

# MEDTRONIC PRIVACY STATEMENT FOR EVENT REGISTRANTS

Medtronic

Medtronic is committed to maintaining your trust by protecting Personal Information. We are committed to ensuring that your privacy and the privacy of your patients is respected, and that Personal Information is handled in a transparent and lawful way. Any Personal Information you provide will only be used in accordance with this Privacy Statement. We encourage you to read this Privacy Statement carefully.

This Privacy Statement tells you how we protect and process the Personal Information you are providing via registration for Medtronic events you are attending.

This Privacy Statement was last revised on April 13, 2020.

## INTRODUCTION

When we use the words "we" or "our," we mean Medtronic. When we use the word "you" or "your" we mean the Health Care Professional (meeting registrant) whose information is entered onto the Registration form ("Form").

## WHAT IS PERSONAL INFORMATION?

Personal Information is information that is processed during registration and through the Mobile App to provide event services. Personal Information that can specifically identify you and that we need to collect relative to the purposes above includes:

Personal Information	Conference Arrangements	Post Conference Evaluation	Transparency	Attendance Tracking
First, middle, and last name	X	X	X	X
Email address	X	X	X	X
Hospital / clinic name	X	X	X	X

Hospital / clinic address	X	X	X	X
Post code, City and State	X	X	X	X
Country	X	X	X	X
Profession	X	X	X	X
Specialty	X	X	X	X
Title	X	X	X	X
Degree	X	X	X	X
NPI			X	
Travel Preferences	X			
Credit Card Info	X			
First and last name of any guests	X		X	X

## HOW DOES MEDTRONIC COLLECT AND PROCESS PERSONAL INFORMATION?

We collect Personal Information via this form, entered either by yourself or a Medtronic representative. The results from the form will be used to facilitate various aspects of travel and/or meeting attendance, reporting and post-meeting evaluation. Not all meetings will utilize data in each of these contexts. However, by agreeing to these usages, you enable us to make arrangements for you if additional needs arise prior to and/or during the event. For example, your data may be used to facilitate:

- Air travel booking, logistics and expenses
- Hotel arrangements, rooming lists with check-in dates/check-out dates, and any special requests/preferences you may have (i.e., accessible room, allergen free pillow, frig in room, near ice machine, far from elevator bank, etc.)
- Food & Beverage headcounts
- Special requests to additionally manage your attendance (i.e., food allergies, special diet, etc.)
- Ground transportation arrangements and manifests with arrival/departure times, etc.
- Duty of Care manifest for travel management company to include emergency contact information in the event of an emergency
- Continuing Education Credits or Certificate of Completion
- Mobile App Roster
- Transparency / disclosure of "transfers of value"
- Event and Conference Support (i.e., provide you with conference information and follow up)
- Guest attendance (i.e., we will collect credit card info to charge a guest fee)

## **SECURITY**

We are committed to protect the security and confidentiality of Personal Information. To prevent accidental or unlawful destruction, loss, alteration, unauthorized access or disclosure of, the Personal Information, we use appropriate technical and organizational measures to safeguard and secure the Personal Information we process.

## **WILL MEDTRONIC SHARE PERSONAL INFORMATION WITH THIRD PARTIES?**

Medtronic will share your personal information collected via this form with necessary third parties to facilitate logistics of travel and meeting attendance, and for reporting purposes. These include but are not limited to hotels, travel and transport companies, regulatory agencies and survey tool companies. For these event services, where necessary and appropriate to share your Personal Information with a third-party, we will not authorize them to keep, disclose or use your information with others except for the purpose of providing the services we ask them to provide.

Please note that subject to applicable laws, we may disclose your personal information if we believe we are required to do so to comply with any law, regulation, court order, legal or government request. In the unlikely event that all or part of our business is acquired by a third party, your information may be transferred to the new corporate owner insofar as relevant to the business in question and subject to appropriate safeguards being in place.

## **HOW LONG WILL MEDTRONIC STORE YOUR PERSONAL INFORMATION?**

Medtronic's Global Record and Information Management Retention Schedule identifies records and information to be retained to meet business, regulatory and legal requirements and defines the time periods for their appropriate retention and destruction. For all Personal Information collected for the purposes of meeting planning defined above, we follow the Medtronic global retention schedule. However, if a regulation requires a longer retention period, then Medtronic will follow the retention period specified in the regulation.

## **HOW TO CONTACT MEDTRONIC**

If you have questions or comments about this Privacy Statement, please contact: [rs.globaldataprivacyoffice@medtronic.com](mailto:rs.globaldataprivacyoffice@medtronic.com)

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## YOUR PERSONAL RIGHTS & HOW TO CONTACT MEDTRONIC

### EUROPE

#### GENERAL DATA PROTECTION REGULATION (GDPR)

##### Supplemental Privacy Notice for European Residents

At any time, you may exercise your right to access rectify and, as the case may be, erase any personal information relating to you, or restrict the processing of your personal information, in compliance with applicable laws.

You have the right to lodge a complaint with your data protection authority.

If you have questions or comments about this Privacy Statement, or would like to exercise your rights, please contact the Medtronic European Data Privacy Office: [rs.privacyeurope@medtronic.com](mailto:rs.privacyeurope@medtronic.com)

### UNITED STATES

#### STATE-SPECIFIC PRIVACY NOTICES

##### CALIFORNIA

##### Supplemental Privacy Notice for California Residents

This notice for California residents supplements the information contained in our Privacy Statement and applies solely to residents of the State of California. We adopt this Supplemental Notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Supplemental Notice. Under the California Consumer Privacy Act ("CCPA"), you have certain rights in relation to some of your personal data, including the right to certain disclosures and explanations of rights. This section explains your rights under California law.

## CALIFORNIA CONSUMER PRIVACY ACT OF 2018

### Categories of Personal Information We Collect

Medtronic collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household (“personal information”). We may have collected the following categories of personal information from consumers through our websites, apps, services, devices, or other services within the twelve (12) months preceding the effective date of this Privacy Statement:

#### Personal Information Category

##### Identifiers such as:

- Name
- Address
- Email address
- Financial information, including credit card numbers
- Commercial information (e.g., purchase history)
- Professional, employment-related, or other similar information
- “Personal information” under the California Consumer Privacy Act does not include information that is
  - publicly available from government records,
  - de-identified or aggregated consumer information,
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data, or
  - certain personal or financial information covered under certain sector-specific privacy laws.

##### Categories of Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from consumers’ interactions with us, including with our devices, applications, websites, services, and representatives
- Publicly available sources
- Customers, including health care providers and insurance providers
- Organizations with whom we partner to provide services to consumers

## Use or Disclosure of Personal Information

In the past 12 months, we have used or disclosed the personal information we collect for our operational purposes and for one or more of the following business purposes:

- To provide products and services to consumers
- To respond to consumer requests
- To improve and personalize consumer access to and experience on our website, for example, by telling consumers about new features, products, or services that may be of interest to them
- To develop records, including records of consumers' personal information
- To contact consumers with information that might be of interest to them, including information about clinical trials and about products and services of ours and of others
- For analytical purposes and to research, develop, and improve programs, products, services and content
- For activities to monitor and maintain the quality or safety of our products and services
- For activities described to consumers when collecting their personal information or as otherwise permitted under CCPA
- For U.S. healthcare providers, to link name, National Provider Identifier (NPI), state license number, and/or IP address to web pages they visit, for compliance, marketing, and sales activities
- To conduct audits and perform troubleshooting activities of our websites, products, and services
- To detect and protect against security incidents and deceptive, malicious, or fraudulent activity
- To ensure our website, products, apps, and services function as intended, including debugging and repairing
- To comply with a law or regulation, court order or other legal process

## How We Share Personal Information

Medtronic will not share consumers' personal information with an unrelated third party without permission, except as described below.

Medtronic may share personal information with any member of our corporate group, including parent companies, subsidiaries, and affiliates, and other companies in which we have an ownership or economic interest for purposes that are consistent with those identified in our Privacy Statement and this Notice.

In the ordinary course of business, we will share some personal information with companies that we hire to perform services or functions on our behalf. In all cases in which we share consumers' personal information with a third party, we will only allow them to keep, disclose, or use consumers' information to provide the services we asked them to provide.

We may be required to release consumers' personal information in response to a court order, subpoena, search warrant, law, or regulation. We may cooperate with law enforcement authorities in investigating and prosecuting users who violate our rules or engage in behavior which is harmful to other users or illegal. In addition, we may keep, disclose, and use consumers' personal information in order to comply with U.S. FDA and other governmental guidance, directions, regulations, and laws.

### **Categories of Personal Information We Sell**

We do not sell personal information of California consumers.

This does not include disclosures that are not a "sale" under the CCPA, including when

- consumers instruct us to disclose their personal information,
- a consumer instructs us to interact with a third party that does not sell that information,
- we use or share consumers' personal information pursuant to a written contract with a service provider that is necessary to perform a business purpose, where our contract prevents the provider from using, keeping, or disclosing consumers' personal information for any purpose other than the reason supplied in the contract, or
- consumers' personal information is transferred as part of a transaction in which the third party assumes control of all or part of our business.

### **Personal Information on Minors**

We do not sell personal information of California consumers, including minors.

### **Rights under California Law**

**Right to Access.** If you are a California consumer, you have the right to ask us to send you the following information up to two times in a twelve-month period:

- The categories of personal data we have collected about you.
- The categories of sources from which we collected the personal data.
- Our business or commercial purpose for collecting personal data.
- The categories of third parties with whom we share personal data.
- What categories of personal data we disclose about you for business purposes.
- What categories of personal data we sell or exchange for consideration about you.
- The specific pieces of personal information we have collected about you.

**Right to Delete.** If you are a California consumer, you have the right to ask us to delete the personal data about you we have collected. We may deny the request if the information is necessary to:

- complete a transaction, including providing a requested or reasonably anticipated good or service, or fulfill a contract between the consumer and Medtronic;
- detect and protect against security incidents, malicious, deceptive, fraudulent, or illegal activity, or take against those responsible for such activity;
- debug to identify and repair errors impairing intended functionality;
- exercise free speech or another right provided for by law;
- comply with the California Electronic Communications Privacy Act;
- engage in research in the public interest adhering to applicable ethics and privacy laws where the consumer has provided informed consent;
- enable solely internal uses reasonably aligned with the consumer's expectations based on the consumer's relationship with Medtronic;
- comply with a legal obligation; or
- otherwise use the information internally in a lawful manner compatible with the context in which the consumer provided the information.

**Right to Opt-out.** If a business sells personal information to third parties, California consumers have the right, at any time, to opt out of the sale or disclosure of their personal information to third parties. Medtronic does not sell personal information to third parties.

**Right to non-discrimination.** The CCPA grants California consumers the right not to be discriminated against for exercising your privacy rights. If you exercise your privacy rights, we will not discriminate against you, for example, by denying you access to our online services or charging you different rates or prices for the same online services, unless that difference is reasonably related to the value provided by your data.

### **Submitting a Request or Inquiry**

If you are a California resident and you want to submit a request or inquiry to us regarding your California rights, you or your authorized agent can contact us using the webform here: <https://www.medtronic.com/us-en/privacy-statement/personal-data-request.html> or call us at 1-866-639-6907. You do not have to create an account with us to submit a request.

Your request will be confirmed within ten days of receipt and we will respond within 45 days. If we need more than 45 days, we will notify you that your request is being delayed.

We can only respond to your request if it is verifiable. This means we are obligated to take reasonable steps to verify your identity or your authorized agent's authority and your right to access the information you request. We may ask for additional information that will help us do so. We will only use that additional information in the verification process, and not for any other purpose.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.