

**PRIVACY NOTICE - Country Specific Provisions
Roche Diabetes Care Digital Solutions And Services**

Effective Date: June 1, 2025

11. COUNTRY SPECIFIC PROVISIONS

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11.1 Argentina

If you reside in Argentina, the legal basis for the content of the Privacy Notice and your personal data rights are governed by the Personal Data Protection Law No. 25.326 and related regulation.

The NATIONAL DIRECTION OF PERSONAL DATA PROTECTION (DNPDP), under the Public Information Agency Access, enforcement authority of Law No. 25.326, has the authority to respond to inquiries, complaints or claims that are filed in relation to any question regarding the protection of personal data. Address: Av. Pte. Gral. Julio A. Roca 710, 2nd Floor, Autonomous City of Buenos Aires, Argentina; telephone: (011) 2821-0047 int. 8846; e-mail: datospersonales@aaip.gob.ar.

11.2 Australia

If you reside in Australia, the legal basis for the content of the Privacy Notice and your personal data rights are governed by the Privacy Act 1988 (Cth) ("the Act").

DISCLOSURE OF PERSONAL INFORMATION OVERSEAS

Information collected from or about you may be transferred to, stored and processed in Australia or any other country in which Roche or its affiliates worldwide, or its or their subcontractors or agents maintain facilities, including in the United States and countries within the European Union such as Germany.

Your personal information may be aggregated with data from other Roche sources and stored or processed on computers or web-based database systems located outside Australia where privacy laws may differ from ours, in jurisdictions including Germany, France and the United States.

Your personal information may be stored, maintained and processed on computers or web-based database systems at Roche which may be accessed by and shared with any affiliate within the global Roche Group (Roche Affiliates), third-parties working with Roche affiliates and/or regulatory authorities or as required by law.

Roche will ensure that if information is transferred outside of Australia, we have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your personal information is adequately protected in these jurisdictions.

DATA BREACH

If Roche becomes aware that a third party has accessed or used your personal information without permission and such breach is likely to place you at risk of serious harm, Roche will endeavour to contact you promptly and also notify the Office of the Australian Information Commissioner.

CONTACT

We are committed to constantly improving our procedures so that your personal information is treated appropriately. If you have any questions or would like to know more about our privacy practices, please contact Roche by one of the following means:

Mail : Attn: Privacy Officer, Roche Diabetes Care Australia Pty Ltd, PO Box 6266, North Ryde NSW 2113

Email : australia.dc_privacy-request@roche.com

11.3 Belgium

When you use the Digital Solutions in Belgium then the following terms apply to you, which are incorporated in and constitute part of the Privacy Notice.

Your personal data as described in this Privacy Notice shall be processed in accordance with the provisions of the Act of 30 July 2018 on the Protection of Natural Persons with Regard to the Processing of Personal Data (the GDPR Implementation Act) and the General Data Protection Regulation (2016/679/EU) "GDPR".

For more information about your privacy rights or if you are not able to resolve a problem directly with Roche and wish to make a complaint, you may contact the Belgian Data Protection Authority on contact@apd-gba.be, which is responsible for making sure that privacy law is followed in Belgium.

11.4 Brazil

If you reside in Brazil, your rights and data will be governed under Lei Geral de Proteção de Dados do Brasil (LGPD).

11.5 Chile

If you reside in Chile, your rights and data will be governed under the "Ley de Protección a la Vida Privada" (Private Life Protection Act N° 19.628)

11.6 Colombia

If you reside in Colombia, your rights and data will be governed under Law 1581 of 2012, Decree 1377 of 2013, Decree 1074 of 2015 and any supplementing and/or amending provisions thereof. Please be informed that: (i) your rights include the possibility to access, rectify, request the suppression of your data and/or revoke the data-processing consent provided herein, unless your data is required to be maintained within a database to perform under a legal or contractual obligation; (ii) your personal data will be processed by Roche for the purposes stated herein; (iii) any answer to questions pertaining to sensitive personal data are optional; (iv) you may direct any questions or requests regarding your personal to Roche, as set forth in the Contact Us section above.

11.7 Croatia

If you live and use the Digital Solutions in Croatia, the provisions of the Law on the Implementation of the EU General Regulation on Data Protection (Zakon o provedbi Opće uredbe o zaštiti podataka, Official Gazette, No. 42/18) and the General Data Protection Regulation (2016/679/EU) "GDPR" apply to you.

For more information about your privacy rights or if you are not able to resolve a problem directly with Roche and wish to make a complaint, you may contact the Croatian Personal Data Protection Agency (Agencija za zaštitu osobnih podataka) at azop@azop.hr, which is responsible for making sure that privacy law is followed in Croatia.

11.8 Czech Republic

If you reside in the Czech Republic, then the following terms which are incorporated in and constitute part of this Privacy Notice also apply to you in full.

Your personal data as described in this Privacy Notice shall be processed in accordance with the provisions of Act No. 110/2019 Sb., Personal Data Processing Act, as amended, and the GDPR.

According to Article 14(2)(e) of the GDPR, you have a right to lodge a complaint with a supervisory authority. Address: Úřad pro ochranu osobních údajů, Pplk. Sochora 27, 170 00 Praha 7, Czech Republic, telephone number: +420 234 665 111, e-mail: posta@uoou.cz.

11.9 Ecuador

If you reside in Ecuador, your rights and data will be governed under LEY ORGÁNICA DE PROTECCIÓN DE DATOS PERSONALES Oficio No. T. 680-SGJ-21-0263

11.10 European Union

In the event that your personal data is covered by the EU General Data Protection Regulation (EU) 2016/679 ("GDPR"): EU representative is Roche Privacy GmbH, Emil-Barell-Str. 1, D-79639 Grenzach-Wyhlen, eu.representative.privacy@roche.com.

11.11 France

When you use the Digital Solutions in France, then the following terms apply to you, which are incorporated in and constitute part of the Privacy Notice.

The provisions of the Privacy Notice shall apply to the extent permitted by applicable laws in France.

The Privacy Notice shall be governed by the laws of France. In accordance with the regulations on personal data, each person concerned has a right of access to the information which concerns him as well as a right of rectification, limitation, portability, withdrawal of his consent, opposition or deletion of this data. The latter can also define directives relating to the sorting of his personal data after his death.

Persons whose personal data have been provided by Roche Diabetes Care France can exercise their rights by contacting france.diabetescare-rgpd@roche.com and can file a complaint with the CNIL (www.cnil.fr) if they concluded that their individual rights are not being respected.

11.12 Germany

Certain products and services of mySugr may be part of statutory health programs, e.g. Digital Healthcare Act in Germany ("Digital Healthcare Application"). Such User Data of Digital Healthcare Applications will be processed in accordance with all legal requirements which are specified in more detail in this section.

User Data of Digital Healthcare Applications will not be processed for product improvement and marketing purposes. When it comes to the lawful basis for data processing based on statutory law, User Data of Digital Healthcare Applications will only be processed for patient safety reasons (incident reporting to BfArM) in accordance with section 5.3.

11.13 Malaysia

If you reside in Malaysia, your rights and personal data are governed by the Personal Data Protection Act 2010 ("PDPA 2010") and its relevant regulations.

11.14 Mexico

If you reside in Mexico, the following additional sections will apply, complement or prevail over any conflicting provisions in this Privacy Notice.

This Privacy Notice is considered a Full Privacy Notice in terms of the Federal Law on Protection of Personal Data Held by Private Parties, its Regulation and the Guidelines for the Privacy Notice.

Processing purposes. The use of personal data to perform our contract and for statutory purposes are considered primary purposes, while the use of personal data for product improvement purposes and to send you interesting information on products and services in addition to the contractual scope, are considered ancillary purposes. You can opt-out of ancillary purposes as mentioned in this Privacy Notice.

Data transfers. Your consent is not required for transferring personal data with our holding company, affiliates or subsidiaries in Mexico or abroad or to transfer it as required by law or by a judicial or administrative order.

Sharing your data with our data processors is not considered a transfer and it does not require your consent.

Your rights. You have the right to know what personal data we have about you and the data processing conditions (Access); the right to request the correction of your personal information if it is outdated, inaccurate or incomplete (Rectification); the right to request the deletion from our records or databases (Deletion); as well as to object the use of your personal data for specific purposes (Objection). These rights are known as ARCO rights.

To exercise any of the ARCO rights, you must send a request at the contact details provided in section 8 of this Privacy Notice with the following requirements: (i) full name; (ii) a copy of your official identification (passport, voter registration card or driver's license); (iii) a clear description of the personal data you wish to access, rectify, delete or object, and (iv) or any other element that facilitates the location of your data. The data controller will inform whether or not to exercise the requested ARCO right within 20 days.

Our response will indicate whether the request proceeds and, if so, we will make the request effective within 15 business days. The deadlines may be extended under the terms set out in the applicable law. We will provide digital documents if you exercise your right of access.

You can also withdraw your consent to the processing of your personal data and limit the use or disclosure of your personal data. Please note that we will not always be able to comply with your request immediately, as we may be required by law to continue processing your personal data.

Automated technologies. We may use automated technologies to collect personal data relating to your use of the Digital Solutions.

11.15 Netherlands

If you use the Digital Solutions in the Netherlands, the following conditions apply to you, which are included in and form part of the Privacy Notice. Your personal data, as described in this Privacy Notice,

will be processed in accordance with the privacy laws and regulations such as, inter alia, the Implementing Act General Data Protection Regulation (GDPR Implementing Act) and the General Data Protection Regulation (2016/679/EU) ("GDPR"). If you have the impression that the processing of your personal data by us is not carried out in accordance with the relevant laws and regulations, you can also submit a complaint to the Dutch Data Protection Authority (<https://autoriteitpersoonsgegevens.nl/nl> or tel: +31 (0) 88 - 1805 250).

11.16 Panama

If you reside in Panama, the legal basis for the content of the Privacy Notice and your personal data rights are governed by the Personal Data Protection Law No. 81 as amended.

The user has the rights of access to the data provided, rectification (of incorrect or inaccurate data), deletion and revocation (revoke this consent when deemed pertinent) which must be requested at the contact details provided in section 8 of this privacy notice, and any management will be resolved within the term granted by the legislation. The rights of deletion and revocation will be subject in any case to Roche's need to keep the data solely to pursue the fulfillment of pending obligations.

11.17 Peru

The processing of personal data collected through the Digital Solutions will be carried out in strict compliance with

the provisions of Law No. 29733 - Personal Data Protection Law, its Regulations and the Security Directive.

Personal data will be used for the purposes specific in this Privacy Notice. As long as it has been expressly authorized, the personal data could be used to send information about the products and services offered by the company.

ROCHE informs the User about the possibility that assists him to invoke his rights of access, updating, inclusion, rectification and deletion, to prevent the supply and to oppose the treatment or objective treatment, as well as the revocation of his consent for the treatment of your personal data, which can be exercised by the User, and where appropriate who represents him, by contacting the contact details provided in section 8 or by means of a written and signed request addressed to the following address: Calle Dionisio Derteano No. 144, interior 1301, district of San Isidro, province and department of Lima, or by sending an email to peru.atencion_diabetes_care@roche.com. The request must contain the following information: name and surname of the User, address for notification purposes, copy of the National Identity Document or Passport, and reasoned request in which the request is specified. In the case of representation, it must be proven by means of a reliable document. If you consider that you have not been served in the exercise of your rights, the User may file a claim with the National Authority for the Protection of Personal Data.

11.18 Philippines

Procedures for regular testing, assessment and evaluation (Article 32 Paragraph 1 Point d GDPR; Article 25 Paragraph 1 GDPR) Incident Response Management; Upon notification receipt of the Affiliate (PH) of a data breach incident from Roche Global Data Privacy, the Local Data Privacy Officer shall provide notification within a 24 hour period.

11.19 Singapore

If you reside in Singapore, your rights and personal data will be governed under the Personal Data Protection Act 2012 ("PDPA") and your consent to the processing of the personal information by Roche and/or its appointed third parties in accordance with this agreement, shall be obtained in accordance with the PDPA prior to uploading and sharing this information with Roche on the Digital Solutions.

11.20 Slovenia

If you live and use the Digital Solutions in Slovenia, the provisions of the Personal Data Protection Act (Zakon o varstvu osebnih podatkov, Official Gazzette, No. 163/22) and the General Data Protection Regulation (2016/679/EU) "GDPR" apply to you. For more information about your privacy rights or if you are not able to resolve a problem directly with Roche and wish to make a complaint, you may contact the Slovenian Data Protection Authority (Informacijski pooblaščenec) at gp.ip@ip-rs.si, which is responsible for making sure that privacy law is followed in Slovenia.

11.21 South Africa

If you live and use the Digital Solutions in South Africa, the provisions of the Protection of Personal Information Act 4 of 2013 ("POPI") apply to you

11.22 Spain

Data blocking In accordance with the provisions of Article 32 of Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights (hereinafter, "Organic Law 3/2018"), and unless one of the exceptions indicated in said article applies, Roche will block the data when they must be rectified or deleted, and will keep those data blocked so long as liabilities may arise as a consequence of the processing and only for the relevant limitation period. After this period, the data must be destroyed.

11.23 Sweden

If you have any questions, would like to request a copy of your data, request that your personal data be corrected or deleted, or request the restriction of the use of your personal data, please reach out to Contact details provided in Section 8 of this privacy notice. You have the right to file a complaint with Integritetsskyddmyndigheten, the data privacy supervisory authority in Sweden, if you consider that the processing of personal data concerning you is in breach of the GDPR.

11.24 Switzerland

If you live in Switzerland, the provisions of the Federal Act on Data Protection (Data Protection Act, DSG) of September 25, 2020, based on Articles 95(1), 97(1), 122(1) and 173(2) of the Federal Constitution, entered into force on September 01, 2023, in each case in the most recent version, as far as it relates to mandatory and non-dispositive provisions, and

(ii) the following additional provisions shall apply in addition:

Storage / storage period of your personal data

We process your personal data,

- as long as it is necessary for the purpose of processing,
- as long as we have a legitimate interest in the storage and
- as long as data is subject to a legal retention obligation.

At the end of these periods, we delete or anonymize your personal data.

Information about your rights regarding your personal data

Under the conditions and within the scope of the data protection law applicable in Switzerland, you have the following rights with regard to your personal data:

- the right to be informed about your stored personal data;
- the right to correct inaccurate or incomplete personal data or to add a notice of dispute;
- the right to receive a copy of certain personal data in a structured, commonly used and machine-readable format, as long as the corresponding processing is based on your consent or is necessary
- for the fulfillment of the contract;
- the right to object to the processing of your personal data;
- the right to delete or anonymize your personal data;
- the right to restrict the processing of your personal data;
- the right to withdraw consent, as long as we process personal data on the basis of your consent.

The withdrawal is only valid for the future, and we reserve the right to continue to process personal data on a different basis in the event of a withdrawal.

Right of appeal

You are also free to submit a complaint against our processing of your data to the responsible supervisory authority, in Switzerland to the Eidgenössischen Datenschutz- und Öffentlichkeitsbeauftragten (EDÖB) [Federal Data Protection and Information Commissioner (FDPIC)].

11.25 Thailand

If you reside in Thailand, your rights and data will be governed under the Personal Data Protection Act B.E. 2562 ("PDPA") and you agree and consent that your personal data shall be processed in accordance with the PDPA and other relevant regulations under the PDPA.

11.26 Turkey

For the users located in Turkey please see the following part regarding the processing of your personal data:

In order to be informed about the below mentioned topics please see the relevant section mentioned accordingly:

- The identity of the data controller and if any, its representative → "Data Controller",
- The purposes for which personal data will be processed → "How we use personal data and legal basis";
- The persons to whom processed personal data might be transferred and the purposes for the same → "Recipients of your Personal Data";
- The method of collection of personal data → "Categories of personal data collected and sources"

In addition to the above mentioned information please note that the legal basis might differ since the processing activity is within the scope of the Turkish Personal Data Protection Law no. 6698 ("KVKK"). Therefore, the legal basis according to each processing purpose will be respectively,

- "To fulfill the core service delivered by the Digital Solutions" → The legal basis for this is consent
- "Use of Personal Data for product improvement purposes" → The legal basis for this processing is consent
- "Use of Personal Data for statutory purposes" → The legal basis for this is being able to comply with our legal obligations.

In addition to the above mentioned information, please remember that you have the below mentioned rights as to KVKK and you can reach us via turkey.kvkk@roche.com to use those rights.:

- a) Learn whether or not her/his personal data have been processed;
- b) Request information as to processing if her/his data have been processed;
- c) Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose;
- ç) Know the third parties in the country or abroad to whom personal data have been transferred;
- d) Request rectification in case personal data are processed incompletely or inaccurately;
- e) Request deletion or destruction of personal data;
- f) Request notification of the operations made as per indents (d) and (e) to third parties to whom personal data have been transferred;
- g) Object to occurrence of any result that is to her/his detriment by means of analysis of personal data exclusively through automated systems;
- ğ) Request compensation for the damages in case the person incurs damages due to unlawful processing of personal data

11.27 United Kingdom

In the event that your data is covered by the UK GDPR and/or the Data Protection Act 2018: the UK representative is Roche Diagnostics Limited, Charles Avenue, Burgess Hill, West Sussex RH15 9RY, United Kingdom. burgesshill.dataprivacy@roche.com

11.28 Uruguay

If you reside in Uruguay, your rights and data will be governed under the Data Protection Law No. 18.331, Decree No. 414/09, art. 37 to 40 of Budget Law No. 19.670 and Decree No. 64/20

11.29 USA

Your Rights If Your Data is Covered by California and Certain Other US State Laws. If you are a California or certain other US states resident , you can find a description of these rights that may be available to you covered in the [US Supplemental Privacy Notice](#) That privacy notice contains information on how to contact Roche to exercise any rights you may have under applicable state law.