

LUMIRADx CARE SOLUTIONS UK LTD

PRIVACY POLICY

Welcome to LumiraDx Care Solutions UK Ltd's privacy policy. LumiraDx Care Solutions UK Ltd ("**We**") are committed to protecting and respecting your privacy.

This privacy policy (together with, where applicable, our Terms and Conditions of trading and End User Licence Agreement) applies only to:

- your use of our website www.lumiradxcaresolutions.com ("**our Site**");
- your use of:
 - our software, such as our online software component known as INRstar and/or any other software (including software applications) owned by LumiraDx Care Solutions UK Ltd ("**Software**");
 - third party software licenced to LumiraDx Care Solutions UK Ltd;
 - devices (such as patient self-care devices and/or any other devices, components or goods); and
 - our services, ("**Products and Services**"); and
- your purchase (or, in the case of devices, hire) of Products and Services,

and sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. This privacy policy also tells you about your privacy rights and how the law protects you.

Our Site and Software is not intended for children and we do not knowingly collect data relating to children.

Your acceptance of this privacy policy is deemed to occur upon your first use of our Site and/or Software or place an order with us. If you do not accept and agree with this privacy policy, you must stop using our Site and/or Software immediately.

PERSONAL DATA

You may be asked to provide personal data whilst you are in contact with us. Personal data is information that can be used to identify or contact you. You do not have to provide the personal data that we request, however, if you choose not to, we may not be able to provide you with the services that you have requested.

If we combine personal data with non-personal data, the combined information will be treated as personal data for as long as it remains combined. Personal data does not include data where the identity has been removed (anonymous data).

CONTROLLER

For the purpose of the General Data Protection Regulations ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation and the Data Protection Act 1998 ("**Data Protection Legislation**") the data controller of your personal data is LumiraDx Care Solutions UK Ltd a company registered in England

and Wales with company registration number 03473597 whose registered office is at Lowin House, Tregolls Road, Truro, Cornwall TR1 2NA. Our Data Protection Registration Number is Z2996445.

This privacy policy **does not** apply to clinical or other associated data relating to patients, collected in the course of treating patients, which is inputted by you (or us on your behalf) onto the Software for the purpose of using the Software, Products and Services (“**Patient Data**”). For the purposes of Data Protection Legislation, LumiraDx Care Solutions UK Ltd is the data processor of Patient Data which is processed in accordance with our Terms and Conditions of trading.

INFORMATION WE MAY COLLECT FROM YOU AND HOW WE USE IT

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your name, username, password, postal address, email address, telephone number and address associated with your order, your professional registration number and your employment status. The identity data may be processed for the **purpose** of setting up your user account within the Software, processing and delivering your order for Products, for the installation and servicing of Products, managing our relationship with you (including notifying you about changes to our privacy policy and to our Products and Services, to provide you with feedback as to your use of our Software and how to improve performance, for support, maintenance and patient safety (including the investigation of faults) and to provide training), enabling you to complete a survey, administer and protect our business, Site and Software (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). The **legal basis** for this processing is the performance of a contract and/or taking steps, at your request, to enter into such a contract and our legitimate interests (namely to keep our records updated, to study how our Site, Software and Products are used, for the running of our business, provision of administration and IT services, network security).
- **Contact Data** includes your name, email address, telephone number and postal address associated with your account or order. The contact data may be processed for the **purpose** of contacting you directly in relation to the Software, Services or Products, processing and delivering your order for our Products, for the installation and servicing of Products, managing our relationship with you (including notifying you about changes to our privacy policy and to our Products and Services, to provide you with feedback as to your use of our Software and how to improve performance, for support, maintenance and patient safety (including the investigation of faults) and to provide training), enabling you to complete a survey, administer and protect our business, Site and Software (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). The **legal basis** for this processing is the performance of a contract and/or taking steps, at your request, to enter into such a contract and our legitimate interests (namely to keep our records updated, to study how our Site and Software is used, for the running of our business, provision of administration and IT services, network security).
- **Financial Data** includes bank account, direct debit and payment card details (type, number, name on card, expiry date and CCV code). The financial data may be processed for the **purposes** of processing and delivering your order for our Products and Services (namely managing payments and charges and collecting monies). The **legal basis** for this processing is the performance of a contract and our legitimate interests (namely to recover debts due).

- **Transaction Data** includes details about any Products, Services and Software you have ordered from us. The transaction data may be processed for the **purpose** of processing and delivering your order. The **legal basis** for this processing is the performance of a contract and our legitimate interests (namely our interest in the proper administration of our Site, Software and business).
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the computer, smartphone, mobile telephone or other electronic device you use to access our Site and Software. The technical data may be processed for the **purpose** of administering and protecting our business, Site and Software (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), to ensure that content from our Site and Software is presented in the most effective manner for you and for your computer, smartphone, mobile telephone or other electronic device to improve the performance and features of our Software, to maintain our Software and ensure you are using the correct version of our Software, to keep our Site and Software safe and secure. The **legal basis** for this processing is our legitimate interests (namely to grow our business and protect our Site and Software).
- **Profile Data** includes your email, username and password, details of orders made for our Products and Services, your interests, preferences, feedback and survey responses. The profile data may be processed for the **purpose** of managing our relationship with you (including notifying you about changes to our privacy policy and to our Products and Services and asking you to leave a review), enabling you to complete a survey, to make suggestions and recommendations to you about other Products and Services that may be of interest to you. The **legal basis** for this processing is the performance of a contract and our legitimate interests (namely to keep our records updated, to study how our Software is used and to grow our business and to inform our marketing strategy).
- **Usage Data** includes information about how you use our Site and Software (including the pages you look at and how you use them). This usage data may be processed for the **purposes** of support, maintenance and patient safety (including the investigation of faults), to maintain and protect our Software and ensure you are using the correct version of our Software, to improve the performance and features of our Products and Services, to provide you with feedback as to your use of our Software and how to improve performance, to provide training, enabling you to complete a survey, to deliver relevant website contents and use data analytics to improve our Site, marketing, customer relationships and experiences and to make suggestions and recommendations to you about Products and Services that may be of interest to you. The **legal basis** for this processing is the performance of a contract and our legitimate interests (namely to study how our Site and Software is used and to grow our business and to keep our Site and Software updated and relevant).
- **Installation and Service history Data** includes records relating to the installation of our Software at your home or business and information relating to the servicing of that Software Installation and Service history Data may be processed for the **purposes** of improving the performance and features of our Products and Services, to maintain and protect our Software and ensure you are using the correct version of our Software. The **legal basis** for this processing is the performance of a contract and our legitimate interests (namely to keep our Software updated and relevant and improve the performance of our Software).
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences. The marketing and communications data may be processed for the **purposes** of sending you the relevant notifications. The **legal basis** for this processing is our legitimate interests and consent.

In addition to the specific purposes for which we may process your personal data set above, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation and to ensure regulatory compliance to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

We also collect, use and share anonymised Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We may also provide you with information about offers and services that are similar to those that you have already received or we feel may interest you. If you:

- **have already concluded a contract with us**, (e.g. if you have purchased Software, Products and Services from us) we will only contact you by electronic means (e-mail, text or Software notifications) with information about offers and services similar to those which were the subject of a previous contract. If you do not want to be on our mailing list, you can opt out at any time by contacting us or unsubscribing by using the links provided in our electronic communications and at the point of providing your details.
- **are a potential new customer** (e.g. enquiring about Software, Products or Services), we will contact you by electronic means only if you have provided your explicit consent to this. If you are happy for us to use your personal data in this way, please tick the relevant box situated on the website page/form on which we collect your details. Again, if you do not want us to use your data in this way, you can opt out at any time by contacting us or unsubscribing by using the links provided in our electronic communications.

HOW IS YOUR PERSONAL DATA COLLECTED

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial Data and Marketing and Communication Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - order Products and Services from us (which will generate the Transactional Data);
 - create a user account in our Software;
 - request the installation and servicing of Software you have ordered from us (which will generate the Installation and Service history Data);
 - request marketing to be sent to you;
 - enter a survey;
 - reporting a problem with our Site or Software;
 - leave a review or complete a contact form for customer service queries; or

- give us some feedback.
- **Automated technologies or interactions.** As you interact with our Site or Software we may automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. When you interact with our Software we may also automatically collect Profile Data.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties which include:
 - Identity and Contact Data from companies within our group (the “**LumiraDx Group**”);
 - Identity and Contact Data from approved third party software providers;
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - Marketing and Communication Data from advertising networks;
 - Technical Data from analytics providers such as Google based outside the EU; and
 - Identity and Contact Data from publicly available sources, such as social media accounts, Companies House and the Electoral Register.

WHERE WE STORE YOUR PERSONAL DATA

Some of the third parties which we work closely with are based outside of the European Economic Area (“**EEA**”) so their processing of your personal data will involve a transfer of data outside of the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe;
- 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 similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site or Software, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

COOKIES

Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site.

Cookies are small data files which are stored on the hard drive of your computer. Cookies contain certain personal information about you, which help us to deliver a better and more personalised service.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Site may become inaccessible or not function properly.

We use the following cookies on our Site:

Cookie	Purpose	Further Information
__gat_UA-32876543-4	This is a tracking cookie for analytics.js. which is used to throttle request rate.	After 10 minutes
__ga	This is a tracking cookie distinguishes users and generates statistical data on how visitors use the website. We use this data to improve and optimise our website content.	Expires after 2 years
__gid		Expires after 24 hours
__zlcmid	This cookie stores the Zopim Live Chat ID (our live chat widget) to identify a users device across visits.	Expires after 1 year
AWSALB	This cookie supports the Zopim Live Chat tool on our website by recording which server cluster you are served by.	Expires after 1 week
__cfduid	This Cloudflare cookie is used by Zopim Live Chat. It improves site performance by identifying individual users from a shared IP address and applies security settings on a per-user basis.	Expires after 1 year

Please note that third parties may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

CHANGE OF PURPOSE

We will ask for your consent before using personal data for a purpose other than those set out in this privacy policy, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like further information on purpose compatibility, please contact us.

DISCLOSURE OF YOUR DATA

You agree that we may disclose your data (including personal data) to the following categories of third parties:

- companies within the LumiraDx Group for the provision of parts of our Products and Services, including data storage and software hosting services;
- suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- courier services providers for the purpose of providing you with our Products;
- approved third party software providers to provide other healthcare software/applications, devices, training and services;
- analytics and search engine providers that assist us in the improvement and optimisation of our Site;
- marketing service providers to assist us with our electronic marketing; and
- other service providers and advisors such as companies that support our IT, to help us analyse the data we hold, process payments, send communications to you, provide us with legal or financial advice in helping us deliver our services to you.

Your personal data will not be shared with third parties for third party marketing purposes unless you have provided your express consent. If you do not want to be contacted with third party marketing information, you can opt out at any time by contacting us.

We may disclose your personal data to third parties:

- where we have your consent to do so;
- to provide and/or improve our Products and Services;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if LumiraDx Care Solutions UK Ltd or substantially all of our assets are acquired by a third party, in which case personal data held by us about you will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights of LumiraDx Care Solutions UK Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

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 third parties 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.

YOUR RIGHTS

Under Data Protection Legislation, in certain circumstances you have the following rights in relation to your personal data:

- (a) **Right to access.** You have the right to request access to information held about you. We will provide you with a copy of your personal data held by us free of charge (providing your request is not excessive or for multiple copies, in which case we may charge a reasonable fee to cover our costs) and certain information about the processing of your personal data and the source of such data (if not directly collected from you by us). You also have the right to request that your personal data is transferred to a third party.
- (b) **Right to object to data processing.** You may withdraw your consent to the processing of your personal data at any time by contacting us. Upon receipt of your notification, we shall promptly stop any processing of your personal data and (if requested by you) erase such information if we are not required to retain it for legitimate business or legal purposes.
- (c) **Right to restrict processing.** You may ask us to suspend the processing of your personal data in the following circumstances:
- if you do not think your personal data is accurate;
 - where we are found to be processing unlawfully but you do not want us to erase your personal data;
 - where you need us to continue holding your personal data to establish, exercise or defend legal claims; or
 - you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.
- (d) **Right of rectification and right of erasure.** You have the right to request that we correct or erase any inaccuracies in your personal data if such information would be incomplete, inaccurate or processed unlawfully.

Where we are relying on consent to process your personal data, you may withdraw consent at any time. 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

You can also exercise these rights at any time by contacting us at DPO@LumiraDx.com. We may reject requests that are unreasonable or require disproportionate effort (for example, such a request would result in a fundamental change to our existing practice) or risk the privacy of others.

Our Site and Software may contain links to and from third party websites or software. If you follow a link to any of these websites or software, please note that these websites and software have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites or software.

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.

PERSONAL DATA RETENTION

We may retain information about you, including personal data, for the period necessary to fulfil the purposes for which it was first collected unless a longer retention period is required or permitted by law. In determining data retention periods, we take into considerations contractual obligations, legal obligations, regulatory body requirements and the expectation and requirements of our customers. When personal data is no longer needed, we will securely delete or destroy it.

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.

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

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

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.

CONTACTING US

If you have any questions, comments or requests regarding this privacy policy or data processing or you would like to make a complaint, please contact us via email at DPO@LumiraDx.com, by telephone on +44 (0)1209 710999 or by post to:

FAO: Data Protection Officer
LumiraDx Care Solutions UK Ltd
1 North Crofty
Tolvaddon Energy Park
Cornwall
TR14 0HX

If you have any cause for complaint about our use of your personal data, please contact us using the details provided above and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office (www.ico.org.uk).

Last updated: ● 2018