

## OMRON CONNECT PRIVACY STATEMENT

Version 2.15 – January 2023

### Scope

This OMRON connect Privacy Statement ("**Privacy Statement**") is intended to be applicable in European Economic Area ("**EEA**") territory. The OMRON connect Privacy Statement, together with the OMRON connect Terms of Use ("**Terms of Use**") applies to your use of:

- Mobile application software 'OMRON connect US/CAN/EMEA' and any updates or supplements to it ("**App**"), once you have downloaded a copy of OMRON connect onto your smartphone or other handheld device ("**Device**"); and
- Any of the services accessible through the App that are available on the App site, including the register/sign-in to OMRON connect cloud service ("**Service**"). *Not applicable if you reject "Cloud usage" in a later step.*

For the purpose of applicable European data protection legislation, the data controller responsible for this App is OMRON Healthcare Co., Ltd ("**OMRON**" or "**We**") based in Japan. OMRON Healthcare Europe B.V. is OMRON's representative in the European Union ("**EU**") and shall serve as point of contact for EU Data Subjects and Data Protection Authorities.

This Privacy Statement sets out the basis on which any personal data OMRON collects from you, or that you through the App or Services, provide to OMRON will be processed by OMRON.

The App is not intended for children, and OMRON does not knowingly collect data relating to children under the age of 16.

Please read the following carefully to understand OMRON's views and practices regarding your personal data and how OMRON will treat it.

### Information OMRON may collect from you

The App can be used either as a stand-alone mobile application or with OMRON's Service. The stand-alone mobile application only stores your measurement data locally on your Device. Nevertheless, the Service requires you to create an account and allows your data to be stored in a cloud using the Service.

All personal data OMRON may collect from you will be encrypted with up-to-date encryption techniques to assure that your personal data cannot easily be accessed and/or read by unauthorized third parties.

OMRON collects and processes the following data about you and your Device:

1. Information that you give OMRON about yourself if you contact OMRON for support, in which case OMRON will keep a record of that correspondence.

This information may include:

- your name and e-mail address ("**Contact Information**");
  - the model of Device you use, your mobile operating system, number and type of registered OMRON devices, storage capacity and available storage information of the Device, application error log, and your region ("**Technical Information**").
2. Details of your use of the App including, but not limited to traffic data, application usage data and other communication data ("**Log Information**"); and

3. Your e-mail address, username and encrypted App password (“**Contact Information**”).

If you choose to use the App with the Service, OMRON will additionally collect and process, either directly or by making use of third parties, the following information about you and your Device:

1. your height, gender, step length, weight and date of birth (“**User Profile Information**”);
2. the model of Device you use, your mobile operating system, number and type of registered OMRON devices and your region (“**Technical Information**”);
3. measurement information, entered manually or transferred from your OMRON devices, stored and managed in the App, activity data, body temperature, blood pressure, electrocardiogram, ECG instant analysis, irregular heartbeat, pulse, sleep, SpO2 (Oxygen saturation), body fat percentage, body mass index, body weight, resting metabolism, skeletal muscle percentage, and visceral fat (“**Measurement Information**”);
4. general trackers information, entered manually or transferred from your OMRON devices, stored and managed in the App, including, but not limited to, the performance of sports and physical activities, eating patterns, use of medication, medical conditions and physical symptoms (“**General Trackers Information**”).

This App requests permission to access your phone’s Location to enable Bluetooth communication with OMRON devices. By selecting “Allow all the time” in the Location permission setting, the App can transfer data from OMRON devices in your phone’s background even when the App is closed (“**Location**”). Please note that, OMRON does not have access nor is able to process personal data and/or your Location as collected via Bluetooth.

The App requests you to grant access to your smartphone’s microphone. If you use our thermometer and ECG with ultrasound communication, these OMRON devices transfer your data to the App by ultrasound. The App uses the microphone only when the App is ready to receive ultrasound from OMRON devices and a data transfer is initiated from the App. Once the transfer of the measurement is complete the microphone data will be automatically and permanently deleted.

### **How OMRON use your information**

OMRON use information held about you in the following ways:

For the performance of OMRON's agreement with you:

- *Contact Information:* to handle your enquiries.
- *General Trackers Information:* to operate the Service, to handle your enquiries
- *Location information:* to operate the App and Service
- *Log Information:* to handle your enquiries
- *Measurement Information:* to operate the Service, to handle your enquiries
- *Technical Information:* to handle your enquiries.
- *User Profile Information:* to operate the Service, to handle your enquiries.

For OMRON's legitimate commercial interests:

- *General Trackers Information:* to develop or improve our products and services and to analyse anonymized, aggregated data to understand usage trends and health data trends.

- *Log Information:* to develop and improve our products and services.
- *Measurement Information:* to develop or improve OMRON's products and services and to analyse anonymized, aggregated data to understand usage trends and health data trends.
- *User Profile Information:* to ask you to fill in questionnaires, to develop or improve our products and services, to provide healthy lifestyle advice or promotional information, and to analyze anonymized , aggregated data to understand usage trends and health data trends

Following your explicit consent:

- *Contact Information:* to inform you of products and/or services OMRON offers.
- *Measurement information:* to operate the Service

**How to cancel your account**

You may request to cancel your account by using the 'cancel account' function within the App, by contacting the support service by using the 'contact us' function within the App or by sending an email with such request to [support-omron.connect@eu.omron.com](mailto:support-omron.connect@eu.omron.com).

Upon receipt of your cancellation request, OMRON will process your request within fourteen (14) calendar days. OMRON will confirm cancellation of your account within thirty (30) calendar days of your request. When your account is cancelled, your User Profile Information and Contact Information is deleted. As a result, your Measurement Information and General Trackers Information is anonymized and cannot be linked back to you.

**Disclosure of your information**

When you consent to provide OMRON with your personal data, OMRON will also ask you for your consent to share, if necessary, your personal data with the third parties set out below for the purposes set out in the table:

<b>Category of data</b>	<b>Recipient</b>	<b>Purpose</b>
Log information User Profile Information	Google Firebase Google Cloud Platform Google Data Studio Segment OneSignal Mixpanel	Application usage analytics
Contact Information User Profile Information Measurement Information General Trackers Information	Amazon Web Services Globalway, Inc.	Data storage
Technical Information Contact Information	OMRON Healthcare Europe B.V. OMRON Healthcare Inc.	Customer support

User Profile Information Measurement Information General Trackers Information	TTEC Europe B.V Salesforce, Inc.	
Technical Information Contact Information User Profile Information Measurement Information General Trackers Information	OMRON Healthcare Europe B.V.	Data analysis and marketing
Contact Information	Precordior LTD	Data analysis

OMRON may disclose your personal information to (other) third parties:

- In the event that OMRON sell or buy any business or assets, in which case OMRON may disclose your personal data to the seller or buyer of such business or assets.
- If OMRON is under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- In order to:
  - Enforce or apply the OMRON connect Terms of Use [www.omron-healthcare.co.uk/omronconnect/terms-of-use.pdf](http://www.omron-healthcare.co.uk/omronconnect/terms-of-use.pdf) or to investigate potential breaches; or
  - Protect the rights, property or safety of OMRON, OMRON's customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

**Transfer of your information outside the EEA**

Generally, the data that OMRON collects from you will be transferred to, and stored at, a destination inside the European Economic Area (“**EEA**”). Your personal data may also be transferred to, and used in countries outside the EEA for the purposes described in this Privacy Statement. Such countries may not have the same level of protection for your information as the country in which you reside. OMRON guarantees that all such data transfers are in accordance with applicable privacy legislation. OMRON will enter into agreements, including the execution of the applicable Standard Contractual Clause (“**SCC**”), with entities in such countries that will ensure that any personal data leaving the EEA will be transferred in compliance with EU data protection law, including but not limited to General Data Protection Regulation (EU) 2016/679 (“**GDPR**”) and meet the mandator requirements. SCC are standardized contractual clauses used in agreements between data controllers (such as OMRON) and their data processors to ensure that any personal data leaving the EEA will be transferred in compliance with European data protection law, including but not limited GDPR and meet the mandatory requirements.

**Security measures**

OMRON has implemented technical and organizational measures to protect your information against unauthorized access, use and disclosure. All information you provide to us is stored on secure servers. Any data transfer will be encrypted using Secured Sockets Layer technology. Where OMRON have

given you (or where you have chosen) a password that enables you to access the Service, you are responsible for keeping this password confidential. OMRON asks you not to share a password with anyone including support staff.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect your personal data, OMRON cannot guarantee the security of your data transmitted to the Service; any transmission is at your own risk. Once OMRON have received your information, OMRON will use strict procedures and security features to prevent unauthorised access.

### **Retention of your information**

OMRON will retain your information in compliance with the applicable law. You can request OMRON to cancel your account or wait until OMRON cancels your account due to inactivity. OMRON will consider your account 'inactive' if you don't use the Service during a two-year period. Before your account becomes inactive, OMRON will notify you by email requesting you to use the Service to prevent your account becoming inactive. OMRON will cancel your account within thirty-one (31) calendar days of it becoming inactive at which time your User Profile Information will be deleted. As a result, your Measurement Information and General Trackers Information is anonymized and cannot be linked back to you.

### **Your rights**

Based on European data protection legislation you have several rights with regards to our processing of your personal data, including:

- **Right of access.** You may ask us for confirmation as to whether We process your personal data. If so, We will grant you access to that personal data and provide you with a copy of the data upon request.
- **Right of rectification.** If you discover errors in the personal data that is being processed by us, you have the right of rectification. Likewise, you have the right to complete the data if incomplete.
- **Right to erasure.** You may ask us for erasure of your personal data. Please refer to the process described in section 'How to cancel your account'.
- **Right to restrict.** If you want to restrict processing, you cannot continue to use the Service. Please refer to the process described in section 'How to cancel your account'. You may decide to continue to use the App without using the Service.
- **Right to withdraw consent.** If you want to withdraw your consent to our processing of your personal data, you cannot continue to use the Service. Please refer to the process described in section 'How to cancel your account'. You may decide to continue to use the App without using the Service.
- **Right to data portability.** You can export your personal data by using the 'export' function in the App to get a copy of your personal data in a structured, commonly used and machine-readable format.
- **Right to lodge a complaint.** In case you may have a question or complaint about how We process your personal data, you may contact us as described in the 'Contact' section. Alternatively, you may consider lodging a complaint with a supervisory data protection authority.

### **Partners**

The App may contain links to and from OMRON's partners and affiliates. If you follow any of these links, please note that they (OMRON's partners and affiliates) have their own privacy policies and that OMRON do not accept any responsibility or liability for these policies or for any personal data that may be collected by them. Please check their policies before you submit any personal data to them.

## **Changes to privacy statement and our duty to inform you of changes**

We keep OMRON's privacy policy under regular review.

This version was last updated on January 2023. It may change and if it does, these changes will be notified to you when you next start the App. The new policy may be displayed on-screen, and you may be required to read and accept the changes to continue your use of the App or the Services. If you choose to not accept these changes, you cannot continue to use the App.

It is important that the personal data We hold about you is accurate and current. Please keep OMRON informed if your personal data changes during OMRON's relationship with you.

### **Contact**

If you have any concerns, questions, comments related to data protection you can contact our data protection officer using the following mail address: [OMCE-ODP@omron.com](mailto:OMCE-ODP@omron.com).

If you have any concerns, questions, comments or requests about this document or the App, you can contact us through our representative in the EU via email to [support-omron.connect@eu.omron.com](mailto:support-omron.connect@eu.omron.com), the 'contact us' function within the App, or by regular mail to:

**OMRON Healthcare Europe B.V.**, Marketing and Communication Department  
Scorpius 33  
2132LR Hoofddorp  
The Netherlands

**OMRON Healthcare Co., Ltd.**  
53 Kunotsubo, Terado-cho, Muko, Kyoto  
Japan

Further information can also be found on <https://www.omron-healthcare.co.uk/omronconnect-support.html>