

## Privacy Notice

Effective Date: January 20, 2026

### Introduction

This Privacy Notice explains how Penumbra, Inc., and its Affiliates (collectively, “Penumbra,” “we,” “us,” “our”) collect, use, share, and protect information gathered through the Penumbra website (the “Website”) or other information gathering platforms Penumbra may use (collectively, “Penumbra Platforms”), as well as through our offline interactions with you. In some cases, Penumbra may issue more specific privacy notices for some products or services.

If you do not want your information handled as described in this Privacy Notice, please do not provide us with your information or interact with the Website or Penumbra Platforms.

### Types of Personal Information Penumbra Collects

Penumbra may collect the following categories of personal information from and about you depending on the circumstances of your relationship with us:

- Contact information such as your name, postal addresses, email addresses, social networking website user account names, telephone numbers, or other addresses at which you are able to receive communications.
- Demographic information such as your age.
- Commercial information. If you interact with us for business reasons, we may collect your job title, business contact details, and information about products or services you expressed an interest in or purchased from us or that we have purchased from you or your company.
- Internet or other electronic network and device activity such as information about your browsing behavior, search history, language preference, and interactions with our websites, emails, and advertisements. We may also collect device data such as the model, operating system and version, the name of the domain from which you access the Internet, your Internet Protocol (“IP”) address, and other unique device identifiers.
- Social media information. We may link to pages or accounts on third-party social media networks (“social media”). If you choose to interact with us on social media, we may collect the information you publish or submit, according to the Terms of Service and Privacy Notice of the social media provider.

- Audio, video, and pictures such as security footage from our facilities as well as recordings you may be included in when participating in our events or interacting with us.
- Location data such as physical location or attendance at events.
- Professional or employment-related information such as your current or past education and job history.
  - If you are a supplier, distributor, or vendor, we may collect information about your employment and educational history to conduct due diligence, as explained in the section titled “How We Use Personal Information.”
- Criminal background. If you are a supplier, distributor, or vendor, and where permitted by law, we may collect public information about your criminal history to conduct due diligence, as explained in the section titled “How We Use Personal Information.”

## How We Collect Personal Information

Penumbra may collect personal information about you from a variety of sources, including:

- From you: Information may be collected when you submit it to the Website or Penumbra Platforms or interact with us online or offline. For example, Penumbra collects the information you provide when you make a purchase, when you submit a request for information, or submit a request for Penumbra to contact you. Penumbra may also request optional information from you to support your use of the products and services.
- From your devices: The devices you use to access the Website or Penumbra Platforms may provide information to us via cookies, web beacons and other similar technologies. Please see the section below titled “Cookies and Related Technologies” for more information.
- From third parties: Our vendors and service providers, such as our web hosting providers, analytics providers, and advertisers, may provide us information about you or your use of the Website or Penumbra Platforms. You may also give us permission to access your information from services offered by third parties, including social media networks. The information we obtain from third parties depends on your relationship with those third parties and the third parties’ privacy policies.
- From publicly available information, including the information you post publicly on social media.

## How We Use Personal Information

Penumbra may use the personal information we collect:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question, we will use that personal information to respond to your inquiry.
- To enter into and fulfill business agreements with you. If you engage in business with us, we will use your personal information to enter a business agreement, receive and fulfill orders, including payment processing, shipment, and returns, and provide customer service.
- To provide you educational information relevant to your expertise or experience with our products.
- To plan and coordinate events, including to invite you to such events, schedule and coordinate these events, and assist with the travel arrangements associated with attending our events.
- To administer, provide, and improve the Penumbra Platforms. For example, we may use personal information to gather and analyze statistics regarding aggregate usage of the Penumbra Platforms. We may also monitor how many users visit our websites, which components or pages are most popular, which domains you come from, which browsers you use, and how you navigate our website and other Platforms. We use this information to improve the content and performance of the Penumbra Platforms.
- To provide you marketing, communications, and offers for products and services from Penumbra and third parties.
- To process job applications and manage the talent acquisition process.
- For research, analysis, and product development, including clinical research.
- To conduct due diligence on our suppliers and vendors. If you are engaging with Penumbra as a third-party commercial supplier, vendor, distributor, or agent, we may use the information you provide us and publicly available information about you to conduct due diligence to ensure compliance with applicable regulations, maintain quality control, and ensure that our partners are reputable and trustworthy. Depending on certain risk factors, this may involve processing names, contact information, employment information, criminal records, financial information, and media and social media profiles of your business, your business's executives, senior officers, and/or beneficial owners, and their familial relations.
- To comply with applicable laws and our legal obligations. We may use your personal information to comply with applicable laws, regulations, industry codes of conduct,

and Penumbra's internal policies and procedures, including:

- For compliance with applicable retention obligations.
- For adverse event reporting, monitoring product safety, and other reporting obligations.
- To detect, prevent, or otherwise address fraud, security, or technical issues.
- To respond to lawful requests by public authorities (e.g., to investigate fraud or respond to a government request).
- To investigate potential breaches.
- To protect our rights, property, security, safety, and those of our customers, vendors, distributors, suppliers, visitors, and others.
- To evaluate or conduct a business transaction, such as merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
- As otherwise described to you at the time your personal information is collected, or with your consent, if not listed here.
- As otherwise required or permitted by law.

## How and When We Share Personal Information

Penumbra may share your personal information for the following purposes:

- With service providers who perform a variety of services and functions for Penumbra, such as data storage, order fulfillment, and marketing services. Your information will only be shared on the condition that the service providers use your information only to fulfill the agreed services on our behalf.
- With researchers and academics who may use your information in accordance with this Privacy Notice.
- With our affiliates and subsidiaries who may use the personal information for the purposes described in this Privacy Notice.
- With a business transaction partner in the event we go through a business transition such as a merger, acquisition by another company, bankruptcy, reorganization, or sale of all or a portion of Penumbra's assets.
- With law enforcement or governmental agencies to comply with any court order, law, or legal process, including to respond to any government or regulatory request.

- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Penumbra, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Penumbra may also reveal your personal information to unrelated third parties for their independent use if: (1) you request or authorize it; (2) the information is provided to comply with the law; or (3) the information is provided to protect Penumbra's rights or safety, or the rights or safety of Penumbra employees or others.

## Links to External Websites

The Website and Penumbra Platforms may contain links to external websites. The Website interfaces with social media sites such as Facebook, LinkedIn, Twitter, and others. A link to such sites does not imply endorsement by Penumbra of such sites. This Privacy Notice does not apply to those external websites, and you should review the privacy policies of these external sites.

## Cookies and Related Technologies

Penumbra may leverage the following technologies to collect information from your device when using the Website or other Penumbra Platforms:

- Cookies: Small files that are transferred to your device's hard drive to store user preferences and other types of information to help us provide you with certain features.
- Web Beacons or Pixels: Electronic images placed in the code of a webpage, application, or email that allow us to monitor things such as user activity and site traffic.
- Tags: Pieces of code, or tags, which gather information about users. For example, tags are used on our websites to better understand online usage patterns and trends. We may also use tags in our emails or newsletters to count how many of those messages are read.
- Widgets: Small components embedded within our Services that enable you to use certain functionalities.

To learn more about the types of cookies we use on our Website, or to change or withdraw your consent at any time, please use our Cookie Preferences interface.

In order to provide your consent for non-essential cookies, please click on the button on the

pop-up cookie banner message or adjust your preferences in “Cookie Settings” or “Your Privacy Choices”, depending on your location. Some cookies are essential for the functioning of the Website and may not be deactivated.

You may also alter your browser settings to block cookies. Browsers are different, so refer to instructions related to your browser to learn about cookie-related and other privacy and security settings that may be available. For more information on cookies and how to disable them, you can consult the information provided by visiting the Networking Advertising Initiative site at [optout.networkadvertising.org](http://optout.networkadvertising.org) and the Digital Advertising Alliance site at [youradchoices.com](http://youradchoices.com).

## Google Analytics

We use Google Analytics to understand how users interact with our Website and to improve how our business communicates its commercial message online. Google Analytics is a service provided by Google (Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043). Google Analytics uses cookies, which transmit anonymized or truncated personal data to a Google server. The information about our websites generated by a Google Analytics cookie helps us evaluate the use of the website, compile reports on website activity, and provide us with other services relating to website activity and internet usage.

You can find more information about Google’s data protection practices and terms of use by visiting Google’s websites at <https://www.google.com/analytics/terms/us.html> and <https://policies.google.com/privacy?hl=en>.

You can prevent Google from collecting and processing cookie-generated data relating to your use of a website by downloading and installing the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout>.

## reCAPTCHA

We use the “reCAPTCHA” service from Google (Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043) to protect the information that you provide on our Website. With this service, we can differentiate between information entered into a form by a human and information entered by an automated machine (“bot”).

The information obtained via the reCAPTCHA service is used in accordance with Google's Usage Terms and Conditions: <https://policies.google.com/privacy?hl=en>.

## Do Not Track

Certain laws require us to indicate whether we honor “Do Not Track” or “Global Privacy

Control” settings in your browser concerning targeted advertising. Penumbra’s websites honor Global Privacy Control (GPC) by automatically disabling Targeting cookies upon detecting the GPC signal. Penumbra’s websites do not respond to Do Not Track (“DNT”) signals. All About Do Not Track, a Future of Privacy Forum website, has more information about DNT signals and is located at: <https://allaboutdnt.com>.

## **Your Marketing Choices**

We will respect your preferences and choices about how we communicate with you for marketing and promotional purposes. We will only contact you with such messages when you have provided your affirmative consent or when it is in our legitimate business interest to do so, depending on the law in your jurisdiction.

We may obtain your Personal Data for marketing purposes directly from you, such as when you subscribe to an email list or newsletter, or from the contact information we receive as part of a business relationship with you or your employer. In some cases, we may receive Personal Data for marketing purposes from third parties such as LinkedIn, PulsePoint or other marketing data sources.

If you are receiving marketing communications about our products, services, or offers but no longer wish to receive these types of communications, you have the option to unsubscribe. To do so, please click the “unsubscribe” link in the communication and follow the instructions to change your marketing preferences. You may also contact the Privacy Office at [dataprivacy@penumbrainc.com](mailto:dataprivacy@penumbrainc.com) to opt out or withdraw your consent for marketing communications.

Please note that if you unsubscribe from our marketing communications, we may still send you communications as needed to provide our products and services and to fulfill our contractual obligations to you and your employer.

## **Clinical Study Participants**

If you participate in a Penumbra-sponsored clinical trial, you will receive detailed information on the scope of personal data processing in your informed consent document. The information you are given for your specific trial controls your situation. In general, your data will be processed for the purpose of conducting the trial, applying for the approval of a new medical device product, and, if applicable, for other purposes as specified in the pertinent declaration of consent for the study. Anyone who views your identified personal data during a clinical trial is obligated to hold this information in strict confidence.

## Job Applicants

If you apply for a job with Penumbra, we will use the personal data that you provide in your application, including any attachments sent, for the purpose of considering your candidacy for employment. This data includes your name and contact information, the information in your CV or resume, your job preferences, and your profile. If you have a social media profile, including a LinkedIn profile, Penumbra may process the data you choose to share on social media as well.

If you use our online job board hosted by Lever, your personal information will also be processed according to Lever's privacy notice, found here: <https://www.lever.co/privacy>.

## Legal Basis for Processing

Penumbra will only process your personal data when allowed by law; that is, when we have a legal basis for processing. We use personal data when one of the following legal bases applies:

- Performance of a Contract: Where necessary to perform a contract with you or to take steps at your request before entering into such a contract.
- Legal or Regulatory Obligation: Where necessary for compliance with a legal or regulatory obligation that we are subject to.
- Legitimate Interests: Where necessary for our interests, provided that your fundamental rights do not override such interests. We consider and balance the potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests.
- Public Interest: Where the processing is necessary for ensuring high standards of quality and safety of healthcare and medical devices.
- Consent: Where you have provided your consent for processing your personal data. If you provide your consent, you may also withdraw your consent at any time by contacting us using the contact information listed below.
- Vital Interests. We may process personal information where it is necessary to protect the life or imminent safety of you or another individual, where no other legal basis applies.

## Purpose Limitation

Penumbra will only process personal information in a way that is compatible with and relevant to the purpose for which it was collected or authorized by you, or as we notify you if



the purposes change. You have the right to object to or request that we restrict processing of your personal data for such additional purposes.

## **Data Security**

Penumbra will take reasonable steps to ensure that personal information is accurate, complete, current, secure, and reliable for its intended uses. We employ procedural and technological security measures that are designed to protect your personal information from loss, unauthorized access, disclosure, alteration, or destruction.

## **Data Retention**

Penumbra will retain your personal information for as long as reasonably necessary for legitimate business purposes or as required by law. Personal information will be kept until it is no longer necessary to provide our products and services, to fulfill our contractual agreements with you, to comply with applicable law, to protect Penumbra's rights and interests (e.g., where the retention is necessary for the establishment, exercise, or defense of legal claims), or as otherwise needed for the purposes for which it was collected or processed.

## **Data Transfers**

At times, personal data may be transferred to other Penumbra affiliates, service providers, or systems in countries that may not offer a level of data protection equivalent to that in your country, including the United States. Where such transfers occur, Penumbra complies with the cross-border data transfer and export control laws of the countries in which it operates.

For personal data exports out of the European Union ("EU") or European Economic Area ("EEA"), Penumbra enters into the European Commission's Standard Contractual Clauses with the recipient to ensure compliance with the special requirements on transfers of personal data out of such countries. Where necessary, Penumbra will take appropriate supplementary measures to ensure an essentially equivalent level of data protection to that guaranteed in the EEA, in accordance with European Data Protection Board ("EDPB") recommendations.

## **Privacy Statement for Children**

The Website and Penumbra Platforms are not intended to be directed to children that are younger than thirteen (13). Penumbra does not knowingly collect or intend to collect personal information from children that are younger than thirteen (13). If you believe we might have any information from or about a child under thirteen (13), please contact us at [dataprivacy@penumbrainc.com](mailto:dataprivacy@penumbrainc.com).

## Your Rights

Some privacy laws provide certain rights for individuals regarding their privacy and personal information. You may have the following rights, in accordance with applicable laws and subject to necessary validation of your identity:

- Access: You may request access to or copies of your personal information. You may also request information about what types of personal information we have, the purposes for which we process it, and who has received access to or a copy of your personal information.
- Correction: You may request that we correct your personal information if you think it is inaccurate or incomplete.
- Deletion or Erasure: You can also request that we erase or delete your personal information in certain circumstances.
- Object. You may have the right to object to our processing of your personal information for certain purposes. Please note that, in certain cases, we may continue to process your personal data, even if you have objected to the processing, if we have compelling legitimate grounds for the processing which override your privacy interests.
- Restrict Processing. You may request that we restrict the processing of certain personal information.
- Data Portability. You may request that we provide you with the personal information we obtained from you in a machine-readable format, and you can ask us to provide it to another entity.

Only you or someone legally authorized to act on your behalf may make requests regarding your personal data and data protection rights.

You may request to exercise your rights at any time by contacting us as described below with the details of your request. You will not receive discriminatory treatment if you exercise any rights conferred to you by law. Please note that, depending on the circumstances and where you are located, not all of these rights may be available to you.

We will handle any request to exercise your rights in accordance with applicable law, but please note that these rights may not be absolute. Penumbra may refuse or deny a request in accordance with applicable privacy laws. Please contact us to appeal any decision made regarding your request.

## Lodging a Complaint

If you believe we are using, disclosing, or otherwise processing your personal information in a way that is not in accordance with applicable law, you can lodge a complaint with the

relevant data protection authority in your state, country, or region.

## California Residents

While Penumbra's business model does not include sharing or selling your personal information for money, we may "sell" or "share" personal information as defined under certain U.S. state laws when we use third-party cookies and tracking technologies to identify and place advertisements targeted to users of the Websites. To opt out of such sale or sharing of your personal information, please click the link in the footer of our Website labeled "Cookie Settings" or "Your Privacy Choices", depending on your location, and disable "Targeting Cookies."

We do not use sensitive personal information for inferring characteristics about individuals. We do not use automated processing of personal information for profiling purposes.

## Privacy Notice Changes and Updates

This Privacy Notice may be amended at any time. If material changes are made in how personal information is collected, used, disclosed, or otherwise processed, this Privacy Notice will be updated, including the "Effective Date" at the top of this Privacy Notice. We recommend that you review the Privacy Notice each time you visit the Website or use Penumbra Platforms to stay informed of our privacy practices. Any changes will be effective when we post the updated Privacy Notice.

## Contact Information

If you would like to exercise your privacy rights or have questions or concerns about this Privacy Notice, our information practices, or any other aspect of the privacy and security of your personal information, please contact us using the information below.

**Email:** [dataprivacy@penumbrainc.com](mailto:dataprivacy@penumbrainc.com)

**Phone:** US and Global **+1 510.995.9809** | Europe (Germany) **+49 30 2005676270**

**Data Protection Officer:** Amy Worley, [dataprivacy@penumbrainc.com](mailto:dataprivacy@penumbrainc.com)