



## PRIVACY POLICY FOR WEBSITE VISITORS & BUSINESS CONTACTS

*Last updated: March 16, 2025*

We at Itamar™ Medical Ltd. (together with its affiliated and/or related companies – “**Itamar Medical**”, “**we**”, “**us**” or “**our**”) develop and operate proprietary medical devices and related mobile and web-based applications for diagnosis and care management of sleep apnea (collectively – our “**Products**”). We put great efforts into communicating our privacy practices and ensuring that the information we process is safe and properly used.

This Privacy Policy (“**Policy**”) describes how we collect, store, use, and disclose data that relates to identified or identifiable individuals (“**personal data**” or “**personal information**” and “**data subjects**”, respectively) who:

- visit or otherwise interact with our website, available at [www.itamar-medical.com](http://www.itamar-medical.com) (collectively – “**Visitor(s)**”, and “**Site**”, respectively), and any online ads and content, or emails and communications in relation to the Site;
- interact with us with respect to our services via various sales and marketing channels such as events, webinars, and other business activities, including business contact persons of our prospective or current corporate customers and business partners (collectively – “**Business Contact(s)**”, and together with Visitors – “**you**” or “**your**”).

The activities described above are the “**Services**” to which this Policy applies. Please note that this Policy does NOT cover our privacy practices regarding individuals who use our Products at our customers and business partners’ direction, including their physicians, patients, and office administrators (“**End Users**”).

**If you are an End User, please visit our [Privacy Policy for End Users](#)** which describes our practices relating to such personal data.

Specifically, this Policy describes our practices regarding:

1. [Data Collection](#)
2. [Data Uses](#)
3. [Data Location](#)
4. [Data Retention](#)
5. [Data Disclosure](#)
6. [Cookies & Tracking Technologies](#)
7. [Communications](#)
8. [Data Security](#)
9. [Your Rights](#)
10. [Roles & Responsibilities](#)
11. [Additional Notices & Contact Details](#)

**Please read this Privacy Policy carefully and make sure that you fully understand it.**

You are not legally required to provide us with any personal data, and may do so (or avoid doing so) at your own free will. However, without it, we may be unable to provide you with the full range of our Services or deliver the best user experience. If you prefer not to share your personal data or have it processed by us or any of our Service Providers (defined in [Section 5](#) below), please refrain from providing it, visiting or interacting with our Site, or using our Services. You may also submit a request to exercise your rights, as explained in [Section 9](#) below.

## 1. DATA COLLECTION

We collect and generate the following types of personal data concerning our Visitors and Business Contacts:

- **Site Usage Data:** When you interact with or use our Services, we may collect certain connectivity, technical and aggregated usage data, such as user agent, IP addresses, device information (like type, OS, device ID, browser version, locale and language settings used), activity logs, communication and performance logs, session recordings, issues and bugs, and the cookies and pixels installed or utilized on our Site and/or your device. We collect or generate such data either independently or with the help of our Service Providers (as defined in [Section 5](#) below), including through the use of "cookies" and other tracking technologies (as further detailed in [Section 6](#) below).
- **Business Contact Data:** Data relating to individuals who are employed or engaged by our prospective or current business customers and partners, which we may collect in the following ways –
  - Direct interactions and communications with us: Data you provide when submitting an online form on the Site, including the "Contact Us", "Request a Demo" and support-related "Customer Community" forms (such as your name, title, medical specialty, e-mail address, phone number, country, and zip code), or when interacting with us through any other means, including surveys, feedbacks, transcripts, and analysis thereof. In this respect, please do not provide us with any personal data or sensitive data which is not required for us to process your request or inquiry;
  - Data received from third parties: We may receive personal data concerning you from other sources. For example, if you participate in an event, webinar, or promotion that we sponsor or participate in, we may receive your personal data from its organizers. We may also receive your contact and professional details (e.g., your name, company, position, country, contact details, professional experience, preferences and interests) from our business partners or Service Providers, and through the use of tools and channels commonly used for connecting between companies and individuals in order to explore potential business and employment opportunities, such as LinkedIn and other data sources.

For the purposes of the California Consumer Privacy Act ("CCPA"), during the 12 months preceding the last update of this Policy, we have collected the personal information described above, which falls within these CCPA-defined categories: Site Usage Data as described above includes Identifiers, Geolocation Data, and Internet or other Electronic Network Activity Information, and Business Contact Data includes Identifiers, Professional or Employment-Related Information, and Commercial Information. We do not use or disclose sensitive personal information, as defined in the CCPA, in connection with the provision of our Services.

## 2. DATA USES

We use Visitors' and Business Contacts' personal data as necessary for the following business and commercial purposes and in reliance on the following legal bases:

Site Usage Data	
Purpose	Legal basis for processing
To facilitate, operate and provide our Site.	<ul style="list-style-type: none"> <li>▪ Legitimate Interests</li> </ul>
To provide customer service and technical support.	
To monitor, study and analyze use of the Site.	<ul style="list-style-type: none"> <li>▪ Consent (where appropriate)</li> <li>▪ Legitimate Interests</li> </ul>
To gain a better understanding on how Visitors use and interact with our Site, and how we could improve their and others' user experience and continue improving our offerings and the overall performance of our Site.	<ul style="list-style-type: none"> <li>▪ Consent (where appropriate)</li> <li>▪ Legitimate Interests</li> </ul>
To facilitate and optimize our marketing campaigns, ad management, and sales operations, and to manage and deliver advertisements for our Products more effectively, including on other websites and applications.	
To support and enhance our data security measures, including for purposes of preventing and mitigating the risks of fraud, error, or any illegal or prohibited activity.	<ul style="list-style-type: none"> <li>▪ Legal Obligations</li> <li>▪ Legitimate Interests</li> </ul>
To comply with court orders and warrants, prevent misuse of the Site, and take any action in any related legal dispute and proceeding.	<ul style="list-style-type: none"> <li>▪ Legal Obligations</li> <li>▪ Public Task</li> <li>▪ Legitimate Interests</li> </ul>
To comply with applicable laws and regulations.	<ul style="list-style-type: none"> <li>▪ Legal Obligations</li> <li>▪ Legitimate Interests</li> </ul>
Business Contact Data	
Purpose	Legal basis for processing
To authenticate the identity of our current customers' users and allow them to access and use our <a href="#">Customer Community</a> .	<ul style="list-style-type: none"> <li>▪ Performance of a Contract</li> </ul>
To provide technical support to our current customers who submit a request via the <a href="#">Customer Community</a> .	<ul style="list-style-type: none"> <li>▪ Performance of a Contract</li> <li>▪ Legitimate Interests</li> </ul>
To contact you with general or personalized Services-related messages, as well as promotional messages that may be of specific interest to them, as further described in <a href="#">Section 7</a> below.	<ul style="list-style-type: none"> <li>▪ Performance of a Contract (where appropriate)</li> <li>▪ Consent (where appropriate)</li> <li>▪ Legitimate Interests</li> </ul>
To facilitate and optimize our marketing campaigns, ad management and sales operations, and manage and deliver advertisements for our Products and related services more effectively, including on other websites and applications.	<ul style="list-style-type: none"> <li>▪ Consent (where appropriate)</li> <li>▪ Legitimate Interests</li> </ul>
To explore and pursue growth opportunities by facilitating a stronger local presence and tailored experiences.	
To facilitate, sponsor and offer certain events, contests, and promotions.	
To create aggregated data, inferred non-personal data or anonymized or pseudonymized data (de-identified data), which we or our business partners may use to provide and improve our respective services, conduct research, or for any other purpose.	<ul style="list-style-type: none"> <li>▪ Legitimate Interests</li> </ul>
To comply with applicable laws and regulations.	<ul style="list-style-type: none"> <li>▪ Legal obligations</li> <li>▪ Legitimate Interests</li> </ul>

If you reside or are using the Services in a territory governed by privacy laws under which “consent” is the only or most appropriate legal basis for the processing of personal data as described herein (in general, or specifically with respect to the types of personal data you expect or elect to process or have processed by us), your acceptance of this Policy will be deemed as your consent to the processing of your personal data for all purposes detailed in this Policy, unless applicable law requires a different form of consent. If you wish to revoke such consent, please contact us at [ltamarDPO@zoll.com](mailto:ltamarDPO@zoll.com).

### 3. DATA LOCATION

We and our authorized Service Providers (as detailed in [Section 5](#) below) maintain, store and process personal data in the United States of America, the European Union, the United Kingdom, Israel, and other locations, as reasonably necessary for the proper performance and delivery of our Site and Services, or as may be required by law.

Local privacy laws may be different in your location. For such data transfers across territories, we and our Service Providers take appropriate measures to protect your personal data, your fundamental rights and freedoms, and the exercise of your rights in accordance with applicable laws.

If we transfer personal data originating from the European Economic Area (EEA), the UK, or Switzerland to countries that provide an adequate level of data protection based on adequacy decisions published by the [European Commission](#), the [UK](#), and [Switzerland](#) (as applicable), we rely on these adequacy findings regarding the level of data protection offered by the recipient country.

To the extent we transfer personal data originating from the EEA, the UK or Switzerland elsewhere, we and the relevant data exporters and importers rely on appropriate data transfer mechanisms as established under applicable law, such as adequacy decisions or, when transferring personal data to non-adequate countries, the standard contractual clauses adopted by the EU (available [here](#)) and the UK (available [here](#)). You can obtain a copy by contacting us as indicated in [Section 11](#) below.

### 4. DATA RETENTION

We retain your personal data for as long as it is reasonably necessary in order to maintain and expand our relationship and provide you with our Site and offerings; in order to comply with our legal and contractual obligations; to pursue our legitimate business purposes; or to protect ourselves from any potential disputes (i.e., as required by laws applicable to log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with our data retention policy.

Please note that except as required by applicable law or our specific agreements with you, we will not be obligated to retain your personal data for any particular period, and we are free to securely delete it or restrict access to it for any reason and at any time, with or without notice to you. If you have any questions about our data retention policy, please contact us by e-mail at [ltamarDPO@zoll.com](mailto:ltamarDPO@zoll.com).

## 5. DATA DISCLOSURE

We may disclose your personal data to certain third parties, as follows:

- **Service Providers:** We engage selected third-party companies and individuals to perform services complementary to our own. Such service providers may include hosting and server co-location, communications and content delivery networks (CDNs), data security, fraud detection and prevention, web analytics, e-mail distribution and monitoring, session, call or activity recording and analysis, remote access services, performance measurement, inbound meeting scheduling automation, data optimization and marketing, content providers, e-mail, voicemail, support and customer relation management systems, and our legal, financial and compliance advisors (collectively, “**Service Providers**”). Our Service Providers may have access to your personal data, depending on each of their specific roles and purposes in facilitating and enhancing our Site and Services, and may only use the data as instructed by Itamar Medical.
- **Event Partners:** If you register for any event that we host, organize or sponsor, then with your permission we may disclose your registration details to others, including the hosts, organizers, speakers, service providers, and sponsors of that event, so that they may contact you with relevant information and offers, or to fulfil any promotions related to that event.
- **Itamar Medical affiliates and organizational changes:** We may disclose personal data internally within our group, for the purposes described in this Policy. In addition, should Itamar Medical or any of its affiliates undergo any change in control or ownership, including by means of merger, acquisition, or purchase of substantially all or part of its assets, personal data may be shared with or transferred to the parties involved in such an event. If we believe that such change in control might materially affect your personal data then stored with us, we will notify you of this event and the choices you may have via e-mail or a prominent notice on our Site.
- **Legal compliance:** We may disclose or allow government and law enforcement officials access to your personal data, in response to a subpoena, warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect our legitimate business interests, including the security or integrity of our Site, Products, and Services.
- **Protecting rights and safety:** We may disclose personal data to others if we believe in good faith that this will help protect the rights, property, or personal safety of Itamar Medical or its employees, any of our Visitors, Business Contacts, End Users or customers, or any member of the general public.
- **Additional disclosures:** For the avoidance of doubt, Itamar Medical may disclose personal data in additional manners, pursuant to your explicit approval, or if we are legally obligated to do so, or if we have successfully rendered such data non-personal, non-identifiable and anonymous.

For the purposes of the CCPA, during the 12 months preceding the last update of this Policy, we may have disclosed to the third parties listed in this Section 5 the following CCPA-defined categories of personal information: Identifiers, Internet or other Electronic Network Activity Information, Geolocation Data, Professional or Employment-Related Information, and Commercial Information.

## 6. COOKIES & TRACKING TECHNOLOGIES

**Cookies:** Our Site and Services utilize “cookies”, anonymous identifiers, pixels, container tags, and other technologies in order for us to provide our Services and ensure that they perform properly, analyze our performance and marketing activities, and personalize your experience. Such cookies and similar files or tags may also be temporarily placed on your device. Certain cookies and other tracking technologies serve to recall personal data, such as an IP address, previously indicated by a Visitor to our Site. Under some data protection laws, like the CCPA and other US state privacy laws, our disclosure of this data to third parties for targeted advertising may be considered a “sale” or “sharing” of personal information. To learn more about our practices concerning cookies and other trackers, and how to exercise your opt-out rights, please visit our [Cookie Policy](#).

For the purposes of the CCPA, during the 12 months preceding the last update of this Policy, we have “sold” or “shared” with our analytics and advertising partners (including Service Providers) the following CCPA-defined categories of personal information: Internet or other electronic network activity information, Geolocation data, and Commercial information. We don’t have actual knowledge that we “sell” or “share” the personal information of individuals under 16 years of age.

**Google Analytics:** We use Google Analytics to collect information about the use of our Site. Google Analytics collects information such as how often you visit the Site, which pages you visited when doing so, and which other sites you used prior to coming to our Site. We do not merge the information collected through the use of Google Analytics with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to and use of the Site is restricted by the [Google Analytics Terms of Service](#) and the [Google Privacy Policy](#). You can learn more about how Google collects and processes data specifically in connection with Google Analytics [here](#), and about Google’s commitment to protecting data confidentially and securely [here](#). Further information about your option to opt-out of these analytics services is available [here](#).

## 7. COMMUNICATIONS

We may engage in service and promotional communications through e-mail, phone, SMS and notifications.

**Service Communications:** We may contact you with important information regarding our Services. For example, we may send you notifications (through any of the means available to us) of changes or updates to our Services, billing and collection matters, log-in attempts or password reset notices, and planned service and maintenance. Please note that certain communications essential to the operation and use of our Services cannot be opted out of.

**Promotional Communications:** We may also notify you about new features, additional offerings, events, special opportunities, or any other information we think you will find valuable. We may provide such notices through any of the contact means available to us (e.g., phone, mobile or e-mail) or through our marketing campaigns on any other sites or platforms. If you do not wish to receive such promotional communications, you may notify us at any time by sending an e-mail to [ItamarDPO@zoll.com](mailto:ItamarDPO@zoll.com), or by following the “unsubscribe”, “stop”, “opt-out” or “change e-mail preferences” instructions contained in the promotional communications you receive.

## 8. DATA SECURITY

We implement industry-standard physical, procedural, and electronic security measures to secure your personal data held with us and our Service Providers, in order to minimize the risks of theft, damage, loss of information, or unauthorized access or use of personal data.

However, please be aware that regardless of any security measures used, we cannot and do not guarantee that our Site will be immune from any wrongdoing, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

## 9. DATA SUBJECT RIGHTS

If you wish to exercise your privacy rights under any applicable law (including the EU or UK General Data Protection Regulation (GDPR), the CCPA, and others), you may do so by contacting us by email to [ItamarDPO@zoll.com](mailto:ItamarDPO@zoll.com).

Such rights may include – to the extent available to you under the laws that apply to you – the right to know or request access to specific pieces of personal data collected, categories of data collected and sources from whom it was collected, as well as the purposes of collecting it and categories of third parties to whom we have disclosed it; the right to request rectification or erasure of your personal data held with Itamar Medical; to restrict the processing of such data and to object to its processing (including the right to opt out of the sale or sharing of your data for targeted advertising, as further detailed in our [Cookie Policy](#)); to port such data; or the right to equal services and prices (e.g., freedom from discrimination).

Please note that we may require additional information, including certain personal data, in order to authenticate and process your request (including validating your name and the email you use when interacting with Itamar Medical) and to ask you to provide further information to better understand the nature and scope of your request. Such additional information may then be retained by us for legal purposes (e.g., as proof of the identity of the person submitting the request), in accordance with [Section 4](#) above.

To the extent applicable to you, you may designate an authorized agent, in writing or through another person or third party to submit a request to exercise your rights by providing written permission in conjunction with the submission of the requested information or by giving the third party your power of attorney, to request to exercise your privacy rights on your behalf. The authorized agent may submit a request to exercise these rights by emailing us.



We will acknowledge your request and provide a follow-up substantive response within a time period permitted by applicable law. We may redact from the data which we will make available to you, any personal data related to others.

If you are a GDPR-protected individual, you also have a right to lodge a complaint with a data protection authority, such as the supervisory authority of your habitual residence. A full list of EEA data protection authorities is available [here](#). You can also lodge a complaint with the UK's [Information Commissioner's Office](#), which is the competent supervisory authority for our UK affiliate, ZOLL Medical (UK) Limited.

## 10. ROLES & RESPONSIBILITIES

Certain data protection laws and regulations, such as the EU or UK GDPR and the CCPA, typically distinguish between two main roles for parties processing personal data: the “**Data Controller**” (or under the CCPA, “Business”), who determines the purposes and means of processing; and the “**Data Processor**” (or under the CCPA, “service provider”), who processes the data on behalf of the Data Controller.

**Itamar Medical is the Data Controller of its Visitors and Business Contacts’ personal data**, and assumes the responsibilities of a Data Controller (or a Business), solely to the extent applicable under law and as set forth in this Policy. In such instances, our Service Providers (as detailed in [Section 5](#)) processing such data on our behalf will assume the role of Data Processor (or “service provider” under the CCPA). For the purposes of Israel’s Protection of Privacy Law, Itamar Medical Ltd. serves as the “**Database Controller**” responsible for the personal data processed in connection with our Services and may be contacted at [ltamarDPO@zoll.com](mailto:ltamarDPO@zoll.com).

## 11. ADDITIONAL NOTICES & CONTACT DETAILS

**Updates and Amendments:** We may update and amend this Policy from time to time by posting an amended version on our Site. The amended version will be effective as of the date it is published. We will provide prior notice if we believe any substantial changes are involved via any of the communication means available to us. After such notice period, all amendments shall be deemed accepted by you.

**External Links:** While our Site may contain links to other websites or services, we are not responsible for their privacy practices. We encourage you to pay attention when you leave our Site for the website or application of such third parties, and to read the privacy policies of each and every website and service you visit. This Policy applies only to our Services.

**Our Site is not designed for children:** We do not knowingly collect personal data from children and do not wish to do so. If we learn that a person who is underage according to the law applicable to them is using the Site, we will attempt to prohibit and block such use and will make our best efforts to promptly delete any personal data stored with us with regard to such a child (except for data that must be retained for legal purposes). If you believe that we might have any such data, please contact us by e-mail at [ltamarDPO@zoll.com](mailto:ltamarDPO@zoll.com).

**Data Protection Officer:** If you have any comments or questions regarding this Policy, if you have any concerns regarding your privacy, or if you wish to make a complaint about how your



personal data is being processed by Itamar Medical, you can contact our Data Protection Officer at [ItamarDPO@zoll.com](mailto:ItamarDPO@zoll.com).

**EU Representative:** Arazy Group GmbH has been designated as Itamar Medical's representative in the European Union for data protection matters pursuant to Article 27 of the GDPR. Arazy Group GmbH may be contacted on matters related to the processing of personal data of individuals in the EU. To make such an inquiry, please send an e-mail to one of the following email addresses: [Germany@arazygroup.com](mailto:Germany@arazygroup.com), [miki.m@arazygroup.com](mailto:miki.m@arazygroup.com).

**UK Representative:** Medes Limited has been designated as Itamar Medical's representative in the United Kingdom for data protection matters pursuant to Article 27 of the UK GDPR. Medes Limited may be contacted on matters related to the processing of personal data of individuals in the UK. To make such an inquiry, please send an email to one of the following email addresses: [medes@arazygroup.com](mailto:medes@arazygroup.com), [miki.m@arazygroup.com](mailto:miki.m@arazygroup.com).

**Questions, concerns, or complaints:** If you have any comments or questions regarding this Policy, or if you have any concerns regarding your personal data held with us, please contact us at [ItamarDPO@zoll.com](mailto:ItamarDPO@zoll.com).