

## PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

This PRIVACY NOTICE FOR CALIFORNIA 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 State of California (“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 California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

### Personal Information 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 Information”). In particular, we have collected the following categories of Personal Information from consumers within the last twelve (12) months:

| <b>Categories of Personal Information</b>   | <b>Specific Examples</b>   |
|---|--|
| Identifiers   | Name, postal address, Internet Protocol address, email address or other similar identifiers  |
| Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) | 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 California 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 Information 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 Information**

We may use or disclose the Personal Information 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 Information 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 Information or as otherwise set forth in the CCPA.
- 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 Information held by us is among the assets transferred.

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

### **Sharing Personal Information**

We may disclose your Personal Information to third parties for business purposes. When we disclose Personal Information 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 Information 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 Information for a business purpose:

- Identifiers.
- California Customer Records personal information categories.
- Protected classification characteristics under California or federal law.
- Commercial information.
- Internet or other similar network activity.

We have disclosed Personal Information 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 Information in connection with products or services.

### **We Do Not Sell Personal Information**

In the preceding twelve (12) months, we have not sold any Personal Information. We do not intend to sell any Personal Information in the future. If we change this intent, we will update this Privacy Notice accordingly.

### **Your Rights**

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

#### **Right to Know**

You have the right to know what categories of Personal Information we collect, the sources from which we collect the Personal Information, the categories of third parties with whom we share or disclose the Personal Information, and the purposes for collecting or disclosing the Personal

Information. We are required to provide this information to you before or at the point of collection of your Personal Information. This Privacy Notice is intended to provide you with this information.

### **Right to Access Your Collected Personal Information**

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

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

### **Right to Request Deletion of Your Personal Information**

You have the right to request that we delete the Personal Information 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 Information 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 Information, 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. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. 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 Information is likely to make the research impossible or seriously impair it; and you provided informed consent during the initial data collection.
7. Enable our internal use in a manner that you would reasonably expect based on your relationship with us.

8. Comply with our legal obligations.
9. Otherwise use your Personal Information internally in a lawful manner that is compatible with the context in which you provided the information.

### **Exercising Your Right to Access and Right to Delete**

To exercise your rights under the CCPA, please complete a [Privacy Request Form](#) and email the completed form to us at [privacy.us@medela.com](mailto:privacy.us@medela.com). The Privacy Request Form 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 may only make a verifiable consumer request twice within a 12-month period. You can submit a verifiable consumer request by completing the Privacy Request Form and:

- Providing sufficient information that allows us to reasonably verify you are the person about whom we collected personal information 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 Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### **Authorized Agent**

You may also designate a person or entity registered with the California Secretary of State to be your authorized agent to exercise your rights on your behalf. When we receive a request from an authorized agent, you or your agent will need to provide us with a copy of your signed, written permission authorizing the agent to act on your behalf and you may need to verify your own identity directly with us, unless we have been provided a power of attorney pursuant to California Probate Code sections 4000 to 4465. We may deny a request from an authorized agent if we do not receive sufficient proof that the agent is authorized to act on your behalf.

### **Response Timing and Format**

We will confirm receipt of a request from you or your authorized agent within ten (10) days 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 Information we collected, we will provide your Personal Information 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.

### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you use of our products or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of products or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Notice of Financial Incentive**

From time to time we may offer a financial incentive, sample products or a discount on future purchases of products or services in connection with your registering an account on our website or app, enrolling in similar services that we may offer, or participating in a survey or other contest. As part of this process, you may be asked to provide your Personal Information through an online form or other format. We do not assign a monetary value to the Personal Information we collect and strive only to use that information to further our business in accordance with our Privacy Policy. To the extent that we are required to assign a monetary value to your Personal Information it is equal to the value of the incentive or discount that we have provided to you. You may unsubscribe to the website, app or similar services as further described in our Privacy

Policy at any time. If you opt out, any benefit that you received from us before opting out is yours to keep and use.

### **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 Information, or your choices and rights regarding such use, or if you wish to exercise your rights under California law, you may contact us via email at [privacy.us@medela.com](mailto:privacy.us@medela.com), or call us at 800-435-8316.

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