

Privacy Policy

Last Updated: March 8, 2023

This Privacy Policy applies only to the websites and services controlled by PURITAN MEDICAL PRODUCTS I LP ("PURITAN," "we," "us," or "our"), where this Privacy Policy is posted (the "Sites"). This Privacy Policy describes how your personal information is collected, used, and shared by PURITAN. Your use of the Sites is also subject to our [Terms and Conditions](#).

WE ENCOURAGE YOU TO READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND OUR PRIVACY PRACTICES. IF YOU HAVE A QUESTION ABOUT HOW YOUR PERSONAL INFORMATION IS BEING USED, YOU CAN CONTACT US THROUGH THE METHODS PROVIDED IN THE "CONTACTING US" SECTION AT THE END OF THIS PRIVACY POLICY. BY USING THE SITES, YOU ACKNOWLEDGE YOU HAVE READ AND UNDERSTOOD THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY, PLEASE DO NOT USE THE SITES.

To print or save this Privacy Policy, please click [here](#).

Notice at Collection

We may collect or process various categories of personal information. The sections titled "Information Collected," and "Notice to California Job Applicants," contain information on the categories of Personal Information collected and our disclosure practices. As an overview, we collect the following categories of personal information: personal identifiers; geolocation information; professional or employment-related information; commercial information (i.e., customer records); internet, technical or other similar network activity; content of your communications with us; and inferences drawn from other personal information. We collect, use, and disclose personal information for the following business purposes: to provide you with our products or services; to contact you in relation to our Sites or for marketing and advertising purposes; to comply with laws or regulations; to respond to your inquiries, for product and service improvement; and to screen for potential risk or fraud.

We only collect sensitive personal information from job applicants for hiring and other business purposes that do not include making inferences. Therefore, we do not offer a specific right to limit. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Information Collected

We collect information from you directly, from the devices you use to interact with us, and from third parties. We collect two types of information from visitors to the Sites: (1) personal information; and (2) non-personal information. "Personal information" is any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be

linked, directly or indirectly, with a particular individual, device, or household. "Non-personal information" includes information that does not identify an individual, device, or household. Please note that over time, non-personal information may become personal information due to regulatory developments, technological advancements, or the co-mingling of personal and non-personal information. Please also note that you have choices about the information we collect. When you are asked to provide personal information, you may decline. However, if you choose not to provide information that is necessary to provide a product or service, you may not be able to use some of our products or services. In particular, we collect the following information from and about you:

- **Identifiers**, which may include name, address, online identifier, Internet Protocol address, or email address. These are sourced directly from you or indirectly from you (e.g., from observing your actions on the Sites). They are collected, used, and disclosed for the following business purposes: to provide you with our products or services; to contact you in relation to our Sites or for marketing and advertising purposes; to comply with laws or regulations; to respond to your inquiries, for product and service improvement, to screen for potential risk or fraud, or to process an order. For example, when you contact us, you provide your first and last name, email address, and other identifying information. We disclose this information for the business purposes listed herein to internet service providers, administrative service providers, and payment processors.
- **Personal information categories contained in customer records**, which may include name, address, telephone number, bank account number, credit card number, debit card number, or any other payment and financial information. We source this information directly from you. We collect, use, and disclose this information for the following business purposes: to fulfill or meet the reason you provided the information, to contact you in relation to our Sites, to respond to an inquiry, to screen for potential risk or fraud, or process an order. For example, we need your payment information when you purchase services from us. We disclose this information for the business purposes listed herein to internet service providers, administrative service providers, and payment processors. We do not sell or share this information.
- **Characteristics of protected classifications**, such as age or gender. We source this information directly from you. We collect and use this information for the following business purposes: to fulfill or meet the reason you provided the information or to provide relevant services. For example, we may use this information for targeted advertising. We do not sell, share, or disclose this information to third parties.

Professional or employment-related information, which includes information from job applications, such as current or past job history or performance evaluations. Additionally, if you contact us, subscribe to our newsletter, or comment on our blog posts, we may collect information including, but not limited to, your name, industry and job information. We collect, use, and disclose this information for the following business purpose: to fulfill or meet the reason you provided the information. We source this

information directly from you. We disclose this information for the business purposes listed herein to administrative service providers, such as background check providers and human resources service providers. We do not sell or share this information.

- **Commercial information**, which may include records of services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. We source this information directly from you or from third parties such as analytics providers. We collect, use, and disclose this information for the following business purposes: to fulfill or meet the reason you provided the information, to contact you in relation to our Sites, to screen for potential risk or fraud, and to respond to an inquiry or process an order. For example, we keep track of your purchases to create a purchase history. We disclose this information for the business purposes listed herein to internet service providers, administrative service providers, and payment processors.
- **Internet, technical or other similar network activity**, which may include usage and browsing history; device information; search history; information on your interaction with our Sites; and error logs. We source this information directly or indirectly from you (e.g., from observing your actions on our Sites). We collect, use, and disclose this information for the following business purposes: to fulfill or meet the reason you provided the information, to screen for potential risk or fraud, or to improve our Sites. We disclose this information for the business purposes listed herein to administrative service providers, data analytics providers, and internet service providers. For more information, please see our Cookie Notice, available [here](#).
- **Inferences drawn from other personal information**, which may include a profile reflecting a person's preferences, interests, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. We source this information directly or indirectly from you, (e.g., from observing your actions on our Sites). We collect and use this information for the following business purpose: to fulfill or meet the reason you provided the information. We do not sell, share, or disclose this information to third parties.

Data Retention: We will retain the personal information listed above for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

How We Respond To Do Not Track Signals

The "Do Not Track" ("DNT") privacy preference is an option that may be made in some web browsers allowing you to opt-out of tracking by websites and online services. At this time, global standard DNT technology is not yet finalized and not all browsers support DNT. We therefore do not respond to DNT technology or DNT signals at this time.

We recognize opt-out preference signals, such as the Global Privacy Control, as a request to opt-out of the sale or sharing of your personal information in a frictionless manner. The Global

Privacy Control is available [here](#). The Global Privacy Control applies to web browsers or devices, so additional web browsers or devices may need to have the Global Privacy Control activated.

Children

We do not knowingly collect personal information from children under the age of majority. In the event that we learn that a person under the age of majority has provided us with personal information, we will delete such personal information.

Use of Information Collected

We use the information that is collected about you for the following business purposes:

- a. Send you electronic (via email) or printed (via US mail) materials regarding our products and/or company news.
- b. Present the Sites and their content to you.
- c. Ensure the Sites are relevant to your needs.
- d. To improve our products and services.
- e. Comply with applicable laws or legal process and/or respond to requests from public and government authorities.
- f. To protect and secure our Sites , assets, networks, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.

Legal Bases for Processing

We process personal information in accordance with applicable law and with transparency and fairness. The legal bases for the processing activities listed in the section above are as follows:

- For letter a), with your consent;
- For letter b), in order to fulfill our contractual obligations to you;
- For letter c and d), for the legitimate purpose of operating our business; ;
- For e), as otherwise in compliance with the law;
- For f), for the legitimate purpose of operating our business. We may also divulge personal information if we believe it necessary or appropriate to protect the rights, property, or safety of us, our customers, or others.

Disclosure of Information with Third Parties

We may disclose your personal information to the following categories of third parties and in the following instances:

- Other members of our group of companies;
- Third party service providers, who help us maintain our Sites and provide other administrative services to us, including, but not limited to: human resources service providers; internet service providers; analytics service providers; online advertising partners; and payment processors;
- Third party companies, including companies resulting from possible mergers, acquisitions or other transformations; and
- Competent authorities, such as government entities or law enforcement, in order to comply with applicable laws.

Additionally, we maintain and use all aggregated and deidentified information in deidentified form. We do not attempt to reidentify it except to ensure our deidentification processes are in compliance with applicable laws.

International Transfers

If you choose to provide us with personal information, we may transfer that information to our affiliates and subsidiaries, or to other third parties, across border, and from your country or jurisdiction to other countries or jurisdictions around the world, in accordance with applicable law. If you are visiting from the EU or other regions with laws governing data collection and use that may differ from United States (US) law, your connection may be through and to servers located in the US, which may not have the same data protection laws as your local jurisdiction and may provide more limited recourse mechanisms, including dissimilar or, at times, weaker data protection rights. With knowledge of these risks, by providing your personal information you acknowledge that you understand:

- Your personal information will be used for the uses identified above in accordance with this Privacy Policy; and
- Your personal information may be transferred to the US as indicated above in accordance with applicable law. For example, where personal information is transferred from the EU to areas which have not been determined to have an adequate level of protection, we take measures designed to transfer the information in accordance with

lawful requirements, such as standard contractual clauses. Please contact us for more information and to receive a copy of the standard contractual clauses we may utilize.

Notice to California Job Applicants

When you apply for a position with us, we will process your personal information as described in this Privacy Policy, and also as described below as it relates to you as a job applicant.

When you apply for a job with us, we ask you to provide personal information to evaluate your application. All information is provided on a voluntarily basis and you choose what personal information to provide. Please note, if you choose not to provide requested personal information, our ability to consider you for a position may be limited.

We may also get information about you from public sources or third-party websites with which we have business relationships to verify information in your application or conduct background screenings, as allowed by law. If you choose, you may provide us with personal information, including sensitive personal information, on third party sites. If you choose to authorize us to access this personal information, you agree that we may collect, store, and use this information in accordance with this Privacy Policy.

How we use your Personal Information as a Job Applicant

We will use your personal information to process your application, including for the below purposes:

- Recruitment, evaluation and selection of job candidates
- General, human resources administration and management
- Conducting satisfaction surveys (for example, to manage and improve the recruitment process)
- Verifying your employment reference(s), conducting background checks, and related assessments
- Compliance with legal and company requirements (for example, to monitor diversity)
- Communicating with you regarding your application and interest in PURITAN
- Identify potential symptoms relating to communicable diseases (including COVID-19) and collect test results to prevent the spread of diseases
- Future job opportunities if you allow this use

How we Disclose your Personal Information as a Job Applicant

Your personal information is not sold or shared. Your personal information will only be disclosed with: PURITAN employees with a legitimate business need; third parties specific to job applicants, such as recruitment agencies, consultants, background service providers and attorneys. These entities may change over time. We always seek to ensure that third parties handling personal information do so in a manner consistent with this Privacy Policy and in accordance with the law.

Your Rights and Choices

Email Unsubscribe: Email customers can opt out of commercial emails by unsubscribing on the link that appears on the bottom of every email, or by contacting Customer Service [1-888-289-3340](tel:1-888-289-3340) (U.S.) or [207-876-3311](tel:207-876-3311).

You may have certain rights with respect to your personal information depending on your location or residency. We will respond to any rights requests in accordance with local legal regulations.

European Economic Area, The United Kingdom, and Switzerland

We process “personal data,” as that term is defined in the European Union’s General Data Protection Regulation (“GDPR”). In processing personal information, we may rely upon the following lawful bases:

- Consent. We may process personal data with the consent of the individual whose data is being processed and/or in reliance upon the consent of the administrator of the account, who must affirm that s/he has obtained appropriate consent from all participants.
- Contract. When we enter a contract with you and/or an administrator for your account, we process personal data on the basis of our contract in order to prepare and enter into the contract, as well as to perform and manage our contract. This is necessary for us to provide the Sites to you.
- Vital interests. In a case where the personal data is required to protect your vital interests or the vital interests of another natural person, then this may be used as the lawful basis of the processing. For example, we may need to process personal data in the event of a pandemic.
- As required by law. We may process personal data as required to comply with legal obligations to which we are subject for the for the purpose of compliance with EEA, UK, or Swiss public, governmental, judicial or other regulatory authorities.
- For legitimate business purposes. This includes but is not limited to legal compliance and the purposes described above.

Your rights under the GDPR: Users who are located in the European Economic Area (“EEA”), U.K., or Switzerland have the right to lodge a complaint about our data collection and processing actions with the supervisory authority concerned. Contact details for data protection authorities are available here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are located in the EEA, U.K., or Switzerland, you have the following rights.

- Access and Portability: Request access to personal data we hold about you or request transmission of your data to a third party.

- Correction: Request that we rectify inaccurate or incomplete personal data we store about you.
- Erasure: Request that we erase personal data when such data is no longer necessary for the purpose for which it was collected, when you withdraw consent and no other legal basis for processing exists, or when you believe that your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- Restriction of processing: Request that we restrict our processing of personal data if there is a dispute about the accuracy of the data; if the processing is unlawful; if the processing is no longer necessary for the purposes for which it was collected but is needed by you for the establishment, exercise or defense of legal claims; or if your request to object to processing is pending evaluation.
- Objection to processing: Object to processing of your personal data based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data unless there are compelling legitimate grounds for our processing that override your interests, rights, and freedoms, or for the purpose of asserting, exercising, or defending legal claims.
- Transfers: Obtain information about and a copy of the safeguards we use to transfer personal data across borders.

Please contact us to exercise these rights.

Virginia Residents

Consumers who are residents of the state of Virginia have the following rights and can exercise their rights by contacting us:

- Opt out of “sales” of personal information and use of their personal information for “targeted advertising,” as those terms are defined under applicable law.
- Opt out of “profiling” under certain circumstances, as defined under applicable law.
- Confirm processing of and access to personal information under certain circumstances.
- Correct personal information under certain circumstances.
- Delete personal information under certain circumstances.
- Opt in to the processing of your sensitive personal information. At this time, we do not collect sensitive personal information from Virginia consumers.

Residents of these states can exercise their rights by contacting us at using one of the methods listed below.

Your California Privacy Rights

The California Consumer Privacy Act (“CCPA”) may entitle California residents to the below rights:

- **the right to know.** You may request information about the categories and specific pieces of personal information we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such

information, and the sale, sharing or disclosure for business purposes of your personal information to third parties, and the categories of third parties with whom this information was sold, shared, or disclosed. You may also request a copy of the personal information we have collected, and upon request, we will provide this information to you in electronic form;

- **the right to opt out of the sale or sharing** of your personal information to third parties;
- **the right to request deletion** of your personal information, subject to certain legal exceptions;
- **the right to correct your personal information** if inaccurate;
- **the right to limit the use and disclosure of your sensitive personal information.** You have the right to limit our use and disclosure of your sensitive personal information if we use such information to infer characteristics about you. We only collect sensitive personal information from job applicants for hiring and other business purposes that do not include making inferences. Therefore, we do not offer a specific right to limit.
- **the right to opt out of profiling using automated decision-making technology.** You may have the right not to be subject to a decision based solely on profiling, except under certain exceptions under local law.
- **the right to not be discriminated against** for exercising any of the rights mentioned above. This includes the right not to be discriminated against in connection with financial incentives. We may offer various financial incentives from time to time, primarily requesting identifiers and contact information as part of an offer, though we may also request information from your customer records. The terms of the financial incentive, including the personal information requested in connection with the offer, will be provided at the time you sign up for the financial incentive. We have calculated the value of the financial incentive by using the expense related to the offer, and the value of your data is the value of the offer presented to you. You may withdraw from any of the financial incentives at any time. For offers involving your e-mail, you may unsubscribe. For all other offers, you may follow the instructions provided with the offer.

The California “Shine the Light” Law

California residents are entitled to, once a year and free of charge, request and obtain certain information regarding our disclosure, if any, of certain categories of personal information to third parties for their own direct marketing purposes in the preceding calendar year; however, we do not share your personal information with third parties for those third parties’ direct marketing purposes.

For more information, please contact us using the details set out in the “Contacting Us” section below.

Public Posting Areas

Please note that any information you include in a message you post to any public posting area, such as the comment section of our blog, is available to anyone with Internet access. If you don't want people to know your email address, for example, don't include it in any message you post publicly. PLEASE BE EXTREMELY CAREFUL WHEN DISCLOSING ANY INFORMATION IN PUBLIC POSTING AREAS. WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF THE INFORMATION THAT YOU DISCLOSE IN PUBLIC POSTING AREAS.

Data Security

We take reasonable physical, electronic and managerial measures to safeguard and secure any personal information you provide to us. Please understand, however, that no data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you understand that any information that you transfer to us is done at your own risk. We use a secure server software, which is licensed and encrypts all information you input before it is sent to us. It is scrambled enroute and decoded once it reaches our website.

Emails that you send to us may not be secure unless we advise you that security measures will be in place prior to your transmitting the information; therefore, please do not send confidential information to us through unsecured email.

If we learn of a security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using these Sites or providing personal information to us you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of these Sites. We may post a notice on our Sites if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

Other Sites Linked To/From Our Website

We are not responsible for the practices employed by websites linked to/from our site nor the information contained therein. Often links to other websites are provided solely as a way for the user to obtain information that may be useful to them. To better protect your privacy, we recommend that you review the privacy policy of any third party website you visit.

Assignment

We may disclose or transfer your information in the course of any direct or indirect reorganization process including, but not limited to, mergers, acquisitions, divestitures, bankruptcies, and sales of all or a part of our assets. Your information may be transferred following completion of such transaction and/or during the assessment process pending transfer. If transferred in such a case, your information would remain subject to this Privacy Policy or a privacy policy that, at a minimum, protects your privacy to an equal degree as this Privacy Policy.

Changes to this Privacy Policy

We reserve the right to change this Privacy Policy from time to time. When we do, we will also revise the "Last Updated" date at the top of this Privacy Policy. For material changes to this Privacy Policy, we will notify you either by email or by placing a prominent notice on the Sites.

Contacting Us

If you are a California or Virginia consumer and would like to exercise your rights, or if you have any questions about our privacy practices or this Privacy Policy, please contact us at the following addresses:

Puritan Medical Products I LP
Attn: Privacy Office
31 School St.
P.O. Box 149
Guilford, ME 04443-0149
privacy@puritanmedproducts.com
800.321.2313 (US + CANADA)
207.876.3311

Verification of Requests: Whenever feasible, we will match the identifying information provided by you to the personal information already maintained by us. If, however, we cannot verify your identity from the information already maintained by us, we may request additional information. We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

If you are resident of California, you may designate an authorized agent to make a request on your behalf. Such authorized agent must have permission to submit requests on your behalf. We may deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf.

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Residents of Virginia have the right to appeal the denial of their request by contacting us as described in the notice of denial.