

PRIVACY NOTICE FOR VIRGINIA RESIDENTS

This PRIVACY NOTICE FOR VIRGINIA RESIDENTS supplements the information contained in the [Privacy Policy](#) of Medela LLC (“Medela”) and applies solely to visitors, users, and others who reside in the Commonwealth of Virginia (“consumers” or “you”) when you visit the Medela website, use the MyMedela App or register to receive Medela’s services or products. We adopt this notice to comply with the Virginia Consumer Data Protection Act (“VCDPA”) in addition to other Virginia privacy laws. Any terms defined in the VCDPA have the same meaning when used in this notice.

Personal Data We May Collect

We may collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household (“Personal Data”). In particular, we have collected the following categories of Personal Data from consumers within the last twelve (12) months:

| Categories of Personal Data | Specific Examples |
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| Identifiers | Name, postal address, Internet Protocol address, email address or other similar identifiers |
| Personal Data Categories | Name, date of birth, signature, address, telephone number, fax number, bank account number, credit card number, debit card number, or any other financial information including income level, or personal health information, including but not limited to insurance policy number and due date or birth date of baby. |
| Protected classification characteristics under Virginia or federal law | Age (40 years or older), marital status, gender, race, color, ancestry, national origin, citizenship, religion or creed, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression), pregnancy or childbirth or related |

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| | medical conditions, sexual orientation, veteran or military status. |
| Commercial information | Order information, shipping information, product, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. |
| Internet or other similar network activity | Access history and information on your interaction with our website or application. |
| Professional or employment-related information | Occupation, employer information |
| Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)) | Education level, school attended |

We obtain the categories of Personal Data listed above from the following categories of sources:

- *Directly from you.* For example, through information you provide to us when you engage our services, including but not limited to, visiting or registering on our website, registering or using the MyMedela App, calling, emailing or chatting with our customer service team, or ordering product.
- *Directly and indirectly from you.* For example, usage details collected automatically in the course of your interaction with our website or MyMedela app.
- *Directly from our service providers and business partners.* For example, from information you provide our service providers when purchasing or renting a product or service, responding to a survey or providing a review.

Use of Personal Data

We may use or disclose the Personal Data we collect for one or more of the following business purposes:

- To process your purchases of or requests for products or services.
- To meet the reason for which your Personal Data was provided.
- To respond to your inquiries and for other customer service purposes.
- To provide you with email alerts and other marketing concerning our

products or services.

- To provide you with updates to your insurance application process and fulfillment.
- To improve our products or services to you.
- To tailor the content and information that we or our service providers may send or display to you, to offer personalized help or instruction or to otherwise personalize your experience while using the website or app.
- To assist in advertising our products and services on third-party websites.
- For testing, research, analysis and product development.
- For marketing analysis, data analytics and other similar analytics
- As necessary or appropriate to protect the rights, property or safety of us, our customers, service providers or others.
- To comply with federal, state and local laws, cooperate with and respond to law enforcement requests and as otherwise required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Data or as otherwise set forth in the VCDPA
- To maintain appropriate records for internal administrative purposes.
- To help maintain the safety, security and integrity of our website, app, products and services, databases and other technology assets, and business.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us is among the assets transferred.

We will not collect additional categories of Personal Data or use the Personal Data we collect for materially different, unrelated, or incompatible purposes without providing you notice and obtaining your consent.

Sharing Personal Data

We may disclose your Personal Data to third parties for business purposes. When we disclose Personal Data for a business purpose, we enter into a contract with the third party that describes the purpose and requires the third party to both keep that Personal Data confidential and not use it for any purpose except performing the contract or otherwise complying with the law.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Data for a business purpose:

- Identifiers.
- Personal Data categories.
- Protected classification characteristics under Virginia or federal law.
- Commercial information.
- Internet or other similar network activity.

We have disclosed Personal Data for a business purpose to the following categories of third parties:

- Affiliates and subsidiaries.
- Our distribution partners and customers or their agents who are providing products or services to you.
- Service providers.
- Development partners.
- Operating systems and platforms.
- Data processors.
- Marketing analytics and advertising companies.
- Research partners.
- Third parties to whom you authorize us to disclose your Personal Data in connection with products or services.

We Do Not Sell Personal Data

In the preceding twelve (12) months, we have not sold any Personal Data. We do not intend to sell any Personal Data in the future. If we change this intent, we will update this Privacy Notice accordingly. "Personal data" means any information that is linked or reasonably linkable to an identified or identifiable natural person. "Personal data" does not include de-identified data or publicly available information.

From time to time we may collect "Sensitive Personal Information" (SPI). SPI includes, but is not limited to, racial origin, religious beliefs, sexual orientation, ethnicity, religion, genetic data, private communications, specified health information and precise geolocation. We do not sell SPI or utilize automated decision making.

Your Rights

If you are a Virginia resident, you have certain rights regarding your Personal Data. This section describes your rights and explains how to exercise those rights.

Right to Access Your Collected Personal Data

You have the right to request that we disclose certain information to you about our collection, disclosure and use of your Personal Data over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of Personal Data we collected about you.
- Our business or commercial purpose for collecting that Personal Data.
- The categories of third parties with whom we share that Personal Data.
- The specific pieces of Personal Data we collected about you.

Right to Correct Inaccurate Information

You have the right to request that we correct any inaccurate information we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will correct (and direct our service providers to correct, if applicable) the inaccurate information, unless an exception applies.

Right to Request Deletion of Your Personal Data

You have the right to request that we delete the Personal Data we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete, if applicable) your Personal Data from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction or provide a good or service requested by you for which we collected the Personal Data, or otherwise perform a contract.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug to identify and repair errors that impair existing intended functionality of our systems.
4. Exercise a legal right provided by law, including exercising or ensuring free speech rights.
5. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest if: the research adheres to all other applicable ethics and privacy laws; deleting the Personal Data is likely to make the research impossible or seriously impair it; and you provided informed consent during the initial data collection.
6. Enable our internal use in a manner that you would reasonably expect based on your relationship with us.
7. Comply with our legal obligations.
8. Otherwise use your Personal Data internally in a lawful manner that is compatible with the context in which you provided the information.

Right to Obtain a Copy of Your Personal Data

You have the right to request a copy of the Personal Data we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will provide a copy of your Personal Data to you, unless an exception applies.

Right to Opt-Out

At all times, you have the right to Opt-Out of the collection of Personal Data through our website or MyMedela app. You can Opt-Out by unsubscribing from our Website at any time, and withdraw your consent with effect for the future, by clicking the "unsubscribe" link at the bottom of newsletter emails received or on our Website within your account profile. Once we receive your request to Opt-Out, we will no longer collect your Personal Data. The election to Opt-Out may effect your ability to purchase our products on line. The right to Opt-Out allows you to stop sharing your information with Medela. Once we receive and confirm your verifiable consumer request to Opt-Out, we will delete your Personal Data from our records, unless an exception applies.

Exercising Your Rights

To exercise your rights under the VCDPA please complete our [Privacy Request Webform](#). Please note that any email requests will not be processed. The Privacy Request Webform is necessary to verify your request. You may also use this form to make a verifiable consumer request on behalf of your minor child.

You can submit a verifiable consumer request by completing the Privacy Request Webform and:

- Providing sufficient information that allows us to reasonably verify you are the person about whom we collected personal data or an authorized representative;
- Describing your request with sufficient detail that allows us to properly understand, evaluate, and respond to it; and
- Including a declaration affirming your identity.

We may deny your request if we cannot verify your identity or authority to make the request. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Data provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We will confirm receipt of a request from you within ten (10) days of receipt of the request.

We will respond to a verifiable consumer request within 45 days. If we cannot verify your request and respond in that time, we will notify you in writing that we need an additional 45 days and explain the reasons for the additional time.

Any disclosures in response to a request to know will only cover the 12-month period preceding the verifiable consumer request's receipt. If you have requested to know specific Personal Data we collected, we will provide your Personal Data in a format that is readily useable and allows you to transmit the information to another person or entity.

If we cannot comply with your request, in whole or in part, we will explain the reasons why we cannot comply in our response.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Changes to Our Privacy Notice

We reserve the right to amend this Privacy Notice at our discretion and at any time. The date this Privacy Notice was last updated is identified at the bottom of this page. You are responsible for periodically visiting the Medela website or app and this Privacy Notice to check for any changes.

Contact Information

If you have any questions or comments about this Privacy Notice, our Privacy Policy, the ways in which we collect and use your Personal Data, or your choices and rights regarding such use, or if you wish to exercise your rights under Virginia law, you may contact us via email at privacy@medela.com, or call us at 800-435-8316.

Updated: July 1, 2023