

## DATA PRIVACY NOTICE - DISTRIBUTORS

Teleflex is committed to protecting and respecting your privacy. This Data Privacy Notice sets out the basis on which any personal data we collect from you or that you provide to us (**Data**) shall be processed. Please read the following carefully to understand our use of Data.

Please note that this Data Privacy Notice only applies to personal data that is collected and processed by Teleflex Incorporated, 550 E. Swedesford Road Suite 400 Wayne, PA 19087-1603, USA (referred to herein as "Teleflex", "we", "us" or "our").

By providing Data for the purposes of the Reseller Due Diligence Questionnaire, and the business relationship between the Company and Teleflex you are consenting to the use of your Data as set out in this Privacy Notice. You have the right to withdraw your consent at any time. Please contact us if you wish to do so (see Contact Us below).

For the purposes of this Privacy Notice, references to "the Company" relate to the organisation named at Section A.1 of the Reseller Due Diligence Questionnaire or the Company with which Teleflex is entering into the distributor arrangement.

### Scope

This Privacy Notice applies to you, whether you are a past, current or prospective employee worker, officer and director of the Company as detailed in the Reseller Due Diligence Questionnaire and the business relationship between the Company and Teleflex. It also applies to third parties whose information you provide to us in connection with our business relationship with the Company. Please ensure that you provide a copy of this Privacy Notice to any third parties whose personal data you provide to us.

### What is Personal Data?

'Personal Data' is any data relating to a living individual who can be identified directly from that data or indirectly together with other information. We hold some or all of the following types of personal data in relation to you which is provided to us by the Company in the Reseller Due Diligence Questionnaire or during the course of the distribution arrangement between the Company and Teleflex:

- Name, business contact details including email and telephone;
- If you own ten per cent (10%) or more of the Company, we collect your name, title, nationality and ownership percentage;
- If you are a director or officer of the Company, we collect your details including your name, title, years with the Company, address, passport number and nationality;
- If you are a current or former officer, director, partner, significant owner or employee of the Company we collect data relating to (i) whether you have been an employee or official of a government, a governmental agency or a business owned or otherwise controlled by a government at any time during the past 5 years; (ii) whether you are related to an employee or official of a government, a governmental agency or a business owned or otherwise controlled by a government; (iii) whether you or an immediate family member have been an employee or member of any public international organizations (e.g. the World Bank, the International Monetary Fund, the United Nations, the Asian Development Bank, or the European Union); (iv) whether you have any interest in, or stand to benefit in any way from, the Company's sale of Teleflex products; (v) whether you have any business, offices or other operations in Cuba, Iran, Libya, North Korea, Sudan, Syria or the Crimea region of Ukraine; (vi) whether you have ever been placed on any restricted parties list (e.g., the U.S. Commerce Department's Denied Persons List, Unverified List or Entity List, or the U.S. Treasury Department's Specially Designated Nationals List); (vii) details as to any ownership interests held in other businesses;
- If you are an employee solely or primarily dedicated to the sale of Teleflex products, we collect data including your name, title and years with your employer, identity and verification details and supporting documentation such as a copy of passport;

- We collect data as to whether you or an immediate family member are a member of a political party;
- We may collect data as to whether you have ever been accused of, investigated regarding, indicted for, charged with, convicted of, or plead guilty or no contest to, any crime involving bribery, corruption or the import, export or distribution of goods;
- Additional information that you provide to us, for example by email or telephone calls for due diligence purposes or as required for the purpose of the distribution arrangement between the Company and Teleflex.

## Purpose and Legal Basis for Processing Your Data

We will hold, process and may disclose your personal data for the following purposes:

Purpose for Processing	Legal Basis for Processing
To carry out and complete our due diligence processes and screening processes, including carrying out searches and verifying your identity to ensure that your name is not included on any of the lists set out at <b>Annex 2</b> , including financial or other sanctions lists, or restricted persons list.	➤ This processing will be carried out on the basis of <b>this Data Privacy Notice</b> . You can withdraw your consent at any time by contacting us (see 'Contact Us' section below)
To provide you with information in relation to the due diligence process or our business relationship; To notify you about changes to our business arrangement; To fulfill the business arrangement between us and the Company; To complete and contribute to any audits.	➤ This use of your data is necessary for our legitimate business interest in managing our business including legal, personnel, administrative and management purposes and for the prevention and detection of crime. We have carried out a balancing test to ensure that your interests do not override this legitimate business interest of ours. For more information on this balancing test carried out by Teleflex please contact PrivacyOfficial@teleflex.com. <b>Please note that you have a right to object to processing of your personal data where that processing is carried on for our legitimate interest.</b>

## Special Categories of Personal Data

Certain categories of your personal data are regarded as 'special'. Special data includes information relating to an individual's:

- Physical or mental health;
- Religious, philosophical or political beliefs;
- Trade union membership;
- Ethnic or racial origin;
- Biometric or genetic data; and
- Sexual orientation.

## Purpose and Legal Basis for Processing Your Special Data

We will hold, process and may disclose your personal data for the following purposes:

Purpose for Processing	Legal Basis for Processing
Carry out and complete our due diligence processes and screening processes, including carrying out searches and verifying your identity to ensure that your name is not included on any of the lists set out at <b>Annex 2</b> , including financial or other sanctions lists, or restricted persons list.	➤ This processing will be carried out on the basis of <b>this Data Privacy Notice</b> . You can withdraw your consent at any time by contacting us (see 'Contact Us' section below)

We will hold on to your Data only for as long as necessary for the purposes of our due diligence process, for the duration of the related services being provided (if applicable) or as required by law.

### Recipients of your Personal Data

We will share the Data we collect as described in this Privacy Notice with our subsidiaries specified in the **Annex 1** of this notice below to allow the subsidiaries to process the Data for the same purposes as the purposes of our processing described above. The entity which will be responsible for management of the shared Data is Teleflex, Incorporated. For address and name of the representative, please see [here](#).

In addition, we may disclose the Data that we collect as described in this Privacy Notice to third parties or agents, including without limitation to:

- Contractors, such as regulatory contractors, tax advisors, accountants and sales agents;
- Service providers, such as payroll providers and information technology providers;
- Legal advisors for the purposes of complying with our legal obligations, seeking advice and for the defence of any legal claims;
- Insurers for the purposes of complying with our legal obligations, seeking advice and for the defence of any claims;
- Auditors for the purposes of complying with our legal obligations;
- other third parties we use to support our business, the due diligence/screening process and the management of the business relationship, such as KPMG and Dun & Bradstreet;
- a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Teleflex and its affiliates' business, whether as a going concern or as part of a bankruptcy, liquidation or similar proceeding, in which the Data held by us about our service providers is among the assets transferred.

We may also disclose the Data:

- To comply with any court order, law or legal process, including in response to any government or regulatory request; and/or
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Teleflex and its affiliates, our customers or others. This includes exchanging information with other companies and, government authorities and organizations for the purposes of fraud protection, customs and trade compliance and credit risk reduction.

### Transfer of Personal Data outside Japan

Such disclosures will involve the transfer of Data to countries located outside of Japan, including the USA, which may not afford you an adequate level of protection in relation to the processing of your Data as that provided in Japan. Appropriate safeguards are in place to protect any transfer of your Data. Teleflex stores Data on servers in the USA hosted by a third party provider, TierPoint Hosted Solutions, 99 TW Alexander Durham, NC, USA 27709. TierPoint Hosted Solutions is Privacy Shield certified, providing a reasonable level of data protection as required by the General Data Protection Regulation ("GDPR"). Please contact us if you wish to obtain further information in relation to those safeguards (see "Contact us" below).

## Your rights

If you are located in Japan, you have the right to request access to, rectification, or erasure of your Data, or restriction of processing or to object to processing of your Data, in certain circumstances pursuant to applicable laws. The following is a summary of what these rights may involve:

- **The right of access** enables you to receive a copy of your Data.
- **The right to rectification** enables you to correct any inaccurate or incomplete Data.
- **The right to erasure** enables you to ask us to delete your Data in certain circumstances, for example where it is no longer necessary for us to process it or if you consider it is being unlawfully processed. Your request can be refused if the processing is necessary to comply with an EU or Irish legal obligation or for the exercise or defence of legal claims.
- **The right to restrict processing** enables you to ask us to halt the processing of your Data in certain circumstances, for example if we process your Data for purposes not notified to you in advance.

We will respond to your request in writing, or orally if requested, as soon as practicable and in any event not more than one month after receipt of your request. We may request proof of identification to verify your request. All requests should be addressed to [PrivacyOfficial@teleflex.com](mailto:PrivacyOfficial@teleflex.com).

You have the right to lodge a complaint with the Data Supervisory Authority, in particular in the Member State of your residence, place of work or place of alleged infringement, if you consider that the processing of your Data infringes the GDPR.

## Security and where we store your personal data

We are committed to protecting the security of your Data. We use a variety of security technologies and procedures to help protect your Data, taking into account the risks presented by the processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, or stored and used. We have implemented strict internal guidelines to ensure that your privacy is safeguarded at every level of our organisation. We will continue to revise policies and implement additional security features as new technologies become available.

## Changes to this Privacy Notice

We reserve the right to change this Privacy Notice from time to time for business or operation reasons. If we make any material changes, we will notify you by contacting the Company in writing and advising of any such changes.

## Contact Us

Questions, comments, requests and complaints regarding this Privacy Notice and the information we hold are welcome and should be addressed to: [PrivacyOfficial@teleflex.com](mailto:PrivacyOfficial@teleflex.com).

## Annex 1

### Subsidiaries of Teleflex Incorporated

Entity Name	Jurisdiction of Formation
1. 1902 Federal Road, LLC	Delaware
2. Arrow Internacional de Chihuahua, S.A. de C.V.	Mexico
3. Arrow Internacional de Mexico, S.A. de C.V.	Mexico
4. Arrow International CR, a.s.	Czech Republic
5. Arrow International LLC	Delaware
6. Arrow Interventional, Inc.	Delaware
7. Distribuidora Arrow, S.A. de C.V.	Mexico
8. Essential Medical, Inc.	Delaware
9. Hudson Respiratory Care Tecate, S. de R.L. de C.V.	Mexico
10. ICOR AB	Sweden
11. Inmed Manufacturing Sdn. Bhd.	Malaysia
12. LMA Urology Limited	Seychelles
13. Medical Innovation B.V.	Netherlands
14. Medical Service GmbH	Germany
15. NeoTract, Inc.	Delaware
16. Project Slim Merger Sub, Inc.	Delaware
17. Pyng Medical Corp.	Canada
18. Rusch Asia Pacific Sdn. Bhd	Malaysia
19. Rüsç Austria GmbH	Austria
20. Rusch Mexico, S.A. de C.V.	Mexico
21. Rusch Uruguay Ltda.	Uruguay
22. Simal SA	Belgium
23. Sometec Holdings SAS	France
24. T.K. India Private Ltd.	India

25. Teleflex Commercial Designated Activity Company	Ireland
26. Teleflex Development Unlimited Company	Ireland
27. Teleflex Funding LLC	Delaware
28. Teleflex General Partner LLC	Delaware
29. Teleflex Global Holdings LLC	Delaware
30. Teleflex Global Services LLC	Delaware
31. Teleflex Holding Netherlands B.V.	Netherlands
32. Teleflex Korea Ltd. South	South Korea
33. Teleflex Life Sciences Limited	Malta
34. Teleflex Life Sciences LLC	Delaware
35. Teleflex Life Sciences Pte. Ltd.	Singapore
36. Teleflex Life Sciences Unlimited Company	Ireland
37. Teleflex LLC	Delaware
38. Teleflex Lux Holding S.à r.l.	Luxembourg
39. Teleflex Manufacturing Unlimited Company	Ireland
40. Teleflex Medical (Proprietary) Limited	South Africa
41. Teleflex Medical (Thailand) Ltd.	Thailand
42. Teleflex Medical Asia Pte. Ltd.	Singapore
43. Teleflex Medical Australia Pty Ltd	Australia
44. Teleflex Medical B.V.	Belgium
45. Teleflex Medical B.V.	Netherlands
46. Teleflex Medical Brasil Serviços e Comércio de Produtos Médicos Ltda.	Brazil
47. Teleflex Medical Canada Inc.	Canada
48. Teleflex Medical Chile SpA	Chile
49. Teleflex Medical Colombia S.A.S.	Colombia
50. Teleflex Medical de Mexico, S. de R.L. de C.V.	Mexico
51. Teleflex Medical Devices S.à r.l.	Luxembourg

52. Teleflex Medical EDC BVBA	Belgium
53. Teleflex Medical Europe Limited	Ireland
54. Teleflex Medical GmbH	Germany
55. Teleflex Medical GmbH	Switzerland
56. Teleflex Medical Hellas s.a.	Greece
57. Teleflex Medical Incorporated	California
58. Teleflex Medical Japan, Ltd	Japan
59. Teleflex Medical New Zealand	New Zealand
60. Teleflex Medical OEM LLC	Delaware
61. Teleflex Medical Philippines Inc.	Philippines
62. Teleflex Medical Private Limited	India
63. Teleflex Medical S.r.l.	Italy
64. Teleflex Medical SAS	France
65. Teleflex Medical Sdn. Bhd.	Malaysia
66. Teleflex Medical Taiwan Ltd.	Taiwan
67. Teleflex Medical Technology Ltd	Cyprus
68. Teleflex Medical Trading (Shanghai) Co., Ltd.	China
69. Teleflex Medical Tuttlingen GmbH	Germany
70. Teleflex Medical, S.A.21	Spain
71. Teleflex Medical, s.r.o.	Czech Republic
72. Teleflex Medical, s.r.o.	Slovakia
73. Teleflex Polska sp. z o.o.	Poland
74. Teleflex Production Unlimited Company	Ireland
75. Teleflex Properties Ireland Limited	Ireland
76. Teleflex Research S.à r.l.	Luxembourg
77. Teleflex Supply Chain Management (Shanghai) Co. Ltd.	China
78. Teleflex Urology Limited Ireland	Ireland
79. TFX Aviation Inc. California	California

80. TFX Development LLC	Delaware
81. TFX Engineering Ltd.	Bermuda
82. TFX Equities Incorporated	Delaware
83. TFX Group Limited	United Kingdom
84. TFX Holding GmbH	Germany
85. TFX International SAS	France
86. TFX North America Inc.	Delaware
87. The Laryngeal Mask Company (Malaysia) Sdn. Bhd.	Malaysia
88. The Laryngeal Mask Company Limited	Seychelles
89. Traverse Vascular, Inc.	Delaware
90. Truphatek Holdings (1993) Limited	Israel
91. Truphatek International Limited	Israel
92. Truphatek Product Resources India Private Limited	India
93. Vascular Solutions LLC	Minnesota
94. Willy Rüsç GmbH	Germany
95. WIRUTEC Rüsç Medical Vertriebs GmbH	Germany
96. Z-Medica, LLC	Delaware
97. Z-Medica Acquisition, Inc.	Delaware
98. Zeus Buyer, L.P.	Delaware

## **ANNEX 2**

### ***Export-related Restricted, Denied, and Blocked Persons Lists***

- Department of Commerce Denied Persons [BIS]
- Department of Commerce Entity List [BIS]
- Department of Commerce "Unverified" List [BIS]
- Department of State Arms Export Control Act Debarred Parties [DDTC]
- Department of State Cuba Restricted List
- Department of State Nonproliferation Orders
  - Executive Order 13382
  - Iran and Syria Nonproliferation Act
  - Executive Order 12938, as amended
  - Missile Sanctions Laws
  - Chemical and Biological Weapons Sanctions Laws
  - Sanctions for the Transfer of Lethal Military Equipment
  - Iran, North Korea, and Syria Nonproliferation Act Sanctions (INKSNA)
  - Iran Sanctions Act (ISA) and the Iran Threat Reduction and Syria Human Rights Act (TRA)
  - CAATSA Section 231(d) Defense and Intelligence Sectors of the Government of the Russian Federation
- Department of State Munitions Export Control Orders [DDTC]
- Weapons of Mass Destruction Trade Control Designations [OFAC]
- Department of State Designated Terrorist Organizations
- Department of State Terrorist Exclusion List
- U.S. Treasury Department Palestinian Legislative Council List [OFAC]
- U.S. Federal Register General Orders

### ***Sanction Programs-related Blocked Persons Lists***

- U.S. Treasury Department Specially Designated Nationals and Blocked Persons, including Cuba and Merchant Vessels, Iran, Iraq and Merchant Vessels, Sudan Blocked Vessels [OFAC]
  - Department of Treasury Specially Designated Terrorist Organizations and Individuals
  - Department of Treasury Specially Designated Narcotic Traffickers and Narcotics Kingpins
  - Department of Treasury Foreign Narcotics Kingpins
  - Department of Treasury Sanctions Related to Significant Malicious Cyber-Enabled Activities
  - List of Foreign Financial Institutions Subject to Part 561
- U.S. Treasury Department Foreign Sanctions Evaders List (FSE-IR, FSE-SY) [OFAC]
- U.S. Treasury Department Sectoral Sanctions Identifications List (UKRAINE-EO13662) [OFAC]
- U.S. Treasury Department List of Persons Identified as Blocked Solely Pursuant to Executive Order 13599 [OFAC]
- United Nations Consolidated List
  - U.N. sanctions measures (assets freeze, travel ban, or arms embargo) imposed by the Security Council on individuals and entities under Security Council Resolutions 751 (1992) and 1907 (2009) concerning Somalia and Eritrea, 1267 (1999) and 1989 (2011) concerning Al-Qaida and associated individuals and entities, 1518 (2003), 1521 (2003) concerning Liberia, 1533 (2004) concerning The Democratic Republic of the Congo, 1572 (2004) concerning Côte d'Ivoire, 1591 (2005) concerning The Sudan, 1718 (2006), 1737 (2006), 1970 (2011) concerning Libya, 1988 (2011), and 2048 (2012) concerning Guinea-Bissau.
- UN Port Ban Vessels
- OMM Vessels Blacklisted in Annex III of UN Resolution 2270 (2016)
- UN Designated Vessels Pursuant to Resolutions 1718 and 2270

### ***General Services Administration GSA Federal Agency and Cause and Treatment Codes***

- U.S. General Services Administration List of Parties Excluded from Federal Procurement Programs [SAM/EPLS]
- U.S. General Services Administration List of Parties Excluded from Federal Nonprocurement Programs [SAM/EPLS]
- U.S. General Services Administration List of Parties Excluded from Federal Reciprocal Programs [SAM/EPLS]

### ***Law Enforcement-related Wanted Persons Lists***

- Air Force Office of Special Investigations - Top Ten Fugitives
  - Focuses on four priorities: to exploit counterintelligence activities for force protection, to resolve violent crime impacting the Air Force, to combat threats to Air Force information systems and technologies, and to defeat and deter acquisition fraud.
- Bureau of Alcohol, Tobacco, Firearms and Explosives Most Wanted

- Enforces U.S. federal laws and regulations relating to alcohol, tobacco products, firearms, explosives, and arson.
- FBI Ten Most Wanted Fugitives
  - Investigative functions fall into the categories of applicant matters, civil rights, counterterrorism, foreign counterintelligence, organized crime/drugs, violent crimes and major offenders, and financial crime.
- FBI Most Wanted Terrorists
  - Lists alleged terrorists that have been indicted by sitting Federal Grand Juries in various jurisdictions in the United States for the crimes reflected on their wanted posters.
- FBI Wanted Fugitives
- FBI Kidnappings and Missing Persons
- FBI Seeking Information
- Food and Drug Administration – Clinical Investigators
- Food and Drug Administration – Disqualified and Restricted
- Food and Drug Administration – Debarment List
  - Individuals that have had various restrictions placed against them by the Food and Drug Administration (FDA) for scientific misconduct.
- Department of Homeland Security Investigations Most Wanted
  - Terrorism, Drug Smuggling, Money Laundering, Human Trafficking/Smuggling, Import/Export Violations, Child Pornography/Exploitation, Document and Benefit Fraud, Gang-related Crimes, Intellectual Property Rights Violations, Worksite Enforcement.
- Naval Criminal Investigative Service - Wanted Fugitives
  - Conducts felony criminal investigations and counterintelligence for the Department of the Navy, and managing Navy security programs.
- U.S. Immigration and Customs Enforcement and Removal Operations Most Wanted
  - U.S. Immigration and Customs Enforcement (ICE) enforces federal laws governing border control, customs, trade and immigration to promote homeland security and public safety.
- U.S. Drug Enforcement Administration - Major International Fugitives
  - Enforces controlled substances laws and regulations of the United States and brings to the criminal and civil justice system of the United States those entities and individuals involved in the growing, manufacture, or distribution of controlled substances appearing in or destined for illicit traffic in the United States.
- U.S. Marshals Service - Top 15 Most Wanted
- U.S. Marshals Service - Major Fugitive Cases
  - Involved in most every federal law enforcement initiative. U.S. Marshals major cases and top 15 most wanted consist of individuals with a history of violent crimes who may be considered armed and dangerous.
- U.S. Secret Service - Most Wanted
  - The United States Secret Service is mandated to carry out two missions: protection and criminal investigations. In criminal investigation, the Secret Service is responsible for the enforcement of laws relating to counterfeiting of obligations and securities of the United States, investigation of financial crimes including, but not limited to access device fraud, financial institution fraud, identity theft, computer fraud, telecommunications fraud, and computer based attacks on our nation's financial, banking, and telecommunications infrastructure.
- Office of Research Integrity Administrative Actions
  - The names of individuals that have had administrative actions imposed against them by the Office of Research Integrity (ORI), maintained by the Public Health Service (PHS). The Assistant Secretary for Health (ASH) makes the final PHS decision on findings of research misconduct and the imposition of administration actions after reviewing the recommendations made by ORI.
- U.S. Postal Inspection Service - Most Wanted
  - Important areas of jurisdictions include: assaults, bombs, controlled substances, electronic crimes, mail fraud, and money laundering.

#### ***Politically Exposed Persons and Office of Inspector General***

- Chiefs of State and Cabinet Members of Foreign Governments [Central Intelligence Agency]
- Senior Political Figures and Oligarchs in the Russian Federation ['Putin List']
- Office of Inspector General List of Individuals/Entities Excluded from Federal Health and Medicare Programs

#### ***International Terrorist, Blocked Person, Wanted, and Entity Lists***

- European Union Consolidated List
  - The European Union Consolidated List, plus European Union persons and entities subject to restrictive measures under European Union Council Regulations.
- Europol Most Wanted Fugitives
- Interpol Recently Wanted
  - Lists persons that are wanted by national jurisdictions.
- Japan Foreign End-Users of Concern

- Kingdom of Saudi Arabia Wanted Militants
- Canada Public Safety and Emergency Preparedness Listed Entities
- Australia Foreign Affairs Consolidated List
- HM Treasury Consolidated List [England]
  - HM Treasury Consolidated List, plus HM Treasury persons and entities subject to restrictive measures under European Union Council Regulations.
- Canadian Border Services Agency Wanted List
  - Violations of human or international rights under the Crimes Against Humanity and War Crimes Act or under international law.
- Canadian Economic Sanctions
  - The sanctions encompass a variety of measures, including limitations on official and diplomatic contacts or travel, the imposition of legal measures to restrict or prohibit trade or other economic activity between Canada and the target state, or the seizure or freezing of property situated in Canada.
- RCMP Wanted Fugitives
  - Enforces laws made by, or under, the authority of the Parliament of Canada.
- **FinCEN (USA PATRIOT Act) Section 311 - Special Measures**
- World Bank Listing of Ineligible Firms
  - Lists names of firms and individuals that are ineligible to be awarded a World Bank-financed contract for the periods indicated because they were found to have violated the fraud and corruption provisions of the Procurement Guidelines or the Consultants Guidelines.
- **OSFI Consolidated List - Entities**
- **OSFI Consolidated List - Individuals**
  - Office of the Superintendent of Financial Institutions (OSFI) issues names subject to the regulations establishing a list of entities made under the Canada Criminal Code or the United Nations suppression of terrorism regulations. OSFI is the sole regulator of banks, and the primary regulator of insurance companies, trust companies, loan companies and pension plans in Canada.
- **OSFI Warning List**
  - Issues entity names that may be of concern to the business community and the public.