

ABBOTT DIABETES CARE
Effective Date: February 4, 2018

Abbott LibreView Patient 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 on the LibreView website. For individuals in the United States, please note that any health information provided to us by your healthcare provider via the Site will be additionally governed by our HIPAA Notice of Privacy Practices, available on the Site.

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, 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 is the data controller of your personal information, including health-related information, transmitted to or stored within the LibreView system.

Newyu, Inc. holds the marketing authorisations/registrations for the LibreView system, provides the system to you and is a data processor of Abbott.

The LibreView system is a secure, cloud-based diabetes management system that is intended for use by individuals to aid in the review, analysis and evaluation of historical glucose data, glucose test results and ketone test results to support an effective diabetes health management program.

Please be aware that other third party glucose meters may be compatible with the LibreView system. Abbott is not responsible for your connection of these third party products or your decision to upload data from these third party products to your LibreView system account. All questions about use of LibreView as a medical device are the responsibility of Newyu.

This Privacy Notice explains how we handle the personal information, including health-related information that you provide to us through your use 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 personal information, including health-related information, 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 OF A HEALTHCARE PROFESSIONAL. INDIVIDUALS SHOULD ALWAYS CONSULT THEIR HEALTHCARE PROFESSIONAL IF THEY HAVE ANY QUERIES OR CONCERNS ABOUT DIABETES MANAGEMENT.

What does this Privacy Notice apply to?

This Privacy Notice applies only to the personal information you submit when creating an account in the LibreView system and to the personal information, including health-related information, that we may receive from you or your healthcare providers or others as set forth herein and stored within the LibreView system, and to any customer services we provide that are connected to your use of the LibreView system.

You may also be able to access your account for the LibreView service via a website domain, depending on your country of residence; however, use of any LibreView website will be subject to an additional privacy notice. This Privacy Notice does not apply to any other personal information provided by you or collected from you by Abbott.

What information does this Privacy Notice govern?

This Privacy Notice covers the following information we collect directly from you:

- Your LibreView system account profile, which includes your name, date of birth and country, and for adults creating a LibreView system account for their own use, their email address. For LibreView system accounts created by a parent/guardian for use by a child, this Privacy Notice covers the child's name, date of birth and country and the name and email address of the parent/guardian.
- Health-related information scanned from your FreeStyle Libre sensor, such as how often you scan your FreeStyle Libre sensor, your use of the FreeStyle Libre sensor, glucose targets, glucose values, logged insulin, logged food, logged exercise and other logged notes.

We will also receive information about your use of our Site or Services 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 "Does the LibreView Site Use Cookies and Related Technologies" below for more information. We may combine this automatically collected information with other information we have about you.

We may also collect information from your healthcare provider or healthcare professional(s) if they register you for a LibreView system account. Where your healthcare provider or healthcare professional(s) creates a patient profile about you which is stored in the LibreView system, we will receive the information about you that they have manually entered such as your name and date of birth, as well as the data uploaded from your Meters.

How does Abbott use personal information?

Abbott will use your personal information, including health-related information, in the following ways:

- to provide you with a LibreView system account to give you access to and present your information in an easy to use and effective manner.
- to respond to your questions or respond to your request for support, including troubleshooting any performance issues.
- to better understand how you interact with and use the LibreView system, including its functionality and features.
- to prepare and send you tailored marketing information, based on the data uploaded (including health-related information) or connected to with your LibreView system account, including from your local Abbott company where you have opted in. You will be provided with an opportunity to opt out of these communications.
- if you are a parent/guardian, to enable you to create a LibreView system account for use by your child, and allow you to manage their use of your LibreView system account.

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.

YOU AGREE THAT BY CREATING A LIBREVIEW SYSTEM ACCOUNT AND BY ACCEPTING THIS PRIVACY NOTICE, YOU CONSENT TO THE PROCESSING OF YOUR SENSITIVE HEALTH-RELATED INFORMATION AS SET OUT HEREIN.

For United States Users

When you provide your healthcare providers access to your LibreView Account, that action constitutes your direction to the healthcare providers to disclose to you and Abbott via the LibreView System, your personal information, including health-related information, they believe to be relevant for the purposes set forth in this Privacy Notice. You are further directing your healthcare providers to continue to disclose your personal information and health information as directed above, until you cancel this direction by contacting the healthcare providers and/or Abbott as stated in this Privacy Notice. You understand that if you cancel this direction, the cancellation will not apply to any information already used or disclosed to Abbott prior to Abbott's and your healthcare providers' receipt of the cancellation.

How does Abbott use other types of information?

We use information obtained from your use of our Site in providing you with a LibreView system account and to help us fix any issues with the LibreView system, and as otherwise described in this Privacy Notice.

We also use de-identified, pseudonymised, aggregated and/or anonymised information, which is information with which Abbott cannot identify you individually, for the following reasons:

- to create, access, retain, use and disclose to our affiliated companies and to third party researchers or healthcare 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.

Does the LibreView Site 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.

Does Abbott share 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 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, the hosting of your LibreView system account in the cloud is by Amazon Web Services in Europe, unless you select France as your country of residence, your personal information will be hosted in France by Orange Business Services, accredited by the ASIP Santé to host health-related information. Where we provide your personal information to third party suppliers to assist us with the provision of your LibreView system account, they are required to keep your personal information confidential and secure and to use your personal information to the minimum extent necessary.

We may share your 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 your personal information with third party providers where you have expressly asked us to do so, for example, where you opt in to receive further information from your local Abbott affiliate. We will not sell or licence your 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 your personal information for commercial purposes to third parties and we may only share your personal data with third parties where you have provided consent or where permitted by applicable law.

We reserve the right to disclose your 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 the information we collect from you 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.

How does Abbott secure personal information?

We have implemented administrative, technical and physical safeguards to protect your 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 that no internet or WiFi transmission is 100% secure, so please exercise caution when uploading personal information, especially health-related information, to your LibreView system account.

You are responsible for protecting against unauthorised access to your LibreView system account. We recommend securing access to your LibreView system account 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.

Where does Abbott store and transfer 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, your personal information, including your health-related information, is hosted on servers within the European Union. If you live select France as your country of residence, your information will be hosted in France by Orange Business Services, accredited by the ASIP Santé to host health-related information. If you select the United States as your country of residence, your personal information is hosted on servers in the United States. If you select a country within another region, your 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 your 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 your personal information only be collected, used, and disclosed as permitted under applicable laws.

We may occasionally need to access or view your personal information, such as your name and email address, and in certain exceptional circumstances your health-related information, via a secure network from the United States to the extent it is where necessary for us to provide you with technical support or to troubleshoot any system issues in relation to your 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, which prevents us from identifying you, for the purpose of conducting data analysis and analytics. The United States may not provide data protection or privacy laws equivalent to the laws of your country; however, we put appropriate measures in place to protect your personal information.

YOU AGREE THAT BY CREATING A LIBREVIEW SYSTEM ACCOUNT AND BY ACCEPTING THIS PRIVACY NOTICE, YOU CONSENT TO THESE TRANSFERS OF YOUR PERSONAL INFORMATION AND TO THE ACCESS OF YOUR PERSONAL INFORMATION, INCLUDING HEALTH-RELATED INFORMATION, WHICH MAY BE REQUIRED IN EXCEPTIONAL CIRCUMSTANCES. Where such exceptional access is required, we will endeavour to seek your consent again before accessing your health-related information.

Will Abbott send me marketing material?

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 profile. You may receive marketing information which is tailored to your specific needs based on the information uploaded or connected to your LibreView system account (including health-related information). We may also invite you to participate in surveys about our products, provide you with news and newsletters, or to 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 we send you, by changing your LibreView preferences or by contacting us at libreviewprivacy@newyu.com. We will process opt-out requests without undue delay.

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

How does Abbott protect the privacy of children?

When a child seeks to use the Site to create a LibreView system account, they are required to enter their date of birth and country so that we may establish whether they are a child under the law of their country. If a date of birth attributable to a child is entered, you will be required to enter the email address of a parent/guardian before a LibreView system account will be created. The parent/guardian must consent to their child's use of the LibreView system. Upon such consent, a LibreView system account will be created for the parent/guardian for use by a child.

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 used by a child by contacting us at libreviewprivacy@newyu.com. This action will delete the account being used by the child but we retain aggregated and de-identified information and may need to retain certain personal information as required by law.

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.

If you are a child, please also note that we whilst you may also have the right to access the personal information we hold about you, we may receive a request for access from your parent/guardian and in some circumstances, we may respond directly to your parent/guardian.

How do I delete my LibreView system account?

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 have 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, including health-related information, so you may want to download and save any required information before requesting that we delete your account from the LibreView system.

If you have chosen to share your LibreView system account information with your healthcare professional, family members and/or friends and you delete your account, those persons will no longer be able to view your glucose 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.

Third-Party Links

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 notices 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.

For French Users

Pursuant to the Law n°78-17 of the 6 January 1978 on Information technology, data files and civil liberties, the Data Controller for your LibreView account is Abbott Diabetes Care, Inc., 1420 Harbor Bay Parkway, Suite 290, Alameda, California 94502 United States.

Abbott Diabetes Care processes your personal data for the purpose of providing your LibreView account as more fully set out in “How does Abbott use personal information?”, except that Abbott will not send you any tailored marketing information. Abbott will also process information obtained from your computer and browser when you use the Site, including to help us fix any issues with the LibreView system. We will not use your data for the other purposes, in particular, analytics as further described in the section entitled “How does Abbott use other types of information?” The section entitled “Will Abbott send me marketing material?” does not apply to users in France. You consent to the processing of your personal data and sensitive personal data as set out herein.

The recipients of the data are its data processors involved in storing and hosting of your account, in particular, Orange Business Services, an accredited health data host located in France. Orange may provide customer support related to the hosting of your data. In exceptional circumstances where Orange is unable to resolve the customer support issue, Newyu based in the United States, may need to access the servers and/or access your data to resolve the customer support issue related to your account, and you consent to a transfer of your data to Newyu for the purpose of receiving such support. We will not share your data with any other third parties, including any other affiliated Abbott companies nor will we transfer your data for any other reason.

You have a right of access and rectification concerning information related to you. You can access information about you by contacting us at libreviewprivacy@newyu.com, at Abbott Diabetes Care at the above address or by writing to Abbott Diabetes Care France (Diabétologie), Bâtiment Cologne, 12 Rue de la Couture, BP 20235, 94518 Rungis Cedex. You can also, for legitimate reasons, oppose the processing of your personal data.

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.