CardioGuide™ HF App
PRIVACY NOTICE
Version Date: August 7, 2026

Abbott Laboratories provides the CardioGuide™ mobile application ("**App**") for the CardioMEMS™ HF System (a wireless sensor implanted in your pulmonary artery that measures your PA pressure and heart rate). For purposes of this Privacy Notice, the "**Services**" are the App and related Abbott controller activities described in this Privacy Notice. In this Privacy Notice, "**Abbott**," "**we**," "**us**," and "**our**" refer to Abbott Laboratories and, where applicable, the Abbott affiliate identified in the **+COUNTRY SPECIFIC PROVISIONS** section for your country or region.

The App exchanges information with the Merlin.net™ Patient Care Network Heart Failure ("**Merlin.net HF**"). Your healthcare provider (doctors, healthcare professionals and clinics together **"Healthcare Provider"**) has entered into an agreement with Abbott for Merlin.net HF, which holds information about your CardioMEMS™ HF System and heart condition. Your Healthcare Provider uses Merlin.net HF to monitor your pulmonary artery pressure ("**PA**") and heart rate and to provide medical treatment, intervention messages and other information through the App. Your Healthcare Provider is the controller of your personal information when it uses Merlin.net HF to provide medical care to you, and Abbott generally processes that personal information as your Healthcare Provider's processor.

We recognise the importance of data protection and privacy and are committed to protecting personal information (also referred to as "personal data" in some jurisdictions), including health-related information. This Privacy Notice describes how your personal information is collected and used by Abbott when Abbott acts as a controller in connection with the Services. It also includes limited information about how the App interacts with Merlin.net HF so that you can understand the relationship between Abbott and your Healthcare Provider.

Please read this Privacy Notice carefully before registering to use the App as it applies to the processing, transfer and storage of your personal information, including health-related data by Abbott and certain affiliated companies as described below. It also applies to the processing of your personal information by our affiliated companies and by our processors if required to address a customer service issue related to the Services.

This Privacy Notice does not apply to personal information processed or collected by other Abbott affiliates or subsidiaries or via other methods, such as other Abbott websites and other Abbott customer call centers. It also does not replace privacy information that your Healthcare Provider gives you about its use of Merlin.net HF as controller to provide medical care.

YOUR CONSENT IS GRANTED AT YOUR FREE WILL AND, WHERE APPLICABLE, YOU ARE NOT UNDER ANY LEGAL OBLIGATION TO PROVIDE PERSONAL INFORMATION TO ABBOTT.

+About Us

Abbott is the manufacturer of the CardioMEMS™ HF System. The CardioMEMS™ HF System is indicated for wirelessly measuring and monitoring PA pressure and heart rate in heart failure patients. Abbott, through its local affiliate, is the provider of Merlin.net HF to your Healthcare Provider.

Your Healthcare Provider is a controller of your personal information for the purposes of providing your medical care. Your Healthcare Provider is responsible for how such personal information is processed and for ensuring that personal information processed through Merlin.net HF for your medical care complies with applicable privacy and data protection laws. The reference to 'controller' is based on its definition in the data protection laws of the UK.

Abbott is a controller of personal information when we use personal information to: (1) provide and operate the App and administer your App account and login; (2) comply with legal obligations, including those related to medical device safety, quality and improvement; and (3) conduct research and statistical analysis for limited purposes, using anonymised information where possible and otherwise using personal information only where Abbott has a lawful basis to do so. For further information see ***+Abbott's Own Use of Your Personal Information***.

You may learn more about how your Healthcare Provider and Abbott uses personal information collected through Merlin.net HF at https://www.cardiovascular.abbott/int/en/policies/hf-policies.html.

+About the Services and Merlin.net HF

Merlin.net HF is a cloud-based remote care system that holds information transmitted from your CardioMEMS™ HF System. Your Healthcare Provider uses Merlin.net HF as controller to monitor your PA and heart rate and, based on those readings, to communicate with you through the App, including by providing treatment instructions, medication adjustments and other information. Abbott generally processes personal information in Merlin.net HF as your Healthcare Provider's processor when it supports your Healthcare Provider's monitoring and treatment activities.

To submit or receive information through the App, you must keep your mobile device connected to WiFi or to cellular/mobile data. Before you can use the App, your Healthcare Provider must register you on Merlin.net HF. To register to use the App, you will need to enter some of your personal information, such as your date of birth, CardioMEMS™ HF System serial number, email address, and telephone number.

After you have registered to use the App, you will be prompted to allow push notifications. You must enable these notifications if you want to receive messages and medication change notifications from your Healthcare Provider through the App. The App also enables you to receive medication notifications and CardioMEMS™ HF System historical pulmonary artery pressure readings and other information you provide to the App. Please keep notification on to receive status updates and reminders. You may also use the App to submit information, such as blood pressure and weight, which will be communicated to your Healthcare Provider.

Some personal information, such as account registration details, your CardioMEMS™ HF System serial number, and information needed to transmit and receive information through the App, is required to provide the Services. Other information, such as information from a mobile health data platform, optional App preferences, and information you choose to submit through the App, may be optional. If you do not provide required information, Abbott may not be able to provide the App or certain App features and Services. If you do not provide optional information or if you disable sharing or notifications, some App features may not be available, and your healthcare provider may have less information to support remote monitoring.

The Services are intended to support your Healthcare Provider's review of information from your CardioMEMS™ HF System and the App. Abbott does not use your personal information for automated decision-making, including profiling, that produces legal effects concerning you or similarly significantly affects you. Decisions about your medical care are made by your Healthcare Provider.

+Collection and Processing of Your Personal Information

The following categories of your personal information are processed through the App:

- full name (required);
- date of birth (required);
- CardioMEMS™ HF System serial number (required);
- email address and/or phone number (required);
- App password (required);
- PA pressure readings from your CardioMEMS™ HF System;
- PA pressure goals and thresholds from your Healthcare Provider;
- systemic blood pressure readings and body weight (provided by you manually or automatically from your mobile health data platform, such as Apple Health);
- medication list from your Healthcare Provider;
- treatment plans from your Healthcare Provider;
- messages from your Healthcare Provider, such as a proposed change in medication;
- messages to remind you to take a PA pressure reading and/or to take medication;
- acknowledgements of receipt of messages and medication change notifications;
- other information from Merlin.net HF your Healthcare Provider chooses to share with you;
- App preferences and settings; and

- information about the App performance, including crash reports.

As listed above, Merlin.net HF uses additional personal information, including health-related data that your Healthcare Provider inputs when creating a Merlin.net HF patient profile for you, which may be displayed to you through the App. That personal information displayed in the App may include your PA readings from your CardioMEMS™ HF System. Abbott may need to access this personal information as your Healthcare Provider's processor to support Merlin.net HF and related services, and as controller where necessary to provide, maintain and secure the App and for the limited purposes described in ***+Abbott's Own Use of Your Personal Information***.

The App also may receive certain personal information from a mobile health data platform that is connected with the App via a mobile device application, such as Apple Health, when you consent to that sharing. For example, you may choose to share systemic blood pressure and weight information you store in Apple Health with the App. You are not required to share personal information with the App from such applications, and you may choose the personal information shared and/or withdraw your consent for the sharing at any time by changing the settings in the relevant application or on your mobile device. Abbott will continue to process in accordance with this Privacy Notice the personal information you chose to share from other mobile device applications, such as Apple Health, the App received before you withdrew consent for the sharing. Any withdrawal of consent will not affect the lawfulness of the processing based on your consent before the withdrawal. Abbott will process information shared via a mobile health data platform only for the purposes described in this Privacy Notice and, where applicable, in accordance with the permissions you select in the relevant application or device settings.

+Your Healthcare Provider's Use of Your Information

Your Healthcare Provider will collect your personal information as part of your medical treatment and will input your information into Merlin.net HF. Your Healthcare Provider uses Merlin.net HF and information you submit through the App to help monitor your CardioMEMS™ HF System and your PA pressure and heart rate. This provides your Healthcare Provider with the type of information that may result in them adjusting your treatment or asking you to come in for an appointment.

Your Healthcare Provider processes your personal information for the following purposes:

- to provide medical care, including on-going medical treatment by monitoring your CardioMEMS™ HF System and your PA pressure and heart rate to assist them to provide you with medical care;

- to grant Abbott access to your personal information to provide technical support for Merlin.net HF and the App, including to receive technical and clinical support, such as assistance with debugging, upgrading or troubleshooting Merlin.net HF or the App or interpreting data; and

- where otherwise required by applicable law.

+Abbott's Access to Personal Information When Providing Merlin.net HF services to Your Healthcare Provider

When we provide Merlin.net HF and related support services to your Healthcare Provider, we process your personal information as a processor on behalf of your Healthcare Provider. Such processing is on the instructions of your Healthcare Provider and relates to the following purposes:

- provide Merlin.net HF and related services for your Healthcare Provider to monitor your CardioMEMS™ HF System and your PA pressure and heart rate;

- provide your Healthcare Provider with technical and clinical support, such as assistance with debugging, upgrading or troubleshooting;

- transmit messages from your Healthcare Provider or clinic to you or from you to your healthcare provider; or

- where authorised by your Healthcare Provider, obtain access to your health information to assist them with interpreting data transmitted from your CardioMEMS™ HF System.

Depending on your location, we may provide support services to your Healthcare Provider from locations in: Belgium; other European locations, particularly if we have operations in your country of residence; or our other support centres located in the United States of America and/or Belgium. We may also use other third parties to provide technical or clinical support to your Healthcare Provider. Where we use any third party to help us provide support services to your Healthcare Provider, we put in place adequate measures to safeguard the confidentiality, integrity and security of your personal information.

The reference to 'processor' is based on its definition in the data protection laws of the UK.

+Abbott's Use of Your Personal Information

Abbott processes your personal information, including your health-related personal information, as a controller for the following purposes:

- to provide and operate the App in accordance with the App End User License Agreement, including administering App registration, login/authentication, App functionality and App security (however, this does not include Abbott's processing described above as a processor for your Healthcare Provider);

- to keep a record of your contact with Abbott when you contact Abbott directly regarding the App or Services;

- where required by applicable laws governing the use and classification of medical devices, including for the purposes of medical device post-market surveillance, quality management, including product development and improvement, safety, performance, and vigilance;

- to contact you for operational and service-related purposes through the App, push notifications, email, by phone messaging (e.g., SMS messaging), or other channels, including to provide service updates, transmission status notices, safety-related information, and support communications, with your consent where required by applicable law;

- to pseudonymise, aggregate and/or anonymize the personal information, where permitted by applicable law, for purposes described in this Privacy Notice;

- for other purposes with your consent, where permitted by applicable law and as described to you when your consent is requested;

- where necessary to establish, exercise or defend legal claims; and

- as otherwise required by applicable law.

Abbott may use anonymized information for Abbott's business, research, product development, analytics, reporting, and other lawful purposes. Such uses may include developing and improving the App, the Services, and the CardioMEMS™ HF System, and related Abbott products and services, including algorithms and technologies such as artificial intelligence and machine learning; analysing how the App, the Services, the CardioMEMS™ HF System, and related Abbott products and services are used, operate, and correlate to certain results and outcomes, including by age group or other demographic categories; research and development as further described below, reporting to Healthcare Providers; and other purposes permitted by applicable law. Where information has been de-identified, pseudonymised, or aggregated but remains capable of identifying you, Abbott will process it only for the purposes described in this Privacy Notice and only where Abbott has an applicable lawful basis. Where required by applicable law, Abbott will obtain your consent before using health-related personal information for research, development, analytics, or similar secondary purposes.

Where Abbott conducts research or statistical analysis relating to the Services, Abbott will use anonymised information where possible. Where research requires the use of personal information that

has not been anonymised, Abbott will apply appropriate safeguards and rely on the lawful basis and special-category condition described in the ***+Research*** and ***+UK*** sections, or request consent where required by applicable law.

Apart from the controller processing described above, Abbott may only use your data for other purposes if you have consented for Abbott to do so or where another lawful basis applies.

The reference to 'controller' is based on its definition in the data protection laws of the UK.

+Data Storage

We receive data transmitted by the App before it is then stored. Personal information processed through the App and Merlin.net HF is stored either on premises in the United States of America or in a regional deployment in Europe, depending on the location of your Healthcare Provider. If your Healthcare Provider is located in the United States of America or in countries outside of the EEA, the UK or Switzerland, personal information will be stored on servers in the United States of America. For the UK, personal information will be stored either in a regional deployment in the EU (if your Healthcare Provider has agreed to store information in this deployment) or on servers in the United States of America.

For French users, Microsoft Azure is certified by the French agency for digital health, the Agence du Numérique Santé to host health-related information. Personal information transmitted to Merlin.net HF may be hosted in the country closest to your Healthcare Provider's country location or otherwise in accordance with the data storage and privacy requirements of your Healthcare Provider's location.

When your personal information is transmitted and hosted on Merlin.net HF servers in a country other than the country location of your Healthcare Provider or your country of residence, it may become subject to the laws of the host country, which may not be equivalent to the laws of the country of your healthcare provider or your country of residence. Abbott has implemented appropriate security measures and controls to protect your personal information. For more information about our global server locations and on which servers your personal information, including health-related information, is stored, please contact your healthcare provider.

See also ***+Security of Personal Information*** and ***+Cross-Border Transfers of Personal Information***.

+Medical Devices and other Legal Requirements

Abbott may use personal information where legally required and where possible we will de-identify, pseudonymise, aggregate and/or anonymise information to comply with our legal obligations as a medical device manufacturer. This information is securely held by Abbott and will not be used to identify you individually by your name or email address, except where we are under a legal obligation to include this information. Where such use of personal information is subject to legal requirements, we do not require consent.

The legal requirements for which Abbott will use this information are:

- to ensure the ongoing safety of a CardioMEMS™ HF System and any future development;
- to monitor and improve the quality, security and effectiveness of medical devices and systems;
- to validate upgrades, and to keep Merlin.net HF and/or the App safe and secure;
- to perform broader analysis to detect systemic issues for public interest in the area of public health;
- where required by applicable laws governing medical devices, to perform device development, validation or testing necessary to comply with those laws; and
- where otherwise required by law, including to respond to any competent regulatory, law enforcement body, governmental authorities, to address national security or epidemics, judicial proceeding, court order, government request or legal process served on us, or to protect the safety, rights, or property of our customers, the public, Abbott or others, and to exercise, establish or defend Abbott's 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, or as evidence in litigation in which we are involved.

We use the terms 'de-identify' and 'pseudonymise' interchangeably. Pseudonymised data is personal information that can no longer be attributed to a specific individual without the use of additional information kept separately. Anonymised data is information that does not relate to an identified or identifiable and from which a person cannot be identified; this kind of data usually falls outside data protection and privacy laws.

For more information about GDPR, please see **+UK** below.

+Research

Abbott conducts research and statistical analysis for limited purposes using anonymised information where possible. Where information has not been anonymised and remains personal information, Abbott uses the minimum information necessary and applies appropriate technical and organisational safeguards, including pseudonymisation where appropriate. Where research involves health-related personal information, Abbott will rely on your consent where required by applicable law, unless another lawful basis is available. Where research involves personal information that is not health-related, Abbott may rely on its legitimate interests where permitted by applicable law.

If a data set is used for research purposes, the data will not include your name, address, phone number, or email address. Data used in research may include the CardioMEMS™ HF System serial number, intervals between implant date and subsequent visit dates, implant date, and demographics such as place of residence and age. Where any research data remains personal information, Abbott will apply appropriate safeguards as described in this Privacy Notice.

We conduct research and statistical analysis for the following purposes:

- to improve the quality, security and effectiveness of our cardiac and medical devices and systems and to allow for the development of innovative and effective treatment of heart-related conditions in the interests of public health;
- to conduct research, for statistical purposes and analysis and to disclose to third party researchers, health care entities or professionals, or public health authorities;
- to evaluate the effectiveness of the App, Merlin.net HF and our medical devices and how they are provided and used;
- to validate the App's and Merlin.net HF's functionality and upgrades, including monitoring and improving the safety and security of such services;
- to research, develop and test medical devices, including new and existing features and functionality and to test and improve the App, Merlin.net HF and our medical devices for product development, data analysis, statistical and survey purposes; and
- for public interest in the area of public health, including where the App, Merlin.net HF and medical devices are eligible for medical reimbursement or are otherwise entitled to social security, insurance or public funding.

Where Abbott relies on your consent to process health-related personal information for a specific research activity, you can withdraw that consent at any time by contacting us. Any withdrawal of consent will not affect the lawfulness of the processing based on your consent before the withdrawal. If you withdraw consent, Abbott will stop processing personal information that relates to that consent unless Abbott has another lawful basis to continue processing, such as described in ***+Medical Devices and other Legal Requirements*.** This does not affect Abbott's use of information that has been anonymised so that it no longer identifies you.

If you are ever asked to participate in a clinical trial, and where required by applicable law, you will be asked to provide a separate informed consent to the research site prior to taking place in any such trial and your participation is completely voluntary. The research in this section does not relate to participation in a clinical trial. For more information about GDPR, please see **+ UK** below.

+Retention of Personal Information

Information collected from your CardioMEMS™ HF System will be retained for a maximum period of seven (7) years from the date of your most recent transmission (that is, the date you last use your CardioMEMS™ HF System and/or the App), except as may be required by law. Other personal information, such as account registration details, App preferences and settings, support records, manually entered information, information from a mobile health data platform, and App performance information, will be retained for as long as necessary for the purposes described in this Privacy Notice, including to provide the Services, maintain security, respond to support requests, comply with legal obligations, resolve disputes, and establish, exercise or defend legal claims.

The section ***+Deleting Your Information*** explains how you can arrange to have your Healthcare Provider delete your information from the Merlin.net Patient Care Network Heart Failur.

+Disclosure of Personal Information by Us

We may share your personal information as follows:

- We share personal information with third-party suppliers solely to provide, maintain, host, and support the App, Merlin.net HF and related services. Depending on the location of your health care provider, Abbott may use Microsoft Azure to receive, process, and store data transmissions from your CardioMEMS™ HF System. Where we provide your personal information to third-party suppliers to assist us with the provision of the App, Merlin.net HF and related services, they are required to keep your personal information confidential and secure and to use your personal information to the minimum extent necessary.

- Where possible, Abbott uses third party service providers to report system errors so that we can support and improve the App, Merlin.net HF and related services and in such instances the information sent to such third parties will not involve the use of your personal information.

- We will not sell or license your personal information to third parties except in connection with the sale, merger, or transfer of a product line or division, so that the buyer can continue to provide you with the App, Merlin.net HF and related services. For the avoidance of doubt, we will not sell your personal information to third parties for commercial purposes.

- We may share de-identified, pseudonymised, aggregated, and/or anonymised information with our affiliates, your Healthcare Provider, third party researchers and national health authorities or insurers to demonstrate the effectiveness of the App, Merlin.net HF, our medical devices or related services or as required for medical reimbursement. This information will not be used to identify you individually.

- We reserve the right to disclose your personal information to respond to authorised information requests from government authorities, to address national security situations, or when otherwise required by law. Furthermore, where permitted or required by law, we may also disclose the information we collect from you 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, or as evidence in litigation in which we are involved. Your personal information may be subject to foreign laws and may be accessible by foreign governments, courts, law enforcement, and regulatory agencies.

+Security of Personal Information

Abbott has implemented appropriate security controls within App and Merlin.net HF to protect your personal information from accidental or unlawful destruction or accidental loss, alteration, disclosure, or access.

App and Merlin.net HF include various security measures to enhance the security of your patient profile and to prevent unauthorised access to, or disclosure of, your personal information. Only those authorised by your Healthcare Provider, including their authorised staff, will have access to your patient profile and only through unique IDs and passwords. Abbott has implemented various security and access controls to ensure that only authorised persons within Abbott may access pseudonymised, aggregated and de-identified data.

Please be aware that the App and Merlin.net HF may be unavailable during periods of routine maintenance.

+Cross-Border Transfers of Personal Information

Depending on the location of your clinic and the deployment used for the Services, information collected through the App and Merlin.net HF may be transferred to and stored in the United States of America or another country outside the UK, or your country of residence. The data protection laws of those countries may not offer protections for personal information equivalent to those of the UK or your country of residence. If you are located in the UK and your data is transferred outside those jurisdictions, your Healthcare Provider and Abbott will use an appropriate transfer mechanism, such as the UK Addendum for international transfers, where required.

If you contact us directly and request technical support, your personal information (including health-related data) may be accessible by our remote care teams in the United States of America or Belgium (or other European locations). Abbott intracompany data transfers are governed by a data transfer agreement providing adequate safeguards to protect personal information. If you would like more information about the relevant transfer safeguards or how to obtain a copy of them, you may contact us using the details in ***+Contact Us***.

We also refer you to **+COUNTRY SPECIFIC PROVISIONS**, for additional provisions that apply to international transfers of personal information depending on your country of residence.

THIS PRIVACY NOTICE INFORMS YOU THAT YOUR PERSONAL INFORMATION MAY BE TRANSFERRED TO, STORED IN, OR ACCESSED FROM THE UNITED STATES OF AMERICA AND BELGIUM (OR OTHER EUROPEAN LOCATIONS), INCLUDING WHERE ACCESS TO YOUR PERSONAL INFORMATION, INCLUDING HEALTH-RELATED INFORMATION, MAY BE REQUIRED IN EXCEPTIONAL CIRCUMSTANCES TO RESPOND TO ANY SUPPORT REQUESTS YOU OR YOUR HEALTHCARE PROVIDER REQUESTS. THESE COUNTRIES MAY NOT OFFER AN EQUIVALENT LEVEL OF PROTECTION FOR YOUR PERSONAL INFORMATION WHEN COMPARED WITH DATA PROTECTION OR PRIVACY LAWS IN WHICH YOU RESIDE.

+How Abbott Sends Marketing and Other Material

We will not knowingly send you advertising or marketing-related information, unless you have opted into receiving these types of communications from us in relation to our other products and services.

Neither Abbott nor its affiliates or licensors will knowingly send advertising or marketing-related information to children.

We do not sell your personal information to third parties for direct marketing.

Please note that we may send you non-marketing related information about necessary App and service updates or issues relating to product safety.

+How Abbott Protects Children's Privacy

The App and Services are intended to be used by adults or, where permitted, by a parent or legal guardian on behalf of a child. Children can be enrolled in Merlin.net HF by a Healthcare Provider. At any time, a parent/guardian may stop the collection of a child's personal information, including health-related information, by contacting the Healthcare Provider and requesting that the account be deleted. This action will delete the Merlin.net HF account associated with the child and will affect the App

functionality available in relation to that child, but we will retain aggregated and de-identified information and may need to retain certain personal information as required by law.

+How Individual Users Can Access and Correct Personal Information and Your Rights

To exercise any data protection or privacy rights in relation to Abbott's processing of your personal information as a controller in connection with the App and Services, you may contact us using any of the methods set out in the section entitled ***+Contact Us.*** Where your request relates to personal information processed by your Healthcare Provider through Merlin.net HF for your medical care, you should contact your Healthcare Provider in the first instance. We are not able to correct or amend any readings from your CardioMEMS™ HF System that have been uploaded.

Depending on your place of residence, you may have the right to: (a) access the personal information we hold about you; (b) request we correct any inaccurate personal information we hold about you; (c) delete any personal information we hold about you; (d) restrict the processing of personal information we hold about you; (e) object to the processing of personal information we hold about you; and/or (f) receive any personal information you have provided to us on the basis of your consent in a structured and commonly used machine-readable format or have such personal information transmitted to another company. Please note that Abbott is not required by law to adopt or maintain systems that are technically compatible with other companies. It may not be possible for Abbott to directly transmit your personal information to another company.

Children may also have the right to access the personal information held about them. Where we receive a request for access for a child's personal information from the child's parent/guardian, we may respond directly to the child's parent/guardian or recommend that they contact their child's Healthcare Provider. We will always seek to verify the identity of person seeking access to a child's information, whether it is from the child him/herself or from a parent or guardian.

+Deleting Your Information

For Merlin.net HF Data: If you have been implanted with the CardioMEMS™ HF System, the only way your Healthcare Provider can monitor you is via Merlin.net HF. Therefore, if you elect not to be enrolled in Merlin.net HF it will affect your Healthcare Provider's ability to monitor your condition and may affect their ability to treat you.

If you would like to have your information deleted from Merlin.net HF, you may do so by contacting your Healthcare Provider. If you request deletion of your information from Merlin.net HF and still have the CardioMEMS™ HF System, your Healthcare Provider will not be able to remotely monitor your PA pressure and heart rate. Please be aware that if your Healthcare Provider deletes your information in Merlin.net HF, we will retain aggregated and de-identified information and may need to retain certain personal information as required by law.

For In-App Data: Use of the App is not required for your Healthcare Provider to monitor your CardioMEMS™ HF System via Merlin.net, unless you are enrolled in the Dynamic Treatment Plan feature. If you choose not to use the App or no longer wish to use it, you may delete the App from your mobile device at any time. Deleting the App will not affect the data transmitted to or stored in Merlin.net HF by your Healthcare Provider, and your Healthcare Provider will continue to be able to monitor your CardioMEMS™ HF System remotely. Deleting the App will also not affect your App account.

To terminate your App account or delete your personal information, you can use the account-deletion function in the App (where provided) or contact Abbott Technical Services at myCardioMEMS@abbott.com or your Abbott representative. You may also exercise your right to request deletion of your personal information using any of the contact methods set out in +Contact Us. Please be aware that any personal information that you have previously downloaded to your mobile device or have sent to a third party will not be deleted if you delete the App. If you delete your personal information in the App, Abbott will retain aggregated, pseudonymized, and anonymized information and may need to retain certain personal information as required by law (such as for medical device regulatory compliance).

+Contact Us

If you have questions, concerns or complaints about the processing of your personal information for the purpose of your medical care or wish to exercise your data protection rights, please contact your Healthcare Provider directly.

If you have questions, comments, or complaints about our privacy practices, including in connection with the App and/or the Services, please contact us by clicking on the "Contact Us" link in one of our websites or emailing us at privacy@abbott.com. Alternatively, you may write to us at:

Attn: Privacy Officer, Abbott, One St. Jude Medical Drive, St. Paul, MN 55117, USA

See also below under your regional section for additional contact details.

In all communications to us, please include the email address used to register for the App and a detailed explanation of your request.

+Changes to this Privacy Notice

This Privacy Notice is kept under regular review. If we make material changes to our privacy practices, an updated version of this Privacy Notice will reflect those changes. You will be alerted to updates to this Privacy Notice by email or the App when you next use the App.

Without prejudice to your rights under applicable law, we reserve the right to update and amend this Privacy Notice without prior notice to reflect technological advancements, legal and regulatory changes and good business practices to the extent that it does not change the privacy practices as set out in this Privacy Notice.

+COUNTRY SPECIFIC PROVISIONS

+Canada

BY ACCESSING OR USING THE APP AND SERVICES, YOU SIGNIFY THAT YOU HAVE READ, UNDERSTOOD AND CONSENT TO OUR COLLECTION, STORAGE, USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION, INCLUDING PERSONAL HEALTH INFORMATION, AS DESCRIBED IN THIS PRIVACY NOTICE.

You acknowledge and understand that many of our service providers, business partners and affiliates operate from outside of Canada. By using the App and Services, you consent that your personal information, including personal health information, may be stored, processed, or transferred to other countries (including the United States where we are headquartered) which may not guarantee the same level of protection of personal information as the jurisdiction in which you reside. Your personal information will be subject to the local laws of the jurisdiction where it is transferred and in certain circumstances, other foreign governments, courts, law enforcement agencies or regulatory agencies may be entitled to access your personal information.

We have in place appropriate physical, technological, and organisational safeguards including access controls to protect personal information against loss, theft, and unauthorised access, use and disclosure. Notwithstanding the safeguards we employ and our commitment to protecting personal information, we cannot guarantee the security or error-free transmission or storage of personal information. There are risks inherent in the use of electronic means to transmit and hold information in electronic format. Any transmission of information is at your own risk.

We may retain your personal information for as long as necessary to fulfill the purposes for which it has been collected, as outlined in this Privacy Notice, or any longer retention period required by law.

Please note that if you exercise certain of your rights set out in the section titled **+How Individual Users Can Access and Correct Personal Information and Your Rights**, including withdrawing your consent, this may limit our ability to provide you with certain Services.

Any changes that we make to this Privacy Notice will become effective when we make a modified version of the Privacy Notice available on the App. Your continued use of the App and/or the Services following any such change constitutes your agreement to follow and be bound by the most recent version of this Privacy Notice.

+UK

This section applies if you are located in the United Kingdom (UK). It describes how we process your personal information (referred to as personal data in these jurisdictions) in connection with the App and the Services.

"**GDPR**" refers to the General Data Protection Regulation (2016/679), together with applicable EU Member State implementing legislation, and for the UK, the UK GDPR and the UK Data Protection Act 2018, each as may be amended from time to time. Where we have included a country above that it outside the European Union, it has been done because such countries contain substantially similar or near equivalent laws to the GDPR.

The references to "controller" and "processor" are based on their respective definitions in the UK Data Protection Act 2018, each as may be amended from time to time.

Lawful basis

In the table below, you can see what personal information is processed by Abbott as a controller. The table includes Abbott's lawful basis for processing the personal information for the listed purpose.

Purpose	**Categories of personal information**	**Abbott's lawful basis**
Providing, operating, maintaining and securing the App, including registration, authentication, account administration, App functionality, App preferences and App performance monitoring.	Name, date of birth, CardioMEMS™ HF System serial number, email address, phone number, App password / authentication credentials, App preferences and settings, consent or acknowledgement records, information about App performance including crash reports, and other non-health-related technical or account information necessary to provide and secure the App.	GDPR Article 6(1)(b) (and equivalent under applicable data protection law): performance of the App EULA. Where processing is not strictly necessary to perform the EULA, GDPR Article 6(1)(f) (and equivalent under applicable data protection law): Abbott's legitimate interests in operating, maintaining and securing the App. Where optional personal information is provided: consent (UK GDPR Article 6(1)(a); and equivalent under applicable data protection law)
Responding to support requests that you make directly to Abbott.	Contact details, account identifiers, App technical information, App performance information, details of the support request, and any information you provide to Abbott in connection with the support request.	GDPR Article 6(1)(b) (and equivalent under applicable data protection law): performance of the App EULA, and/or GDPR Article 6(1)(f) (and equivalent under applicable data protection law): Abbott's legitimate interests in responding to support

Purpose	Categories of personal information	Abbott's lawful basis
		requests and maintaining the App.
Sending non-marketing App, service, security or product-safety notices.	Name, email address, App account information, communication preferences, and information necessary to identify the relevant App, service, security or product-safety notice.	GDPR Article 6(1)(b) (and equivalent under applicable data protection law): performance of the App EULA; GDPR Article 6(1)(c) (and equivalent under applicable data protection law): compliance with legal obligations, where the notice is legally required; and/or GDPR Article 6(1)(f) (and equivalent under applicable data protection law): Abbott's legitimate interests in providing service, security and product-safety communications.
For the purposes described in the consent.	Name, date of birth, CardioMEMS™ HF System serial number, email address, phone number, App password / authentication credentials, App preferences and settings, consent or acknowledgement records, information about App performance including crash reports, and other non-health-related technical or account information necessary to provide and secure the App.	GDPR Article 6(1)(a) (and equivalent under applicable data protection law): the data subject has given consent. Where Abbott relies on consent, you may withdraw it at any time as described in this Privacy Notice.
Complying with legal requirements, including medical device safety, vigilance, post-market surveillance and other obligations under the EU Medical Devices Regulation (EU 2017/745) or equivalent applicable law, responding to lawful requests; and establishing, exercising or defending legal claims.	Information relevant to the legal requirement, request, investigation or claim, such as account information, contact details, App information, support communications and other information necessary for the relevant purpose.	GDPR Article 6(1)(c) (and equivalent under applicable data protection law): compliance with legal obligations. Where health-related personal information is processed for purposes mandated by the EU Medical Devices Regulation or equivalent applicable law, GDPR Article 9(2)(i): reasons of public interest in the area of public health, including ensuring high standards of quality and safety of medical devices, on the basis of the EU Medical Devices Regulation or equivalent applicable law. For establishing, exercising or defending legal claims: GDPR Article 6(1)(f) (and equivalent under applicable data

Purpose	Categories of personal information	Abbott's lawful basis
		protection law): Abbott's legitimate interests in protecting its legal rights and where health-related personal information is involved, GDPR Article 9(2)(f): processing necessary for the establishment, exercise or defence of legal claims.
Pseudonymized data for research or statistical purposes to: ▪ improve the quality, security and effectiveness of cardiac and medical devices and systems and to allow for the development of innovative and effective treatment of heart-related conditions; ▪ analyse and to disclose to third party researchers, health care entities or professionals, or public health authorities; ▪ evaluate the effectiveness of the services and how they are provided and used; ▪ validate the services' functionality and upgrades, including monitoring and improving the safety and security of such services; ▪ develop and test medical devices, including new and existing features and functionality and to test and improve the services and our medical devices for product development, data analysis, statistical and survey purposes; and ▪ facilitate public health, including where the services and medical devices are eligible for medical reimbursement or are otherwise entitled to social security, insurance or public funding.	Date of birth, CardioMEMS™ HF System serial number, App preferences and settings, consent or acknowledgement records, information about App performance including crash reports, and other non-health-related technical or account information necessary to provide and secure the App.	For health-related personal information: GDPR Articles 6(1)(a) and 9(2)(a): explicit consent. For non-health-related personal information: GDPR Article 6(1)(f): legitimate interests. Where Abbott relies on consent, you may withdraw it at any time as described in this Privacy Notice.

Purpose	Categories of personal information	Abbott's lawful basis
For Abbott's business, research, product development, analytics, reporting, and other activities using anonymised information.	Information that has been anonymised so that it no longer identifies you.	Data protection law does not apply to anonymised information.
Conducting research using personal information that is not health-related.	Minimised non-health-related information necessary for the research purpose, such as App usage information, App performance information, general demographic information and other non-health-related information used for product improvement, analytics, surveys or real-world evidence studies.	GDPR Article 6(1)(f) (and equivalent under applicable data protection law): Abbott's legitimate interests in conducting research, analytics, product improvement and real-world evidence studies, where permitted by applicable law.
Conducting research using health-related personal information where the information has not been anonymised.	Minimised health-related personal information necessary for the research purpose, which may include pseudonymised or de-identified information such as CardioMEMS™ HF System serial number, intervals between implant date and later visit dates, implant date, and demographics such as place of residence and age.	GDPR Article 6(1)(a) and GDPR Article 9(2)(a) (and equivalent under applicable data protection law): explicit consent.

The table above describes Abbott's processing as controller. It does not describe processing that Abbott carries out as processor on behalf of your Healthcare Provider in connection with Merlin.net HF. Should Abbott conduct research using identifiable personal information from the App, it will rely on the lawful basis stated in the table above and, where explicit consent is required, will obtain your consent separately before any such processing begins. For further information about Abbott's research purposes, safeguards and consent withdrawal where Abbott relies on consent, see **+Research**.

Data transfers: Information collected through the App and Merlin.net HF may be transferred to and stored in the United States of America, depending on the location of your Healthcare Provider and the applicable deployment. If you request technical support your personal information (including health-related data) will be accessible by our remote care teams in locations including the United States of America and Belgium. Your personal data will be transferred on the basis of EU Standard Contractual Clauses.

If you are located in the UK, your Healthcare Provider and Abbott will have entered into the UK Addendum for international transfers where required. You may contact us using the details in ***+Contact Us*** if you would like more information about the relevant transfer safeguards or how to obtain a copy of them.

If you contact us directly and request technical support, your personal information (including health-related data) may be accessible by our remote care teams in the United States of America, and the EU and by other support locations identified in ***+Cross-Border Transfers of Personal Information*** where required to respond to your request. Abbott international intracompany data transfers are governed by a data transfer agreement incorporating the European Commission approved Standard Contractual

Clauses providing adequate safeguards to protect personal information transferred outside the UK. See **+Data Storage**

Abbott also transfers your personal information, as a "controller", as necessary for Abbott to comply with its legal requirements, such as those related to the quality and safety of medical devices or reimbursement or payment of medical costs, as described in **+Medical Devices and other Legal Requirements**, or for research where Abbott has a lawful basis, including consent for health-related personal information where required as described in **+Research** and this **+UK** section.

Data Protection Officer: The contact details of our European data protection officer along with other useful contact information are available at www.eu-dpo.abbott.com.

Your rights: If you would like to exercise any of your rights set out in the section entitled **+How Individual Users Can Access and Correct Personal Information and Your Rights** and are contacting us by email, it helps us if you title your email subject line accordingly (for example, "Correction Request" or "Access Request", or other right as applicable, in the subject line of the email.) We will respond to your request in accordance with applicable legal requirements, including within any applicable legal deadlines. You have the right to lodge a complaint with your local data protection authority if you are unhappy with any aspect of Abbott's processing of your personal information.

Your local Abbott affiliate is Abbott Medical U.K. Limited, Elder, Central Boulevard, Blythe Valley Park, Solihull, B90 8AJ, UK. Details of Abbott's DPO can be found at www.eu-dpo.abbott.com.

You have the right to lodge a complaint with the ICO if you are unhappy with any aspect of Abbott's processing of your personal information.

END OF PRIVACY NOTICE – THIS PRIVACY NOTICE IS FOR THE PURPOSE OF DISCLOSING TO YOU HOW YOUR PERSONAL DATA IS USED AND PROCESSED BY ABBOTT. IT IS NOT AN AGREEMENT AND DOES NOT FORM PART OF THE END USER LICENSE AGREEMENT THAT FOLLOWS.