



---

## U.S. Privacy Statement

The privacy and the protection of Personal Information is important to PMC, as defined below. This privacy statement outlines how we collect and use Personal Information and meet our data protection obligations.

For questions related to this statement or the processing of Personal Information in general, please contact us via:

[USprivacyoffice@philipsmedicalcapital.com](mailto:USprivacyoffice@philipsmedicalcapital.com), or toll-free at 1(866) 513-4762.

---

## Table of Contents

- 1 Who should read this privacy statement?
- 2 What do we expect from our customers, partners, suppliers, and Service-Users?
- 3 Who is processing your Personal Information?
- 4 What Personal Information do we process?
- 5 Do we process Sensitive Personal Information?
- 6 From what sources do we collect your Personal Information?
- 7 For what purposes do we process your Personal Information?
- 8 Do we use automated individual decision-making, including profiling?
- 9 How do we protect your Personal Information?
- 10 With whom will we share your Personal Information?
- 11 How long do we store your Personal Data?
- 12 What choices and rights are offered to California or Nevada residents and Minors regarding Personal Data?
- 13 How can you contact us with a request, question, or complaint?
- 14 Will we update this privacy statement?

## 1 Who should read this privacy statement?



**This privacy statement is for our customers, partners, suppliers, and other individuals that make use of our services and/or visit our websites, online applications or offices. When we refer to our customers, partners, and suppliers, we also include potential customers, partners, and suppliers.**

This privacy statement applies to you and your representative(s) if your Personal Information (as defined below) is processed (including storing, accessing, using, transferring, disclosing, and deleting) by us:

- as a customer (i.e., end-user) and prospective customer, if we provide, or offer to provide to you, a financial solution.
- as a partner (i.e., an organization that refers customers to us, or an organization that works with us, to develop and supply our financial products), if we seek to create or have a relationship with you.
- as a supplier, in the course of receiving products, services, or offers from you.
- as a customer, partner, supplier, or visitor when you visit one of our websites, online applications, tools, or our offices and facilities, or as a subscriber to PMC publications and/or newsletters ("Services", parties using any such Services, "Service Users").

This privacy statement only applies to the parties identified above. For other parties, please see our relevant privacy statement covering how we manage your Personal Information for that relationship.

This privacy statement does not apply to information you provide on third party sites not controlled by PMC. When interacting with our websites, you may be able to link or connect with non-PMC websites, services, social media networks, applications, or other third-party features. Enabling these features may lead to other third parties having access to or processing your Personal Information. PMC does not have any control over, nor do we endorse, these third-party features and is not responsible for the privacy or security of any information you provide to any such third-party website. We encourage you to review the privacy policies of these third parties before using these features.

By accessing or using the Services (as defined above), you consent to this privacy statement. If you have any objection to any term(s) in this privacy statement, please do not use the Services and reach out to us as instructed in Section 13 below.

## 2 What do we expect from our customers, partners, suppliers, and Service-Users?



**We expect our customers, partners, suppliers, and Service Users to comply with applicable data protection and privacy laws and to keep the principles of data minimization and transparency top of mind.**

As a customer, partner, supplier, or Service User, you must not provide us with more Personal Information about yourself, your employees, representatives, clients, or Ultimate Beneficial Owners (UBOs) than we might need or request for a given purpose.

You must also inform your employees, representatives, clients, or UBOs about your intention to transfer their Personal Information to us. You may refer them to this privacy statement so that they can learn about how and why we process their Personal Information.

### 3 Who is processing your Personal Information?



**Philips Medical Capital, LLC (“PMC”, “we,” “us”, or “our”) collects and processes your Personal Information in accordance with the terms set forth in this privacy statement.**

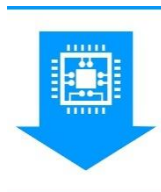
Our contact information is:

Philips Medical Capital, LLC  
1111 Old Eagle School Road, Wayne, PA 19087  
[USprivacyoffice@philipsmedicalcapital.com](mailto:USprivacyoffice@philipsmedicalcapital.com)  
1(866) 513-4762

PMC is a joint venture between, ultimately, DLL U.S. Holding Company, Inc. (“DLL”) and Philips North America LLC (“Philips”). DLL is a wholly owned subsidiary of De Lage Landen International B.V., which is a wholly owned subsidiary of Coöperatieve Rabobank U.A. (“Rabobank” and together with its subsidiaries, the “Rabobank Group”). Entities within the Rabobank Group and DLL are deemed affiliates of PMC.

A Data Protection Officer (“DPO”) has been appointed for De Lage Landen International B.V. and its subsidiaries (“DLL Group”). The DLL Group DPO can be contacted by email via [USprivacyoffice@philipsmedicalcapital.com](mailto:USprivacyoffice@philipsmedicalcapital.com). For any questions or requests related to this privacy statement, please contact us by email via [USprivacyoffice@philipsmedicalcapital.com](mailto:USprivacyoffice@philipsmedicalcapital.com) or our customer service team toll-free at 1(866) 513-4762.

### 4 What Personal Information do we process?



**PMC collects and processes certain Personal Information of customers, partners, suppliers, and Service Users in a variety of contexts. This session explains the types of Personal Information we collect and process, depending on your relationship or interaction with PMC.**

“Personal Data” or “Personal Information” is any information directly or indirectly relating to an individual or household, or any information that can be used to identify an individual or household. These terms will be used interchangeably throughout this privacy statement.

Personal Information is “processed” when any activity is undertaken on your Personal Information, such as collection, storage, access, use, transfer, disclosure, and deletion.

The Personal Information, including Sensitive Personal Information, we collect and process depends on your relationship or interaction with PMC. We collect and process the following categories of Personal Information:

#### 1. Contact and identification Information

---

Your name, business name, address, telephone number, (business) e-mail address, copy of ID, date of birth, business tax identification number (EIN), federal or state identification number (including social security number, driver's license number, passport number), copy of proof of residency, account name, online identifier, device identifier, or IP address.

## **2. Characteristics of Protected Classification**

Date of birth/age, gender, military or veteran status, marital status, national origin, nationality, citizenship, race, or ethnicity.

## **3. Contract/agreement and financial information**

Contract number, contract duration, information concerning your financial situation, payment history, bank account details, credit risk profile, information related to our products or services and the process of obtaining financial services.

## **4. Background Information**

Personal Information that we processed based on the external and internal referral registers of Rabobank, credit bureaus, and national and international sanctions lists.

## **5. Communications, recording, video surveillance and images**

Information concerning our conversations via telephone or in online chat sessions, video recordings, inbound and outbound e-mail communications, and camera images that we record in our offices.

## **6. Website and online application use information**

Cookies or similar tracking technologies may collect your IP address, data about the applications and devices you use to visit our website and online applications, browsing and search history, interaction with our websites, advertisements, user login and access information, or language preference in the context of using our services.

## **7. Inferences**

Inferences based on information about an individual to create a summary about, for example, an individual's preferences and characteristics.

## **8. Information about commercial or consumer needs**

Information about business needs and operational information, records of personal property, product or services purchased, obtained, or considered, payment history, or other purchasing or consumer histories or tendencies.

# **5 Do we process Sensitive Personal Information?**



**If needed, we will process some Sensitive Personal Information relating to you. As this information is more sensitive, we take extra care to determine whether such special categories of Personal Information are necessary for our processing.**

---

We may collect special categories of Sensitive Personal Information, a class of protected Personal Information, including: social security numbers, driver's license numbers, passport numbers, account log-in names and passwords, geolocation data of equipment we finance, gender, country of birth, citizenship, national origin, nationality, proof of residency, race, ethnicity, marital status, military status, criminal record, contents of mail, email or a text message, certain biometric information such as video, picture, or voice recording for the purpose of identifying an individual.

---

## 6 From what sources do we collect your Personal Information?



The sources from which we collect Personal Information depend on, among other things, our relationship or interaction with you. The information below lists the categories of sources from which we collect Personal Information in different contexts.

- You directly, or other authorized parties acting on your behalf, through physical (e.g., paper application, visitor registration when you visit our office), audio (e.g., phone), visual (e.g., Closed Circuit Television monitoring when you visit our offices), or electronic (e.g., website, social media) sources.
- Public records made available by federal, state, or local government entities or widely available sources made available by media.
- Other parties that provide data to support our business and operational activities, such as our affiliates, joint venture partners, business partners, manufacturers, vendors, dealers, distributors of goods or service you finance with us, credit bureaus, employee benefit providers, and suppliers who provide goods and services to us.
- Equipment you finance with us.

## 7 For what purposes do we process your Personal Information?



We process Personal Information of our customers, partners, suppliers, or Service Users (and/or their respective representatives, employees and UBOs where relevant) for a variety of purposes.

### I. Contractual Necessity:

**When you (as a customer or a partner on behalf of a customer) obtain a quote from us to finance an asset**

You may contact us directly for a quote for a finance product in relation to an asset you are purchasing, or one of our partners may contact us to provide you with a quote.

**When you (as a customer or a partner on behalf of a customer) make an application for a finance product**

If a quote is accepted and you wish to make an application, we need to process your Personal Information to evaluate the application. We will also process the contact details of the partner who sends an application to us.

**When we establish a new relationship with you as a partner or supplier**

If we establish a new partner or supplier relationship, then we will process the Personal Information of the relevant employees and the representatives of that partner or supplier in the administration of the new relationship and as part of our due diligence checks.

**When we undertake credit decisions and assess financial risk**

We assess your credentials, credit worthiness, payment history, and financial status from a risk perspective and validate whether you can fulfil the payment obligations under the contract. We also undertake credit checks on partners and suppliers to manage the financial risk of our business.

**When we activate a contract and make payments for the asset(s) we are financing or the products and services we are acquiring**

We will review contract documentation, payment details, and signature screening before making payments to either our customers or partners for the financed asset, or our suppliers for products or services purchased.

**When we send invoices to our customers and receipt payments**

We undertake daily payment reconciliations to ensure customer accounts are paid on time and in line with the contractual provisions.

**When we collect payments from our customers**

We will collect your bank details to set up regular payments in accordance with your contract terms. Card payment details may also be processed for one-off payment collections.

**If customers fail to make payments on time**

If you do not adhere to your contract requirements, we will contact you using your Personal Information to seek solutions if arrears occur and collect outstanding payments.

**When we collect or recover an asset of our customers or sell customers' debt**

If you do not adhere to the contract terms, in some cases we will process your Personal Information to recover the assets and any amount outstanding on the account.

**Account management and contract management for customers, partners and suppliers**

We process your Personal Information to establish and maintain our business relationship with you.

**When our customers require insurance for their asset and/or submit a claim**

If your contract terms require that the asset is insured, we will provide your contact details to our insurer unless you arrange alternative insurance coverage. When a claim is made for an asset that we own, we will submit the claim containing your Personal Information to the insurer. We also process the contact details of a partner that forwards a claim to us on behalf of the customer.

**When we remarket and resell an asset of our customer**

We may remarket an asset that we have previously leased to you. If you purchase an asset from us, we will process your contact and payment details to effectuate the asset sale.

**If you have a query on your contract**

We will process your Personal Information if you contact us with a query about your contract. If you call our Customer Service team, we may record these calls for monitoring and service improvement purposes.

**When we ask you for feedback**

We may process your Personal Information if we send you feedback requests for service improvement purposes.

**If we send you mail**

If we need to send you hard copy documents via a postal service, we will share your name and contact details with the postal service provider.

**If a company merger, acquisition, or divestment takes place**

If we acquire or merge with another business entity, or divest one of our business entities, we will process your Personal Information to transfer your contract to the relevant entity.

**In the transfer of receivables/securitization**

If we transfer our agreement with you to another financial institution, your Personal Information may be processed by a third party acquiring your contract with us.

**II. Promotion and/or Marketing**

**When we contact you about similar products or services**

Where we have an existing customer relationship with you, we may contact you to make you aware of products or services that are similar or may be of interest to you.

**When we undertake direct marketing**

If you are a potential new customer, we may contact you to make you aware of our products and services.

**When we share customer information with our partners to manage the relationship**

We may share details of your asset purchase and contract details with the partner who introduced you as a customer to PMC.

**When we build business relationships with new customers, partners and suppliers**

We may obtain your contact and company details via our relationship with an intermediary with whom you have or had a business relationship, via Rabobank Group or via internet searches of publicly available information.

**III. Support business operations, including to meet risk, legal, and compliance requirements**

**To manage our risk**

We develop and utilize risk models, which can process Personal Information, to determine our risks when providing financial services.

**IV. We process Personal Information of visitors of our websites, online applications (e.g. portals, mobile apps) and offices for a variety of purposes.**

**When you visit our websites and online applications**

When you visit our website or use our applications, we may automatically collect information about how you use our Services using cookies, pixel tags, web beacons, and other similar or related technologies. Some of this information is not capable of identifying you but some information can be associated with you, your browser, or your device. We have relationships with third-party advertising companies to help track and report on usage of our website and applications.

Various third parties are developing or have developed signals or other mechanisms for the expression of consumer choice regarding the collection of information about an individual consumer's online activities over time and across third-party websites or online services. Currently, we do not monitor or take any action with respect to your "do not track" preferences.



---

**If you access an online account on our online applications**

If you are given a log in to a PMC customer or partner online web portal or mobile application, we will process your contact details and provide you with security credentials to enable you to access your account. Cookies and tracking technologies are in operation on these sites which you can read more about in our Cookie Statement:

<https://leasedirect.com/lss/cookie-statement>

**To manage our facilities**

If you visit a PMC office, we operate CCTV and ensure access to offices is managed securely. Your image is captured by our CCTV systems and your contact details are recorded to provide you with access to our offices via a secure pass.

**V. In addition, we may process Personal Information of anyone who interacts with us for legal, compliance and business improvement purposes**

**To develop and improve our systems and processes**

We may process Personal Information to develop and improve our systems and processes.

**To manage and evidence our compliance with data protection and privacy laws**

If you exercise any of your rights under data protection and privacy law, we will process your Personal Information to manage your request. If we experience a data breach, we will process the data of impacted individuals as required to mitigate risk and inform you of a breach where it is required.

**If you make a complaint**

We will process your contact details and any supporting information to administer, investigate, and respond to your complaint.

**When we make or receive a legal claim**

We will process Personal Information if we make or receive a legal claim in respect of the contract we have with you. We may share your Personal Information with legal specialists for the purpose of defending our legal rights.

**For legal and regulatory compliance purposes**

We process your Personal Information to fulfill our legal, regulatory, and compliance purposes. In some cases, we may be instructed by relevant government or supervisory authorities to process or share your Personal Information to comply with a regulatory requirement, court order or assist with an investigation. We process your Personal Information to fulfill our regulatory obligations including confirming the identity of our customers, our partners, their representatives, and UBOs to comply with Know Your Customer (KYC) and Anti-Money Laundering (AML) requirements.

## 8 Do we use automated individual decision-making, including profiling?



PMC does rely on decisions made through automated means in certain circumstances, subject to your right to request a manual review.

To improve our efficiency, we use automated processes. For instance, we rely on algorithms to help us with credit scoring, development of risk models, and creation of certain credit underwriting scorecards. Whenever we use algorithms or automation, we may rely on the outcome of the algorithms or automations for a decision in certain cases. At your request, we may involve human oversight and manual review of the decisions.

## 9 How do we protect your Personal Information?



**We use various measures to protect your Personal Information against unauthorized or unlawful destruction, loss, disclosure, and processing.**

PMC endeavors to take appropriate and reasonable organizational and technical measures to protect your Personal Information when we process it and share it with third parties. These include:

- All of our employees are subject to confidentiality obligations to ensure the adequate protection of your Personal Information.
- We use appropriate security measures designed to ensure confidentiality, integrity, and availability of your Personal Information, as well as certifying systems and services which are resilient and able to restore data in the event of a data loss.
- We regularly evaluate the effectiveness of our technical and organizational measures to ensure continuous improvement in the security of processing Personal Information.
- We usually only process your Personal Information for the purposes for which these were originally collected. Personal Information may also be processed for a legitimate business purpose different from the original purpose (secondary purpose), but only if the secondary purpose closely relates to the original purpose.
- When we share your data with third parties outside of the Rabobank Group, we perform due diligence and assessments of those parties and endeavor to verify the secure processing of your Personal Information by way of contractual terms and conditions, when feasible.

## 10 With whom will we share your Personal Information?



**Where needed, we may share your Personal Information with:**

- a. Other PMC affiliates or within the Rabobank Group.**      **b.**  
**Third parties outside PMC or the Rabobank Group.**

### **Sharing data within the DLL Group**

As a global organization, your Personal Information may be transferred to other entities in the DLL Group who provide operational support enabling the delivery of better customer services. We also provide products and services to global partners and customers and collaborate across the various DLL entities to deliver global solutions.

### Sharing data within the Rabobank Group

DLL is ultimately a wholly owned subsidiary of Coöperatieve Rabobank U.A., a Dutch Bank with a registered office in Amsterdam, the Netherlands ("Rabobank"). The "Rabobank Group" consists of Rabobank and all of its subsidiaries. There may be times when we share your Personal Information with Rabobank or other Rabobank Group entities. For instance, you may be a customer of Rabobank and DLL, respectively, and we might share your Personal Information internally to avoid a duplication of your efforts. Alternatively, we may share your Personal Information with Rabobank (or vice versa) if we think they might have a financial product that might be of interest to you.

### Sharing data outside the Rabobank Group

Like any other company, we rely on the services of third parties. In certain instances, your Personal Information may also be transferred to third parties outside the Rabobank Group. The categories of third parties to whom we may disclose your Personal Information depend on, among other things, our relationship and/or interaction(s) with you. We may disclose for our business purposes the categories of Personal Information listed in Section 4 above to the following categories of third parties:

#### 1. Business Partners and Service Providers

When we engage business partners, specialist suppliers, consultants, or contractors to assist us in running our business, we may share your Personal Information with them where it is necessary for the service or partnership they provide to us to complete transactions, support everyday operations, or for business management and development purposes. Examples include disclosing to our, manufacturers, vendors, dealers, distributors, business partners, or credit bureaus. As part of certain business arrangements or for the purpose of providing you with additional services or products, we may share your information with our owner(s).

#### 2. Advertisers and/or Marketing Agencies

Where permitted by applicable law and/or with your consent, we may disclose your Personal Information to third party advertisers or marketing agencies that process your Personal Information on our behalf for marketing purposes. The privacy policy of such third-party advertisers or marketing agencies will govern their use of your Personal Information.

#### 3. Legal and Regulatory Obligations

We may also disclose your Personal Information to third parties, including legal advisors, government authorities, regulators or supervisory authorities, and law enforcement agencies, when necessary to (a) enforce or apply the terms and conditions of the Services, including in connection with an investigation of potential violations of any such terms and conditions, (b) comply with legal or regulatory requirements or a governmental request or inquiry, (c) protect the rights, property, or safety of us, our customers, or other third parties, (d) prevent, investigate, detect, or prosecute a crime or protect national security, or (e) detect, prevent, or otherwise address fraud, security, or technical issues.

#### 4. Business Transaction or Reorganization:

We may also transfer your Personal Information to a third party in the event of a sale, merger, or transfer of our company's equity or assets or in the unlikely event of a bankruptcy, liquidation, or receivership of our business.

Lastly, we may disclose anonymized or aggregated data based on your Personal Information to third parties, provided that such information can no longer reasonably identify or be linked to you or your household.

---

## 11 How long do we store your Personal Data?



**Generally, we will store your Personal Information for as long as we need it for the purposes for which we have collected it.**

We have a retention policy which specifies how long we store data. We endeavor to retain each category of your Personal Information for no longer than what is reasonably necessary for business purposes according to our internal retention policy. We use the following criteria to determine the applicable retention period(s):

- whether there is a retention period required by applicable laws or regulations;
- pendency of any actual or threatened litigation for which we are required to preserve the information;
- pendency of applicable statutes of limitations for potential legal claims; and
- business needs or generally accepted best practices in our industry

When we determine that it is no longer reasonably necessary to retain your Personal Information for disclosed business purpose(s) based on the above criteria, we will endeavor to delete or de-identify your Personal Information.

We have implemented appropriate technical and organizational measures to ensure that only people that have a right or need to know your information can access it.

## 12 What choices and rights are offered to California or Nevada residents and Minors regarding Personal Data?



**Depending on your state of residency or age, and subject to certain legal limitations and exceptions, you may have additional privacy rights with respect to your Personal Information.**

### [California Consumer Privacy Act Disclosure and Notice at Collection for Residents of California:](#)

If you are a resident of California, the additional privacy notice set forth in this section is applicable to you pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act and its implementing regulations (collectively, the “CCPA”). This disclosure explains what Personal Information we collect, where we collect it from, what we use it for, and who we disclose it to, how long we keep it, the rights California residents may have, and how to exercise them.

---

Please note that the CCPA, and this disclosure, do not apply to information covered by other federal and state privacy laws, including the Gramm-Leach-Bliley Act, the Fair Credit Reporting Act and certain other laws.

## Collection, Use, and Disclosure of Personal Information

### Categories of Personal Information:

In the past 12 months, we have collected the following categories of Personal Information, including Sensitive Personal Information from you:

- *Personal Identifier and Contact Information*—such as your name, business name, postal address, telephone number, (business) e-mail address, copy of ID, date of birth, business tax identification number (EIN), federal or state identification number (including social security number, driver's license number, passport number), copy of proof of residency, account name, online identifier, device identifier, or IP address.
- *Biometric Information*—such as face image, video, and voice recordings.
- *Characteristics of Protected Classification*—such as date of birth/age, gender, military or veteran status, marital status, national origin, nationality, citizenship, race, or ethnicity.
- *Contract/agreement and financial information*—such as contract number, contract duration, information concerning your financial situation, payment history, bank account details, credit risk profile, information related to our products or services and the process of obtaining financial services.
- *Background Information*—such as Personal Information that are processed in the external and internal referral registers of Rabobank, credit reference agencies, in national and international sanctions lists to ensure your and our security, to prevent and investigate fraud, and to prevent money laundering and financing of terrorism.
- *Communications, recording, and images*—such as information concerning our conversations via telephone or in online chat sessions, video recordings, inbound and outbound e-mail communications, and camera images that we record in our offices.
- *Website and online application use information*—such as cookies or similar tracking technologies that may collect your IP address, data about the applications and devices you use to visit our website and online applications, browsing and search history, interaction with our websites, advertisements, user login and access information, or language preference in the context of using our services.
- *Inferences*—such as inferences based on information about an individual to create a summary about, for example, an individual's preferences and characteristics.
- *Information about commercial or consumer needs*—such as information about business needs and operational information, records of personal property, product or services purchased, obtained, or considered, payment history, or other purchasing or consumer histories or tendencies.
- *Sensitive Personal Information*—such as social security numbers, driver's license numbers, passport numbers, account log-in names and passwords, geolocation data of equipment we finance, gender, country of birth, citizenship, national origin, nationality, proof of residency, race, ethnicity, marital status, military status, criminal record, contents of mail, email or a text message, certain biometric information such as video, picture, or voice recording for the purpose of identifying an individual.

### Categories of Sources of Personal Information

In the past 12 months we have collected personal information about California residents from the following categories of sources:

- You directly, or other authorized parties acting on your behalf, through physical (e.g., paper application, visitor registration when you visit our office), audio (e.g., phone), visual (e.g., Closed Circuit Television monitoring when you visit our offices), or electronic (e.g., website, social media) sources.
- Public records made available by federal, state, or local government entities or widely available sources made available by media.
- Third parties that provide data to support our business and operational activities such as our affiliates, joint venture partners, business partners, manufacturers, vendors, dealers, distributors of goods or services you finance with us, credit bureaus, and suppliers who provide goods and services to us.
- Equipment you finance with us.

#### **Business and Commercial Purposes for the Collection, Disclosure, and Use of Personal Information**

We collect, use, disclose, or process Personal Information of California residents for the following business and/or commercial:

- Contractual necessity to provide you with products and Services
- Promotion and/or marketing to provide potential products and Services that may be of interest to you
- Support business operations, including to meet risk, legal, and compliance requirements
- Improve our products and Services

PMC may use, process, or disclose Sensitive Personal Information of California residents we collect for one or more of the following purposes:

- To perform or provide the Services reasonably expected by you;
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and/or confidentiality of Personal Information;
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions;
- To ensure the physical safety of natural persons;
- For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with PMC;
- For third parties to perform Services on behalf of PMC;
- To verify or maintain the quality or safety of Services or devices that are owned or controlled by PMC, and to improve, upgrade, or enhance the Services or devices that are owned or controlled by PMC;
- To collect or process Sensitive Personal Information where such collection or processing is not for the purpose of inferring characteristics about you;
- For any other acceptable purposes as set forth in the CCPA.

#### **Disclosure of Personal Information**

- You and, where appropriate, your representatives
- Our affiliates
- Business Partners and Service Providers
- Advertisers and/or Marketing Agencies

- 
- Legal advisors, government authorities, regulators or supervisor authorities and law enforcement agencies
  - Third parties in the event of a sale, merger, or transfer of our company's equity or assets or in the unlikely event of a bankruptcy, liquidation, or receivership of our business.

### Retention of Personal Information

We have a retention policy which specifies how long we store data. We endeavor to retain each category of your Personal Information for no longer than what is reasonably necessary for business purposes according to our internal retention policy. We use the following criteria to determine the applicable retention period(s):

- whether there is a retention period required by applicable laws or regulations;
- pendency of any actual or threatened litigation for which we are required to preserve the information;
- pendency of applicable statutes of limitations for potential legal claims; and
- business needs or generally accepted best practices in our industry

When we determine that it is no longer reasonably necessary to retain your Personal Information for disclosed business purpose(s) based on the above criteria, we will endeavor to delete or de-identify your Personal Information.

We have implemented appropriate technical and organizational measures to ensure that only people that have a right or need to know your information can access it.

### Your Rights and Choices:

1. **Right to Know and Portability:** You may request that we disclose to you the following information covering the 12-month period prior to your request if you submit a Verifiable Request (as defined in Section 13, below) (such request, an "Access Request"):
  - a. The categories of Personal Information collected about you.
  - b. The categories of sources from which your Personal Information was collected.
  - c. The purpose for collecting or disclosing your Personal Information.
  - d. The categories of third parties to whom Personal Information is disclosed about you, and the categories of Personal Information disclosed.
  - e. The specific pieces of Personal Information collected about you.
  - f. If we disclosed your Personal Information for a business purpose, what categories of Personal Information we disclosed for a business purpose, and to which categories of recipients we disclosed it to.
  - g. You may request a copy of your Personal Information, and/or request that we transmit your Personal Information to another entity. To the extent technically feasible, we will comply with your request and provide and/or transmit your Personal Information in a structured, commonly used, and machine-readable format.
2. **Right to Delete:** you may request that we delete certain Personal Information collected about you by submitting a Verifiable Request ("Deletion Request"). We may

---

deny your Deletion Request if retaining your Personal Information is necessary for us or our service providers to:

- a. Complete the transaction for which we collected your Personal Information, provide goods or Services that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
  - b. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
  - c. Debug products to identify and repair errors that impair existing intended functionality;
  - d. Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
  - e. Make other internal and lawful uses of that information that are compatible with the context in which you provided it; and
  - f. Comply with legal obligations, laws, and regulations, including other denial grounds provided under CCPA.
3. **Right to Correct.** You have the right to request that we correct any of your Personal Information that is inaccurate by submitting a Verifiable Request. We will correct any inaccurate Personal Information pursuant to your request to the extent possible using commercially reasonable efforts. We may deny your correction request if the Personal Information is accurate.
4. **Right Not to Receive Discriminatory Treatment:** You have the right to be free from discrimination by PMC for exercising your rights under the CCPA.

For purposes of this section and under CCPA, “**Sell**,” “**Selling**,” “**Sale**,” or “**Sold**,” means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, Personal Information to another business or a third party for monetary or other valuable consideration.

For purposes of this section and under CCPA, “**Share**,” “**Shared**,” or “**Sharing**” means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, Personal Information to a third party for Cross-context Behavioral Advertising, whether or not for monetary or other valuable consideration.

We do not Sell or Share, as such terms are defined above, your Personal Information.

We do not offer the right to limit our use and disclosure of Sensitive Personal Information because we do not use or disclose Sensitive Personal Information in such a manner as to require provision of the right.

#### **Individuals Under 16 Years of Age**

We do not knowingly collect, Sell or Share personal information from children under 16 without parental consent.

#### **Residents of Nevada**



Nevada's data privacy law defines selling Personal Information as exchanging it for money. We do not sell Personal Information of residents of Nevada. However, you may contact us at [USprivacyoffice@philipsmedicalcapital.com](mailto:USprivacyoffice@philipsmedicalcapital.com) or our customer service team toll-free at 1(866) 513-4762 with questions.

#### Notice to Minors

Our customer-facing websites are not designed for minors and are not directed at or intended to be visited by minors. No visitor to our websites who is under the age of eighteen (18) should provide any Personal Information to us. If you are a minor, please do not visit our websites and do not send any Personal Information to us.

If we become aware that we have collected Personal Information from a minor, we will take steps to delete such information in accordance with applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of eighteen (18) has provided us with Personal Information without your consent, please contact us at [USprivacyoffice@philipsmedicalcapital.com](mailto:USprivacyoffice@philipsmedicalcapital.com) or our customer service team toll-free at 1(866) 513-4762.

## 13 How can you contact us with a request, question, or complaint?



**We would like to hear from you if you have any questions about this privacy statement, or if you wish to exercise any of your rights.**

For questions related to this privacy statement, please contact our local privacy officer or local compliance officer via email at [USprivacyoffice@philipsmedicalcapital.com](mailto:USprivacyoffice@philipsmedicalcapital.com). You can also reach our customer support toll-free at 1(866) 513-4762.

If you would like to exercise any of your rights or have any concerns, please do so by completing this form:

[Submit a Request or Complaint](#)

#### PMC's Verification Process

When you make a request regarding your Personal Information, we will ask you to provide the following information to verify your identity ("Verifiable Request"):

- Name, address, phone number, date of birth, email address; and, in certain situations as may be required to confirm your identity, the last 4 digits of your social security or individual taxpayer identification number, and/or a copy of government issued photo ID.

If you are making a request as an authorized agent for a California resident, we may request that you provide, as applicable:

- Your name, address, phone number, date of birth, email address; and, in certain situations as may be required to confirm your identity, a copy of government issued photo ID.

- 
- The California resident's name, address, phone number, date of birth, email address, last 4 digits of social security or individual taxpayer identification number; and, in certain situations as may be required to confirm the identity of the individual on whose behalf the request is being made, a copy of a government issued photo ID.
  - A document to confirm that you are authorized to make the request on the California resident's behalf. We accept as applicable: a copy of a power of attorney, legal guardianship, conservatorship order, or the California resident's signed permission demonstrating that you are authorized to act on such California resident's behalf.

In addition, if you are a company or organization ("Authorized Entity") making a request as an agent on behalf of a California resident:

- Authorized Entity's active registration with the California Secretary of State.
- From the individual who is acting on behalf of the Authorized Entity, proof that the individual is authorized to make the request. We accept a letter on the Authorized Entity's letterhead, signed by an officer of the Authorized Entity.

## 14 Will we update this privacy statement?



### **Last updated on September 4, 2025**

This privacy statement will be updated from time to time in case of additional legal requirements or if we process personal data differently. The changes we made to the privacy statement will become effective upon posting as of the last updated date as shown above. This is the most up-to-date version. The most recent previous version of our privacy statement can be found below.

**View or download a PDF version of this privacy statement dated September 4, 2025**  
**View or download the previous version of the Privacy Statement dated December 31<sup>st</sup>, 2022**