

INTRODUCTION

Welcome to ConvaTec's Privacy Policy

ConvaTec ZAO, Kosmodamianskaya Nab. 52, Building 1, 9th Floor, Moscow, Russia respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website regardless of where you visit it from. It also provides information on other ConvaTec processes where personal data is processed and tells you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

1. IMPORTANT INFORMATION AND WHO WE ARE**2. THE DATA WE COLLECT ABOUT YOU****3. HOW IS YOUR PERSONAL DATA COLLECTED****4. COOKIES****5. PURPOSE AND LEGAL BASIS FOR PROCESSING****6. DISCLOSURES OF YOUR PERSONAL DATA****7. INTERNATIONAL TRANSFERS****8. DATA SECURITY****9. DATA RETENTION****10. YOUR LEGAL RIGHTS****11. GLOSSARY****12. CONTACT US**

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy aims to give you information on how ConvaTec collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a product or use a service. It also provides information on other methods by which ConvaTec may process personal information, for example, when individuals telephone our customer service centres.

It is important that you read this Privacy Policy together with any other fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This Privacy Policy supplements the other notices and is not intended to override them.

CONTROLLER

ConvaTec is a global company, made up of different legal entities in many countries, which together shall be referred to as the “ConvaTec Group”. For the purpose of this Privacy Policy, ConvaTec ZAO at Kosmodamianskaya Nab. 52, Building 1, 9th Floor, Moscow is the controller and responsible for your personal data (and shall be referred to as “ConvaTec”, “we”, “us” or “our” in this Privacy Policy).

The ConvaTec Group has appointed a data protection officer (DPO), the Group DPO, who is responsible for overseeing questions in relation to this Privacy Policy and all other data protection queries and has designated the Information Commissioner’s Office (ICO) of the United Kingdom to be its lead Supervisory Authority. For contact details of the Group DPO and the ICO, please see below:

CONTACT DETAILS

Group DPO:

Email address: dataprivacy@convatec.com

Postal address: ConvaTec Group Data Protection Officer
Floor 7, 3 Forbury Estate
23 Forbury Road
Reading, RG1 3JH
United Kingdom

ICO:

Email address: <https://ico.org.uk/concerns/>

Telephone number: +44 1625 545 700 (for outside the United Kingdom) 0303 123 1113 (for inside the United Kingdom)



Kingdom)

Postal address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK95AF

A LOCAL DATA PRIVACY EXPERT

ConvaTec ZAO has appointed a local Data Privacy Specialist to answer all your questions in Russian. Their contact details are as follows:

Local Data Privacy Specialist Name: Olga Shor

Email address: Olga.Shor@convatec.com

Office: +7-495-663-70-30

You have the right to make a complaint at any time to the ICO. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us at the Group DPO or your local Data Privacy Specialist in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Depending upon the nature of your interaction with us, we **may** collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.

- **Special Category Health Data** includes type of ostomy, date of surgery, type of products used.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **User Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

In each case of data collection, we will be fully transparent and let you know which personal data we are processing and the purpose for the processing.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through direct and indirect interactions. You may give us your identity, contact information, health-related data and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- request a product sample;
- purchase a product;
- create an account on our website;
- subscribe to a service, programme or publication;
- request marketing materials on products, services or events;
- enter a competition, promotion or survey; or
- give us some feedback.

If you receive regular or large amounts of personal data from third parties, include a statement here. For example:

We may receive personal data from third parties and/or public sources as set out below:

- identity and contact personal data from the electoral register;

In such circumstances we will contact you to let you know about the processing of your personal information not later than one month after the date we receive it.

4. COOKIES

We may store some information on your computer using a technique your browser supports called "cookies." The cookies are used for a variety of purposes, including but not limited to: helping you login (e.g., remembering your user name if you register or login); remembering some of your customised user preferences; helping us better understand how people use our website; and helping us improve our website. In some cases, this information will help us tailor content to your interests or help us avoid asking for the same information when you revisit our website. The cookies set by our websites are used only by our websites. To disable or limit the use of cookies, please refer to the options provided by your Internet browser. If you do so, however, some pages on this website may not work properly. For more information on cookies, please click here to link to our [Cookie Policy](#).

WEB BEACONS

A web beacon is a clear GIF (Graphics Interchange Format) image or pixel tag that companies place on their websites to allow an Internet advertising or audience measurement company to help them analyse their advertising campaigns and general usage patterns of visitors to their websites. We use web beacons on some of our websites. Except as otherwise described in this Privacy Policy, we will not sell, rent or give away your personal data to any unrelated third party without your permission.

WEB SERVER LOGGING AND IP ADDRESSES

With or without cookies, our website keeps track of usage data, such as the source address that a page request is coming from (i.e., your IP address, domain name), date and time of the page request, the referring website (if any), and other parameters in the URL (e.g., search criteria). We use this data to better understand website usage on the whole and to determine which areas of our website users prefer (e.g., based on the number of visits to those areas). This information is stored in log files and is used by us for statistical reporting.

5. PURPOSE AND LEGAL BASIS FOR PROCESSING

We will only process your personal data for the purpose we specify at the time the data is collected and when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests and if your interests and fundamental rights do not override



those interests.

- Where we need to comply with a legal or regulatory obligation.
- Where you grant consent.

We have set out below, in a table format, a description of the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To make enhancements to our products and services we may ask you to leave take part in a survey	(a) Identity (b) Contact (c) Profile (d) Product/service usage	Consent
To enable you to partake in a prize draw or competition.	(a) Identity (b) Contact (c) Profile	Performance of a contract with you
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)

To fulfil a prescription for a medical device as prescribed for you by a healthcare professional	a) Identity (b) Contact (c) Health data	Consent
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Consent

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. From time to time we will send you marketing communications if you have requested information from us or consented to receive marketing materials.

You can ask us to stop sending you marketing materials or messages at any time by following the unsubscribe links on any marketing message sent to you or by [Contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product regulatory issue, product/service experience or other transactions.

6. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 5 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. INTERNATIONAL TRANSFERS

Depending upon the type of data and the purpose for which it is processed, we may share your personal data within the ConvaTec Group. Due to the international nature of the ConvaTec Group, this may involve transferring your data outside the European Economic Area (EEA). Where a transfer of personal data takes place between ConvaTec Group companies, we will ensure that personal data receives the same level of protection it has in Europe by requiring the recipient ConvaTec legal entity to sign up to the data protection obligations contained in the GDPR.

Also, many of our external third party service providers (for example, IT support consultants or marketing agents) are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA to such third parties, we ensure adequate protection is afforded to it by using specific contracts approved by the European Commission. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.

Alternatively, where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide adequate protection to personal data shared between the Europe and the US. For further details, see *European Commission: EU-US Privacy Shield*.

Please [Contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by [Contacting us](#).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

You have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Right of personal data portability.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please [Contact us](#).

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [Contacting us](#)

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

INTERNAL THIRD PARTIES

Other companies in the ConvaTec Group who may act as joint controllers or processors (depending upon the nature of the data processing) and who provide, for example, IT and system administration services and undertake leadership reporting.

EXTERNAL THIRD PARTIES

- Service providers acting as processors based who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Tax authorities, regulators and other competent bodies acting as processors or joint controllers who require

reporting of processing activities in certain circumstances].

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Right of data portability of your personal data. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

12. CONTACT US

The ConvaTec Group has appointed a data protection officer (DPO), the Group DPO, who is responsible for



overseeing questions in relation to this Privacy Policy and all other data protection queries and has designated the Information Commissioner's Office (ICO) of the United Kingdom to be its lead Supervisory Authority. For contact details of the Group DPO and the ICO, please see below:

CONTACT DETAILS

Group DPO:

Email address: dataprivacy@convatec.com

Postal address: ConvaTec Group Data Protection Officer
Floor 7, 3 Forbury Estate
23 Forbury Road
Reading, RG1 3JH
United Kingdom

ICO:

Email address: <https://ico.org.uk/concerns/>

Telephone number: +44 1625 545 700 (for outside the United Kingdom) 0303 123 1113 (for inside the United Kingdom)

Postal address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK95AF

ConvaTec ZAO has appointed a local Data Privacy Specialist to answer all your questions in Russian. Their contact details are as follows:

Local Data Privacy Specialist Name: Olga Shor

Email address: Olga.Shor@convatec.com

Office: +7-495-663-70-30

You have the right to make a complaint at any time to the ICO, We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us at the Group DPO or your local Data Privacy Specialist in the first instance.