scope of this Privacy Notice

This Privacy Notice applies to the:

- personal information you submit when creating a LibreView system account as a Professional User.
- personal information you enter into the LibreView system when you create a patient profile. This includes the data from your patients' Meters that you upload into the LibreView system.
- personal information, including health-related information, of your patients you share with other healthcare professionals.
- customer services we provide that are connected to your use of the Site or the LibreView system.

INFORMATION FOR PROFESSIONAL USERS

Registration for a LibreView System Account as a Professional User

When you set up a LibreView system account as a Professional User, we collect the following information from you:

- Your LibreView system account profile, which includes your name, email address, name of your healthcare organisation and address.

When you create a LibreView Practice, we collect the following information from you:

- Practice information, which includes the practice name, address, phone number and whether you wish to transfer your existing patients into the practice. When you create a Practice, you become the administrator for that Practice. An automatic Practice ID is assigned, which if you provide to your patients, will allow them to connect with your practice.
- For invitations to other healthcare professionals in your practice, their email address.

Where a healthcare professional in your practice invites you to join an existing practice, you will be required to enter the LibreView system account profile information listed above.

Collecting Data from Patient LibreView System Accounts

To invite a patient to create a LibreView system account, you will be required to enter:

- Patient's name, date of birth and email address for adults, and for child patients, the email address of their parent/guardian.

If the patient you invited has already registered for a LibreView account, when you connect with that patient, you will see the following information:

- Patient name, date of birth and last upload of data from their compatible Meters and related statistics.

You may also create a patient profile where you may upload a patient's Meter readings to the LibreView system, without inviting the patient to create a LibreView system account. You may delete patient profiles and any data you enter into it at any time. To create a patient profile, you will be asked to enter the following information:

- Patient's name, date of birth and email (optional).

Other Information We Receive from You as a Professional User

We will also receive information about your use of our Site through cookies and other technologies: your domain name; your browser type and operating system; webpages you view; links you click; your IP address; the length of time you visit our Site and/or use our Services; and the referring URL or the webpage that led you to our Site. Please see the section "Cookies and Related Technologies" below for more information. We may combine this automatically collected information with other information we have about you.

How Abbott Uses Your Personal Information

Abbott will use your personal information to provide you with a LibreView system account, including:

- to give you access to information about your patients in an easy to use and effective manner.
- to respond to your questions or respond to your request for support or to fix any issues, including troubleshooting any performance issues.
- to better understand how you interact with and use the Site and the LibreView system, including its functionality and features.
- to provide you with marketing information, including based on your use of the LibreView system if (where required by law) you opted-in to receive such communications when you set up your LibreView system account.

YOU AGREE THAT BY CREATING A LIBREVIEW SYSTEM ACCOUNT AS A PROFESSIONAL USER AND ACCEPTING THIS PRIVACY NOTICE, YOU CONSENT TO THE PROCESSING OF YOUR PERSONAL INFORMATION AS SET OUT HEREIN.

How Abbott Shares Your Personal Information with Third Parties

We only share personal information with our third party suppliers so that we may provide, maintain, host and support the LibreView system. Newyu, which holds the marketing authorisations/registrations for the LibreView system, will process your personal information on our behalf, as a third party supplier. If you select a country in Europe as your country of residence, LibreView system accounts are hosted in the cloud by Amazon Web Services in Europe, unless you are located in France where data will be hosted by Orange Business Services, accredited by the ASIP Santé. Where personal information is provided to third party suppliers to assist us with the provision of the LibreView system, they are required to keep personal information confidential and secure and may only use personal information to the minimum extent necessary.

We may share personal information with third parties (including affiliated Abbott companies) with whom we are jointly marketing a product or service or jointly conducting a program or activity. We also may share personal information with third party providers where you have expressly asked us to do so. We will not sell or licence personal information to third parties except in connection with the sale, merger or transfer of a product line or division, so that the buyer can continue to provide you with information and services. For the avoidance of doubt, we will never sell personal information for commercial purposes to third parties and we may only share personal data with third parties where consent, where required, has been provided or where permitted by applicable law.

We reserve the right to disclose personal information to respond to authorised information requests from government authorities, to address national security situations or when otherwise required by law. Furthermore, where permitted or required by law, we may also disclose personal information where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Privacy Notice or as evidence in litigation in which we are involved. Your personal information may be subject to foreign laws and may be accessible by foreign governments, courts, law enforcement and regulatory agencies.

Security of Your Personal Information

We have implemented administrative, technical and physical safeguards to protect personal information from unauthorised or unlawful access, accidental loss, destruction, damage, misuse, disclosure and alteration, including through the use of cryptographic technologies. Abbott restricts access to personal information by its employees on a need to know basis. Please keep in mind that no internet or WiFi transmission is 100% secure, so please exercise caution when uploading personal information, especially the health-related information of your patient, to the LibreView system.

You are responsible for protecting against unauthorised access to your LibreView system account, practice and patient profiles that you have created. We recommend securing access to your LibreView system account and thereby your practice and patient profile, by always logging out, choosing a robust password that nobody else knows or can easily guess, and keeping your account information and password private. Abbott is not responsible for any lost, stolen or compromised passwords or for any activity on your LibreView system account from unauthorised users where caused by you. If you think your account has been compromised, please contact us as soon as you are able at libreviewprivacy@newyu.com.

Storage and Transfer of Your Personal Information

The personal information transmitted to the LibreView system will be stored in the cloud on secure servers. If you select a country in Europe as your country of residence, personal information is hosted on servers within the European Union. If you select France as your country of residence, personal information will be hosted in France by Orange Business Services, accredited by the ASIP Santé. If you select the United States as your country of residence, personal information is hosted on servers in the United States. If you select a country within another region, personal information will be hosted on servers within that region or otherwise in accordance with the data storage and privacy requirements of the selected country/region. When personal information is hosted in a country other than the one selected, it may become subject to the laws of the host country, which may not be equivalent to the laws of the selected country. However, Abbott will put appropriate measures in place to protect your personal information and ensure that personal information only be collected, used, and disclosed as permitted under applicable laws.

We may occasionally need to access or view personal information, such as your name and email address, remotely via a secure network from the United States where necessary to provide technical support or to troubleshoot any issues in relation to your or a patient's LibreView system account.

We may also transfer information to the United States from Europe (except France), the Asia Pacific, Latin America or other regions via a secure network in de-identified or pseudonymised form, for the purpose of conducting data analysis and analytics. While the United States may not provide data protection or privacy laws equivalent to the laws of your country, Abbott has implemented appropriate measures to protect personal information.

Marketing

Abbott (or its affiliates) may send you advertising and marketing-related information about diabetes care or their other products and services if (where required by law) you opted-in to receive such communications when you set up your LibreView system account. We may also invite you to participate in surveys about our products, provide you with news and newsletters, or notify you about special offers and promotions. These materials may be sent by us or by one of the companies in the Abbott Group. You may opt out from receiving marketing-related communications by either clicking on the unsubscribe link at the bottom of marketing-related emails or by contacting us at libreviewprivacy@newyu.com.

How may I access and/or correct my personal information?

You may correct your profile information through the LibreView system account settings.

You may have the right to access the personal information we hold about you and/or request we correct, delete or take other action in connection with your personal information, subject to applicable law. To request the exercise of these rights, please contact us at libreviewprivacy@newyu.com.

Deletion of a LibreView System Accounts

If you would like to delete your LibreView system account, please contact us at libreviewprivacy@newyu.com. Please be aware that if you delete your account, we will retain aggregated and de-identified information and may need to retain certain personal information as required by law.

Once your LibreView system account and any associated personal information has been deleted, you will no longer have access to the LibreView system and deletion of your account may be irreversible. You may not therefore be able to reactivate your LibreView system account or retrieve any personal information. Please download and save any required information before requesting that we delete your account from the LibreView system.

If your patient has shared their LibreView system account information with you and requests that we delete their LibreView system account, once deleted, you will no longer be able to remotely view their Meter readings.

Abbott reserves the right to delete inactive LibreView system accounts after 6 months. We will notify you in advance so that you have an opportunity to ensure your account stays current and available for your use.

Cookies and Related Technologies

We use cookies on this Site. Cookies are text files containing small amounts of data which are downloaded to your computer when you visit a website. Cookies are useful because they allow us to recognise your computer, and improve your experience on our websites.

Your web browser (such as Internet Explorer, Firefox or Chrome) then sends these cookies back to the website on each subsequent visit so that we can recognise you. Cookies can only be read by the server that sent it to your browser. Our systems may not recognize Do Not Track (DNT) headers or similar mechanisms from some or all browsers.

To find about more about cookies visit <http://www.allaboutcookies.org>.

Managing your cookies

There are various ways that you can control and manage your cookies. Please remember that any settings you change will not just affect these cookies used by this Site. These changes will apply to all websites that you visit (unless you choose to block cookies from particular sites).

This site uses the following types of cookies:

1. Strictly Necessary Cookies: These cookies are strictly necessary for us to operate this Site and used to secure access to the Site and to recognise you when you login to your LibreView system account.
2. Functionality and security cookies: These cookies are used to help this Site display the correct date and time for your user sessions and help us protect and keep the Site secure.

Third-Party Links on this Site

Our Site may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Privacy Notice, but instead is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.

How can I contact Abbott?

If you have questions, comments, or complaints about our privacy practices, please contact us by clicking on the “Contact Us” link on one of our web sites, or emailing us at libreviewprivacy@newyu.com. Alternatively, you may send a letter to the following address:

Attn: Legal Department
Abbott Diabetes Care Inc.
1420 Harbor Bay Parkway, Suite 290
Alameda, CA 94502
USA

In all communications to us, please include the email address used to create your LibreView system account and a detailed explanation of your request.

If you would like us to amend or delete the personal information we hold about you and are contacting us by email, please put “Amendment Request” or “Deletion Request”, or other right as applicable, in the subject line of the email. If you would like to access the personal information we hold about you, please put “Access Request” in the subject line of the email. We will do our best to respond to all reasonable requests in a timely manner, or at the very least, in accordance with any applicable legal requirement.

Changes to this Privacy Notice

If we change our privacy practices, an updated version of this Privacy Notice will reflect those changes. You will be alerted to updates and will be required to consent to any changes when you next log into the Site. This means that when you log in to your LibreView system account, you will be notified if there is a new version of this Privacy Notice and will be prompted to read and accept it so that you can continue to access and use your LibreView system account. Without prejudice to your rights under applicable law, we reserve the right to update and amend this Privacy Notice without prior notice to reflect technological advancements, legal and regulatory changes and good business practices to the extent that it does not change the privacy practices as set out in this Privacy Notice.

If you do not agree to the changes to this Privacy Notice, you should request deletion of your LibreView system account by contacting us at libreviewprivacy@newyu.com.

INFORMATION YOU MUST PROVIDE TO PATIENTS ABOUT HOW THEIR PERSONAL INFORMATION IN THE LIBREVIEW SYSTEM IS PROCESSED AND STORED

Abbott’s Use of Your Patients’ Information

You should advise your patients that we use their personal information provided by you for the following reasons:

- to provide them with a LibreView system account where they have requested the creation of a LibreView system account based on the invite link you sent.
- to respond to questions, requests for support or to fix any issues, including troubleshooting any performance issues.
- to understand how patients interact with and use the Site and the LibreView system, including its functionality and features.
- to provide patients with LibreView system accounts with marketing information based on the information uploaded or connected to their LibreView system account (including their health-related information). Where they have opted in to receive such communications. They will be provided with an opportunity to opt-out of these communications.
- as otherwise set forth in our HIPAA Notice of Privacy Practices.

FreeStyle Libre software and the LibreView system collect information separately. Abbott will never combine these data (the de-identified data obtained through the FreeStyle Libre software and the data uploaded to the LibreView system) for the purposes of re-identification. Abbott uses technical and organizational measures to ensure that these data flows remain separate. This supplements the FreeStyle Libre Software Privacy Policy accordingly.

Abbott also uses de-identified, pseudonymised, aggregated and/or anonymised information from LibreView system users, which is information from which Abbott cannot identify your patients, for the following reasons:

- to create, access, retain, use and disclose to our affiliated companies and to third party researchers or health care entities or professionals for research and analysis.
- to evaluate how the LibreView system is provided and used, including its performance or impact on users (including base user demographics, such as geography), to validate upgrades, and to keep the LibreView system safe and secure.
- for product development, data analysis or statistical and survey purposes.
- to research, develop, including functionality and features, test and improve the LibreView system and Meters.
- to research, develop and test new features and functionality for users of the LibreView system.

How Abbott Protects the Privacy of Children

Where your patient is a child, you should advise their parent/guardian of the following:

- When you invite a child to register for a LibreView system account, you are required to enter the email address of their parent/guardian as children are not permitted to hold their own LibreView system account. The consent of the child's parent/guardian is required for their child to be able to use the LibreView system. Upon such consent, a LibreView system account will be created.
- If you have a child patient already authorised by his/her parent/guardian to use an existing LibreView system account, the parent/guardian will be notified and must authorise the sharing of the information contained within the LibreView system account being used by the child, with you.
- At any time, a parent/guardian may stop the collection of a child's personal information, including health-related information, by requesting that Abbott delete the LibreView system account they set up for use by their child by contacting us at libreviewprivacy@newyu.com. Such requests will result in the deletion of the account being used by the child, and you should advise the parent/guardian that we retain aggregated and de-identified information and may need to retain certain personal information as required by law.

How Abbott Shares Personal Information of your Patients with Third Parties

We only share your patients' personal information with our third party suppliers so that we may provide, maintain, host and support the LibreView system. Newyu, which holds the marketing authorisations/registrations for the LibreView system, will process personal information, including health-related information, on our behalf as a third party supplier. If you select a country in Europe as your country of residence, LibreView system accounts are hosted in the cloud by Amazon Web Services in Europe, unless your patients are located in France where their personal information, including health-related information, will be hosted by Orange Business Services, accredited by the ASIP Santé to host medical data. Where personal information is provided to third party suppliers to assist us with the provision of the LibreView system, they are required to keep personal information confidential and secure and may only use personal information to the minimum extent necessary.

We may share their personal information with third parties (including affiliated Abbott companies) with whom we are jointly marketing a product or service or jointly conducting a program or activity. We also may share personal information with third party providers where you or your patient has expressly requested us to do so. We will not sell or licence personal information to third parties except in connection with the sale, merger or transfer of a product line or division, so that the buyer can continue to provide you with information and services. For the avoidance of doubt, we will never sell personal information for commercial purposes to third parties and we may only share personal information with third parties where consent, where required, has been provided or where permitted by applicable law.

We reserve the right to disclose personal information to respond to authorised information requests from government authorities, to address national security situations or when otherwise required by law. Furthermore, where permitted or required by law, we may also disclose personal information where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Privacy Notice or as evidence in litigation in which we are involved. Personal information may be subject to foreign laws and may be accessible by foreign governments, courts, law enforcement and regulatory agencies.

Security of Your Patients' Personal Information

We have implemented administrative, technical and physical safeguards to protect personal information, including health-related information, from unauthorised or unlawful access, accidental loss, destruction, damage, misuse, disclosure and alteration, including through the use of cryptographic technologies. Abbott restricts access to personal information by its employees on a need to know basis. Please keep in mind, and remind your patients, that no internet or WiFi transmission is 100% secure, so please exercise caution when uploading their personal information, especially health-related information, to the LibreView system.

Storage and Transfer of Your Patients' Personal Information

The personal information transmitted to the LibreView system will be stored in the cloud on secure servers. If your patients are located in Europe, personal information is hosted on servers within the European Union. If your patients are located in France, their personal information, including health-related information, will be hosted in France by Orange Business Services, accredited by the ASIP Santé to host medical data. If your patients live in the United States, their personal information is hosted on servers in the United States. If your patients live in another region, their personal information will be hosted on servers within that region or otherwise in accordance with the data storage and privacy requirements of your country/region. When your patients' personal information is hosted in a country other than the one which they live, it may become subject to the laws of the host country, which may not be equivalent to the laws of their country. However, Abbott will put appropriate measures in place to protect their

personal information and ensure that personal information only be collected, used, and disclosed as permitted under applicable laws.

We may occasionally need to access or view personal information, such as your patient's name and email address, and in certain exceptional circumstances your patients' health-related information may be remotely accessed via a secure network from the United States where necessary to provide technical support or to troubleshoot any issues in relation to a patient's LibreView system account. AS A DATA CONTROLLER OF THE PERSONAL INFORMATION, INCLUDING HEALTH-RELATED INFORMATION OF YOUR PATIENTS FOR WHOM YOU HAVE CREATED A PATIENT PROFILE, YOU SHOULD NOTIFY YOUR PATIENTS TO THESE TRANSFERS, INCLUDING ACCESS AS MAYBE REQUIRED, OF THEIR PERSONAL INFORMATION, INCLUDING HEALTH-RELATED INFORMATION, WHICH MAY BE REQUIRED.

We may also transfer information to the United States from Europe (except France), the Asia Pacific, Latin America or other regions via a secure network in de-identified or pseudonymised form, which prevents us from identifying individual patients, for the purpose of conducting data analysis and analytics. While the United States may not provide data protection or privacy laws equivalent to the laws of your country, Abbott has implemented appropriate measures to protect personal information.

Marketing

Abbott (or its affiliates) may send your patients' who have created a LibreView system account advertising and marketing-related information about diabetes care or their other products and services if (where required by law) they have opted-in to receive such communications when they set up their LibreView system account. Your patients who have created a LibreView system account will be advised via the Privacy Notice and Terms of Use as to how they will be marketed to and how to unsubscribe.

Please note that we will not send marketing information to patients for whom we have only received their personal information because you created a patient profile for them.

Neither Abbott nor its affiliates or third party suppliers will send advertising or marketing-related information to children.

How may your patients access, correct and/or delete their personal information?

Patients who have created a LibreView system account may correct their profile information via their account settings.

Where a patient requests access to the personal information you hold about them, for example in their patient profile, you are responsible for handling their request in accordance with applicable data protection and privacy laws.

Where you have created or added a patient to the LibreView system, we will co-operate with you to delete their information following notice from you to remove them from the LibreView system.