

**ABBOTT DIABETES CARE**  
**Effective Date: May 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](http://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.** This Privacy Notice 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, Alameda, CA 94502, USA ("**Abbott**" or "**us**", "**our**", "**we**") is the developer of Sensors ("**Sensors**"), Readers ("**Readers**") and glucose test meters ("**Meters**") for the FreeStyle Libre family of products, and the FreeStyle LibreLink app ("**App**"), which may be compatible with the Site and the LibreView data management system ("**LibreView system**"). Abbott is the controller of your LibreView system account that you create as Professional User.

Abbott recognizes the importance of data protection and privacy and is committed to protecting personal information, including health-related information.

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

**BY ACCEPTING THIS PRIVACY NOTICE AND CREATING A LIBREVIEW SYSTEM ACCOUNT AS A PROFESSIONAL USER, YOU AFFIRM YOU HAVE THE APPROPRIATE AUTHORIZATIONS, CONSENTS OR PERMISSIONS FOR YOURSELF, YOUR PRACTICE AND YOUR PATIENTS, AS APPLICABLE, TO ACCEPT TO THIS PRIVACY NOTICE.**

**Background of the LibreView System**

The LibreView system is a secure, cloud-based diabetes information management system that may be used by Abbott, Professional Users, and patients to aid in the review, analysis and evaluation of patients' historical glucose data, glucose test results, and ketone test results to support an effective diabetes health management program. The LibreView system allows Abbott to provide improved treatment guidance for patients utilizing Abbott's Meters, Readers and App. The LibreView system also permits Professional Users to create patient profiles, to remotely manage patients who have LibreView system accounts, and share patients' LibreView system account information with other professional users within the same LibreView practice.

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

**THE LIBREVIEW SYSTEM IS NOT INTENDED FOR THE DIAGNOSIS OF OR SCREENING FOR DIABETES MELLITUS. USERS SHOULD BE AWARE THAT THE LIBREVIEW SYSTEM IS AN INFORMATION MANAGEMENT SERVICE TO ENABLE THE ANALYSIS OF GLUCOSE DATA AND IS NOT INTENDED AS A SUBSTITUTE FOR THE ADVICE YOU PROVIDE TO YOUR PATIENTS AS A HEALTH CARE 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.**

**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.

**For European Economic Area (“EEA”) And Swiss Users:** 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, EXCEPT AS OTHERWISE PROVIDED IN THIS PRIVACY NOTICE, YOU ARE THE CONTROLLER AND ARE RESPONSIBLE FOR COMPLYING WITH APPLICABLE DATA PROTECTION AND PRIVACY LAWS. 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 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 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 controller, including health-information, in accordance with the Site Privacy Notice. When your patient has created a LibreView system account and grants you access to that account or where you sets up a LibreView system account for your patient, Abbott (through the LibreView system) will be processing both your and your patient’s personal data as a ‘processor’ on your behalf as a healthcare provider where you process your patient information to protect their vital interests as determined in your sole discretion as their healthcare provider.

**For United States of America Users:** Abbott is a “Covered Entity” pursuant to the Health Insurance Portability and Accountability Act and its implementing regulations (collectively “HIPAA”) and may use any patient personal information, including health information, that you provide to us through the LibreView system for the purpose of improving treatment guidance for patients utilizing Abbott’s Meters, Readers or Sensors. Abbott’s use of patient personal information, including health information that you provide to use through the LibreView system will be additionally governed by our HIPAA Notice of Privacy Practices, available on the LibreView website located at [www.libreview.com](http://www.libreview.com).

### **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, including demographic and health-related information, of your patients that you enter into the LibreView system when you create a patient profile. This also includes the data from your patients’ Meters or Readers that you upload into the LibreView system.
- personal information, including demographic and 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 organization 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 system 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 Sensors, Readers or Meters and related statistics.

You may also create a patient profile where you can upload information from a patient's Meter or Reader 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).

**For United States of America Users:** you understand that Abbott will maintain this patient information in order to improve its treatment guidance for patients utilizing Abbott's Meters. Readers or App as set out in our HIPAA Notice of Privacy Practices.

### **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 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.

### **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 authorizations/registrations for the LibreView system and will process your personal information on our behalf as a third party supplier. 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.

**If you are located in a country in Europe other than France**, LibreView system accounts are hosted in the cloud by Amazon Web Services in Europe.

**If you are located in France**, LibreView system accounts are hosted by Orange Business Services, accredited by the ASIP Santé.

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, survey 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 license 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 authorized 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 unauthorized, accidental or unlawful access, 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 Wi-Fi transmission is 100% secure, so please exercise caution when uploading personal information, especially the health-related information of your patient's, to the LibreView system.

You are responsible for protecting against unauthorized 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

unauthorized users where caused by you. If you think your account has been compromised, please contact us as soon as you are able at [DiabetesCarePrivacy@Abbott.com](mailto:DiabetesCarePrivacy@Abbott.com).

### **Storage and Transfer of Your Personal Information**

The personal information transmitted to the LibreView system will be stored in the cloud on secure regional servers.

**If you are located in the EEA or Switzerland other than France**, personal information is hosted on servers within the European Union.

**If you are located in France**, personal information will be hosted in France by Orange Business Services, accredited by the ASIP Santé.

**If you select the United States of America as your location**, personal information is hosted on servers in the United States of America.

**If you select a country outside of the EEA, Switzerland or the United States of America as your location**, 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 in your location. 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.

### **If you selected a country outside the United States of America as your country of residence:**

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 of America where necessary to provide technical support or to troubleshoot any issues in relation to a patient's LibreView system account.

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

**BY CREATING A LIBREVIEW SYSTEM ACCOUNT AND BY ACKNOWLEDGING THIS PRIVACY NOTICE, WE ARE INFORMING YOU OF THESE TRANSFERS OF PERSONAL INFORMATION TO THE UNITED STATES OF AMERICA AND TO THE ACCESS OF PERSONAL INFORMATION, INCLUDING HEALTH-RELATED INFORMATION, WHICH MAY BE REQUIRED IN EXCEPTIONAL CIRCUMSTANCES TO RESPOND TO ANY SUPPORT SERVICE REQUESTS. THE UNITED STATES OF AMERICA MAY NOT OFFER AN EQUIVALENT LEVEL OF PROTECTION FOR PERSONAL INFORMATION WHEN COMPARED TO SWITZERLAND, AN EEA COUNTRY OR OTHER COUNTRY WITH DATA PROTECTION OR PRIVACY LAWS IN WHICH YOU OR YOUR PATIENTS ARE LOCATED.**

### **Marketing**

Abbott (or its affiliates) may use your personal information to 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 [DiabetesCarePrivacy@Abbott.com](mailto:DiabetesCarePrivacy@Abbott.com).

Abbott will not sell personal information to third parties for direct marketing.

Where you opt out of receiving marketing-related information about diabetes care, we may continue to send you non-marketing related information. This information may be in relation to necessary system and service updates or issues including product safety.

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

You may correct your profile information through the LibreView system account settings. We are not able to correct or amend any data uploaded from a Reader, Meter or App.

### **Deletion of a LibreView System Account**

If you would like to delete your LibreView system account, please contact us at [DiabetesCarePrivacy@Abbott.com](mailto:DiabetesCarePrivacy@Abbott.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. **For United States of America Users:** Abbott may also retain any patient personal information, including health information that you provide to us through the LibreView system for the purpose of improving treatment guidance for patients utilizing Abbott's Meters, Readers or App.

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 is 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 information from their Meter, Reader or App.

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 recognize 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 recognize 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 recognize 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.

**Rights**

Depending on your location, you may have the right to: (a) access the personal information we hold about you; (b) request we correct any inaccurate personal information we hold about you; (c) delete any personal information we hold about you; (d) restrict the processing of personal information we hold about you; (e) object to the processing of personal information we hold about you; and/or (f) receive any personal information you have provided to us on the basis of your consent , in a structured and commonly used machine-readable format or have such personal information transmitted to another company by used the export function in your LibreView system account.

Your patients may also have the right in relation to the personal information held about them through the LibreView system. Abbott will provide reasonable assistance and cooperation in assisting you to respond to any request by your patient to exercise their rights.

**For EEA and Swiss Users:** You have the right to lodge a complaint with your local data protection authority if you are unhappy with any aspect of Abbott’s processing of your personal information. The contact details of our European data protection officer along with other useful contact information are available at [www.EU-DPO.abbott.com](http://www.EU-DPO.abbott.com).

**For United States of America Users:** Please note that your patients’ rights with respect to any health information provided to us by you, or which they share with you as their healthcare provider, through the LibreView system will be governed by our HIPAA Notice of Privacy Practices, available at [www.Libreview.com](http://www.Libreview.com).

**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 [DiabetesCarePrivacy@Abbott.com](mailto:DiabetesCarePrivacy@Abbott.com). Alternatively, you may send a letter to the following address:

Attn: Privacy Officer  
Abbott Diabetes Care Inc.  
1420 Harbor Bay Parkway,  
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.

**EU Data Protection Officer:** If you are in the EEA, the contact details of our European data protection officer along with other useful contact information are available at [www.eu-dpo.abbott.com](http://www.eu-dpo.abbott.com).

If you would like to exercise any of your rights set out at section 16 above and are contacting us by email, please title your email subject line accordingly (for example, "Correction Request" or "Access Request"), or other right as applicable 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 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 [DiabetesCarePrivacy@Abbott.com](mailto:DiabetesCarePrivacy@Abbott.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 so that they will have access to their personal information, including health-related information, in an easy to use and effective manner, to allow them to store, back-up and retrieve historic glucose values and to have continuous access to information about how they manage their diabetes. Provision of a LibreView system account may also be to a parent/guardian on behalf of a child or on behalf of a person that provides care for another person with diabetes.
- to help us fix any issues with the LibreView system, including where we respond to questions, requests for support or to fix any issues, including troubleshooting or any other performance issues.
- where they have opted in, 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). If they have opted in, they will also be provided with an opportunity to opt-out through each marketing communication they receive from us.
- **For United States of America Users only:** to provide improved treatment guidance for you and patients using the LibreView system, as well as for research and Abbott's health care operations activities, as applicable as described in this Privacy Notice and our HIPAA Notice of Privacy Practices.

**If your patient uses the FreeStyle Libre software:** 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). Abbott uses technical and organizational measures to ensure that these data flows remain separate.

## **Data Analysis**

Abbott uses de-identified, pseudonymized, aggregated and/or anonymized information from LibreView system users for limited purposes. Our parent company Abbott Laboratories assists us as a data processor with this data analytics process, in particular, the processes related to de-identifying, pseudonymizing and/or anonymized information. The purposes for which Abbott will use this information are:

- to improve the quality, security and effectiveness of medical devices and systems and to allow for the development of innovative and effective treatment for and management of diabetes in the interests of public health.
- to create, access, retain, use and disclose to our affiliated companies and to third party researchers, health care entities or professionals or public health authorities for the purposes of scientific research, statistical purposes 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 research, develop and test healthcare care systems and management.
- to validate upgrades, and to keep the LibreView system safe and secure.
- to research, develop and test medical devices, including new and existing features and functionality and to test and improve the LibreView system, App, Readers or Meters for product development, data analysis, statistical and survey purposes.

**EU General Data Protection Regulation for EEA and Swiss Users:** Abbott processes information as a controller based on the following legal bases as set out in the General Data Protection Regulation (“GDPR”):

- Abbott’s legitimate business interests when we de-identify and pseudonymize data to better understand how you interact with and use the LibreView system, including its functionality and features.
- Consent to send tailored marketing information connected with your LibreView system account from your local Abbott company.
- Public interest in the area of public health, including where you receive reimbursement or are otherwise entitled to public funding for use of Abbott’s medical devices, to monitor and improve the quality, security and effectiveness of medical devices and systems, to identify and implement quality improvements or new developments and where we use information obtained from your use of the LibreView system to help us fix or enhance the LibreView system.
- Public interest in the area of public health and to conduct scientific research when we de-identify or pseudonymize information in the LibreView system.
- Legal requirements related to the regulation, quality and safety and post-market surveillance of medical devices.

The contact details of our European data protection officer along with other useful contact information are available at [www.eu-dpo.abbott.com](http://www.eu-dpo.abbott.com).

## **Record Retention**

Abbott will continue to store personal information while there is an active LibreView system account and in accordance with applicable data retention requirements. The section entitled “How do I delete my LibreView System account” below explains how you can delete an account and what happens to the personal information once your account has been deleted.

## **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. Where required, you may need to obtain the consent of the child's parent/guardian for their child to be able to use the LibreView system, and upon obtaining such consent, a LibreView system account will be created.
- If you have a child patient already authorized by his/her parent/guardian to use an existing LibreView system account, the parent/guardian will be notified and must authorize 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 [DiabetesCarePrivacy@Abbott.com](mailto:DiabetesCarePrivacy@Abbott.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 as set forth in our HIPAA Notice of Privacy Practices and as needed to provide, maintain, host and support the LibreView system. Newyu, which holds the marketing authorizations/registrations for the LibreView system, will process personal information, including health-related information, on our behalf as a third-party supplier and our Business Associate under HIPAA. 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.

**If you select a country in the EEA or Switzerland other than France as your location**, LibreView system accounts are hosted in the cloud by Amazon Web Services in Europe. Apart from where in exceptional circumstances your personal information is required to respond to your request for customer support, we will only transfer pseudonymised and de-identified information outside of the EEA.

**If you are located in France**, your patients' personal information, including health-related information, will be hosted by Orange Business Services, accredited by the ASIP Santé to host medical data.

Where a patient has opted in to received direct marketing communications from us, 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, survey or activity, and **for patients located in the United States of America**, provided that such disclosure complies with HIPAA. 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 license 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 authorized 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 unauthorized 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 Wi-Fi 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 regional servers.

**If your patients are located in the EEA or Switzerland other than France**, 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 of America**, their personal information is hosted on servers in the United States of America.

**If your patients live in a country outside the United States of America**, 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 your personal information and ensure that personal information only be collected, used, and disclosed as permitted under applicable laws.

### **If your patient lives in a country outside the United States of America:**

- Abbott 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 of America where necessary to provide technical support or to troubleshoot any issues in relation to a patient's LibreView system account.
- We may also transfer information to the United States of America from Europe (except France), the Asia Pacific, Latin America or other regions via a secure network in de-identified or pseudonymized form, which prevents us from identifying your patient, for the purpose of conducting data analysis as described in the section entitled "Data Analysis" above. The United States of America may not provide data protection or privacy laws equivalent to their country of residence; however, we put appropriate measures in place to protect your personal information.

**EXCEPT AS OTHERWISE PROVIDED IN THIS PRIVACY NOTICE, YOU ARE A CONTROLLER OF THE PERSONAL INFORMATION, INCLUDING HEALTH-RELATED INFORMATION OF YOUR PATIENTS FOR WHOM YOU HAVE CREATED A PATIENT PROFILE, AND SO YOU SHOULD NOTIFY YOUR PATIENTS TO THESE TRANSFERS, INCLUDING ACCESS AS MAY BE REQUIRED, OF THEIR PERSONAL INFORMATION, INCLUDING HEALTH-RELATED INFORMATION, WHICH MAY BE REQUIRED.**

### **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.

**For United States of America Patients:** Please be aware that if your patient opts-in to receive marketing communications from Abbott, they will have authorizing you to use and disclose their personal information so that Abbott may send them advertising and marketing-related information about diabetes care or other products and services. You should inform your patients that once your information is disclosed pursuant to this authorization that it may be re-disclosed and no longer protected by HIPAA. Neither you nor we may condition patient treatment, payment, insurance enrolment, eligibility for benefits on their choice to opt-in to receive marketing communications from Abbott. Any such authorization by your patient will remain in effect for so long as they share personal information with you as their healthcare provider through the LibreView system account and opt-in to receive marketing communications. Your patient may revoke this authorization at any time by opting out of receiving marketing communications by either clicking on the unsubscribe link at the bottom of any marketing-related emails we send to them or by contacting us at [DiabetesCarePrivacy@Abbott.com](mailto:DiabetesCarePrivacy@Abbott.com), but such revocation will only apply to the extent that we have not already taken action based on it.

### **Patients' rights in relation to their personal information**

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

Depending on your patients' place of residence, they may have the right to: (a) access the personal information we hold about you; (b) request we correct any inaccurate personal information we hold about you; (c) delete any personal information we hold about you; (d) restrict the processing of personal information we hold about you; (e) object to the processing of personal information we hold about you; and/or (f) receive any personal information you have provided to us on the basis of your consent, in a structured and commonly used machine-readable format or have such personal information transmitted to another company by using the export function in your LibreView system account.

Where a patient requests to exercise such rights 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.

**For United States of America Users:** Abbott retains the right to maintain any patient personal information, including health information that you provide to us through the LibreView system for the purpose of improving treatment guidance for patients utilizing Abbott's Meters, Readers or App.

**For EEA and Swiss Users:** Your patient also has the right to lodge a complaint with their local data protection authority if they are unhappy with any aspect your or Abbott's processing of their personal information. The contact details of our European data protection officer along with other useful contact information are available at [www.EU-DPO.abbott.com](http://www.EU-DPO.abbott.com).