

Terms last modified: June 23<sup>rd</sup>, 2021

## PRIVACY POLICY

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## General Information

Your privacy and confidence are and have always been a priority to **Insulcloud S.L.** and its affiliates, **Insulcloud Delivery S.L.U.** and **Insulcloud Factory S.L.U.** (hereinafter **Insulcloud**). We explain, in a simple manner, how we use the personal information you provide us through this website. **Insulcloud** guarantees you that has taken all the necessary measures to provide security and protection to the personal data you provide us through the mobile application Diabetes Control Insulclock® 360°.

This Privacy Policy regulates the use of personal data on our websites [insulclock.com](http://insulclock.com), [tudiabetesbajocontrol.com](http://tudiabetesbajocontrol.com) and [shop.insulclock.com](http://shop.insulclock.com), including the subpages and their versions in languages other than Spanish (hereinafter, collectively referred to as "the website", "our website" or "this website"). If you leave our website via a link or visit our social media pages, you will also leave the scope of this Privacy Policy.

Because the services and products that Insulcloud offers through this website make data processing necessary, this Privacy Policy complements the Privacy Notice and Conditions of Use of the INSULCLOUD® 360° SYSTEM. The INSULCLOUD® 360° SYSTEM is composed of a device that is anchored to the insulin pen, a mobile application and a web platform for healthcare professionals

Please read carefully the contents of this section and, if you have any doubts or questions on how **Insulcloud** processes your data or any other aspect of this Privacy Policy, please do not hesitate to contact our [Data Protection Officer](#) who will contact you as soon as possible.

Due to legal changes as well as the organizational changes that may occur in **Insulcloud**, this Privacy Policy may change, so we recommend you review it periodically. However, in case we consider that the changes introduced are important, we will contact you through the contact information you have provided, if applicable.

If you do not agree with anything, in whole or in part, of what is detailed here, please, do not use any of our services and this website.

## Who will be responsible for processing your personal information?

The information you provide us through this mobile application will be responsibility of **Insulcloud**. In order to you can identify us and, if you wish, contact us, we provide you with our data:

- **Owner:** Insulcloud, S.L
- **Trade name:** Insulcloud
- **Registered at:** Madrid Business Register in volume 32823, sheet 103, section 8, paper M590850 on October 22<sup>nd</sup>, 2014.

- **VAT:** ESB87131454
- **Registered Office:** Avenida de Sabino Arana 8, 2ª, 48013 Bilbao, Bizkaia (Spain)
- **e-mail:** [info@insulclock.com](mailto:info@insulclock.com)
- **Data Protection Officer:** [legal@insulclock.com](mailto:legal@insulclock.com)

## What is Personal Information?

It is about any information that relates to an identified or identifiable natural person. An identified or identifiable natural person is one whose identity can be determined, directly or indirectly, in particular by means of an identifier element (for example: name, email or an identification number).

We collect, store and use your personal information when necessary to provide you with some of our services and for the development of our business, as described in this Privacy Policy. Our intention is that you are permanently informed on how **Insulcloud** processes the personal information about you, so we recommend you to [contact us](#) if you have any question in this regard.

## What personal data do we collect and how do we collect it?

To navigate the website, you do not need to register or provide us with any personal data beyond those collected automatically. Likewise, the scope of the data processed depends on the use that the user makes of the functions of the website. However, we offer you certain services that require you to provide us with some personal data in order to provide the service:

- **Contact us.** The website offers you the possibility to contact us to request additional information about our company or our products. We only need you to provide us with an email address, which will be used to answer any questions you may have. If you click on the CONTACT section, our page will open the email wizard that you have installed on the terminal from which you access our website.

We inform those people who send us their curriculum vitae by email or through the CONTACT section enabled on the website, that if the profile matches the one requested by the company, their data will be incorporated into the Human Resources file whose manager is **Insulcloud**. Your data will be processed in order to manage a possible candidate selection process. If the candidate does not want the processing of their data to be carried out for the indicated purpose, or wishes to exercise her rights, she should write to Insulcloud at the address indicated above or by contacting our [Data Protection Officer](#).

- To provide you with a **demo of the ENDO® Web Platform**. If you are a health professional, we give you the possibility to use a simulator of our ENDO® Web Platform, in which you can see how the information related to a patient with diabetes is displayed. For this we need you to provide us with your full name, an email address and your telephone number.

## Google® Services

We use [Google® Analytics](#) to obtain and analyze your browsing information on our website. This digital tool, developed by Google®, provides an analysis of audience and traffic of our website. Google® Analytics® does not collect data such as names, surnames or postal address from where the connection is established. The information obtained is related to the number of pages visited, the language, the browser used, the operator from which the visit is made and the IP address from which the user accesses, among others. Google® uses a cookie to obtain information about your use of this website (such as your IP address) and stores it in the United States. However, your IP address will be shortened (and therefore anonymized) before transfer by Google® in Member States of the European Union or in other States that have signed the Convention on the European Economic Area. As Google® says, only in exceptional cases is the full IP address transmitted to a Google® server in the United States and shortened there. Google® will analyze the information obtained in order to prepare reports on the activities of the website and to provide us with other additional services. The IP address transmitted by your browser in the context of Google® Analytics® will not be combined with other Google® data. Read our [Cookies Information](#) to know more.

In addition to blocking all cookies in the browser, you can prevent the processing of this data through Google® by downloading and installing the browser plug-in available through the following [link](#).

As an alternative to the browser plug-in, especially in mobile device browsers, you can prevent the registration by Google® Analytics® by setting an opt-out cookie that prevents the future recording of your data when visiting this website (the cookie opt-out is only valid in this browser and for this domain, so if you delete cookies from this browser, you will have to click the link again): [Disable Google® Analytics®](#).

In addition, the website uses the [Google® AdWords®](#), advertising tool, including its conversion and remarketing function.

The remarketing tool allows us to display personalized advertising on other websites that you visit. To do this, Google® analyzes your use of our website and stores the corresponding ID in your browser. This ID allows us to assign you to a specific group of users and to recognize you when you visit a website that is part of the Google® advertising network. These websites may now display advertisements related to your use of our website. During this process Google® does not collect any personal data from you, this assignment takes place exclusively through your browser. The data collected will be stored and processed in the United States.

We use conversion tracking to determine the success of advertising our services on other websites. To do this, a conversion cookie is generated when you click on one of our ads. This cookie allows us to recognize that you have

reached our website through this advertisement. Thanks to these usage statistics, we create statistics to evaluate the conversion of our ads. We do not receive any information about you personally. Your browser's set of conversion cookies is individual and cannot be used by other Google® AdWords® clients for their statistics.

You can prevent this remarketing by [disabling this function](#).

You can obtain more information about Google® Analytics® in [Google's data protection statement](#), as well as more information about Google AdWords by clicking [here](#).

## **Facebook® Services**

Our website uses so-called Facebook® pixels or Custom Audience. This is the function of a Facebook® web analytics service. Facebook® pixels are non-visible graphic files integrated into our website. When you visit our website, various information about the pixel is stored in the browser. Thus, we can know which subpages you have visited. We share this information with Facebook® in order, on the one hand, to better tailor our ads to your interests and, on the other, to analyze the effectiveness of our ads on Facebook®. Depending on how you use the website, it will be assigned to certain stakeholders called custom audiences. The information generated by cookies is usually transferred to a Facebook® server in the United States and stored there. You can learn more about data collection using Facebook® tracking pixels [here](#) or [here](#).

We have no influence on the data processing operations of Facebook®. Facebook® uses the data for advertising, market research and offer optimization purposes. In this regard, the privacy policy of Facebook® applies. Please note that the use of these tracking methods allows the identification of users across numerous websites. You can [deactivate this function](#) in the settings of your Facebook® account for all the devices or terminals that you use. For more information, see the Facebook® [Privacy Policy](#) and [Terms of Service](#).

## **Data of Minors**

We want to let you know that this website is intended exclusively for an audience over 18 years of age. Minors who intend to make use of the services contained in the website must have the prior consent of their parents, guardians or legal representatives, who are solely responsible for the acts carried out by the minors in their charge. If we detect that a minor is making use of this mobile application, we will request an authorization from their parents or legal guardians. Once the consent has been obtained, the minor's parents or legal guardians may obtain access to the minor's data and to the account that the minor may eventually create.

Parents or legal guardians of the minor may express their wish to terminate the processing of the minor's data at any time, through a request to **Insulcloud** so that the minor's account is deleted, sending an email to [legal@insulclock.com](mailto:legal@insulclock.com)

or by sending a letter to Insulcloud S.L., Avenida Manoteras 38, C-411, 28050 Madrid (Spain), accompanied by a photocopy of the ID card and a photocopy of the family book. We will eliminate the minor's account, but we will keep general information that is not identified and that we are obliged to keep in order to comply with current legislation.

## **For what do we use your personal information?**

Insulcloud will use your personal data with the utmost caution to ensure adequate protection of your personal information, adjusting to current legislation at all times and we will do as explained below:

- To solve your technical doubts, including functioning problems, solving incidences or to solve any other kind of doubt or for receiving and responding any kind of comment you want to put in our knowledge.
- To send you upgraded information about your treatment, diabetic education, healthy lifestyle, physical activity and nutrition, if you desire it so.
- To send you personalized marketing information related with your interests. Do not worry, you will always have the opportunity to regret receiving this kind of communications.
- To better understand the way you use and interact with the website (including its functions and benefits), including its operation and its influence on users (including basic demographic data of users, such as their geographic location) in order to validate the updates and guarantee, at all times, the safety and protection of the website.
- If you are a healthcare professional and request a demo of the ENDO® Web Platform, we will use your personal information to provide you with a user account and to contact you to obtain your impressions of the INSULCLOUD® 360° SYSTEM.
- For product development or data analysis, surveys or statistical studies.
- To investigate, develop (including functionalities and features), test and improve the website.
- Because of legal issues, it is possible that we are obligated to keep and use personal data, as may occur for prevention, detection or investigating a crime or a fraud possible threats to people safety, infractions of this privacy policy or as an evidence in eventual legal proceedings in which Insulcloud be a party. It is possible that your personal data is under the legislation of third countries and, according to that, it is accessible by the government, tribunals, security bodies or regulatory entities of said countries. Moreover, it is probable that we use your personal data to comply with internal security audits requirements for the protection of your data or another issue we consider as necessary. These uses will always be covered in:
  - a. current laws, including those applicable outside your country of residence.

- b. a request from a court or tribunal, a security or regulatory body, as well as other public authorities, including those that come from outside your country of residence.
- c. compliance with this Privacy Policy or our Legal Notice and Terms of Use; and
- d. protection of our rights, privacy, security or property, or those of other people.

As we indicated previously, the website also receives automatic information. This information is collected to help us administer, protect and improve our services, analyze their use and improve the user experience. We may automatically combine the information we collect with other information we have about you. See our [Cookie Information](#) for more information.

### **Do we share your personal information?**

We share your personal information with our suppliers, insofar as this is necessary to facilitate, maintain and house the website or offer technical support for its use.

In the event that we provide your personal information to our suppliers for the purpose of providing assistance, said third parties will be obligated to maintain and protect the confidentiality of your personal information and use it only to the extent that be strictly necessary.

We may share your personal information with third parties (including affiliated Insulcloud companies) with whom we market a product or service or perform a joint activity or program, including but not limited to R&D projects and/or statistical analysis. We may also share your personal information with other providers if you expressly request it.

We will not transfer your personal information to third parties, except in connection with the sale, merger or transfer of a line or division of our products or **Insulcloud** so that the buyer can continue to provide information and services. To avoid doubts, we will not sell your personal information to third parties for commercial purposes, and we will only share your personal data with third parties to the extent that you have given your consent or as permitted by applicable law.

### **Where do we store your personal information?**

The personal information that you provide us and data generated because of the use of this website are hosted in the cloud, in a secure way, by [Google Cloud Platform](#), a digital tool developed by Google®.

We have taken the steps to ensure that the information we collect is processed in accordance with this Privacy Policy and in accordance with the requirements of applicable law, regardless of the location of the data and according to the agreement signed between **Insulcloud** and Google®.

We guarantee that in the event that we are obliged to provide your personal information to our suppliers, present or future, with the purpose of providing us with support for possible incidents of the website, said third parties will be obliged to maintain and protect the confidentiality of your personal information and use it only to the extent that it is absolute and strictly necessary.

## **How do we protect your personal data?**

Given the "core" of **Insulcloud**, the protection of your personal information has always been, is and will be a key principle of our company. That is why we use and have put in place all the legal, administrative and technical mechanisms to guarantee the protection of your personal data.

Your personal data are protected. **Insulcloud** restricts the access of its employees to your personal information only in those cases or situations in which such access is strictly necessary to provide a good service or to guarantee the security thereof. Our staff will only access the personal data necessary to provide the specific service or need.

On the other hand, your personal identification data (name, surname and e-mail address) are stored pseudonymously and in a dissociated way to the other data that you provide us through the INSULCLOUD® 360° SYSTEM, in such a way that they can no longer be attributed to you.

It is important to keep in mind that no data transmission made over the Internet is perfectly safe, so we advise you to take precautions whenever you share personal information through the network. Also, keep in mind that only you are responsible for protecting the access data to the account that you have created in the INSULCLOUD® 360° SYSTEM, so we recommend you pay attention to not leave open user sessions, create a password that only you know and that cannot be easily guessed, as well as not share with anyone the keys or access data to your account.

We **Insulcloud** are here to help you, always and at all times, so if you are aware or suspect that your personal information may be compromised, please get in touch with our [Data Protection Officer](#) as soon as possible.

## **How long do we store your personal information?**

We will safeguard and retain your personal information for as long as necessary and reasonable in accordance with current legislation and according to commercial matters. To determine these times or periods of conservation, **Insulcloud** will observe the provisions of local laws and contractual obligations. When we no longer need personal information, we will remove it from our records and databases in a secure manner.

We keep your personal data to provide you a quality service and for legitimate and essential business purposes, such as maintaining the performance of the

website, make business decisions based on data about new functions and offers, meet our legal obligations and resolve disputes.

If you request it, we may delete or anonymize your personal data so that it is not identified, unless, legally, we can or are required to keep certain personal data, including the following cases:

- If there is an unresolved problem related to your account, such as an unresolved claim or dispute, we will retain the necessary personal information until the problem is solved.
- When we are required to retain personal data to comply with our legal, fiscal, accounting and auditing obligations, we will retain the necessary personal data during the period required by applicable law; and/or,
- When necessary for our legitimate business interests, such as preventing fraud or maintaining the safety of our users.

## **What rights do you have regarding your personal information?**

The current legislation on Data Protection gives you rights. **Insulcloud** ensures that your rights are respected, and we guarantee that you can always exercise them.

You have **ACCESS RIGHT** to know if **Insulcloud** is processing your personal data or data of the person you legally represent, as well as to have control over them, to know the purposes for which we process your data, how we process your personal information in **Insulcloud** and how much other information you may request from us in this regard. You have the right to free access to the personal information that we have in our possession about you. To exercise your right [contact us](#). We will ask you to identify yourself properly, through a proof of identity, then, so before providing your personal information we must verify your identity. Once the identity verification procedures are completed, we will provide you with this information as soon as possible, which will never be longer than one month (30 days) from the date you submitted your request.

You also have **RIGHT OF RECTIFICATION** of your personal data, that is, you have the right to modify your personal data that is inaccurate or incomplete. You may request this rectification by [contacting us](#), indicating what data it refers to, as well as the correction that must be made and it must be accompanied by the supporting documentation of the request, since in this case we must verify your identity. Once your request has been received, we will proceed to rectify your data within a period no longer than 10 days.

The **RIGHT OF SUPPRESSION** also assists you, which implies the request of suppression of data or registration of yours that is in our power, that is unnecessary or not pertinent for the purpose for which it was collected or allows your identification by **Insulcloud**. The data will be blocked, that is, it will be identified and reserved in order to prevent its processing. We will proceed to agree the cancellation of the personal data on which the right is exercised,

and we will do it within 10 days from the reception of your request, and we will notify you in writing the result of the cancellation practiced. You may request this cancellation by [contacting us](#), indicating what data you refer to.

You also have the **RIGHT OF LIMITATION**. The exercise of this right of limitation means that, if you request it, the processing operations that in each case would correspond will not be applied to your personal data, that is, we will not delete your data, but we will stop processing it as we had come doing it so far. You can request this limitation of treatment by [contacting us](#), indicating what data it refers to. We will proceed to agree on the limitation of treatment of the data or personal data on which the right is exercised, and we will do so within 10 days from the collection of your request, and we will notify you in writing of the result of the limitation of treatment practiced.

You also have the **RIGHT OF OPPOSITION**, at any time, which implies that you can object to the continuation of your personal data in **Insulcloud** [contacting us](#), for which it must also be conveniently identified, in the same terms as for the exercise of previous rights. In no more than 10 days, we will stop processing your data unless there are legitimate and legal reasons that make the process, we make about your data prevail over your interests, rights and freedoms, or for the formulation, exercise or defense of claims.

The RGPD also gives you the **RIGHT TO DATA PORTABILITY** according to which you can request a copy of your personal data in electronic format so that you can transmit such data for use in the service of a third party. We will comply with the exercise of this right without undue delay and as soon as possible, in response to technical needs. You can ask for the portability of your data by [contacting us](#)

You also have the **RIGHT TO NOT TO BE SUBJECT TO AUTOMATED DECISION-MAKING**, which means that you have the right not to be subject to decisions that are based solely on automated decision-making, including the creation of profiles, when the decision may have a legal effect on you or produce a similar material effect.

In the event that these rights are to be exercised with respect to the personal data of a minor, in addition to the previous proofs of identity, your request must be accompanied by a photocopy of the family book or document that proves that you are the legal representative of the minor, his/her parents or legal guardians.

We also inform you that if for any reason you are not satisfied with the way in which Insulcloud we treat the information that we have under our responsibility with your personal data, you have the right to claim before the National Control Authorities: [Germany](#), [Austria](#), [Belgium](#), [Bulgaria](#), [Croatia](#), [Cyprus](#), [Czech Republic](#), [Denmark](#), [Slovakia](#), [Slovenia](#), [Spain](#), [Estonia](#), [Finland](#), [France](#), [Greece](#), [Hungary](#), [Ireland](#), [Italy](#), [Latvia](#), [Lithuania](#), [Luxembourg](#), [Malta](#),

[Netherlands](#), [Poland](#), [Portugal](#), [United Kingdom](#), [Romania](#), [Sweden](#), [Iceland](#), [Liechtenstein](#), [Norway](#), [Switzerland](#).

If you wish to submit any kind of request regarding personal information that **Insulcloud** has about you, please do not hesitate to contact our [Data Protection Officer](#), who will contact you as soon as possible.