

MyFreeStyle App Privacy Notice

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I. What is MyFreeStyle App?

MyFreeStyle App is a mobile application (the “**MyFreeStyle App**”) that provides information and services related to your wellbeing (all together, the “**Services**”). The MyFreeStyleApp uses data to provide insights and coaching about your wellbeing. As part of the Services, these insights and coaching may involve sending you communications via push notifications, and involve the use of integrated algorithms and artificial intelligence to provide a personalized experience.

The Services are provided by Abbott Diabetes Care Inc. (“**Abbott**”, “**us**”, “**we**”, “**our**”) and is powered by Abbott’s vendor, Sweetch Health Ltd. (“**Sweetch**”), including Sweetch’s automated personalization and coaching technology (“**Sweetch Coaching Services**”).

II. What Does this Privacy Notice Cover?

This Privacy Notice explains our practices related to “**Personal Information**” collected through the Services. Personal Information is information that identifies or relates to you as an individual or could be used to reasonably identify you. Note that Sweetch, as Abbott’s vendor powering the MyFreeStyle App, collects Personal Information through the Services, including in relation to App Permissions (more information in Section VI) and the Sweetch Coaching Services.

You can only use the Services if you are over 18 years old. Each user is required to confirm their age. If you think your child is using the Services, please contact us using the details below in Section XIII.

We may update this Privacy Notice from time to time. If material changes to the Privacy Notice are made, we will reasonably notify you through appropriate means, subject to applicable law.

III. How Do We Collect Your Personal Information?

We may collect Personal Information that you provide when you use our Services, engage with customer service on phone calls and any other way that you may interact with us. We may also collect Personal Information from another source provided by you like the device you use to access the MyFreeStyle App.

Sweetch provides us Personal Information it collects through the MyFreeStyle App, such as user demographics and sensor details.

We may collect Personal Information in collaboration with a Partner Integration (see Section VIII), such as if you connect the MyFreeStyle App to an integrated fitness tracker app.

We also may collect inferences drawn from your Personal Information.

IV. What Personal Information Do We Collect and How Do We Use It?

Abbott may collect, use, and disclose the following types of Personal Information.

Categories of Personal Information we may collect, use, or disclose	Purposes for collection, use, and disclosure	Categories of recipients to whom Personal Information may be disclosed
Identifiers , including name, email address, mailing address, online identifier, phone number, or other similar identifiers.	Provide and customize the Services, customer service and support, manage and send transactional communications, marketing purposes, conduct research, product development and data analysis, prevent fraud and comply with the law, draw inferences reflecting your preferences.	Analysis firms, advertisers, customer service and support providers, email, IT services and SMS vendors, web hosting and development companies, and fulfillment companies, professional consulting firms, auditors, accountants, and legal services firms.
Customer records , such as name, address, phone number, or medical information.	Provide and customize the Services, customer service and support, manage and send transactional communications, marketing purposes, conduct research, product development and data analysis, prevent fraud and comply with the law, draw inferences reflecting your preferences.	Analysis firms, advertisers, payment processing companies, customer service and support providers, email, IT services and SMS vendors, web hosting and development companies, and fulfillment companies, professional consulting firms, auditors, accountants, and legal services firms.
Characteristics of protected classifications , including age and date of birth, gender, and medical condition or diagnosis.	Provide and customize the Services, customer service and support, manage and send transactional communications, marketing purposes, conduct research, product development and data analysis, prevent fraud and comply with the law, draw inferences reflecting your preferences.	Analysis firms, email, IT services and SMS vendors, professional consulting firms, auditors, accountants, and legal services firms.
Commercial Information , including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Provide and customize the Services, customer service and support, manage and send transactional communications, marketing purposes, conduct research, product development and data analysis, prevent fraud and comply with the law, draw	Analysis firms, advertisers, payment processing companies, customer service and support providers, professional consulting firms, auditors, accountants, and legal services firms.

<p>Internet or other electronic network activity information, including device ID and information on your interaction with the Services.</p>	<p>inferences reflecting your preferences. Provide and customize the Services, customer service and support, manage and send transactional communications, marketing purposes, conduct research, product development and data analysis, prevent fraud and comply with the law, draw inferences reflecting your preferences.</p>	<p>Analysis firms, advertisers, email, IT services and SMS vendors, web hosting and development companies, and fulfillment companies, professional consulting firms, auditors, accountants, and legal services firms.</p>
<p>Audio, electronic, visual, or similar information, including audio recordings of customer care calls.</p>	<p>Provide and customize the Services, customer service and support, manage and send transactional communications, conduct research, product development and data analysis, prevent fraud and comply with the law, draw inferences reflecting your preferences.</p>	<p>Customer service and support providers, professional consulting firms, auditors, accountants, and legal services firms.</p>
<p>Geolocation data, including precise geolocation information based on App Permissions (as described in Section VI). This may be considered sensitive under certain applicable laws.</p>	<p>Provide and customize the Services, customer service and support, manage and send transactional communications, marketing purposes, conduct research, product development and data analysis, prevent fraud and comply with the law, draw inferences reflecting your preferences.</p>	<p>Analysis firms, advertisers, email, IT services and SMS vendors, web hosting and development companies, and fulfillment companies, professional consulting firms, auditors, accountants, and legal services firms.</p>
<p>Inferences, used to create a profile reflecting your preferences, characteristics, predispositions, behavior and attitudes. This may be considered sensitive under certain applicable laws.</p>	<p>Provide and customize the Services, customer service and support, manage and send transactional communications, marketing purposes, conduct research, product development and data analysis, prevent fraud and comply with the law, draw inferences reflecting your preferences.</p>	<p>Professional consulting firms, auditors, accountants, and legal services firms.</p>
<p>Personal Information collected and analyzed concerning a consumer's health, such as prescriptions, doctor appointments, and health conditions. This may be considered sensitive under certain applicable laws.</p>	<p>Provide and customize the Services, customer service and support, manage and send transactional communications, marketing purposes, conduct research, product development and data analysis, prevent fraud and comply with the law, draw inferences reflecting your preferences.</p>	<p>Customer service support providers, professional consulting firms, auditors, accountants, and legal services firms.</p>

<p>Your interactions with the Services, including information you submit to the MyFreeStyle App, such as logs of your food intake, exercise, sleep, stress level, weight, height, energy, and mood levels.</p> <p>This may be considered sensitive under certain applicable laws.</p>	<p>Provide and customize the Services, customer service and support, manage and send transactional communications, marketing purposes, conduct research, product development and data analysis, prevent fraud and comply with the law, draw inferences reflecting your preferences.</p>	<p>Customer service and support providers, email, IT services and SMS vendors, professional consulting firms, auditors, accountants, and legal services firms.</p>
<p>Sensor information, such as Sensor ID product type, and Sensor error information.</p> <p>Some Sensor information may be considered sensitive under certain applicable laws.</p>	<p>Provide and customize the Services, customer service and support, manage and send transactional communications, marketing purposes, conduct research, product development and data analysis, prevent fraud and comply with the law, draw inferences reflecting your preferences.</p>	<p>Customer service and support providers, email, IT services, professional consulting firms, auditors, accountants, and legal services firms.</p>

We may use, as permitted by applicable law, any of the categories of Personal Information listed above for our internal business purposes, such as data analysis, audits, developing new products, enhancing the Services, identifying usage trends and determining the effectiveness of our promotional campaigns.

At your direction, we may disclose your Personal Information to partners or other organizations with which we jointly develop and/or promote the Services.

We may, as permitted by applicable law, aggregate, anonymize and/or de-identify data we collect and use it for any purpose, including product and service development and improvement activities. We may also combine information we gather about you on the Services with our offline records, as well as records provided by third parties. We use this consolidated information to help us better design products and services, to communicate information to you, to enhance our marketing and research activities, to serve you more relevant advertising and for other purposes, as disclosed to you from time to time.

V. Disclosures of Personal Information

In addition to the recipients we describe in Section IV, we disclose Personal Information, including at your direction, and with your consent (if required by applicable law), with:

- Vendors, such as those that provide, maintain, host, support and facilitate your use of the Services. For instance, we disclose your Personal Information with vendors to send you communications such as surveys.
- Affiliates, such as to assist us with providing the Services and for marketing communications.
- Integrated Partners, as described in Section VIII.
- Others, where we are legally required to or permitted to do so or to protect our rights or the rights of others. For instance, to: respond to requests from any competent law enforcement body, regulatory or government agency, court or other third-party where we believe the disclosure is necessary or appropriate; comply with a regulatory requirement, judicial

proceeding, court order, government request or legal process served on us; protect the safety, rights or property of our customers, the public, us or others; exercise, establish or defend our legal rights or where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Privacy Notice; as evidence in litigation in which we are involved; as part of a business transaction such as a merger or acquisition.

We also disclose Personal Information to Sweetch so that Sweetch can provide the Sweetch Coaching Services. Additionally, we disclose Personal Information to Sweetch to be de-identified, in which case the data has been removed of any identifying information to the extent that it is not possible to re-identify an individual, subject to applicable law. Sweetch uses de-identified data to improve its automated technologies, which in turn improves the Sweetch Coaching Services available through the MyFreeStyle App.

VI. App Permissions

Depending on your device or application permission settings, the MyFreeStyle App, powered by Sweetch, may collect information from the devices you use to access the MyFreeStyle App such as motion information (based on your device's motion measurements), approximate and precise geolocation (based on your device's location technology), calendar (based on your device's calendar), and connection to device-based apps, such as Apple and Google Health.

If you do not consent to the MyFreeStyle App's collection of App Permissions, this may impact Sweetch's ability to provide the Sweetch Coaching Services, including certain functionality of the MyFreeStyle App.

VII. How Long is My Personal Information Retained For?

We keep Personal Information for as long as is necessary for the purposes described in this Privacy Notice. This generally means holding the information for as long as one of the following apply:

- Your Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information
- Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected
- We are otherwise required or permitted to keep your Personal Information by applicable laws or regulations

To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the data; the potential risk of harm from unauthorized use or disclosure of the data; the purposes for which we process the data and whether we can achieve those purposes through other means; and the applicable legal requirements.

VIII. What Security Measures Are Put in Place to Protect Personal Information?

We have implemented administrative, technical and physical safeguards to protect your Personal Information from unauthorized or unlawful access, accidental loss, destruction, damage, misuse, disclosure and alteration, including the use of cryptographic technologies. We restrict access to Personal Information by its employees on a need-to-know basis proportional to the sensitivity of the data.

IX. Privacy Rights and Choices

Depending on your state of residency, you may have certain rights related to the Personal Information that we have collected about you, as described in this section. We will comply with your request as soon as reasonably practicable, subject to legal requirements. Requests to exercise your rights may be granted in whole, in part, or not at all, depending on the scope and nature of the request and applicable law.

Once you have submitted your request, we will respond within the time frame permitted by the applicable U.S. state law. To help protect the security of your Personal Information, we will need to verify your identity in connection with any requests. We may contact you by email to verify your request. Depending on your request, we may ask you for information such as your name, an email address, or phone number that you have used with us. We take steps to ensure that only you or your authorized representative can exercise rights with respect to your Personal Information. If you are an authorized agent making a request, we may require and request additional information to protect the Personal Information entrusted to us, including information to verify that you are authorized to make that request.

There may be situations where we cannot grant your request, for example, if you make a request for access and we cannot verify your identity, we will not be able to comply with the request. We may also be unable to comply with your request to delete if we have a legal or regulatory obligation to keep your Personal Information, such as when you participate in scientific research. Other reasons your request may be denied are if it jeopardizes the privacy of others or would be impracticable to honor. Where we deny your request in whole or in part, we will take steps to inform you of the denial and provide an explanation of our actions and the reasons for the denial.

If you have a registered account on the Services, you may exercise some of these rights through your account or profile settings and preferences. Generally, you may also exercise your rights to your Personal Information by submitting your requests via our [Privacy Web Form](#).

We will not discriminate against you if you exercise your rights as described in this Privacy Notice. Please note, certain choices may affect our ability to deliver the Services.

Right to Confirm, Know, or Access: You have the right to confirm that we process your Personal Information, know details concerning that processing, and to access your Personal Information.

This right covers information regarding:

- Your Personal Information confirmed to be processed by us
- Our purposes for processing your Personal Information
- The categories of Personal Information we disclose to external parties
- The categories of external parties to which we disclose your Personal Information

You also have the right to obtain your Personal Information in a transportable format.

Right to Correct Personal Information: You may request that we correct Personal Information that we maintain about you if you believe such Personal Information is inaccurate. Upon receipt of a verifiable request to correct inaccurate Personal Information, we will use commercially reasonable efforts to correct the information as you direct.

Right to Request Deletion of Personal Information: You may request that we delete your Personal Information. Please note that we may retain certain Personal Information as permitted by applicable law.

Right to Limit the Processing of Sensitive Personal Information: You may request that limit the use, disclosure, or processing of sensitive Personal Information, including withdrawing consent or opting out of our processing of your sensitive Personal Information. Please note that we may retain certain Personal Information as permitted by applicable law. To submit a request for this right, use our [Privacy Web Form](#).

Opt-Out Rights: We do not process Personal Information for the purposes of selling (for monetary or nonmonetary exchange of benefit) or sharing for cross-context behavioral or targeted advertising.