

Privacy Notice. February 2019

Introduction

This Privacy Notice explains how Penumbra collects, uses, shares, and protects information gathered through the Penumbra website (the “Website”) and processing activities implemented by Penumbra relating to its business activities and relationships. Included herein is a description of the general measures implemented by Penumbra to ensure adequate protection of information relating to an identified or identifiable natural person (“Personal Data”).

Penumbra fully understands the importance of privacy and the protection of personal data, and is committed to ensuring adequate levels of data protection of the Personal Data collected, including from: healthcare professionals; purchasers of our products; users of the Website(s); and job applicants.

The Website may contain links to external websites. The Website may use 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 sites and you should review the privacy policies of these external sites.

Modifications

We may modify this Privacy Notice from time to time and will notify you if we make any material changes to the Privacy Notice.

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When and Why We Collect and Share Personal Data

Penumbra may collect your Personal Data that you communicate to us through direct or indirect interactions with Penumbra; that we collect automatically, such as via cookies; or in compliance with applicable law.

We take steps to ensure your rights are not disproportionately infringed, including allowing you to change your details/personal data to make sure it is accurate, and making sure that we do not start to use your personal data for new purposes without giving you prior notice. Where we rely on our legitimate interests to process your Personal Data, you have the right to object to such processing, as described in more detail under 'Your Rights and Contacts' below.

Where necessary, specific privacy notices and/or consent requests will be provided with more information detailing the processing of your Personal Data. In the event that legislation of your country so requires, this Notice and/or those consents may be supplemented, where applicable, by mandatory information prescribed by local law.

The Website is not intended to be directed to children and Penumbra does not knowingly collect, or in any way intend to collect Personal Data from children without the consent of his/her parent or guardian.

Personal Data may be shared with Penumbra and/or its affiliates, its business partners that may include distributors, certain vendors, and regulatory authorities. Depending on the purpose of the processing activities, Penumbra's legal basis for processing your Personal Data may include:

- **prior consent** via a signed document that will include relevant information to allow you to be fully informed and permit voluntary consent to the processing described in that document;
- **contractual relationship** with you to support the business needs of the contract engagement and refusal will mean that Penumbra will not be able to enter into a contract with you including for payment purposes or to facilitate contract management; track interactions and meetings;
- **to satisfy legal obligations applicable to Penumbra**; allow us to identify you on the healthcare professional only sections of the Website; use related to prevention and investigatory activities or administrative formalities, registration, declarations or audits; to satisfy legal requests from administrative or judicial authorities, in accordance with applicable laws; comply with a subpoena, required registration, or legal process.
- **to protect the legitimate rights and interests** of Penumbra to protect the health, safety, and security of Penumbra personnel and premises; in providing information about our products; to protect ourselves against possible fraudulent actions including website security.

How Data is Stored, Protected, Retained

Personal Data is stored by Penumbra in databases hosted by third parties located in the United States. Where third-parties are engaged to process Personal Data, such third parties are required to comply with applicable privacy laws and this privacy notice; and must ensure adequate technical and organizational security measures designed to protect the confidentiality, integrity, and availability of your Personal Data.

Your Personal Data may be transferred to Penumbra, Inc. in Alameda, California USA. For any transfer made to a country outside the European Economic Area (EEA), Penumbra will ensure the implementation of adequate safeguards required by applicable data privacy regulations (including the European Commission's Standard Contractual Clauses, as the case may be adapted to Switzerland, as applicable) to protect your personal data. To find more about the safeguards implemented by Penumbra, and to obtain a copy of them, please contact us by emailing dataprivacy@penumbrainc.com.

A variety of technological and organizational procedures and measures are designed to ensure the integrity, confidentiality, and availability of the Personal Data and consider and value the likelihood and severity of risk of rights and freedoms of natural persons as well as the state of the art, the costs of implementation and the nature, scope, context, and purposes of processing. Procedures and measures include technical and physical access controls including encryption, and pseudonymization and anonymization of Personal Data.

Your Personal Data will be kept for the minimum time period necessary to fulfill the purposes described herein, except where a longer storage is necessary to comply with applicable law or to protect Penumbra's rights and interests (i.e. where the processing is necessary for the establishment, exercise or defense of legal claims).

Your Rights and Contacts

Penumbra's data protection measures are monitored on an ongoing basis by its data protection officer.

Contact Penumbra's data protection officer if you would like more information about Penumbra's data protection processes, or would like to request access to, rectification, erasure/deletion, restriction of processing, withdraw your consent to processing at any time, without affecting the lawfulness of processing based on consent before its withdrawal, object to processing, request limitation of processing, or request the portability of your Personal Data retained by Penumbra. These rights may be subject to certain requirements or limitations as provided for by applicable law. Additional rights may be granted to you by local law in your country of residence.

You further have the right to lodge a complaint with a supervisor authority, in particular with the supervisory protection authority competent for your place of habitual residence or the place of the alleged infringement.

Penumbra, Inc., with its headquarters located at One Penumbra Place, Alameda, California, 94502, USA, and its affiliated entity, Penumbra Europe GmbH located at Am Borsigturm 44 13507 Berlin Germany are the controllers, as the term is used in the EU General Data Protection Regulation (GDPR).

All questions, complaints, or comments about this Privacy Notice or Penumbra's data protection practices can be emailed to Penumbra's data protection officer at dataprivacy@penumbrainc.com and we will use reasonable efforts to respond to you as soon as possible.

Cookie Policy

A cookie is simple data file sent by a website that is stored on your internet browser when you visit a website. It allows you to temporarily save information about visits and visitors to a website and are used by this Website to 'remember' you. Each time you visit the Website, the data from your previous visit is retrieved. To find out more about cookies, including which cookies have been registered, how to manage them and how to delete them, visit <http://www.youronlinechoices.eu>.

In order to provide your consent to our placement of cookies other than Strictly Necessary Cookies (as described below), please click on the button on the pop-up message. If you do not wish to provide your consent, or if you would like to make your individual choices and only accept some of our cookies, please click the "Cookie Settings" link and make your selections in the Privacy Preference Center. You can also use this tool to withdraw your consent and change your preferences at any time.

If you, or another user of your computer, wish to withdraw your consent at any time, you can also do so by altering your browser settings to decline cookies. You have the option to configure your browser to accept, reject, or delete cookies.

The Cookie Settings Privacy Preference Center provides options to select your preference related to *Functional Cookies and Targeting Cookies*. These cookies are not currently deployed on the Website.

We use the following cookies on our Website:

Strictly Necessary Cookies – These cookies are essential to enable you to move around the Website and use its features. These cookies 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.

<i>Name of Cookie</i>	<i>Description of Cookie</i>
<i>JSESSIONID</i>	<i>Used for J2EE session management.</i>
<i>OptanonConsent</i>	<i>Used for general management of cookies.</i>

Performance Cookies (or Analytical Cookies) – These cookies tell us about how visitors use the Website. Information. 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. These cookies are optional, and we will only place those cookies if you have provided your consent.

<i>Name of Cookie</i>	<i>Description of Cookie</i>	<i>Expiration</i>
<i>_ga</i>	<i>Used by Google Analytics: monitor traffic and highlight issues that people browsing our website may be facing. Used to distinguish users.</i>	<i>13 months</i>
<i>_gat</i>	<i>Used by Google Analytics: monitor traffic and highlight issues that people browsing our website may be facing. Used to throttle request rate.</i>	<i>Session</i>
<i>_gid</i>	<i>Used by Google Analytics: monitor traffic and highlight issues that people browsing our website may be facing. Used to distinguish users.</i>	<i>1 day</i>