

Prepared by: Quality Manager		Code: I-PO-5.3-003
Reviewed and Approved by: Managing Director		Edition: 1
Date of issue: 28.03.2022		Effective date: 01.04.2022
<b>Privacy Policy</b>		

## INTELLIGO PRIVACY POLICY

Intelligo (collectively "Intelligo," "We" or "Our") is committed to respecting your privacy. This Privacy Statement is intended to answer your important questions about our privacy practices, whether you are looking for health information or are mining the experience of Intelligo to refine your expertise in meeting the needs of your patients.

This Privacy Statement applies to all Intelligo's online or digital services activities, including, but not limited to [www.intelligofree.com](http://www.intelligofree.com) (the "Site"), our other websites, mobile applications ("Apps") and digital services ("Services") in which it is posted or linked.

Please carefully read this Privacy Statement to learn more about how we collect, use, disclose and store information provided and the steps we take to help protect the often-sensitive information provided from unauthorized use or disclosure. When you submit information to or through the Services, you consent to the collection, processing and retention of your information as described in this Privacy Statement.

IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY STATEMENT, THEN PLEASE DO NOT USE ANY OF THE SERVICES.

Please note that this Privacy Statement does not apply to information collected through third-party websites or services that you may access through the Services.

These Privacy Policy is between Intelligo ("Intelligo", "we" or "us") and anyone that purchases an Intelligo Product or service "you" ) or any other person who uses and/or who purchases an Intelligo Product or service on behalf of you, concerning your use of (including any access to):

- ❖ the Intelligo website located at [www.intelligofree.com](http://www.intelligofree.com)
- ❖ the software applications we make available for download or access at our websites, in the Google Play, App Store or Huawei AppGallery or other mobile service provider locations or other locations we indicate (referred in current document as "Apps")
- ❖ any Intelligo products ("**Intelligo Products**") and our data services, available through the internet to users of Intelligo Products or Software Apps that provide and permit the access, collection, storage, processing, analysis and/or transmission of data generated by a Intelligo Product or Software App ("**Intelligo Services**")
- ❖ as well as any email or other messages that you receive from us.

We are committed to protecting your personal information and your right to privacy. If you have any questions and concerns about this privacy notice, or our practices with regards to your personal information, please contact us at [vigilance@intelligofree.com](mailto:vigilance@intelligofree.com).

When you use any of our Intelligo Websites, Products, and Services, we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any

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terms in this privacy notice that you do not agree with, please discontinue use of Intelligo Websites, Products and Services.

This privacy notice applies to all information collected through Intelligo Websites, Products and Services, as well as any related services, sales, marketing or events.

### **Intelligo Data Service**

Our Data Service, included in Intelligo Services, is intended to allow a user to use the data generated by, or created in connection with the use of Intelligo to help the user to manage his or her diabetes in accordance with the applicable labeling of Intelligo Websites, Products and Services.

Each Data Service or software app may require the creation of an Intelligo user account on the software app. If so, you are required to accurately complete and maintain the user account and to provide us with all required information. You are responsible for obtaining, maintaining and paying for all hardware, software and telecommunications and other services necessary for the use of the data services.

Use of our Data Services requires an internet-enabled smart device or computer. Each Data Service receives user data from a software app that is downloaded to your smart device or computer.

Our Data Services may also permit users to share user data, reports and other information relating to the user to certain third parties selected by the user. By selecting the third party (which may be a person, a software app, or another business), you are authorizing us to send your user data to each party you select. Intelligo does not verify or validate any information regarding such third parties or the information you have provided regarding them. Once your information has been provided to a third party designated by you, Intelligo has no further control or responsibility regarding that information.

Our collection, storage and transmission of user data and any other information that you provide to Intelligo through Intelligo Websites, Products and Services are governed by the Privacy Policy.

### **What information do we collect?**

We only collect personal information that you provide to us. When you use the Services, we collect Personal Information and Usage Data.

In this Privacy Statement, "Personal Information" means information associated with or used to identify or contact a specific person. Personal Information includes: (1) contact data (such as full name, e-mail address, telephone number and employer); (2) demographic data (such as gender, date of birth, physical address and zip code); and (3) certain Usage Data (defined below).

Certain subsets of Personal Information, such as information about health or medical status (pursuant to all applicable laws) and Location Data (defined below), are characterized as sensitive (collectively, "Sensitive Personal Information") and may be subject to stricter regulation and consent requirements than other information. Before providing it to us, we urge you to carefully consider whether to disclose your Sensitive Personal Information. If you do provide Sensitive Personal Information to us, you consent to its use and disclosure for the purposes and in the manner described in this Privacy Statement.

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“Usage Data” is information about an individual’s activity on or through the Services that are being considered as Personal Information, such as (but not limited to) browser type, operating system, IP address and webpages visited.

The personal data we receive from you (which we refer to collectively as your "Personal Information") includes but not limited to Registration and Ordering Information, Feedback Information, Data Services Information, User Information and Derived Information, such as glucose readings, information associated with each glucose reading such as date, time, and device identifier; Thresholds input into Data Services or Software Apps and notifications arising from those thresholds.

In general, you are entitled to at any time access your Personal Information. You have the right to request rectifying, erasing, transferring some or all of this information to other organizations or restricting its processing. You also have the right to object to some processing and, where we have asked for your consent to process your data, to withdraw this consent.

By accepting this Privacy Policy, you agree that Intelligo has the right to collect and use Data Services Information, store it on our servers, process it using Data Services, and transmit it to the User and each Designated Recipient and Designated Third Party Service, where applicable for Intelligo Websites, Products and Services that are requested by you.

By accepting this Privacy Policy, you agree that Intelligo has the right to use Data Services Information in connection with our provision of Data Services and for our operations, administration and product development, maintenance and support in line with applicable data protection laws.

**How your information is used?**

We may share and disclose information as described above, at the time information is collected, as follows:

To Perform Services. We may use third parties to perform services requested or functions initiated by users. We may disclose Personal Information to identify a user in communications sent through the Services. We also may offer users the opportunity to share information with friends and other users through the Services.

Feedback Information you provide to us. We do not identify you or include any information that could be used to identify you. Feedback Information may be used by us and be provided by us to our customers and third parties.

Data Service in connection with our provision of Data Services and for our operations, administration and product development, maintenance and support in line with applicable data protection laws; Analytical statistics to improve our products and provide better service tailored to you.

We may use Personal Information (anonymous) in accordance with applicable data privacy laws to manage our Products and Services, including the Website, to improve our business and provide new website and product and service features, and to otherwise manage our business.

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With IntelliGO's Third Party Contractors. We share information, including Personal Information, with our service providers to perform the functions for which we engage them, such as data analysis, system design and maintenance, customer services and for marketing and promotions.

Social Media Plugins. When you use the Services, Social Media operators can place a cookie on your computer to recognize individuals who have previously visited the Services. If you are logged into a Social Media account while using the Services, the social plugins allow that Social Media to receive information that you have accessed and used the Services. The social plugins also allow the Social Media operator to share information about your activities in or through the Services with other Social Media users. For example, Facebook Social Plugins allows Facebook to show your Likes and comments on our pages to your Facebook friends. Facebook Social Plugins also allows you to see your friends' Facebook activity through the Services. IntelliGO does not control any of the content from the Social Media plugins. For more information about Social Media plugins, please refer to the privacy statements and other legal notices of the Social Media platform.

Legal Requirements. In certain circumstances, IntelliGO may release your Personal Information in response to a court order, subpoena, search warrant, regulation, binding order of a data protection agency, governmental request or other legal or regulatory process. IntelliGO may disclose information if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of IntelliGO and our customers or others.

Corporate Changes. We may transfer information, including your Personal Information, in connection with a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control by IntelliGO or any affiliated company (in each case, whether in whole or in part). When one of these events occurs, IntelliGO will use reasonable efforts to notify users before information is transferred or becomes subject to different privacy practices.

Registration and Ordering Information to manage your account and IntelliGO Products and Services applicable to you. We also use your email address to contact you regarding your account. We make any Registration and Ordering Information confidential.

De-Identification as removing information that could identify you, and we may use such de-identified information for any purpose, except where we are required to do otherwise under applicable law.

Other Uses for purposes other than those permitted in this Privacy Policy but only after you consent to such use. We will only use your data with your consent to provide services to you. We will only collect and keep glucose monitoring history (readings, calibrations, alerts) for you to access. With consent you can share information with others. You have the right not to upload device data to the IntelliGO servers. In this case data will not be accessible to others. Without the data upload the only record of information is on your smart device itself. We only share information with your consent, to comply with law, to provide you with services, to protect your rights, or to fulfill business obligations. We may hold, process, share and transfer your Personal Information but solely for legitimate purposes in accordance with applicable laws, ordinances and guidelines, and it is only disclosed on a need-to-know basis to those who are authorized to use it for these purposes.

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### Third Parties

In the ordinary course of our business, Intelligo will collect and use providers to perform services or functions on our behalf. We will not authorize those third parties to keep, use or disclose your Personal Information except for providing the services we have asked them to provide.

When you elect to share your protected health information with a Designated Third-Party Service, such as through the Apple Health app, you are electing to provide your data to a third party, and your authorization continues until you revoke it.

Your Designated Recipients may share your Personal Information with Intelligo for purposes relating to their use of Intelligo Websites, Products and Services.

Once you share any Personal Information with a third party, including Designated Third-Party Services, we have no control over that Personal Information and how it is used by any such third party. You should refer to the terms of service, privacy policy and other provisions of the websites for each third party to which you provide any Personal Information yourself, and for any Designated Third-Party Service you authorize.

### Is your Information transferred Internationally?

In compliance with GDPR (General Data Protection Regulation), our major servers are located in Nuremberg, Germany.

As part of the services offered to you, the information which you provide to us may be transferred to countries outside the European Union ("EU"). For example, this may happen if any of our servers are transferred in any country outside of the EU. By submitting your personal data, you're agreeing to this transfer, storing or processing.

If you are a resident out of EU, we only store your personal information in our servers, your personal information will only be transferred with your consent, to comply with law, to provide you with services, to protect your rights, or to fulfill business obligations.

If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU to provide you with those services.

We take reasonable steps to protect all personal information from loss, misuse, and unauthorized access, disclosure, alteration or destruction. You should however keep in mind that no internet transmission is ever 100% secure or error free. And you should therefore take exceptional care in deciding what information you send to us via e-mail and avoid including any of your personal or healthcare information without encrypting it first and we would ask you not to share your passwords with anyone.

### How long do we keep your information?

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Your data is stored in IntelliGO Products maximum for 14 days. Data transferred to IntelliGO Products is stored offline on your smart device also maximum for a period of 14 days.

We keep your information/data you upload in the servers until you ask us to be deleted, or for a minimum of 10 years after your last transaction with IntelliGO (as required by law), after this time they will be destroyed.

We are required under law to keep your basic personal data (name, address, contact details) for a minimum of 10 years after your last transaction with IntelliGO, after this time they will be destroyed.

We securely store your personal information and isolate it from any further processing until deletion is possible.

**Do we collect information from minors?**

We are concerned to protect the privacy of children, children aged 16 or under must have parent/guardian's consent before we will accept any personal information.

**Applicable laws and regulations**

For Personal Information that IntelliGO receives from users, affiliates and companies in the European Union, the European Economic Area, and Switzerland, IntelliGO will commit to handling such personal information in accordance with General Data Protection Regulations (GDPR) and the European law principles for international transfers such as EU Standard Contractual Clauses or Privacy Shield.

Where IntelliGO requires your Personal Information to comply with legal or contractual obligations, then provision of such data is mandatory: if such data is not provided, then we will not be able to manage the relationship, or to meet obligations placed on us. In all other cases, provision of requested Personal Information is optional.

**What security measures do we take to protect your personal information?**

Each user will need an IntelliGO account and a password to access the data in any of IntelliGO Websites, Products and Services. All of our systems are protected by strong passwords, a firewall to filter any malicious access, intrusion detection to detect any system anomalies and malicious code protection to perform security checks on all committed data.

In order to ensure the confidentiality of your data different types of users have different access levels. You own your healthcare data, you can upload, download or ask us to delete it, you can choose to share it with others which will give them the ability to view or download your data.

We use a firewall to filter any malicious access, intrusion detection to detect any system anomalies and Malicious code protection to perform security checks on all committed data.

Data encryption: AES symmetric encryption is used to encrypt and store your passwords.

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Database attack prevention: The complexity of the account password prevents hackers from hitting the database.

Interface security: Strictly restrict the user's menu authority and button authority, and only return the user's matching authority data.

Data encryption: The CGM glucose data stored and transmitted via software are encrypted.

### **Further Processing**

If we wish to use your personal data for a new purpose, not covered by this Data Protection privacy notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### **Your rights with your personal information**

Contact our Data Protection Officer at [privacy@intelligofree.com](mailto:privacy@intelligofree.com) for any requests.

Based on the applicable laws of your country, you have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. You are able to review, update or delete your personal information at any time using your own access to Intelligo Websites, Products and Services or by contacting us.

You have rights to object to some processing and, where we have asked for your consent to process your data, to withdraw this consent. These rights may be limited in some situations – for example, when fulfilling your request would reveal Personal Information about another person or when we have a legal requirement to process your data.

You have the right to request your personal data to be erased when it is no longer necessary for Intelligo to retain such data.

You have the right to request that Intelligo provides you with your personal data and where possible, to transmit that data directly to another data controller, this applies when the processing is based on your consent or is necessary for the performance of a contract with you by automated means.

You have the right to lodge a complaint with the Information Commissioners Office:

Keizersgracht 421, 1016EA Amsterdam, Netherlands

### **Our Children's Policy**

The Services are not intended for use by children. If you are under the age of majority in your place of residence, you may use the Services only with the consent of or under the supervision of your parent or legal guardian. Consistent with the requirements of the Children's Online Privacy Protection Act (COPPA), if we learn that a child under age 13 has provided Personal Information to or through the Services without first receiving

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his or her parent's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use the Services and subsequently we will dispose of such Personal Information in accordance with this Privacy Statement.

If you believe Intelligo may have any information from or about a child under age 13, please contact our Privacy Office using the contact information at the end of this Privacy Notice.

**Do we make updates to this Privacy Policy?**

We may update this privacy notice from time to time. The updated version will be indicated by an updated date and will be effective as soon as it is accessible. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your information.

*On behalf of Intelligo B.V.*

\_\_\_\_\_  
*Managing Director*

01.04.2022

*Date*

**Contact Us**

Privacy Office  
Keizersgracht 421,  
1016EA Amsterdam,  
Netherlands

[privacy@intelligofree.com](mailto:privacy@intelligofree.com)

Be sure to include your name, address, and email address if you want to receive a response by email. Otherwise, we will respond by postal mail within the time required by applicable law.