

PRIVACY POLICY

[Last Amended: Dec 31, 2021]

1. GENERAL

This document sets out the privacy policy ("Privacy Policy") of Cordio Medical LTD., which is an Israel legal corporate entity, registered under number 514975374 ("Cordio", "we", "us" and "our").

Privacy Commitment

Cordio Medical LTD is committed to protecting the privacy of all individuals in respect of whom we hold any personal data.

We have included information below regarding which types of data are collected and how we process and use your data to inform you about our processing practices and assure you that your Personal Data is treated with respect and in accordance with the applicable data protection legislation when using the HearO a Cordio App® pplication.

For the purposes of the European Union General Data Protection Regulation ("GDPR"), we are considered the processor (as such term is defined under the GDPR) of the Personal Data we process on behalf of the Customers unless you are a patient participating in a clinical trial Cordio is sponsoring, then we are considered as joint controller concerning your personal data.

This Privacy Policy is an integral part of the HearO™ [License Agreement](#) ("Agreement"). Any definitions that are used herein and not defined herein shall have the meaning ascribed to them in the terms and conditions.

2. INFORMATION WE COLLECT

2.1. If you are the application admin or part of the health care provider staff :

2.1.1. Registration - When you register for our platform, you will need to provide us with your full name, e-mail address, profession, phone number. This information will be processed for the purpose of performing our contract with you, to set up your account with us, and enable you to use our platform.

2.1.2. Contact Details - If you contact us for support or other inquiries, you may be requested to provide us with your full name and e-mail address and/or phone number. We will process this information subject to our legitimate interest and use it solely to contact you, respond to your inquiries, and provide you with the support or information that you requested. We may process the contents of our correspondence with you to improve our customer service and resolve any disputes with you (if applicable).

2.1.3. Online Identifiers and Technical Non-Personal Data - When you use our platform, we may, either directly or indirectly (through our third-party service providers) collect your IP address. We may collect technical Non-Personal Data from you when you access our platform as well, such as your language preference and the

actions you take when you use our platform. In the event required under applicable law, we will obtain your consent to gather such information. Please note that we do not attempt to analyze or determine your identity based on such information or otherwise combine it with any information such as your name or e-mail address.

2.2. If you are the HearO™ application end-user

2.2.1. End-users data processed on behalf of Customers - When you and our customer use our platform, certain information regarding the end-user will be uploaded onto our platform either automatically or by you or the customer, including:

2.2.1.1. Contact details such as: name, e-mail, Tel no., address etc.

2.2.1.2. Data concerning health such as voice records and health indicators (weight, pulse, etc.)

2.2.2. We will have access to this information as provided by our customer. However, Cordio will not use the information for any other purpose than providing our services to the customer. We will retain any such information for as long as needed, subject to applicable law and our customer written instructions.

3. HOW WE COLLECT DATA

Depending on the nature of your interaction with us, we may collect information from you in one or both of the following ways:

- (i) **Automatically** – we may automatically collect some information from you, such as your IP address, when you use our platform.
- (ii) **Provided by you** – we will collect information if and when you choose to provide us with the information, such as via communications with us or when you register and use the HearO™ application, all as explained in this Privacy Policy.

4. SHARING INFORMATION WITH THIRD PARTIES

We may disclose your personal data to any member of our group of companies reasonably necessary for the purposes and on the legal basis set out in this notice.

We may disclose your personal data to our trusted third parties. We have engaged to perform business-related functions on our behalf, including, but not limited to, marketing and distribution of our products, hosting services, database maintenance, and analytics services.

In addition to the specific disclosures of personal data set out in this section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary to establish, exercise, or defend legal claims, whether in court proceedings or an administrative or out-of-court procedure.

5. DATA RETENTION

We retain the information we collect as long as it remains necessary for the purposes set forth above, all according to applicable laws and our customer's written instructions.

6. DATA SUBJECT RIGHTS

Depending on your jurisdiction, data protection and privacy laws provide you with the ability to exercise certain rights regarding your Personal Data that we process, such as:

- The right to access and be informed about how your personal information is being used.
- The right to access the personal information we hold about you.
- The right to request the correction of inaccurate personal information we hold about you.
- The right to request that we delete your data or stop processing it or collecting it, in some circumstances.
- The right to request that we transfer or report elements of your data either to you or another service provider.
- The right to complain to a supervisory authority; and
- To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7. SECURITY

We have put in place physical, administrative, and technical procedures and measures designed to help prevent unauthorized access and maintain data security confidentiality.

Although we take appropriate measures to safeguard against unauthorized disclosures of personal data, we cannot assure you that your personal data will never be disclosed, altered, or destroyed in a manner that is inconsistent with this privacy policy.

8. DATA TRANSFER (To our EU customers - Your Information and Countries Outside of EEA)

The personal data that we process may be transferred to, processed, or stored outside the European Economic Area ("EEA").

We are committed to processing any EU personal information in third countries approved as adequate by the European Commission or using the European Commission's standard contractual clauses.

Further information may be obtained from our Data Protection Officer.

9. NO SALE OF PERSONAL INFORMATION

Cordio Medical LTD does not and will not sell your Personal Information.

10. CHANGES TO THIS PRIVACY POLICY

Cordio Medical Ltd. reserves the right to amend this privacy notice at our discretion and at any time.

When we make changes to this privacy notice, we will post the updated notice on our Website and application and update the notice's effective date. Your continued use of our Website and application following the posting of changes constitutes your acceptance of such changes

11. CONTACT US

Please contact us if you have any questions (or comments) concerning this Privacy Policy, as follows:

- By e-mail: dpo@cordio-med.com
- By Tel : +97235467163