

Wellspect Privacy Notice

This Wellspect Privacy Notice is a supplement to the information contained in the [Dentsply Sirona Privacy Notice](#), and describes how Wellspect (collectively, “Wellspect,” “we,” “our,” or “us”) collects, uses, discloses and otherwise processes the personal data of individual patients, in particular who have given their consent to:

1. Request a product sample, receive support, and/or order products, and/or;
2. Receive direct marketing communications, and/or;
3. Product development, and/or;
4. Electronic invoice handling (only applicable in Italy)

1. Data controller

The primary data controller of your personal data will be the applicable Wellspect business (part of Dentsply Sirona Group) with whom you have interacted, who will be responsible for processing your personal data for the purposes you have provided consent for.

For a list of Wellspect companies and international locations, see [here](#).

2. Personal data and data processing

Personal Data Collected Directly from You. We will process your personal data for the following purposes (where relevant):

2.1. Provide requested product sample and/or service

Categories of personal data:	Name Contact details (email address, phone number and address) Health-related data including medical device description and details of the medical device concerned Information in our communication
Purpose of processing:	Personal data is processed to provide you with product sample and/or service you have requested (e.g., customer Care support including technical assistance on Wellspect products, education materials, handling any complaints, general Wellspect information or Peer Support consultation; product delivery).
Legal basis:	Consent, where required by law
Retention period:	Up to one year after deliverance of requested material or service, or until you withdraw your consent if earlier

2.2. Direct marketing

Categories of personal data:	Name Contact details (email address, telephone number and address) Product in use
Purpose of processing:	Sending direct marketing through electronic communications, including email, telephone and social media
Legal basis:	Consent, where required by law
Retention period:	Up to two years after consent is obtained or until you withdraw your consent, if earlier

2.3. Product and service improvement activities

Categories of personal data:	Name Contact details (email address, phone number and address) Gender Age Product in use Illness/disease Special needs related to illness/disease
Purpose of processing:	Personal data is collected, registered, and stored in our user register for product development to develop and/or improve Wellspect products, offerings, services, including through user research to better understand user behavior, experiences and preferences, and your personal data will be used for contacting you with request for participation in future product development/research projects (e.g. interviews, workshops or marketing questionnaires).
Legal basis:	Consent, where required by law
Retention period:	Until you withdraw your consent

2.4. Electronic invoice handling (only applies to patients in Italy)

Categories of personal data:	Name Contact details (email address, phone number and home address) Use of Wellspect medical product Medical device number and trade name
Purpose of processing:	Personal data is processed to provide you with an e-invoice of the Wellspect medical product you order.
Legal basis:	Legal obligation
Retention period:	10 years

Personal Data Collected from Third Parties. We may collect data about you from third-party sources such as healthcare providers, or other third parties, as follows:

- **Orders and prescription information.** To be able to provide you with these services and/or products, we may process information regarding the orders and related prescriptions of medical devices that we receive from national healthcare service providers to be able to dispense the medical device to you as an end user of

Wellspect products. Relating to the product deliveries, we process your personal data such as your name, personal contact information, your age to determine reimbursement, and health information including prescription information, details regarding the ordered medical device, in UK, your NHS number, gender (information about male / female catheters) and your prescription habits.

We do not conduct automated decision-making that produces legal or similarly significant effects for the processing of this personal data.

3. Recipients of your personal data

Wellspect affiliates and employees of Wellspect. Your personal data may be shared with our employees who need access to perform their work duties. We may disclose the personal data we collect to other Wellspect affiliates who will use and disclose this personal data in accordance with the Wellspect Privacy Notice and the Dentsply Sirona Privacy Notice. A list of Wellspect companies and their locations can be found [here](#).

Vendors and service providers. We may disclose the collected personal data to our vendors and service providers who perform functions on our behalf or provide us with service, including:

- storing of and managing personal data for delivering prescribed and other products,
- storing of and managing personal data for keeping product development registers,
- storing of and managing personal data for direct marketing purposes, and;
- issuing electronic invoicing (only applicable for Italy).

Independent data controllers. We also share your personal data with certain entities which process your personal data as independent controllers. The fact that the entity is an independent controller means that we do not determine how the personal data disclosed to the company will be processed by such company. Recipients of your personal data as independent data controllers are:

- In case of Peer Support, your selected peer consultant.
- Distributors that Wellspect uses.

4. Third country transfers

In connection with your data processing, your personal data may be transferred and processed in the other jurisdictions where we and our affiliates and service providers have operations. Where some of these jurisdictions may not provide equivalent levels of data protection as compared to your home jurisdiction, we will, as required by applicable law, ensure that your privacy rights are adequately protected by organizational, technical, contractual and/or other lawful means. Additional information on these transfers can be found in the Dentsply Sirona Privacy Notice available at <https://dentsplysirona.com/privacy>.

5. Security

We have implemented safeguards that are intended to protect the personal data we collect from loss, misuse, unauthorized access, disclosure, alteration, and destruction. Additional

information can be found in the Dentsply Sirona Privacy Notice available at <https://dentsplysirona.com/privacy>.

6. Your rights in respect to your personal data.

You have several rights under your local privacy laws, that allow you to exercise certain rights in relation to the personal information that we hold about you, subject to certain conditions and exceptions. Additional information about these rights can be found in the Dentsply Sirona Privacy Notice available at <https://dentsplysirona.com/privacy>.

7. Children's data and individuals with limited legal capacity

We may provide these services and/or products to children under the age of 18 and to individuals who have limited legal capacity, and in such cases will, in line with applicable law, provide notice to and obtain consent on the child's or individual's behalf from a parent, legal guardian, or other authorised representative acting on behalf of these individuals.

8. Contact Us

Wellspect welcomes your questions and comments about your privacy or this Notice. Please contact us at privacy@dentsplysirona.com. Additional details of the Data Protection Officer can be found in the Dentsply Sirona Privacy Notice available at <https://dentsplysirona.com/privacy>.