

Last updated: March 15, 2021

PRIVACY POLICY

This Privacy Policy (the "**Privacy Policy**") describes our practices in connection with the personal information that you provide to any European entity of ATTINDAS HYGIENE PARTNERS group ("**Attindas**") by any means, including off line forms (e.g., product orders), telephone calls, email, fax, a website which is operated (as indicated in its conditions of use) by Attindas (the "**Website**"). An updated list of Attindas entities in Europe is available here:

Country	Entity	Incorporation number	Address
Austria	Attends GmbH	FN 183747 t	Klammstrasse 1, 4020, Linz, Austria
Germany	Attends GmbH Authorized representative in the UK: Attends Ltd. (find details below)	No.HRB 5042	Am Kronberger Hang 3, 65824, Schwalbach am Taunus, Germany
Belgium	Attends BVBA	No.0465664336	3140 Keerbergen, Haachtsebaan, 119 box 1, Belgium
Finland	Attends OY	No.1526265-2	PB 7330 00002 Helsinki
Spain	Laboratorios Indas, S.A.U.	Tax Number ES A45002516	Paseo del Club Deportivo, nº1, Edf. 18 Planta Baja y Primera Derecha (Parque Empresarial La Finca) 28223 Pozuelo de Alarcón - Madrid, Spain
Spain	Domtar Personal Care Europe, S.L.U.	Tax Number ES B85004604	Paseo del Club Deportivo, nº1, Edf. 18 Planta Baja y Primera Derecha (Parque Empresarial La Finca) 28223 Pozuelo de Alarcón - Madrid, Spain
France	Indas Eurl	815 279 732 R.C.S. Lyon	Avenue Satolas Green Cap Arrow 69330 Pusignan, France
Norway	Attends As	No.980609162	Klingenberggata 7, 0161, Oslo, Norway
Netherlands	Attends BV	No.000016055543	Boslaan 19, 8302AA Emmeloord, Netherlands
Portugal	Indas Portugal, Produtos de Saude, Hospitalares e de Higiene Sociedade Unipessoal, Lda	Registration and Tax Number 503505196	Rua Padre Americo, no 14-B, Escritorio 1, Freguesia de Lumiar, Concelho de Lisboa, 1600-648, Lisbon, Portugal
United Kingdom	Attends, Ltd	No.03718732	Unit 10, Mariner Court, Calder Park, WF4 3FL, Wakefield, England, UK

	Authorized representative in the European Union: Domtar Personal Care Europe, S.L.U. (find details above)		
Sweden	Attends AB	No.556757-7258	Jarnvagsgatan 4, 57824, Aneby, Sweden
Sweden	Attends Healthcare AB	No.556563-1867	Jarnvagsgatan 4, 57824, Aneby, Sweden
Switzerland	Attends GmbH	No.CH-105.156.905	Baslerstrasse 15, 4310, Rheinfelden, Switzerland

Updates to this Privacy Policy

We may change this Privacy Policy. Please take a look at the **"Last updated"** legend at the top of this document to see when this Privacy Policy was last revised. The processing of your personal information will be governed by the Privacy Policy in force at the time your personal information is collected unless otherwise agreed by you or allowed under applicable law.

HOW WE PROCESS YOUR PERSONAL INFORMATION

1. Personal information collected through our Websites

Data Controller

The Data Controller, who determines which personal information is collected, how and for which purposes is the Attindas entity which operates the relevant website or web portal.

In the case of online sales the Data Controller is the Attindas entity that contracts with you, as identified in the relevant terms and conditions applicable to the purchase or use of the relevant product or service. All terms and conditions of sale of our products and services (unless expressly provided for therein), including this Privacy Policy, may be assigned to any third party.

Lawful Basis for Processing

(a) Your consent. You are able to remove your consent at any time (see section *"What are your rights when you provide personal information?"* below).

(b) We have a contractual obligation (for example when you purchase or order one of our products or services; or when you request or order a free sample; without your personal information we will not be able to provide you with the products or services ordered, or the samples requested).

How Information is collected

We collect your personal information directly from you, when you are interacting with us, for example information you give us as requested by phone, email or detailed in the forms you may be asked to complete and also information we collect automatically from your use of our products or services such as your interaction with adverts that we place on websites or other media.

Information Processed

We may collect (automatically, as detailed in the forms you will be asked to complete) and process the following personal information:

- (a) Personal identifiers, contacts and characteristics (for example, name and contact details: email, address or telephone; questions);
- (b) Payment information (for example your credit card when you purchase or goods online);
- (c) Health condition (for example if you are an user of incontinence products, type of incontinence products used or size, when you order a sample of our products).

Purposes of the processing

We use your personal information in order to:

- (a) evaluate an application to contract our products or services or participate in any competition. For example, this may include verifying whether you are eligible to enter into a competition or to check your credit rating when purchasing a product, etc.;
- (b) manage sales activities including managing orders, product samples, invoices, payment management and delivery of orders;
- (c) provide you with a product or service you have requested and manage our contractual relationship with you. For example, to answer your questions or respond to comments submitted to us; to send you information or samples you have requested; to perform and enforce the terms and conditions that govern the product or service (which may include, depending on the product or service, the recording of calls between us and you to evidence the rendering of the product or service or to identify any breach of the terms and conditions that govern the product or service, for accounting, billing and payment verification purposes, to collect debts, to serve notice of unpaid, due and enforceable debts to solvency files which payment has been requested from you); to award a prize if you are the winner of a competition, to post content you have submitted for publication, to share your personal information with payment processing organizations, to request you to fill in a questionnaire to better understand your circumstances and better assess your needs, etc;
- (d) comply with our (contractual and legal) obligations or defend our interests in judicial or administrative proceedings (in any relevant jurisdiction). For example, this includes responding to the requests of governmental and judicial orders of any competent jurisdiction or sharing the personal information with other enforcement agencies regarding any mandatory requirement; to comply with Attindas Group policies (such as Anti-Bribery

- policies) or to share information with sick funds or insurance companies; to respond to legal process such as subpoenas or discovery requests, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims (which can be reported through the internal whistleblowing system according to Attindas Whistle-blowing policy);
- (e) carry out any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock. For example, this includes a sale of our assets in connection with a bankruptcy proceeding or an intra-group corporate or business reorganization;
 - (f) analyse how our products and services are used by our customers and to improve our business. For example, this includes the analysis of statistical information on the use of our websites by visitors and of any feedback on our business or testimonials that you may provide;
 - (g) honor your preferences on direct marketing and for advert targeting purposes. You may receive direct marketing communications on personal care, medical devices, cosmetic and hygiene products and services, which may or may not be personalised for you (i.e., tailored to your profile), by any means (e.g., post, phone call, email, text message or other electronic means) and carry out targeted advertising. For example, whenever you provide us with any personal information (e.g., when you ask for our products or services), you may be asked for your preferences in this respect and provide you with information on the kind of direct marketing available and on whether us and/or a third party may send you such direct marketing or carry out targeted advertising. You may also decide to subscribe to one of our newsletters. To discontinue direct marketing or targeted advertising, you may send a request as explained in section "*What are your rights when you provide personal information?*" below. Furthermore, and regarding direct marketing by electronic means, where required by applicable law, we will obtain your consent inform you in each of our communications how to unsubscribe in a straightforward way and at no cost (other than as related to transmission of your request). We will answer your request as soon as reasonably practicable, and in any case, within the legally determined term (if there is one). Please note that if you do opt-out of receiving marketing-related messages from us, we will still send messages as necessary to fulfill other purposes (such as administrative messages relating to the operation of the product or service).

How Long we Store Your Information

Your personal information is securely stored.

We keep your personal information for 7 years for the above mentioned purposes a) to e), unless there is a subsisting legal reason that makes us to block and retain the information for a longer period. We will store your personal information indefinitely for statistical analysis and for direct marketing purposes (unless you withdraw your consent).

Information Shared with third parties

We may share your personal information with other Attindas entities outside Europe (in particular, our affiliate in the US, Attends Healthcare Products Inc. (8081 Arco Corp Drive, Suite 330, Raleigh NC 27617):

- (a) for the purposes indicated under paragraph "Purposes of the processing".
- (b) if it is necessary to honor your preferences on direct marketing and targeted advertising purposes, i.e., if you have agreed to receiving marketing and targeted advertising; or
- (c) to support us in performing any of the abovementioned purposes (e.g., cloud services providers that provide ICT infrastructure used by us to provide you with a product or service or Group management, administrative and support services, including ICT, finance and accounting support and internal audits). Some of these third party recipients may be located worldwide, including outside of the European Economic Area (EEA), United Kingdom (UK) and Switzerland (such as the US). These countries may provide personal information protection standards that are not necessarily equivalent to those applicable in the EEA, UK and Switzerland (in which case, specific safeguards are adopted by us for personal information originating in the EEA, UK and/or Switzerland such as ensuring the third party is subject to other adequacy finding or enters into a written agreement with us requiring that the third party provides a level of privacy protection equivalent to the one required within the EEA, UK and Switzerland).

Your personal information may also be shared with public authorities for compliance with legal obligations and with third party service providers who assist us in fulfilling the purposes set out above.

2. Personal information collected through social networks

Data Controller

The Data Controller, who determines which personal information is collected, how and for which purposes, is the Attindas entity that owns the profile of the social network in each case.

Lawful Basis for Processing

Your consent. The fact of participating in a draw or promotion (for example, by sending a comment, or by indicating a "like" or answering a question) implies that you have given us your consent to process your personal information with the exclusive purpose of managing your participation in such draw or promotion in the terms indicated below. You are able to remove your consent at any time (see section "*What are your rights when you provide personal information?*" below).

How information is collected

We collect your personal information directly from you, when you interact with our social network profile (for example, by subscribing to the profile, sending a comment, or pointing out a "like" or answering a question).

Information Collected

We may collect (automatically, as detailed in the forms you will be asked to complete) and process the following information:

Personal identifiers, contacts and characteristics (for example, name and contact details: email, address or telephone);

Purposes of the processing

We use your personal information in order to manage your participation in draws or promotions published in the profile of our company or of our products or brands in social networks, including the publication of the winner in the referred profiles.

How Long we Store Your Information

We keep your personal information for the time necessary to manage your participation in the draw or promotion, which shall not exceed six months from the notification of the prize to the winner(s).

Information Shared with Third Parties

We may share your personal information with other Attindas entities outside Europe (in particular, our affiliate in the US Attends Healthcare Products Inc. (8081 Arco Corp Drive, Suite 330, Raleigh NC 27617

- (a) for the purposes indicated under paragraph "Purposes of the processing".
- (b) if it is necessary to honor your preferences on direct marketing and targeted advertising purposes, i.e., if you have agreed to receiving marketing and targeted advertising; or
- (c) to support us in performing any of the abovementioned purposes (e.g., cloud services providers that provide ICT infrastructure used by us to provide you with a product or service or Group management, administrative and support services, including ICT, finance and accounting support and internal audits). Some of these third party recipients may be located world-wide, including outside of the European Economic Area (EEA), United Kingdom (UK) and Switzerland (such as the US). These countries may provide personal information protection standards that are not necessarily equivalent to those applicable in the EEA, UK and Switzerland (in which case, specific safeguards are adopted by us for personal information originating in the EEA, UK and/or Switzerland such as ensuring the third party is subject to other adequacy finding or enters into a written agreement with us requiring that the third party provides a level of privacy protection equivalent to the one required within the EEA, UK and Switzerland).

Your personal information may also be shared with public authorities for compliance with legal obligations and with third party service providers who assist us in fulfilling the purposes set out above.

3. Personal information collected through sales or purchases of products and services made by customers or suppliers

Data Controller

The Data Controller, who determines which personal information is collected, how and for which purposes, is the Attindas entity which contracts with you, as identified in the relevant terms and conditions applicable to the sale or purchase of the relevant product or service. All terms and conditions of sales or purchases of products and services (unless expressly provided for otherwise therein), including this Privacy Policy, may be assigned to any third party.

Lawful Basis for Processing

(a) We have a contractual obligation (for example, when you purchase or order our products or services, or when we purchase or order your products and services; without your personal information we will neither be able to offer or sell our products or services to you nor to purchase your products or services),

(b) We have a legitimate interest (for example, when you are the legal representative or a contact person of a customer or a supplier),

How Information is Collected

We collect your personal information:

(a) Directly from you, from contracts, orders, proposals, invoices or delivery notes, etc.; or when you interact with us, for example information you give us as requested by phone, email or detailed in the forms you may be asked to complete and also information we collect automatically about your use of our products and services or our use of your products and services.

(b) From publicly accessible sources (e.g. from your website).

(c) From third parties, if allowed by law, for example, if you are in the process of contracting for a product or service for which we need to evaluate your financial solvency or your reputation from a compliance perspective, we may check your credit rating by consulting financial solvency files held by third parties or screen your name against publicly available information (sanctions lists, politically exposed persons lists or adverse media), we may also receive your information from third parties for one of the purposes specified below.

Information Collected

We may collect and process the following personal information:

(a) Personal identifiers, contacts and characteristics (name, ID);

(b) Employment information: email, address, telephone, title, company.

(c) Economic transactions (when you are a freelance, professional or individual entrepreneur): payment information such as bank details; goods or services purchased or sold; credit rating; Tax Number.

(d) Compliance checks: publicly available information about sanctions, politically exposure or adverse media.

Purposes of the processing

We use your personal information in order to:

- (a) evaluate an application to contract our products or services or participate in any competition. For example, this may include verifying whether you are eligible to enter into a competition or to check your credit rating when purchasing a product, or screen your name against publicly available information (sanctions lists, politically exposed persons lists or adverse media) in order to comply with compliance regulations and Attindas compliance program, etc.;
- (b) manage the commercial or contractual relationship with our customers or suppliers including managing purchase orders, requests for proposals; evaluation of offers and proposals; invoices, delivery notes, payments, reception of goods and services and customer complaints. For example, to answer your questions or respond to comments submitted to us; to send you information or samples you have requested; to perform and enforce the terms and conditions that govern the product or service (which may include, depending on the product or service, the recording of calls between us and you to evidence the rendering of the product or service or to identify any breach of the terms and conditions that govern the product or service, for accounting, billing and payment verification purposes, to collect debts, to serve notice of unpaid, due and enforceable debts to solvency files which payment has been requested from you); to award a prize if you are the winner of a competition, to post content you have submitted for publication, to share your personal information with payment processing organizations, to request you to fill in a questionnaire to better understand your circumstances and better assess your needs, etc.;
- (c) manage contractors and subcontractors for Health & Safety purposes;
- (d) comply with our (contractual and legal) obligations or defend our interests in judicial or administrative proceedings (in any relevant jurisdiction). For example, this includes responding to the requests of governmental and judicial orders of any competent jurisdiction or sharing the personal information with other enforcement agencies regarding any mandatory requirement; to comply with Attindas Group policies (such as Anti-Bribery policies) or to share information with sick funds or insurance companies; to respond to legal process such as subpoenas or discovery requests, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims (which can be reported through the internal whistleblowing system according to Attindas Whistle-blowing policy);
- (e) carry out any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock. For example, this includes a sale of our assets in connection with a bankruptcy proceeding or an intra-group corporate or business reorganization;
- (f) analyse how our products and services are used by our customers and to improve our business. For example, this includes the analysis of statistical information on the use of our websites by visitors and of any feedback on our business or testimonials that you may provide;
- (g) honor your preferences on direct marketing and for advert targeting purposes. You may receive direct marketing communications on personal care, medical devices, cosmetic and hygiene products and services, which

may or may not be personalised for you (i.e., tailored to your profile), by any means (e.g., post, phone call, email, text message or other electronic means) and carry out targeted advertising. For example, whenever you provide us with any personal information (e.g., when you ask for our products or services), you may be asked for your preferences in this respect and provide you with information on the kind of direct marketing available and on whether us and/or a third party may send you such direct marketing or carry out targeted advertising. You may also decide to subscribe to one of our newsletters. To discontinue direct marketing or targeted advertising, you may send a request as explained in section "*What are your rights when you provide personal information?*" below. Furthermore, and regarding direct marketing by electronic means, where required by applicable law, we will obtain your consent inform you in each of our communications how to unsubscribe in a straightforward way and at no cost (other than as related to transmission of your request). We will answer your request as soon as reasonably practicable, and in any case, within the legally determined term (if there is one). Please note that if you do opt-out of receiving marketing-related messages from us, we will still send messages as necessary to fulfill other purposes (such as administrative messages relating to the operation of the product or service).

How Long we Store Your Information

Your personal information is securely stored.

We keep your personal information for 7 years from the end of the last taxation year to which the records relate for the above mentioned purposes a) to f), unless there is a subsisting reason that makes us to retain the information for a longer period. We will store your personal Information indefinitely for statistical analysis and for direct marketing purposes (unless you withdraw your consent).

Information Shared with Third Parties

We may share your personal information with other Attindas entities outside Europe (in particular, our affiliate in the US, Attends Healthcare Products Inc. (8081 Arco Corp Drive, Suite 330, Raleigh NC 27617):

- (a) for the purposes indicated under paragraph "Purposes of the processing";
- (b) it is necessary to honor your preferences on direct marketing and targeted advertising purposes, i.e., if you have agreed to receiving marketing and targeted advertising; or
- (c) to support us in performing any of the abovementioned purposes (e.g., cloud services providers that provide ICT infrastructure used by us to provide you with a product or service or Group management, administrative and support services, including ICT, finance and accounting support and internal audits). Some of these third party recipients may be located world-wide, including outside of the European Economic Area (EEA), United Kingdom (UK) and Switzerland (such as the US). These countries may provide personal

information protection standards that are not necessarily equivalent to those applicable in the EEA, UK and Switzerland (in which case, specific safeguards are adopted by us for personal information originating in the EEA, UK and Switzerland such as ensuring the third party is subject to other adequacy finding or enters into a written agreement with us requiring that the third party provides a level of privacy protection equivalent to the one required within the EEA, UK and Switzerland).

Your personal information may also be shared with public authorities for compliance with legal obligations and with third party service providers who assist us in fulfilling the purposes set out above.

4. Personal Information about Contractors, Subcontractors or Self-Employed Workers

Data Controller

The Data Controller, who determines which personal information is collected, how and for which purposes is the Attindas entity which contracts with the Contractor, as identified in the relevant agreement.

Lawful Basis for Processing

(a) We have a legal obligation: compliance with Health & safety regulations related to the coordination of business activities;

(b) We have a contractual obligation, for example, when you are an individual Contractor (not a company), without your personal information we will not be able to contract your services;

(c) We have a legitimate interest, for example, if you are the legal representative or a contact person of a Contractor.

How Information is Collected

We collect your personal information:

(a) Directly from you, from contracts, orders, proposals, invoices or delivery notes, etc.; or when you interact with us, for example information you give us as requested by phone, email or detailed in the forms you may be asked to complete and also information we collect automatically about your use of our products and services or our use of your products and services.

(b) From publicly accessible sources (e.g. from your website).

(c) From third parties: if allowed by law, for example, if you are in the process of contracting for a product or service for which we need to evaluate your financial solvency, we may check your credit rating by consulting financial solvency files held by third parties, we may also receive your information from third parties (from the main Contractor when you are a Subcontractor, etc.) for one of the purposes specified below.

Information Collected

We may collect and process the following personal information:

- (a) Personal identifiers, contacts and characteristics (name, ID);
- (b) Employment information: email, address, telephone, title, company, skills, driving license and training on the operation of tools, vehicles and machines, affiliation to Social Security;
- (c) Health and Safety information and training, including medical reports attesting that you are fit for your work.

Purposes of the processing

We use your personal information in order to:

- (a) comply with legal obligations regarding the coordination of business activities and health & safety;
- (b) security and access control to our facilities;
- (c) supervise the compliance of our Contractors (and their subcontractors and self-employed workers) with their legal and contractual obligations, including health & safety regulations;
- (d) fulfil our obligations (legal and/or contractual), as well as to defend our interests in any judicial or administrative procedure (and in any jurisdiction). This includes, for example, answering judicial or administrative requests from any competent authority, or for the purpose of communicating personal information to any Competent Data Protection Authority in relation to any mandatory requirements in this respect; to comply with Attindas Group policies (including our policies on fighting bribery and corruption) or to share information with health insurance funds or insurance companies; to respond to requests or subpoenas, exercise rights, litigate and manage internal complaints or claims (which may be reported through Attindas whistleblower channels).

How Long we Store Your Information

We keep your personal information for the time necessary to fulfil the purposes of this processing activity (previously indicated), unless there is a legal obligation that obliges us to block them and keep them for a longer period.

Information Shared with Third Parties

We may share your personal information with other Attindas entities outside Europe (in particular, our affiliate in the US, Attends Healthcare Products Inc. (8081 Arco Corp Drive, Suite 330, Raleigh NC 27617):

- (a) for the purposes indicated under paragraph "Purposes of the processing".
- (b) it is necessary to honor your preferences on direct marketing and targeted advertising purposes, i.e., if you have agreed to receiving marketing and targeted advertising; or
- (c) to support us in performing any of the abovementioned purposes (e.g., cloud services providers that provide ICT infrastructure used

by us to provide you with a product or service or Group management, administrative and support services, including ICT, finance and accounting support and internal audits). Some of these third party recipients may be located world-wide, including outside of the European Economic Area (EEA), United Kingdom (UK) and Switzerland (such as the US). These countries may provide personal information protection standards that are not necessarily equivalent to those applicable in the EEA, UK and Switzerland (in which case, specific safeguards are adopted by us for personal information originating in the EEA, UK and/or Switzerland such as ensuring the third party is subject to other adequacy finding or enters into a written agreement with us requiring that the third party provides a level of privacy protection equivalent to the one required within the EEA, UK and Switzerland).

Your personal information may also be shared with public authorities for compliance with legal obligations and with third party service providers who assist us in fulfilling the purposes set out above.

5. Personal information about Healthcare professionals

Data Controller

The Data Controller, who determines which personal information is collected, how and for which purposes is the Attindas entity which contracts with you, as identified in the relevant terms and conditions applicable to the sale or purchase of the relevant product or service, or which interacts with you as a healthcare professional.

Lawful Basis for Processing

- (a) We have a contractual obligation, for example, when you are a healthcare professional and you purchase or order one of our products, or request a free sample of one of our products; without your personal information we will not be able to send you our products or samples;
- (b) We have a legitimate interest, for example, when you are a healthcare professional working for a health institution and we process your professional information as business contact person of that institution; or as healthcare professional interested in being kept updated on new sanitary products and technologies.
- (c) Your consent, for example, when you are interested in receiving information or specific training about our products. You are able to remove your consent at any time (see section: "What are your rights when you provide personal information?" below).

How Information is collected

We collect your personal information:

- (a) Directly from you, when you interact with us: for example, information that you provide to us by phone or email, information we collect when you

- purchase or request our products or free samples and any other information automatically collected from your use of our products and services including your use of our websites and any other information automatically obtained from your use of our products and services, for example resulting from your interaction with our websites; from medical prescriptions that you send to us so that we are able to supply our healthcare products to insured persons.
- (b) From third parties which have obtained your previous consent to share with us your personal information or which have collected them from publicly available sources.
 - (c) From publicly available sources.

Information Collected

We may collect and process the following personal information:

- (a) Personal identifiers, contacts and characteristics (name);
- (b) Employment information: email, address, telephone, title, healthcare profession, field of practice, company.
- (c) Economic transactions (for example, when you are a pharmacist which purchases products directly from us): payment information such as bank details; goods or services purchased or sold; terms of purchase; credit rating; wholesaler you work with; delivery address.

Purposes of the processing

We use your personal information in order to:

- (a) provide you with our products and free samples, as requested by you, and to manage our commercial, sales, orders, invoicing, payment and delivery activities;
- (b) manage commercial relationships with healthcare institutions and health insurance funds;
- (c) provide you information and training about our products;
- (d) manage orders from pharmacies to pharmaceutical wholesalers or distributors;
- (e) supply prescribed healthcare products to insured persons (end users) within the framework of a Health Insurance system;
- (f) get reimbursed of the price of the healthcare products supplied within the framework of a Health Insurance system;
- (g) evaluate any request to hire our products or services, or to participate in any contest. This may include, for example, obtaining and processing your personal information for the purpose of verifying whether you are eligible to participate in a particular competition, or to verify your creditworthiness for the purchase of any product, etc;
- (h) manage our sales activity including order management, product sample shipping, billing management, payment management and order shipping;
- (i) manage the commercial or contractual relationship with our customers. For example, to answer your questions or respond to comments submitted to us; to send you information or samples you have requested; to perform and enforce the terms and conditions that govern the product or service (which

may include, depending on the product or service, the recording of calls between us and you to evidence the rendering of the product or service or to identify any breach of the terms and conditions that govern the product or service, for accounting, billing and payment verification purposes, to collect debts, to serve notice of unpaid, due and enforceable debts to solvency files which payment has been requested from you); to award a prize if you are the winner of a competition, to post content you have submitted for publication, to share your personal information with payment processing organizations, to request you to fill in a questionnaire to better understand your circumstances and better assess your needs, etc;

- (j) comply with our (contractual and legal) obligations or defend our interests in judicial or administrative proceedings (in any relevant jurisdiction). For example, this includes responding to the requests of governmental and judicial orders of any competent jurisdiction or sharing the personal information with other enforcement agencies regarding any mandatory requirement; to comply with Attindas Group policies (such as Anti-Bribery policies) or to share information with sick funds or insurance companies; to respond to legal process such as subpoenas or discovery requests, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims (which can be reported through the internal whistleblowing system according to Attindas Whistle-blowing policy);
- (k) carry out any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock. For example, this includes a sale of our assets in connection with a bankruptcy proceeding or an intra-group corporate or business reorganization;
- (l) honor your preferences on direct marketing and for advert targeting purposes. You may receive direct marketing communications on personal care, medical devices, cosmetic and hygiene products and services, which may or may not be personalized for you (i.e., tailored to your profile), by any means (e.g., post, phone call, email, text message or other electronic means) and carry out targeted advertising. For example, whenever you provide us with any personal information (e.g., when you ask for our products or services), you may be asked for your preferences in this respect and provide you with information on the kind of direct marketing available and on whether us and/or a third party may send you such direct marketing or carry out targeted advertising. You may also decide to subscribe to one of our newsletters. To discontinue direct marketing or targeted advertising, you may send a request as explained in section "*What are your rights when you provide personal information?*" below. Furthermore, and regarding direct marketing by electronic means, where required by applicable law, we will obtain your consent inform you in each of our communications how to unsubscribe in a straightforward way and at no cost (other than as related to transmission of your request). We will answer your request as soon as reasonably practicable, and in any case, within the legally determined term (if there is one). Please note that if you do opt-out of receiving marketing-related messages from us, we will still send messages as necessary to fulfill other purposes (such as administrative messages relating to the operation of the product or service).

How Long we Store Your Information

Your personal information is securely stored.

We keep your personal information for 7 years from the end of the last taxation year to which the records relate for the above mentioned purposes a) to j), unless there is a subsisting legal reason that makes us to block and retain the information for a longer period. We will store your personal information indefinitely for statistical analysis and for direct marketing purposes (unless you withdraw your consent).

Information Shared with Third Parties

We may share your personal information with other Attindas entities outside Europe (in particular, our affiliate in the US, Attends Healthcare Products Inc. (8081 Arco Corp Drive, Suite 330, Raleigh NC 27617):

- (a) for the purposes indicated under paragraph "Purposes of the processing".
- (b) if it is necessary to honor your preferences on direct marketing and targeted advertising purposes, i.e., if you have agreed to receiving marketing and targeted advertising; or
- (c) to support us in performing any of the abovementioned purposes (e.g., cloud services providers that provide ICT infrastructure used by us to provide you with a product or service or Group management, administrative and support services, including ICT, finance and accounting support and internal audits). Some of these third party recipients may be located world-wide, including outside of the European Economic Area (EEA), United Kingdom (UK) and Switzerland (such as the US). These countries may provide personal information protection standards that are not necessarily equivalent to those applicable in the EEA, UK and Switzerland (in which case, specific safeguards are adopted by us for personal information originating in the EEA, UK and/or Switzerland such as ensuring the third party is subject to other adequacy finding or enters into a written agreement with us requiring that the third party provides a level of privacy protection equivalent to the one required within the EEA, UK and Switzerland).

Your personal information may also be shared with public authorities for compliance with legal obligations and with third party service providers who assist us in fulfilling the purposes set out above.

6. Personal information collected through our Customer Service

Data Controller

The Data Controller, who determines which personal information is collected, how and for which purposes is the Attindas entity which contracts with you, as identified in the relevant terms and conditions applicable to the sale or purchase of the relevant product or service.

Lawful Basis for Processing

- (a) We have a contractual obligation, for example, when you are a consumer which requests a sample of our products; or has bought one of our products and wants to ask a question or to make a suggestion, recommendation or complaint about them; without your personal information we won't be able to handle your request.
- (b) We have a legal obligation, for example, when you are a consumer and we process your personal information to comply with our obligations related to product warranty; or, for example, when you are a consumer, customer or healthcare professional and process your personal information to investigate an adverse incident with one of our products;
- (c) We have a legitimate interest, for example, when you are a customer and we process the personal information of your employees; or, for example, when you are a sole proprietorship or owner of a pharmacy and we process your contact business information of the contact business information of one of your employees; or, for example, when you are a healthcare professional providing services for sanitary institutions and we process your contact business information.

How Information is collected

We collect your personal information:

- (a) Directly from you, when you are interacting with us, for example information you give us as requested by phone, email, social networks, or detailed in the forms you may be asked to complete.
- (b) Indirectly from other sources, with your prior consent (for example, retail shops or pharmacies which distribute our products where you make a complaint about our products; or healthcare professionals involved on investigations of adverse incidents).

Information Collected

We may collect and process the following personal information:

- (a) Personal identifiers, contacts and characteristics (for example, name and contact details: email, address or telephone);
- (b) Economic transactions (for example, products purchased, price, defects or complaints about the performance of a product);
- (c) Health condition (for example, side effects or health problems (e.g. skin irritation) arising from the use of our products; if you are an user of incontinence products, type of incontinence products used, size).

Purposes of the processing

We use your personal information in order to:

- (a) manage our Customer Service; questions, suggestions, recommendations and complaints; our obligations related with product warranty;
- (b) manage adverse incidents (including investigations and recall of products);
- (c) manage the Quality and Environmental policies of the Company;

(d) comply with our (contractual and legal) obligations or defend our interests in judicial or administrative proceedings (in any relevant jurisdiction). For example, this includes responding to the requests of governmental and judicial orders of any competent jurisdiction or sharing the personal information with other enforcement agencies regarding any mandatory requirement; to comply with Attindas Group policies (such as Anti-Bribery policies) or to share information with sick funds or insurance companies; to respond to legal process such as subpoenas or discovery requests, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims (which can be reported through the internal whistleblowing system according to Attindas Whistle-blowing policy).

How Long we Store Your Information

Your personal information is securely stored.

We keep your personal information for 10 years from the end of the last taxation year to which the records relate unless there is a subsisting legal reason that makes us to block and retain the information for a longer period.

Information Shared with Third Parties

We may share your personal information with other Attindas entities outside Europe (in particular, our affiliate in the US, Attends Healthcare Products Inc. (8081 Arco Corp Drive, Suite 330, Raleigh NC 27617):

- (a) for the purposes indicated under paragraph "Purposes of the processing".
- (b) it is necessary to honor your preferences on direct marketing and targeted advertising purposes, i.e., if you have agreed to receiving marketing and targeted advertising; or
- (c) to support us in performing any of the abovementioned purposes (e.g., cloud services providers that provide ICT infrastructure used by us to provide you with a product or service or Group management, administrative and support services, including ICT, finance and accounting support and internal audits). Some of these third party recipients may be located world-wide, including outside of the European Economic Area (EEA), United Kingdom (UK) and Switzerland (such as the US). These countries may provide personal information protection standards that are not necessarily equivalent to those applicable in the EEA, UK and Switzerland (in which case, specific safeguards are adopted by us for personal information originating in the EEA, UK and/or Switzerland such as ensuring the third party is subject to other adequacy finding or enters into a written agreement with us requiring that the third party provides a level of privacy protection equivalent to the one required within the EEA, UK and Switzerland).

Your personal information may also be shared with public authorities for compliance with legal obligations and with third party service providers who assist us in fulfilling the purposes set out above.

7. Personal information of participants on product evaluation programs

Data Controller

The Data Controller, who determines which personal information is collected, how and for which purposes, is the Attindas entity which contracts with you, as identified in the relevant terms and conditions applicable to the specific product evaluation program, observational study or in-house user test.

Lawful Basis for Processing

Your consent. You are able to remove your consent at any time (see section "*What are your rights when you provide Personal Information?*" below).

How Information is collected

We collect your personal information directly from you, when you voluntarily complete product evaluation questionnaires or interviews.

Information collected

We may collect and process the following personal information:

- (a) Personal identifiers, contacts and characteristics, for example, name and contact details: email, address or telephone;
- (b) Evaluation of products details, for example information about how you tested our products, your satisfaction with our products, proposals for their improvement, information about your health condition (if you are an user of incontinence products, type of incontinence products used or size, how our products may have affected your health –e.g. skin irritation-).

Purposes of the processing

We use your personal information in order to:

- a) evaluate of our products in use to improve them and provide better products to our customers;
- b) compare performance with competitors' products.

How Long we Store Your Information

Your personal information is securely stored.

We keep your personal information for 12 months from the evaluation. After that time they will be deleted or irrevocably anonymized.

Information Shared with Third Parties

We may share your personal information with other Attindas entities outside Europe (in particular, our affiliate in the US, Attends Healthcare Products Inc. (8081 Arco Corp Drive, Suite 330, Raleigh NC 27617):

- (a) for the purposes indicated under paragraph "Purposes of the processing".

- (b) it is necessary to honor your preferences on direct marketing and targeted advertising purposes, i.e., if you have agreed to receiving marketing and targeted advertising; or
- (c) to support us in performing any of the abovementioned purposes (e.g., cloud services providers that provide ICT infrastructure used by us to provide you with a product or service or Group management, administrative and support services, including ICT, finance and accounting support and internal audits). Some of these third party recipients may be located world-wide, including outside of the European Economic Area (EEA), United Kingdom (UK) and Switzerland (such as the US). These countries may provide personal information protection standards that are not necessarily equivalent to those applicable in the EEA, UK and Switzerland (in which case, specific safeguards are adopted by us for personal information originating in the EEA, UK and/or Switzerland such as ensuring the third party is subject to other adequacy finding or enters into a written agreement with us requiring that the third party provides a level of privacy protection equivalent to the one required within the EEA, UK and Switzerland).

Your personal information may also be shared with public authorities for compliance with legal obligations and with third party service providers who assist us in fulfilling the purposes set out above.

8. Personal information processed to provide you (or the person you are caring) with healthcare products at your home or nurse home within the framework of a national (public or private) health insurance system

Data Controller

The Data Controller, who determines which personal information is collected, how and for which purposes, is the Attindas which provides healthcare products to you or the person you are caring.

Lawful Basis for Processing

- (a) We have a contractual obligation with you, for example when you order or purchase our sanitary products or when you request free samples to try any of them; or, with a health insurance company or sick fund, of which you (or the person you care of) are an insured person, to provide you (or the person you care of) with our sanitary products.
- (b) We have a legal obligation to provide you with our sanitary products within the framework of a national (public or private) health insurance system; or to get reimbursed, totally or partially, of the price of the sanitary products provided to you, or the person you care of, within the framework of such national health insurance system;
- (c) We have a legitimate interest to perform our obligations under a contract with a national health insurance system or sick fund, and to get

- reimbursed, totally or partially, of the price of the sanitary products provided to you, or the person you care of, contract;
- (d) Provision of healthcare services, for example, provision of incontinence products to insured persons within the framework of national health insurance system.

How Information is collected

We collect your personal information:

- (a) Directly from you, when you are interacting with us, for example information you give us as requested by phone, email, social networks, or detailed in the forms you may be asked to complete.
- (b) Indirectly from other sources, for example, from the national (public or private) health insurance system or your health insurance company or sick fund; or from the medical doctor which prescribe healthcare products to you or the person you care of.

Information Collected

We may collect and process the following personal information about you or the person you care of:

- (a) Personal identifiers, contacts and characteristics, for example, name and contact details: email, address, telephone, ID number, Social Security number, date of birth, age, sex, antropometric characteristics;
- (b) Social circumstances data (professional status);
- (c) Economic, financial and insurance data (insurance company, insured number, bank data);
- (d) Transaction of goods and services data (orders or purchases of our sanitary products; delivery of our sanitary products);
- (e) Health-related information, for example medical prescriptions received from your medical doctor which we need to forward to your health insurance company or sick fund, if you are an user of our sanitary products, type of incontinence products used, mobility, size, skin problems, etc. when we provide you with our sanitary products).

Purposes of the processing

We use your personal information in order to:

- (a) provide you with sanitary products (e.g. incontinence products) within the framework of a national (public or private) health insurance system.
- (b) get totally or partially reimbursed of the price of the sanitary products provided to you or to the person you care of, from either the health insurance system, your health insurance company or sick fund, you or the person you care of.
- (c) provide you with products or services that you have requested and to manage the contractual relationship with you. For example, to answer your questions or respond to comments submitted to us; to send you information or samples you have requested; to perform and enforce the terms and conditions that govern the product or service (which may include, depending on the product or service, the recording of calls

between us and you to evidence the rendering of the product or service or to identify any breach of the terms and conditions that govern the product or service, for accounting, billing and payment verification purposes, to collect debts, to serve notice of unpaid, due and enforceable debts to solvency files which payment has been requested from you); to award a prize if you are the winner of a competition, to post content you have submitted for publication, to share your personal information with payment processing organizations, to request you to fill in a questionnaire to better understand your circumstances and better assess your needs, etc;

- (d) comply with our (contractual and legal) obligations or defend our interests in judicial or administrative proceedings (in any relevant jurisdiction). For example, this includes responding to the requests of governmental and judicial orders of any competent jurisdiction or sharing the Personal Information with other enforcement agencies regarding any mandatory requirement; to comply with Attindas Group policies (such as Anti-Bribery policies) or to share information with sick funds or insurance companies; to respond to legal process such as subpoenas or discovery requests, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims (which can be reported through the internal whistleblowing system according to Attindas Whistle-blowing policy).

How Long we Store Your Information

Your personal information is securely stored.

We keep your personal information for 7 years (or any longer term required by the local regulations applicable to the relevant national health insurance system) from the end of the last taxation year to which the records relate, unless there is a subsisting legal reason that makes us to block and retain the information for a longer period.

Information Shared with Third Parties

We may share your personal information with other Attindas entities outside Europe (in particular, our affiliate in the US, Attends Healthcare Products Inc. (8081 Arco Corp Drive, Suite 330, Raleigh NC 27617):

- (a) for the purposes indicated under paragraph "Purposes of the processing".
- (b) if it is necessary to honor your preferences on direct marketing and targeted advertising purposes, i.e., if you have agreed to receiving marketing and targeted advertising; or
- (c) to support us in performing any of the abovementioned purposes (e.g., cloud services providers that provide ICT infrastructure used by us to provide you with a product or service or Group management, administrative and support services, including ICT, finance and accounting support and internal audits). Some of these third party recipients may be located world-wide, including outside of the European Economic Area (EEA), United Kingdom (UK) and

Switzerland (such as the US). These countries may provide personal information protection standards that are not necessarily equivalent to those applicable in the EEA, UK and Switzerland (in which case, specific safeguards are adopted by us for personal information originating in the EEA, UK and/or Switzerland such as ensuring the third party is subject to other adequacy finding or enters into a written agreement with us requiring that the third party provides a level of privacy protection equivalent to the one required within the EEA, UK and Switzerland).

Your personal information may also be shared with public authorities for compliance with legal obligations and with third party service providers who assist us in fulfilling the purposes set out above.

What are your responsibilities when you provide us with or allow us access to your personal information?

You must provide accurate personal information and only when you are 18 years of age(*) or over and keep them up-to-date. You must comply with any data protection and privacy legal requirements applicable to you. You must comply with and not disable any security measure of a Website. If you are acting as a (legal or de facto) representative of any legal entity, you must only provide your professional contact details in respect of that legal entity (and never your private contact details).

(*) We do not intend to collect, or direct any personal information collection to, information of individuals under 18 years old, and we request that you do not provide personal information to us.

What are your rights when you provide personal information?

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to information portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at dpc.dataprivacy@attindas.com if you wish to make a request. We will answer your request as soon as reasonably practicable, and in any case, within the term legally determined.

Moreover, where the processing is based on consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

How to complain

You can also complain to your local Data Protection Authority if you are unhappy with how we have used your information:

Country	Data Protection Authority	Website
Austria	Österreichische Datenschutzbehörde	http://www.dsb.gv.at/
Belgium	Commission de la protection de la vie privée Commissie voor de bescherming van de persoonlijke levenssfeer	http://www.privacycommission.be/
Croatia	Croatian Personal Data Protection Agency	http://www.azop.hr/
Czech Republic	The Office for Personal Data Protection - Úřad pro ochranu osobních údajů	http://www.uoou.cz/
Estonia	Estonian Data Protection Inspectorate (Andmekaitse Inspektsioon)	http://www.aki.ee/en
Finland	Office of the Data Protection Ombudsman	http://www.tietosuoja.fi/en/
France	Commission Nationale de l'Informatique et des Libertés - CNIL	http://www.cnil.fr/
Germany	Der Hessische Datenschutzbeauftragte Gustav-Stresemann-Ring 1, 65189, Wiesbaden	https://datenschutz.hessen.de/
		Contact details of Data Protection Authorities of other German States can be found at:

		https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html
Hungary	National Authority for Data Protection and Freedom of Information	http://www.naih.hu/
Ireland	Data Protection Commissioner	http://www.dataprotection.ie/
Italy	Garante per la protezione dei dati personali	http://www.garanteprivacy.it/
Latvia	Data State Inspectorate	http://www.dvi.gov.lv/
Lithuania	State Data Protection	http://www.ada.lt/
Luxembourg	Commission Nationale pour la Protection des Données	http://www.cnpd.lu/
Netherlands	Autoriteit Persoonsgegevens	https://autoriteitpersoonsgegevens.nl/nl
Norway	Datatilsynet The Data Inspectorate	https://www.datatilsynet.no/
Poland	The Bureau of the Inspector General for the Protection of Personal Data - GIODO	http://www.giodo.gov.pl/
Portugal	Comissão Nacional de Protecção de Dados - CNPD	http://www.cnpd.pt/
Romania	The National Supervisory Authority for Personal Data Processing	http://www.dataprotection.ro/
Slovakia	Office for Personal Data Protection of the Slovak Republic	http://www.dataprotection.gov.sk/
Slovenia	Information Commissioner	https://www.ip-rs.si/
Spain	Agencia de Protección de Datos	https://www.aqpd.es/
Sweden	Datainspektionen	http://www.datainspektionen.se/
Switzerland	Data Protection and Information Commissioner of Switzerland Eidgenössischer Datenschutz- und Öffentlichkeitsbeauftragter	https://www.edoeb.admin.ch
United Kingdom	The Information Commissioner's Office	https://ico.org.uk

You May find more information on the following link:
http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

If you have any questions regarding how we process your personal information, or about this Privacy Policy, you can contact our Data Privacy Officer (DPO) by email (dpc.dataprivacy@attindas.com). We will be happy to assist you.