

WRIGHT MEDICAL GENERAL PRIVACY POLICY

INTRODUCTION

Our Privacy Commitment

Wright Medical Group N.V. understands the right to privacy and is committed to keeping all your Personal Data secure.

About this Privacy Policy

This Privacy Policy is an overview of how Wright Medical and its affiliates process personal information about individuals.

The list below sets out what is covered in this Privacy Policy and you can click on the headings below to go to a specific section:

1. **THE TYPE OF INFORMATION WE PROCESS**
2. **WHY WE PROCESS YOUR INFORMATION**
3. **CHILDREN**
4. **DISCLOSURE OF YOUR INFORMATION TO THIRD PARTY**
5. **INTERNATIONAL TRANSFERS OF PERSONAL DATA**
6. **HOW WE SAFEGUARD YOUR INFORMATION**
7. **HOW LONG WE KEEP YOUR PERSONAL DATA**
8. **YOUR RIGHTS**
9. **CONTACT US**
10. **UPDATES TO THIS PRIVACY POLICY**

Scope

This Privacy Policy governs the handling of Personal Data by Wright Medical while carrying on commercial activities.

We use the following definitions in this Privacy Policy:

“Wright Medical”, “we or “us” means Wright Medical Group N.V. and each of its affiliates.

“Personal Data” means any data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, Wright Medical (or its representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Wright Medical or any other person in respect of an individual.

“Processing” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

1. **THE TYPES OF INFORMATION WE PROCESS**

1.1 We may process information about you including, but not limited to:

- General information, such as name, postal and/or email address, phone number, date of birth, job title, and other information such as photographs and digital imagery, payment-related information, government issued identification in accordance with applicable law (e.g.

driving license, passport, professional license number), agreements, your communications preferences; queries you make to Wright Medical;

- Sensitive information, such as health information or reports of an individual end-customer (i.e. concerning product claims and investigations, patient pre and post-operative outcomes for research and statistical purposes in accordance with applicable law); and
- Digital information generated from your use of our websites and mobile applications, such as IP address, geo-localization, device ID and data transmitted via cookies. For more information on the cookies used by Wright Medical please see our Cookie Policy below.

2. WHY WE PROCESSES YOUR INFORMATION

2.1 We may process your Personal Data for purposes including, but not limited to:

- Proceeding with the orders of our products and services;
- Responding to enquiries, and inviting individuals to our events;
- Engaging with healthcare professional and key opinion leaders;
- Conducting surveys and interviews with healthcare professional to help us improve our products;
- Providing information about our products and services;
- Complying with regulatory obligations;
- Improving the content, functionality and usability of our websites;
- Personalising the content of our websites according to the user's interests;
- Managing and administrating our business; and
- Any other purpose identified in applicable Privacy Notices, or other agreement between you and Wright Medical

2.2 Where we process Personal Data, we make sure that we have a lawful basis, including:

- Processing is necessary to perform our contractual obligations with our customers;
- You have provided consent (in which cases, such consent can be withdrawn at any time);
- Processing is necessary to comply with legal and regulatory obligations;
- Processing is necessary to protect the vital interests of an individual;
- Processing is in the public interest;
- Processing is necessary to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- Processing is in Wright Medical's legitimate interests, such as
 - managing and administrating the operation of our business effectively and efficiently;
 - complying with internal policies and procedures;
 - monitoring the use of our copyrighted materials;
 - conducting scientific and statistical research;
 - improving our products and services;
 - enabling quick and easy access to information on Wright Medical products;
 - offering optimal, up-to-date security solutions for mobile devices and IT systems; and
 - obtaining further knowledge of current threats to network security to update our security solutions and provide these to the market.

2.3 In addition to the above, where we process special categories of Personal Data, such as information about individuals' health, religion, ethnicity, genetic and biometric data, sexual orientation or sex life, we shall only do so in accordance with the obligations of the law. We rely on conditions including, but not limited to:

- You have provided explicit consent;

- Processing is necessary for specific rights and obligations related to employment;
- Processing is necessary to protect the vital interests of an individual;
- Processing is necessary for the purposes of provision of healthcare or occupational medicine, pursuant to a contract with a healthcare professional, and
- Processing is necessary for scientific research.

3. **CHILDREN**

3.1 We will not collect personal information for children under the age of 13 without prior, verifiable consent from his or her legal representative.

4. **DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES**

4.1 We may share your Personal Data within the Wright Medical group of companies for the purposes described above.

4.2 We may also share your Personal Data outside of the Wright Medical group for the following purposes:

- With third party agents and contractors for the purposes of providing services to us (for example, IT and communications providers). These third parties will be subject to appropriate data protection obligations and they will only use your Personal Data as described in this Privacy Policy;
- To the extent required by law, for example if we are under a duty to disclose your Personal Data to comply with any legal obligation (including, without limitation, to comply with tax reporting requirements and disclosures to regulators), or to establish, exercise or defend its legal rights;
- If we sell our business or assets, in which case we may need to disclose your Personal Data to the prospective buyer for due diligence purposes; and
- If we are acquired by a third party, in which case the Personal Data held by us about you will be disclosed to the third-party buyer.

5. **INTERNATIONAL TRANSFERS OF PERSONAL DATA**

5.1 Wright Medical is a global business. Our customers and our operations are spread around the world. As a result, we collect and transfer Personal Data on a global basis. That means that we may transfer your Personal Data to locations outside of your country.

5.2 Where we transfer your Personal Data to a country located outside the European Economic Area ('EEA'), we will ensure that it is protected and transferred in a manner consistent with the legal requirements. In relation to data being transferred outside of the EEA, for example, this may be done in one of the following ways:

- The country that we send the data to might be approved by the European Commission as offering an adequate level of protection for Personal Data;
- The recipient might have signed up to a contract based on "model contractual clauses" approved by the European Commission, obliging them to protect your Personal Data;
- Where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme; or

- In other circumstances the law may permit us to otherwise transfer your Personal Data outside Europe.

6. HOW WE SAFEGUARD YOUR INFORMATION

6.1 We have extensive controls in place to maintain the security of our information and information systems. Personal Data is protected with safeguards according to the sensitivity of the relevant information. Industry best practice security controls are in place and monitored on a regular basis. Electronic and physical access to systems where Personal Data is gathered, processed or stored is limited and controlled.

6.2 As a condition of employment, Wright Medical employees are required to follow all applicable laws and regulations, including in relation to data protection law. Access to sensitive Personal Data is limited to those employees who need to know it to perform their roles. Unauthorised use or disclosure of confidential client information by a Wright Medical employee is prohibited by policy and may result in disciplinary measures.

7. HOW LONG WE KEEP YOUR PERSONAL DATA

7.1 How long we will hold your Personal Data for will vary and will be determined by the following criteria:

- The purpose for which we are using it – Wright Medical will need to keep the data for as long as is necessary for that purpose;
- Legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Data.

8. YOUR RIGHTS

8.1 Under the applicable law (e.g. European data privacy law), you may have the following rights:

- The right to obtain information regarding the Processing of your Personal Data and access to the Personal Data which we hold about you;
- The right to withdraw your consent to the Processing of your Personal Data at any time. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason for doing so. For example, we may need to retain Personal Data to comply with a legal obligation;
- In some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided directly to Wright Medical;
- The right to request that we rectify your Personal Data if it is inaccurate or incomplete;
- The right to request that we erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data, but we are legally entitled to retain it;
- The right to object to, or request that we restrict, our Processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our Processing of your Personal Data, but we are legally entitled to refuse that request;

- The right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us; and
- The right to provide instructions regarding the Processing of data after your death.

8.2 You can exercise your rights by contacting us using the details listed in paragraph 9 below.

8.3 If you prefer not to receive promotional information by email from Wright Medical, you can click on unsubscribe links below or contact wright.international@wright.com.

[Unsubscribe <https://mywrightinternational.com/preferences.php>.]

9. CONTACT US

9.1 If you have any questions about this Privacy Policy, or to obtain more information about Wright Medical's handling of your Personal Data, please contact our Privacy Officer using the following contact information:

Address: International Headquarters
Fraser House, 56 Kingston Road,
Staines-upon-Thames, TW18 4NL, UK

Email Address: dataprotection@wright.com

9.2 We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive from our Privacy Officer, you may escalate concerns to the applicable privacy regulator in your jurisdiction. Upon request, Wright Medical's Privacy Officer will provide you with the contact information for that regulator.

10. UPDATES TO THIS PRIVACY POLICY

10.1 We may change this Privacy Policy at any time. Any changes will become effective when we post the revised Privacy Policy on this website. Your use of our services following these changes means that you accept the revised Privacy Policy. We recommend that you regularly review the Privacy Policy when you visit our website.

10.2 This policy was last updated in May 2019.

Cookie policy

1. What is a cookie?

Cookies are small text files of letters and numbers that a website may place or store on your computer or mobile device when you visit a site or page.

When navigating on Wright Medical's websites, cookies may be placed on your computer or mobile device.

You have the right reconsider your decision at any time.

2. Types of cookies

First-party cookies: These cookies are set by the website you're visiting (e.g. www.wright.com)

Third-party cookies: These cookies are set by someone other than the owner of the website you're visiting.

Session cookies: These cookies only last as long as your online session and disappear from your computer or device when you close your browser (like Internet Explorer or Safari).

Persistent cookies: These cookies stay on your computer or device after your browser has been closed and last for a time specified in the cookie.

Strictly necessary cookies: These cookies let you use all the different parts of the Wright Medical website. Without them, services that you've asked for can't be provided.

Functional cookies: These cookies help us personalise the service to you by remembering your preferences and settings.

Performance cookies: These cookies help us make sure that the website is working properly and fix any errors. Also, they let us understand how you use our website.

The following cookies are cookies used on our website:

Name of the cookie	Third Party Provider	Functionality
last_username	N/A	This cookie remembers last username signed into website.
PHPSESSID	N/A	This cookie is used to maintain user session variables.
BE_CLA3	N/A	This cookie keeps track of visitor preferences. It is a persistent cookie.
wp-settings-time-1	N/A	This cookie recognizes logged in users.
__utma	Google Analytics	This cookie keeps track of the number of times a visitor has been to the site, when their first visit was, and when their last visit occurred. It is a persistent cookie.
__utmb __utmc	Google Analytics	The B and C cookies are brothers, working together to calculate how long a visit takes. __utmb takes a timestamp of the exact moment in time when a visitor enters a site, while __utmc takes a timestamp of the exact moment in time when a visitor leaves a site. __utmb expires at the end of the session. __utmc waits 30 minutes, and then it expires.

__utmt	Google Analytics	This cookie is used to throttle the request rate – limiting the collection of data on high traffic sites. It expires after 10 minutes.
__utmz	Google Analytics	This cookie keeps track of where the visitor came from, what search engine they used, what link they clicked on, what keyword they used, and where they were when accessed the site. It expires in 6 months.
_gat _gid _ga	Google Analytics	These cookies are used to distinguish users.
_atuvc	AddThis	This cookie gathers visitor statistics.
_cfduid	CloudFlare	This cookie identifies different users behind a shared IP address.
_pk_id.14.179f, _pk_ref.14.179f, _pk_ses.14.179f	Piwik/MedOK	These cookies are used to distinguish unique users by assigning a randomly generated number as a client identifier.

3. Your agreement to the use of cookies

The use of cookies is subject to your agreement. You accept the use of cookies by pursuing your navigation after your first entrance on the website, but you can change your settings at any time.

4. How can I control or delete cookies?

In relation to our website, most browsers are initially set up to automatically accept cookies that are placed on your computer or mobile device when you use websites. You can change the settings on your browser to block cookies or to alert you when cookies are being set on your computer or mobile device. You can also delete cookies stored on your computer or mobile device through your browser.

Please refer to your browser instructions or Help screen to learn more about how to adjust or modify your browser settings. You will find below the Help pages of the commonly used navigators:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Safari](#) (on your mobile, see this [page](#))
- [Opera](#)

You can also activate the parameter “Do not track” on your browser to send a code stating that you do not wish to be tracked:

- [Internet Explorer 11](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Safari](#)
- [Opera](#)

For opting-out cookies placed by Google Analytics, you can also install the following add-on on your usual) navigator (Microsoft Internet Explorer 11, Google Chrome, Mozilla Firefox, Safari or Opera): <https://tools.google.com/dlpage/gaoptout?hl=en-GB>

Please note that parts of our websites may not function correctly if you disable the cookies.