

Permobil's Global Privacy Notice

Last Updated: February 20, 2023

Your privacy is important to us at [Permobil](#). We want you to have the information you need to be able to make the choices that are right for you, especially when using our products or services. We created this Global Privacy Notice ("Notice") to explain how we collect, use, disclose, transfer, store, and maintain your Personal Information for this reason. We are committed to complying with the data protection laws that are effective in the country where you live, work or otherwise reside.

This Notice applies to the Products listed in the [Our Products](#) Section as well as to our other Products that refer to this Notice. When we use the generic term "Products" in this Notice, we mean the services, websites, apps, software and devices Permobil and its subsidiaries or affiliates offer. To help you find the information you need, we have divided this Notice into the sections in the menu on the left.

You have certain rights relating to how Permobil uses your Personal Information. You can read about your rights in the [Your Rights and Choices](#) section and you are also welcome to [contact us](#).

When we talk about "Personal Information", we are considering all Personal Information as it is defined by the data protection laws that apply to us on a global basis, whether personal data, personal health information, or personally identifying information. In addition, we describe what Personal Information we collect in our "[What Information Do We Collect About You?](#)" section.

Permobil complies with the guiding principles of global data protection laws and other fair information practices, including the following principles from Europe's General Data Protection Regulation ("GDPR"):

- Lawfulness, Transparency and Fairness
- Purpose Limitation
- Data Minimization
- Accuracy
- Storage Limitation
- Confidentiality and Integrity

Who is the Controller When We Process Your Personal Information?

When we use your information for purposes such as our [online services](#), conducting repairs and maintenance, and conducting certain [marketing activities](#), we act as a Controller. This means that we are acting as the person or organization that decides why we need your Personal Information and how we will process it as a benefit to you as you use our Products.

In many cases, we receive your Personal Information from your dealer or clinician when they ask us to build your customized Product. In these interactions, we act as a Processor on their behalf. This means that we are the person or organization that is performing the processing on behalf of the Controller of your Personal Information.

Either way, we will protect the Personal Information we hold and provide you with the ability to confirm that it is processed in a manner that you expect when you use our Products.

How Do We Collect Your Personal Information?

We collect Personal Information about you when you place an order with your dealer or clinician for any of our Products. We also collect it from you when you register for any of our online services and use our Products. If you use our connected Products and have provided your consent, it is another way we can collect your Personal Information from you or directly from your Product.

What Information Do We Collect About You?

When you use our Products or interact with us, we collect information about you that we use for different purposes. These purposes include providing you with the Products you have requested and communicating with you about them. We also use this information to develop our Products and make them better.

We collect the following categories of Personal Information depending on the product or service you use:

- **Identity information**

Identity information includes your first name, last name, username or similar identifier, date of birth, and gender. We collect identity information when you, your dealer, or your clinician reaches out to us for services, when you make a request, or when you lodge a complaint. In some cases, we receive your identity information from your dealer or clinician when your product order is placed.

- **Contact information**

Contact information includes your email address, mailing address, and phone numbers. We collect your contact information when you reach out to us for services, to make a request, or to lodge a complaint. In some cases, we receive your contact information from your dealer or clinician when your wheelchair order is placed.

In most cases, we collect this Personal Information as a processor or business associate of your dealer or clinician; however, there are instances where we act as a controller or non-covered entity health care provider when processing this information, such as with complaint handling, product maintenance, and accounting processes.

- **Measurement information**

During a client evaluation, we collect your body measurements to provide you with a wheelchair custom fit to your specifications and needs.

When you are ordering certain seating and positioning products, we conduct pressure point mapping to custom fit your seating and positioning needs.

- **Transaction information**

Transaction information includes details about your order history, including products, services, and parts, and other details of the Products you have purchased from us. We collect this information to provide you with better customer support and service, such as when you need a new part or technical assistance.

- **Sign-in information**

Before you may enroll to access our software and apps, you or your clinician will need to register for an account with the Product (“User Role”). Personal Information collected in the registration process includes your name and email address. Your User Role is subject to approval by Permobil. Once you have registered and your User Role has been approved, you will receive a username and password.

- **Technical information**

Technical information includes internet protocol (IP) address, your login credentials, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website and [our online products](#).

- **Usage information**

Usage information includes details about how you use our Products. This includes your seating and positioning regimen when you register for the [Virtual Seating Coach](#). If you use our connected Products and have provided your consent, we collect your usage information from your Product.

- **Health information**

If you have registered for any of our [online services](#), we collect information on behalf of the clinic or health services provider that you have chosen to deliver and maintain our Products, including information about your use of our Products, please see the [Our Products](#) section for further information about what type of information related to our Products that we collect.

In conducting business, we will receive and create records containing limited health information. Any health information collected is not combined with data from other Products or used for other purposes without your explicit consent. For example, we will not use your health information to market or advertise our Products to you without your explicit consent.

- **Location information**

Permobil offers location-based products that require your explicit consent prior to activation. To provide these location-based Products, we collect, use, and share precise location data with you, your legal guardian, your dealer, or your clinician with your consent. The information shared includes the real-time geographic location of your wheelchair when the GPS device is activated. **You can turn on or off location data collection on your device in the My Permobil smartphone app, on [My Permobil website](#), by contacting your dealer, or by [contacting us](#).**

- **Information from device sensors**

Permobil offers power wheelchairs with sensors that will collect data about your location, wheelchair mileage, battery status, maintenance information, diagnostic data, and service data about the Products that you use and receive from Permobil upon activation. **These sensors are inactive at the time you receive your power wheelchair and can be activated at your request.** Your dealer can provide you with information on how to activate the device sensor. Information about your use of our Products is occasionally collected on behalf of your clinic or health services provider to aid you in your specialized treatment. Depending on our Product, you can control what sensor data the device and the apps can use by contacting your dealer or sending an email to privacy@permobil.com.

How Do We Use Your Information?

The type of Personal Information that we process depends on which Products that you use. Please refer to the [Our Products](#) section for more specific information regarding what Personal Information is collected by our specific Products and how it is used.

Legal requirements

Permobil stores Personal Information to fulfil legal requirements. For example, we store it according to bookkeeping regulations. We also store it to fulfil reporting obligations required by the EU Medical Device Regulations or US Food and Drug Administration (FDA) for Medical Device Manufacturers, as applicable. This processing is based on legal obligations under applicable law. Please see the sections titled [Legal Obligation](#) and [Legal Disclosures](#) for more information about our legal requirements.

Communications

Necessary Communications

From time to time, we use your Personal Information to send important notices, such as communications about the Products and changes to our terms, conditions, and policies. Because this information is necessary for Permobil to maintain the quality of our Products, keep you informed of your privacy rights, fulfil our contractual obligations with you, and ensure your safety through proper usage of the device, you may not opt out of receiving these communications. This processing is based on Permobil's [legitimate interest](#) purposes or our [contract](#) with you.

Optional Communications

If you are a Permobil customer, the Personal Information we collect also allows us to keep you posted on Permobil's latest product announcements, software updates, and upcoming events. This processing is based on our legitimate interest to communicate with you. **These communications are optional. If you do not want to be on our mailing list, you can opt out at any time by [contacting us](#) or by clicking the unsubscribe link in the e-mail.**

Internal Use

We use Personal Information to help us create, develop, operate, deliver, and improve our Products and detect and protect against errors, fraud, or other illegal activity. We use this information to verify your identity (for example, when you return to our website). This processing is based on our [contract](#) with you or Permobil's [legitimate interest](#) purposes.

We also use Personal Information for internal purposes such as auditing, data analysis, and research to improve Permobil's Products and customer communications and to implement billing systems for Permobil Products. This processing is based on Permobil's [legitimate interest](#) purposes, our [contract](#) with you, or your explicit [consent](#) and use of [My Permobil](#) services.

We make every attempt to only use the minimum amount of Personal Information necessary for performing these tasks and in many cases, such as product improvement, we only use information that has been de-identified, aggregated, anonymized, or pseudonymized.

External Use

We use Personal Information to enforce the End User License Agreement (“EULA”); work with your dealer to order and provide Products and customizations; and enable clinics and health service providers to track and service their fleet of Permobil Products, when [location services](#) have been activated. This processing is based on Permobil’s [legitimate interest](#) purposes, our [contract](#) with you, or your explicit [consent](#) and use of [My Permobil](#) services.

Information from device sensors

Permobil uses your information from active device sensors to:

- Provide your clinic or health services provider with feedback on how and when you use the power seat functions of your product such as power tilt, power recline, or power elevating leg rests. This processing is based on your explicit [consent](#) and use of [My Permobil](#) services.
- Provide you with support for your use of various Permobil Products, such as service repairs, parts replacements, and technical assistance with our online services. This processing is based on our [contract](#) with you.
- Enable our licensors to improve their licensed technology. This processing is based on our [legal obligations](#) and is processed in a de-identified, aggregated, anonymized, or pseudonymized format.
- Address clinical outcomes. This processing is based on your explicit [consent](#) and use of My Permobil services.
- Facilitate your Permobil product’s compliance with clinician protocols. This processing is based on our [legal obligations](#).
- Enable dealers and clinicians to track and service their fleet of Permobil Products. This processing is based on your explicit [consent](#) and use of My Permobil services.
- Implement billing systems for Permobil Products. This processing is based on our [contract](#) with you.

Do We Sell Your Information?

No. Permobil will not sell, rent, transfer, disclose or otherwise permit the use of your Personal Information by advertisers or other third-parties, except for your dealer, clinician, or health service provider, or as set out in the [Disclosure to Third-Parties](#) section.

How Long Do We Keep Your Information?

We keep your information only so long as we need it to provide the Products you’ve requested of us and fulfil the purposes described in this Notice.

We retain and use your Personal Information as necessary to comply with our legal and regulatory obligations, such as reporting required by the EU Medical Device Regulations and US Food and Drug Administration (FDA) for Medical Device Manufacturers, as applicable. We also retain and use your Personal Information as necessary for resolving disputes and enforcing legal agreements and policies.

When we no longer need to use your information for the purpose we collected it and there is no need for us to keep it to comply with our legal or regulatory obligations, we'll either remove it from our systems or depersonalize it so that we cannot identify you. We may retain your information in backups. For more information about our retention practices please [contact us](#).

How Do We Store Your Information?

Your Personal Information is stored by Permobil on its servers, and on the servers of the cloud-based database management services Permobil engages, which are located in Ireland, Sweden, Australia, or the United States. For more information about how or where we store your Personal Information, please [contact us](#).

Cookies and Other Technology

We use third-party service providers to help us analyze your activities on our websites and improve our Products. For example, these service providers help us measure the performance of our Products or analyze visitor activity. We permit these service providers to use cookies to perform these services for Permobil. Our third-party service providers are required to comply fully with this Notice.

The information collected is Internet Protocol (IP) addresses or similar identifiers. You can set your browser not to accept cookies and our website will tell you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

The method used to block cookies will depend on the web browser used. For example, if you disable a cookie in Microsoft Edge, it will not be disabled in Google Chrome, Firefox, or Safari. Consult the "Help" or corresponding menu in your web browser for instructions. You can also often change settings in relation to a specific type of cookie. For more information visit www.aboutcookies.org or www.allaboutcookies.org.

Our use of cookies is generally not linked to any Personal Information. However, to the extent that nonPersonal Information is combined with Personal Information, we treat the combined information as Personal Information for the purposes of this Notice.

Types of Cookies Used

- **Strictly necessary cookies:** these cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.
- **Performance cookies:** these cookies allow us to count visits and traffic sources, so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site and will not be able to monitor its performance.

- **Advertising and Targeting Cookies:** these cookies are set through our site by our advertising partners. They are used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not directly store Personal Information but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.
- **Social Media Cookies:** these cookies are set by a range of social media services that we have added to the site to enable you to share our content with your friends and networks. They can track your browser across other sites and building up a profile of your interests. This impacts the content and messages you see on other websites you visit. If you do not allow these cookies you may not be able to use or see these sharing tools.

Google Analytics and Quantcast Measure

We use Google Analytics and Quantcast Measure to store information about how visitors use our website so that we may make improvements and give visitors a better user experience.

Google Analytics is a third-party information storage system that records information about the pages you visit, the length of time you were on specific pages and the website in general, how you arrived at the site and what you clicked on when you were there. These cookies do not store any Personal Information about you, such as your name, address, etc. and we do not share the data outside of Permobil. You can view Google Analytics' privacy policy at the following link: <http://www.google.com/intl/en/policies/privacy/>. You can view Quantcast Measure's privacy policy at the following link: <https://www.quantcast.com/privacy/>.

You may opt-out of Google Analytics collection by downloading the browser plugin "Google Analytics Opt-out Browser Add-on" [here](#).

IP addresses

An IP or Internet Protocol Address is a unique numerical address assigned to a computer as it logs on to the internet. Your IP address is logged when visiting our site, but our analytic software only uses this information to track how many visitors we have from various regions.

Social Media Plug-Ins

Our website permits you to use a third-party social networking platform such as Facebook, YouTube, Twitter and Instagram. This includes use of social media plugins such as Facebook "Like", Tweet, etc.

When you use these social networking platforms and plugins, your username and password for the available service or collected from you on these services may be shared with us. When you use social networking platforms and plugins, you share your information with them, and their privacy policy applies to disclosures of such information. In addition, they may be able to collect information about you, including your activity or may notify your connections on the social networking platform about your use of the website.

Such services may allow your activity to be monitored across multiple websites for purposes of delivering more targeted advertising. Please note that their own privacy policies apply and we encourage you to read them.

What Are the Legal Grounds for Our Processing?

We rely on the following legal bases to use your Personal Information:

Performance of a Contract

Where it is needed to provide you with our products or services under our contract with you, such as:

- Building or creating your customized product when you place an order
- Verifying your identity when you contact us or make a request
- Processing purchase transactions
- Confirming and verifying the details of your order with you, your dealer, or your clinician
- Updating you, your dealer, or your clinician dealer on the status of your order, as needed •
- Allowing you to register your product in line with our warranty policy
- Providing you with technical and customer support.

Legitimate Interest

Where it is in our legitimate interests to do so, such as:

- Managing our Products and updating your records
- To perform and/or test the performance of, our products, services and internal processes
- To follow guidance and recommended best practice of government and regulatory bodies
- For management and audit of our business operations including accounting
- To carry out monitoring and to keep records of our communications with you and our staff (see below)
- For market research and analysis and developing statistics
- For direct marketing communications regarding relevant Products. We will send marketing to you by SMS text message, email, phone, post and social media and digital channels (for example, using WhatsApp and HubSpot)
- Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses
- Where we need to share your Personal Information with people or organizations in order to run our business or comply with any legal and/or regulatory obligations

In all cases where legitimate interest is relied upon as a lawful basis, we take steps to ensure that our legitimate interests are not outweighed by any prejudice to your rights and freedoms.

Legal Obligation

To comply with our legal obligations under applicable law, such as:

- Keeping records for tax purposes
- Responding to subpoenas or compelling orders
- Providing information to public authorities.
- Reporting obligations with legal entities
- Auditing activities as required by applicable law

Consent

With your freely given, informed, specific, and unambiguous consent, for processing such as:

- Direct marketing communications
- Sending product updates or technical alerts
- Sending you marketing communications and information on new products, services and assets
- Communicating with you about, and manage your participation in contests, offers or promotions;
- Soliciting your opinion or feedback and providing opportunities for you to test software;
- Processing of special categories of Personal Information such as health information
- Processing if you are a vulnerable person (e.g. a minor child, an individual who is intellectually disabled, or a person with a mental health disability, etc.).

Disclosure to Third Parties

Permobil will only share your Personal Information and product use information with your clinic or health services provider and with Permobil's dealers who sell Permobil Products when you activate services that collect that information. For more details on any of the topics below or our third-party practices in general, please [contact us](#).

We also collect information on behalf of the clinic or health services provider that you have chosen to deliver and maintain our Products, including information about your use of our Products.

Depending on the product or service, we disclose Personal Information:

- To our third-party service providers that perform services on our behalf, such as web-hosting companies, mailing vendors, analytics providers, and information technology providers.
- To law enforcement, other government authorities, or third parties (within or outside the jurisdiction in which you reside) as may be permitted or required by the laws of any jurisdiction that may apply to us; as provided for under contract; or as we deem reasonably necessary to provide legal services. In these circumstances, we take reasonable efforts to notify you before we disclose information that may reasonably identify you or your organization, unless prior notice is prohibited by applicable law or is not possible or reasonable in the circumstances.
- To service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets.

Administrative Disclosures

Permobil shares your Personal Information and product use information with third parties who provide services to Permobil, such as information processing, customer data management, customer research and other similar services. We require these third parties to protect your information and be obliged, under a written agreement, to act in accordance with our instructions and this Notice, to follow applicable law, and to implement appropriate technical and organizational measures for the protection of the Personal Information.

Internal Disclosures

Permobil shares your Personal Information and product use information with its internal subsidiaries acting as joint controllers or processors. Permobil is a global company with divisions worldwide. As a result, your Personal Information may be processed by any of our divisions, whether in Europe, the Middle East, Africa ("EMEA"), Asia, Australia, New Zealand, or the Americas as described in the [International Data Transfers](#) section.

Legal Disclosures

Permobil will disclose your Personal Information when required by law or legal process, in litigation, and/or to respond to requests from public and governmental authorities within or outside your country of residence. We are also required to disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

When we receive information requests, we require that it be accompanied by the appropriate legal documents such as a subpoena or search warrant. We believe in being as transparent as the law allows about what information is requested from us. We carefully review any request to ensure a valid legal basis for it, and we limit our response to only the data law enforcement is legally entitled to for the specific investigation.

Operational Disclosures

We also disclose information about you if we determine that disclosure is reasonably necessary to enforce any EULAs; to protect our operations or other users; or if we are required to do so by any applicable law, rule, regulation, subpoena, or other legal process. Additionally, in the event of a reorganization, merger, bankruptcy or sale we will transfer all Personal Information and product use information we collect to the relevant third-party, as appropriate.

Our Products

Permobil is an international company with a variety of Products available depending on the region where you live. The following is a list of the products that Permobil offers regionally and in some cases globally. For questions regarding any of the listed products, please contact your dealer or clinician for more information. You may also [contact us](#).

Website and software

Our website and software use limited Personal Information depending on your use of the Product. We collect limited Personal Information from you, your dealer, or your healthcare provider as needed to provide you with a personalized experience, improve service reliability, combat spam or other malware, or improve features and functionality of the website or software. **We do not use your data for any advertising or similar commercial purposes without your explicit consent.**

QuickConfig

QuickConfig is a single simplified configuration tool that can be easily accessed from a smart device to set-up or change settings, in real time, to adapt the Permobil Power Wheelchair to the client's individual needs and improve the chair's functionality. QuickConfig collects and processes Personal Information, about you as user of the Product including e-mail address, names, country, organization information, and usage history on your use of the Product. This information is necessary for QuickConfig to function properly and to enable your use of the Product.

Purpose and/or Activity	Type of Personal Information	Source of Personal Information	Legal Basis for Processing
To allow Permobil to create an account for the user so that they can use the Product and receive real-time information and instructions for setting up or changing the settings (configuration and reconfiguration) of the Permobil Power Wheelchair.	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information ➤ Sign-in Information ➤ Usage Information 	Directly from you or from your employer or principal (in their capacity as the dealers and/or the rehabilitation center in regards of users of the Permobil Power Wheelchair)	Performance of a Contract

Virtual Seating Coach

When you sign up for the Virtual Seating Coach service (the “VSC Service”), Permobil collects and processes Personal Information, including e-mail addresses, names, information about how the VSC Service is used, and information on your use of the wheelchair. This information is necessary for the VSC Service to function properly and for your healthcare provider to specialize your health services and treatment. Optional information includes addresses, dates of birth, telephone numbers, and health information.

You can connect to the VSC Service through a web portal or an application (“app”) on your mobile phone. The mobile phone app requires a username or email address and password to enable the connection to your Personal Information. You will only be able to access your own Personal Information when logged into the app or web portal. Any information transferred between the app or web portal and the secure server where your Personal Information is stored is encrypted in transit.

Purpose and/or Activity	Type of Personal Information	Source of Personal Information	Legal Basis for Processing
To provide you with the Virtual Seating Coach and to allow your clinician to manage your prescribed regimen	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information ➤ Sign-in Information ➤ Limited Health Information ➤ Usage Information ➤ Location Information 	<p>Directly from you or from your dealer or clinician</p> <p>Collected from device sensors.</p>	Consent

My Permobil

My Permobil collects and processes Personal Information, including e-mail, names, addresses, chair serial number, order information, SIM card information and information on your use of the wheelchair. This information is necessary for it to function and offer enhanced performance and usage information to you. **My Permobil has the option to collect [location information](#) with your explicit consent.**

Purpose and/or Activity	Type of Personal Information	Source of Personal Information	Legal Basis for Processing
To allow Permobil to use the collected data to improve its Products	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information ➤ Sign-in Information ➤ Health Information ➤ Location Information ➤ Information from Device Sensors ➤ Usage Information 	<p>Directly from you or from your dealer or clinician</p> <p>Collected from device sensors.</p>	Legitimate interest pursued by the controller
To share personal data for research purposes	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information ➤ Sign-in Information ➤ Health Information ➤ Location Information ➤ Information from Device Sensors ➤ Usage Information 	<p>Directly from you or from your dealer or clinician</p> <p>Collected from device sensors.</p>	Legitimate interest pursued by the controller
To allow Permobil to send Product information and marketing material via email	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information ➤ Sign-in Information ➤ Health Information ➤ Location Information ➤ Information from Device Sensors ➤ Usage Information 	Directly from you or from your dealer or clinician	Consent
To share data with family, friends and caregivers at the data subject's request	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information ➤ Sign-in Information ➤ Health Information ➤ Location Information ➤ Information from Device Sensors ➤ Usage Information 	<p>Directly from you or from your dealer or clinician</p> <p>Collected from device sensors.</p>	Consent

Fleet Management

Fleet Management collects and processes Personal Information, including e-mail, names, addresses, chair serial number, order information, SIM card information and information on your use of the Products. This information is shared with your dealer and is necessary for Fleet Management to function properly and for your dealer to enable proactive, fast and reliable service and maintenance of the wheelchair whenever needed.

Capture

The 3D Scanning ROHO Capture app collects and processes Personal Information, including but not limited to email, names, addresses, scanned images, and certain health information. This information is necessary for it to function properly and for your clinician and/or health care provider and/or Permobil to be able to provide the Products necessary to meet your prescribed seating and positioning needs.

Purpose and/or Activity	Type of Personal Information	Source of Personal Information	Legal Basis for Processing
To provide you with manage our relationship with you regarding appropriately fitting the product	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information ➤ Limited Health Information ➤ Information from Device Sensors 	<p>Directly from you or from your dealer or clinician</p> <p>Collected from device sensors.</p>	Performance of a Contract

BodiTrak system

The BodiTrak system is a pressure point mapping system that collects limited data, including but not limited to pressure point maps, names, and/or account numbers. This information is necessary for it to function properly and for your clinician and/or health care provider and/or Permobil to be able to provide the Products necessary to meet your prescribed seating and positioning needs.

Purpose and/or Activity	Type of Personal Information	Source of Personal Information	Legal Basis for Processing
To provide you with manage our relationship with you regarding appropriately fitting the product	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information ➤ Limited Health Information ➤ Information from Device Sensors 	<p>Directly from you or from your dealer or clinician</p> <p>Collected from device sensors.</p>	Performance of a Contract

SmartDrive MX2+ and PushTracker (collectively PushTracker System)

When you register to use the PushTracker System, Permobil collects and processes Personal Information, including name, email address, age, username, and password. In addition, Permobil collects the information you provide through your use of the system, including contact information and personal characteristics. The PushTracker System requires access to Bluetooth to connect with your SmartDrive device in order to properly work as intended.

PushTracker has the option to collect [location information](#). If you do not want us to use your location information to determine the city you are located within and display a location map with relevant information, you can turn off the location services in the account settings section of the app.

Purpose and/or Activity	Type of Personal Information	Source of Personal Information	Legal Basis for Processing
To provide you with the PushTracker System and to manage our relationship with you regarding the product	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information ➤ Sign-in Information ➤ Limited Health Information ➤ Information from Device Sensors ➤ Usage Information ➤ Location Information 	<p>Directly from you or from your dealer or clinician</p> <p>Collected from device sensors.</p>	Consent

Smart Evaluation Application

When you register to use the Smart Evaluation Application (“app”), Permobil collects and processes Personal Information, including name, email address, age, username, and password. In addition, Permobil collects the information you provide through your use of the app, including contact information, credit card information, and personal characteristics.

The app has the option to collect [location information](#). If you do not want us to use your location information to determine the city you are located within and display a location map with relevant information, you can turn off the location services in the account settings section of the app.

Purpose and/or Activity	Type of Personal Information	Source of Personal Information	Legal Basis for Processing
To provide you with the Smart Evaluation App and to manage our relationship with you regarding the product	<ul style="list-style-type: none"> ➤ Identity Information ➤ Sign-in Information ➤ Information from Device Sensors ➤ Usage Information ➤ Location Information 	<p>Directly from you or from your dealer or clinician</p> <p>Collected from device sensors.</p>	Consent

Global Regulations

Permobil has an international presence, with offices and facilities in multiple jurisdictions. For more information regarding our compliance with your country’s data protection regulation, please [contact us](#).

International Data Transfers

To offer our Products, we may need to transfer your Personal Information to recipients in countries other than the country in which the information was originally collected, such as when Permobil personnel and third parties acting on our behalf access, use and process your Personal Information in a country that is different from the country where you reside. Those countries may not have the same data protection laws as the country in which you initially provided the information.

When we transfer your Personal Information to other countries, we protect that Personal Information as described in this Notice, in the manner required by applicable data transfer regulations, and as disclosed to you at the time the data is collected.

Permobil uses approved Model Contractual Clauses (Article 46.2 GDPR), (https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contract-transfer-personal-data-third-countries_en) for the international transfer of Personal Information collected in the European Economic Area and Switzerland.

European Union

Permobil acts as either a [Controller or Processor](#) of your Personal Information. We adhere to the guidelines set by the General Data Protection Regulation (GDPR) throughout our company and as described in this Notice.

How Permobil Processes Personal Information Under the GDPR

Purpose and/or Activity	Type of Personal Information	Source of Personal Information	Legal Basis for Processing
To provide you with My Permobil solutions or provide access to our website.	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information ➤ Measurement Information ➤ Sign-in Information ➤ Limited Health Information ➤ Location Information 	Directly from you or from your dealer or clinician.	Consent

Purpose and/or Activity	Type of Personal Information	Source of Personal Information	Legal Basis for Processing
To manage our relationship with you which will include notifying you about changes to our terms of business or this notice	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information 	Directly from you or from your dealer or clinician.	Legitimate Interests : ensuring we can notify you about changes to our terms of business or this notice
To interact with governmental or regulatory bodies or other authorities in relation to you	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information 	Directly from you or from your dealer or clinician.	Legal or Regulatory Obligation
To manage and protect our business, including improving data security, troubleshooting data and systems, system maintenance and testing, data hosting, managing our offices and other facilities	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact information ➤ Technical Information ➤ Usage Information 	Directly from you or from your dealer or clinician.	Legitimate Interests : ensuring the efficient and secure running of our business, including through office and facilities administration, maintaining information technology services, network and data security, fraud prevention and improving or reorganizing our infrastructure

To invite you to take part in marketing or other promotional events, or client seminars or similar events, and to manage your participation in them	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information 	Directly from you or from your dealer or clinician.	Legitimate Interests : ensuring our end user records are up to date, promoting our Products, identifying ways to grow our business
To send you marketing (including paper and electronic marketing communications) or to contact you by other means to offer you our Products	<ul style="list-style-type: none"> ➤ Identity Information ➤ Contact Information 	Directly from you or from your dealer or clinician.	Legitimate Interests : promoting our Products, identifying ways to grow our business

Permobil does not perform any known automated decision-making, including profiling.

Your Right to Lodge Complaints

You always have the right to lodge a complaint with the relevant supervisory authority where you live, work or where an alleged infringement of the GDPR has occurred. You can find the relevant authority in your country at the following link: http://ec.europa.eu/justice/article-29/structure/data-protectionauthorities/index_en.htm.

United States

As a medical device manufacturer, Permobil may act as a health care provider when determining the proper type or size of the device that is needed for a particular patient. For more information about our HIPAA related practices, please contact us at: privacy@permobil.com.

Current privacy laws in the US are sectoral and state based. Because of this, describing our privacy practices for each state or sector would be cumbersome for you to read and we want to ensure that you can find the information you need to make decisions about your Personal Information. For this reason, we are describing our practices in only a few of the states where we do business. Regardless, we will treat all Personal Information according to all sectoral and state specific privacy laws and practices that apply to our business. For more information, please [contact us](#).

Your California Privacy Rights

THIS SECTION OF OUR PRIVACY NOTICE IS FOR U.S. CALIFORNIA STATE RESIDENTS and applies solely to visitors, users, and others who reside in the state of California (“California Residents”). The terms in this section have the same meaning as defined in the California Consumer Privacy Act of 2018 (CCPA) and other applicable California privacy laws.

CCPA permits California residents to certain privacy rights as they relate to the [collection](#), [security](#), [quality](#), [access](#), [use and disclosure](#) of your Personal Information.

We will not discriminate against you for exercising any of your rights under CCPA, including:

- Denying goods or services.
- Charging different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Providing a different level or quality of goods or services.
- Suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Your CCPA Defined Personal Information

To learn about the categories of information we collect, please see "[What Information Do We Collect About You](#)" above. To learn about the categories of sources of information we collect, see "[How Do We Collect Your Personal Information](#)" above. To learn about how we use and share your information, see "[How Do We Use Your Information?](#)" above. For more information about our practices related to the CCPA, please contact us at privacy@permobil.com.

Requests to Know or Delete CCPA Defined Personal Information

You have the right to request that we disclose what Personal Information we collect, use, disclose and sell including categories of Personal Information collected, categories of sources and third parties, our purposes, and specific pieces of Personal Information we collected about you.

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions such as completing transactions, security reasons, legal compliance and other internal lawful uses.

To request this information please submit a verifiable consumer request to us by either:

- Calling us at 1.800.736.0925 or
- Emailing us at privacy@permobil.com and asking for a Consumer Request Form
- Completing and submitting the [Data Subject Request Form](#) on our website

Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. To make a request, you must provide enough information to allow us to reasonably verify that you are the person about whom we collected Personal Information or that you are an authorized representative.

We will respond to your request within forty-five (45) days of when we receive it. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Selling CCPA Defined Personal Information

We do not and will not sell your Personal Information to third parties. If we change that practice in the future, we will update our privacy policy and provide an opt-out link pursuant to the CCPA. We will treat any information that we collected prior such a change as though you opted-out of the sale of your Personal Information

Direct Marketing

California Civil Code Section 1798.83 permits California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please contact us at: privacy@permobil.com.

Tracking Signals

California law requires that we disclose how Permobil responds to web browser “Do Not Track” signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information (as that term is defined in California law) about a consumer’s online activities. [Our Products](#) do not currently support “Do Not Track” codes. That is, Permobil does not currently respond to or take any action regarding “Do Not Track” requests.

Canada

Your Rights Under the Personal Information Protection and Electronic Documents Act (PIPEDA)

1. **Accountability** - We are responsible for the Personal Information under our control. Our [Privacy Officer](#) oversees our privacy program.
2. **Identifying purposes** - We explain why we collect the Personal Information we ask for. When we authorize other parties to collect information on our behalf, they do the same. [Learn more about how we use your Personal Information](#).
3. **Consent** - We need your permission to collect, use, and disclose Personal Information, with some exceptions. The exceptions are determined by law and can include times where legal, medical, or security reasons make it impossible or impractical to seek consent. You can give consent in writing, as well as verbally, electronically, or through authorized representatives. In certain circumstances, it’s also implied. [Learn more about consent](#).
4. **Limiting collection** - We only collect your Personal Information in fair and legal ways. The information we collect is limited to identified purposes. [Learn more about the information we collect](#).
5. **Limiting use, disclosure, and retention** - We only use or disclose your Personal Information for the reasons it’s collected. We use it for other purposes you consent to, or when it is required or allowed by law. We keep the information only for as long as we need to, or as required or allowed by law. [Learn more about how we use your Personal Information](#).
6. **Accuracy** - Any Personal Information that we collect, use, or disclose should be as correct, complete, and up to date as possible for the reasons it is used. If your contact information changes, please [contact us](#) right away.

7. **Safeguards** - To protect your Personal Information from intrusion, release, or misuse, we use security safeguards that match the sensitivity level of the information. Learn more about our [Data Protection and Security Safeguards](#).
8. **Openness** - We make information about our privacy policies and how we manage your Personal Information available to you.
9. **Individual access** - If you [submit a request](#), we tell you what Personal Information about you we have, and how we use and disclose it. We give you access to the information, with certain exceptions allowed by law. You may verify the accuracy and completeness of your information and request changes, if appropriate. [Learn more about accessing your information](#).
10. **Inquiries and concerns** - [Contact us](#) if you have any questions or concerns about our privacy policies and practices.

Opting Out of Third-Party Advertising

If you reside in Canada, you may be able to use the tool developed by the Digital Advertising Alliance of Canada to opt out of third-party advertising. By using this tool, you can obtain a list of parties that may target advertisements based on your online web-browsing activities. It also allows you to opt out of their use of your information for that purpose. You can find the tool at the following link: <https://youradchoices.ca/choices/>.

Australia

Because Permobil has a presence in Australia, we are required to meet the requirements of Australia's Privacy Act in relation to the [collection](#), [security](#), [quality](#), [access](#), [use and disclosure](#) of Personal Information. For more information about our practices related to the Australian Privacy Principles (APPs), please contact us at: privacy@permobil.com.

How to Make a Complaint Under the Australian Privacy Principles

If you believe that your privacy has been compromised, or if you feel that we have breached the APPs or mishandled your Personal Information, you are entitled to make a complaint by contacting us. If you are dissatisfied with how we handle any complaint you raise under this Privacy Notice, you may wish to contact the [Office of the Australian Information Commissioner](#).

Japan

Because Permobil has a presence in Japan, we are required to meet the requirements of Japan's Act on the Protection of Personal Information (APPI) in relation to the [proper handling](#) of Personal Information. For more information about our practices related to Japan's APPI, please contact us at: privacy@permobil.com.

New Zealand

Because Permobil has a presence in New Zealand, we are required to meet the requirements of New Zealand's Privacy Principles in relation to the [collection](#), [security](#), [access](#), [quality](#), [use and disclosure](#) of Personal Information. For more information about our practices related to New Zealand's Privacy Principles, please contact us at: privacy@permobil.com.

If you are a New Zealand resident, and you are dissatisfied with how we handle any complaint you raise under this Privacy Notice, you may wish to contact the [Office of the Privacy Commissioner](#).

Singapore

Because Permobil has a presence in Singapore, we are required to meet the requirements of Singapore's Personal Data Protection Act (PDPA) in relation to the [collection](#), [security](#), [access](#), [quality](#), [use and disclosure](#) of Personal Information. For more information about our practices related to Singapore's PDPA, please contact us at: privacy@permobil.com.

South Korea

Because Permobil has a presence in South Korea, we are required to meet the requirements of its Personal Information Protection Act (PIPA) in relation to the [collection](#), [use and disclosure](#) of Personal Information. For more information about our practices related to South Korea's PIPA, please contact us at: privacy@permobil.com.

Your Rights and Choices

You have certain rights regarding the Personal Information we maintain about you. We also offer you certain choices about what Personal Information we collect from you, how we use that information, and how we communicate with you. If you have any questions about your rights as stated below, or want to make use of your rights, please [contact us](#).

You may exercise any of your rights at any by [contacting us](#) or submitting a [request form](#). You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights); however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one calendar month. Occasionally it may take us longer than one calendar month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

Right to be Informed About How Your Personal Information is Used

You have a right to be informed about how we will use and share your Personal Information. This explanation will be provided to you in a concise, transparent, intelligible and easily accessible format and will be written in clear and plain language.

Right to Access Your Personal Information

You have a right to obtain proof of whether we are processing your Personal Information, access to your Personal Information and information about how your Personal Information is being used by us.

The right to access Personal Information may be limited in some circumstances by local law requirements. We will respond to all requests to access, modify, or delete your Personal Information as required by local law requirements. To exercise these rights, please [contact us](#).

Right to Have Inaccurate Personal Information Corrected or Updated

You have a right to have any inaccurate or incomplete Personal Information corrected or updated (e.g. GDPR – Right of Rectification; HIPAA – Right to Amend; etc.) If we have disclosed the relevant Personal Information to any third parties, we will take reasonable steps to inform those third parties of the correction where possible.

Right to Have Your Personal Information Erased in Certain Circumstances

You have a right to request that your Personal Information be erased if:

- the Personal Information is no longer necessary for the purposes for which it was collected or otherwise processed
- you object to the processing of your Personal Information, in accordance with your right to object and we do not have an overriding legitimate interest
- if the Personal Information has been processed unlawfully by us
- your Personal Information must be erased to be compliant with a legal obligation under applicable law.

We will consider each request carefully in accordance with the requirements of any laws relating to the processing of your Personal Information. If you have any questions about your right to erasure, please [contact us](#). We may not be able to erase Personal Information from backups.

Right to Restrict Processing of Your Personal Information

You have a right to restrict the processing of your personal data in certain circumstances: These include when:

- you contest the accuracy of the Personal Information, and we must restrict the processing for a certain period to enable us to verify the accuracy of relevant data
- the processing is unlawful, and you request restriction of the use rather than erasure of the Personal Information
- we no longer need the Personal Information for the purposes of the processing as stipulated in the [How Do We Use Your Information](#) section in this Notice, but the Personal Information is required by you for the establishment, exercise or defense of a legal claim
- you have objected to processing pursuant to what is set out under the [Right to Object](#) section, and our verification of the legitimate grounds is pending

Right to Data Portability

In certain circumstances you can request to receive a copy of Personal Information about you that you have provided to us (for example by completing a form or providing information through a website). The right to data portability only applies if the processing is based on your consent or if the personal data must be processed for the performance of a contract and the processing is carried out by automated means (i.e. electronically).

Right to Object to Processing

You have a right to object to processing of your Personal Information in certain circumstances, including where:

- we are processing personal data based on legitimate interests or for the performance of a task in the public interest
- we are using personal data for direct marketing purposes
- information is being processed for scientific or historical research or statistical purposes.

If you request to exercise your right to object, we will no longer process the Personal Information unless we can demonstrate compelling and legitimate reasons for such processing that overrides the privacy interest. If you object to processing for direct marketing, we will no longer conduct such processing.

In certain circumstances, even if you object to certain processing, we may continue such processing if permitted or obligated to do so under applicable law, such as when we must fulfil legal requirements or to fulfil contractual obligations in relation to the registered person.

Marketing Communications

We would like to send you information about our Products that may be of interest to you. You can tell us not to send you marketing communications at any time by e-mail by clicking on the unsubscribe link within the marketing e-mails you receive from us or by contacting us as set out under "Contact Us" below.

Giving and Withdrawing Consent

You are asked to provide your consent for certain processing of your Personal Information. If processing is conducted based on your consent, such processing is stated in this Notice and according to instructions as set out herein.

You may withdraw any consent you previously provided to us for processing of your Personal Information. Once you have withdrawn your consent, we will stop processing your Personal Information connected to your consent and for explicitly stated purposes as set out herein. You may withdraw consent by contacting us as described in the [Contact Us](#) section of this Notice.

Please note that even if you withdraw your consent for certain processing purposes, we may continue process other Personal Information for other purposes where we have another legal ground to do so. This can include processing to fulfil a contractual obligation in relation to you regarding our Products, or when we have a legal obligation according to applicable law to do so.

How to Exercise Your Rights

You may exercise any of your rights at any time by [contacting us](#) or submitting a [request form](#). Please note that we may contact you and ask you to confirm your identity to ensure that we do not disclose your Personal Information to any unauthorized person. We may ask you to specify your request before we perform any actions.

Once we have confirmed your identity, we will handle your request in accordance with applicable law. Please note that even if you object to certain processing of Personal Information, we may continue the processing if permitted or required to do so by law, such as when necessary to fulfil legal requirements.

Data Protection for Children

We are committed to protecting children's data and giving you a choice about how your child's data is or is not used. We follow global data protection laws as they relate to children's privacy where applicable to Permobil Products, such as the United States' Children's Online Privacy Protection Act. We do not knowingly collect Personal Information from children without proper parental or guardian consent.

If you believe that we may have collected Personal Information from someone under the age of eighteen (18), or the equivalent minimum age depending on your jurisdiction, without parental or guardian consent, please let us know using the methods described in the [Contact Us](#) section and we will take appropriate measures to investigate and address the issue promptly.

How Do We Protect Your Information?

We use industry-standard technologies, such as firewalls, encryption techniques, and authentication procedures, among others, designed to protect the security of your Personal Information and to protect Permobil accounts and systems from unauthorized access. You will know that information is encrypted on our website when you see "https" in the URL.

Although we strive to keep your Personal Information secure, no security measures are perfect, and we cannot guarantee that your Personal Information will never be disclosed in a manner inconsistent with this Notice (for example, as the result of unauthorized acts by third parties that violate the law or this Notice).

Permobil is in no way liable for any claims or losses of any kind related to the use or misuse of your User ID due to the activities of third parties outside of Permobil's control or due to your failure to maintain the confidentiality and security of your User ID. We are not responsible if someone else accesses your account through registration information they have obtained from you or through a violation by you of this Notice or the EULA. If you have a security-related concern, please email privacy@permobil.com.

Future Changes

Permobil may update this Notice from time to time. When changed it in a material way, a notice will be posted on our website along with the updated Notice. Please check here from time to time for changes.

What happens if there is a change in ownership?

Information about our customers and users, including Personal Information, will be shared and transferred as part of any merger, acquisition, sale of company assets or transition of service to another provider. This also applies in the unlikely event of an insolvency, bankruptcy or receivership in which customer and user records would be transferred to another entity as a result of such a proceeding.

Contact Us

If you have any questions or concerns about Permobil's Notice or data processing or if you would like to make a complaint about a possible breach of local privacy laws, please contact us using the following contact details depending on your country of residence or your location, as applicable:

USA, Canada, Central or South America, Australia, Asia, New Zealand	European Union, European Economic Area, UK, Switzerland	Germany
Privacy Officer Permobil AB 300 Duke Drive Lebanon, TN 37090 USA privacy@permobil.com	Privacy Officer Permobil GmbH Jan Stenbecks Torg 17 Kista, 164 40 Sweden privacy@permobil.com	Data Protection Officer Permobil, Inc. Brandenburger Straße 2-4 Ratingen, D-40880 Germany privacy@permobil.com

You may also contact us by phone at the relevant customer support number for your country. All such communications are examined, and replies issued where appropriate as soon as possible. If you are unsatisfied with the reply received, you may refer your complaint to the relevant regulator in your jurisdiction. If you ask us, we will do our best to provide you with the information you need.