

MEDTRONIC PRIVACY NOTICE

for GAIТЕWAY™ Software Platform

in the United States of America

Last updated: March 20, 2026

Introduction

This notice describes how Medtronic collects and uses information about you (“personal data”) in connection with the activities described below when you **use the GAIТЕWAY™ Software Platform**, including the UNiD™ Hub Platform and the UNiD™ Services and Data (collectively, the “GAIТЕWAY Platform” or “Platform”), in the circumstances described below.

Unless otherwise set out below, the Medtronic company responsible for processing your personal data is **Medtronic, Inc.** or an affiliate of Medtronic, Inc. (together “Medtronic,” “we,” or “us”).

In this privacy notice, we tell you what personal data we obtain about you, how we use that information, with whom we share it, what rights you have regarding your information, and how to contact us to exercise these rights.

Medtronic and some of its affiliates, including our international affiliates, also operate other websites. This privacy notice does not apply when you have been notified that an alternative notice applies (for example, on other Medtronic websites).

Personal Data We Collect and How We Use It

[How Your Personal Data is Used](#)

This section describes what personal data we collect and how we process it in each of the circumstances set out below.

Creating/Managing Your Medtronic Account

From the information you or your employer submit to us, we will create a Medtronic user account for you to utilize our services, including to access the GAiTEWAY Platform. Uses will be subject to the GAiTEWAY™ Software Platform Terms of Use.

Types of personal data

If a Medtronic user account is created for you, the types of personal data we obtain or process about you may include:

- Credentials. User ID, email, password, authentication/verification codes
- Contact information. First name, last name, email address, personal or work telephone number, and third-party login information
- Professional Details. Your profession, your job title and your medical specialty, the name of the institution or practice you are affiliated with, its location, and phone number
- Device/network information. Your device, browser, and operating system version and type, device identifiers, IP address, authentication data, and your interactions with our services, including timestamped logs of resources requested, accessed, and interacted with
- Connected applications identifiers. Any unique identifiers used to identify you by other applications connected to the GAiTEWAY Platform (e.g., Siebel ID, MyCase ID)

Purposes of use

- Creating and maintaining your account, including verifying your contact and authentication information through welcome communications
- Authentication and ensuring account security, we'll do so with your consent or based on a contractual relationship we have with you or to take steps at your request, before entering a contract
- Recording your preferences, including for communications from us
- Authorizing your delegates/emergency contacts to access your account as needed

Using the application "Chat" function

While using the GAiTEWAY Platform, you may choose to interact or communicate with a Medtronic Representative through the application “Chat” function.

Types of personal data

The types of personal data we obtain or process about you include:

- Your first and last name
- Date and time of message
- Any other personal information you chose to include in the message

Purposes of use

We will use your data to review and respond to your messages or comments, and where applicable, to provide you with the required support and take any necessary follow-up actions.

Analysis, research, and development

We may collect and process your personal data for quality and safety purposes, as well as for research and development purposes.

Types of personal data

- Your networking information, including system generated user ID, system log including system events and error logs, machine data, system configuration, system generated procedure ID, device ID, other data collected during your interaction with our applications or related services, and date and time stamps.
- Procedure metrics, such as how many procedures you complete and when, and the nature of those procedures

Purposes of use

- Efficacy and quality analysis, including event and crash detection, repair, and improvement, and utilization and efficacy reviews
- Creating summary reports and utilization trends to show how you use the service
- User demographics and service/feature adoption tracking

- [Application improvement](#)
- [Post market surveillance](#) in accordance with applicable regulations

[Cookies and Other Digital Tracking Technologies](#)

When you visit our websites or apps, we may collect certain information by automated means, including cookies and similar technologies, such as Flash cookies, local storage, web beacons and pixels, JavaScript, software development kits (SDKs) and device identifiers.

While personal data collected through these technologies is not shared for money or other similar compensation, the use of these technologies may be considered personal data sharing under applicable law. The types of technologies, purposes of use, parties involved, and controls available to you, which may vary across our digital offerings, are detailed in our [Cookie Policy](#).

Sharing Your Personal Data

In the ordinary course of business in carrying out the purposes described in this notice, we may share your personal data with certain categories of third parties, including:

Medtronic affiliated companies given the corporate structure of Medtronic; your personal data may be shared with other affiliates within the Medtronic group.

Service Providers: Medtronic may share personal data with relevant third-party service providers, who act on our behalf to fulfill the activities noted in this privacy notice. These providers include:

- Enterprise Resource Planning (ERP) platform providers
- Customer Relationship Management tool providers
- Email Automation tool providers
- Connectivity Tools (e.g. video conferencing tools)
- Survey Tool providers or platforms
- Cloud Hosting Service providers
- Professional Advisors (e.g. consultants, legal advisors, auditors)

Business and Research Partners/Professional Advisors/Specialist Services: Medtronic may share personal data with external organizations with which it has partnered (such as research partners and partners in co-branded initiatives), and with external specialists or professional advisors within a particular field (such as lawyers, consultants, tax advisors, auditors, specialist delivery providers, banks, payment service providers and benchmarking agencies). In cases where those third parties are independently responsible for the processing of your personal data, their privacy notice will apply to their processing of your data.

To Others for Legal and Related Interests: Medtronic may share personal data where it is:

- Required by law;
- Required to disclose and/or share your personal data with regulatory, public or governmental authorities to comply with any law, regulation, court order, legal or government request;
- Allowed or required by law for public health purposes, including reporting complaints and quality issues to medical device regulators;
- Needed to protect its own or others vital interests, including the safety of life and property, or for investigating illegal or malicious activities, where allowed by law;
- Needed to exercise or defend legal claims;
- Needed with its corporate affiliates, who have the same privacy requirements; and
- Needed to fulfill corporate transactions (such as mergers, acquisitions, dissolutions or divestitures), as well as for to companies with whom Medtronic is working on a potential or pending corporate transaction.

International Transfers

In some cases, Medtronic may transmit, or store personal data collected to affiliates, vendors, or sites in other countries. We will only transfer personal data as allowed by applicable law to further the purposes set out in this document. Where personal data is transferred to another country, we take administrative and technical measures to ensure adequate safeguards and protections are applied as provided for by applicable law. In cases where personal data is transmitted to other countries, we will ensure that safeguards equivalent to those required by applicable data protection laws are in place. For more information on the safeguards

implemented by Medtronic, please contact us via email at rs.globaldataprivacyoffice@medtronic.com.

For more information on Medtronic affiliates (including those affiliates to whom personal data may be transferred) please consult Exhibit 21 of the most recent annual 10-K filing, available at <https://investorrelations.medtronic.com/sec-filings>.

Data Retention

We will only keep your personal data for so long as necessary to fulfill the purposes for which we are allowed to use them, as set out in this privacy notice. Your data may be archived for longer in order to take into account applicable statute of limitation periods, or as otherwise required by law. For more information on the retention of your personal data, contact us as indicated in the “How to contact us” section below.

Your Privacy Rights

Your Privacy Rights

You may have some of the rights below relating to your personal data, depending on applicable laws. Additional information may be found in the Specific Jurisdictions section.

- **Access** your personal data and confirm how your personal data is being processed.
- **Transfer** or **obtain a copy** in a structured, machine-readable, or **portable format**.
- **Correct** or amend if it is incomplete, inaccurate, or outdated.
- Request **deletion**. Subject to applicable law, we may sometimes deidentify this data.
- **Restrict** or **limit** excessive or unlawful processing, where the accuracy of the data is contested.
- **Object** to or **opt-out** of processing in circumstances where Medtronic claims a legitimate interest in its processing and where your rights outweigh those of Medtronic, such as where that data is used for direct marketing (including email or telephonic marketing).
- **Withdraw (or manage) consent** where it is the basis for processing, which may include cases where the data is sensitive or on children. Where consent is revoked, we will not further process that data unless required or otherwise permitted by applicable law.

[Exercising Your Rights](#)

How to exercise your rights. You or your authorized agent may exercise these rights at any time by completing the [Privacy Rights Request form](#), or by calling us at 1-866-639-6907.

Process. We will first confirm that we have received your request. For rights requests, we are required to verify your identity, your right to access the information requested, and, as applicable, your authorized agent's authority to act on your behalf. We may need to ask you for additional information that will help us do so, including government-issued IDs containing your name and address, utility bills containing that same information, and/or unique identifiers like usernames. We will only use that additional information in the verification process, and not for any other purpose.

After the validation of identity and authority (including if we do not receive that information), we will process your request and then contact you with our response to your request, including any data and reasons for rejection as applicable, within the time required by applicable law. If we need more time, we will notify you in accordance with applicable law.

Fees. We may charge a reasonable fee in some geographies to process or respond to your request only if allowed by applicable law, for instance if it is excessive, repetitive, or manifestly unfounded. If a fee is warranted, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Additional Options. Depending on your jurisdiction, you may have additional options if you are dissatisfied with our response:

- You may internally appeal or contact our Data Protection Officer if you disagree with a decision we made about your rights. Please include a copy of or reference to the decision.
- You may also complain to a data protection or regulatory authority if you have further concerns about our data practices or our response to a request. If you need information about which authority may apply to you depending on your location and circumstances, please contact us.

You will not be discriminated against for your exercise of your rights.

Children and Personal Data Online

We do not intentionally collect personal data from children (as defined by applicable law) unless we have received verifiable consent (from the parent or the child, depending on the requirements of applicable law) unless a legal requirement or vital interest applies. If you believe we have collected personal data from a child, please contact us using the information found in the “How to contact us” section.

Special Provisions for Specific Jurisdictions

[United States of America Supplemental Privacy notice](#)

Past practices. The statements in this notice are our data processing activities for the described scope of the notice both as current and within the past 12 months.

Protected health information under HIPAA. This notice does not apply to our data processing activities and practices for Protected Health Information (PHI), which is regulated under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). In those cases, you may have received a Notice of Privacy Practices from Medtronic or your health care provider which will govern that data use. Data governed under HIPAA may be deidentified through either or both the Safe Harbor and Expert Determination methods. While that data is then deidentified, Medtronic does not, and will not permit others to, reidentify deidentified PHI except as required by applicable law or as directly consented to by the subject of that PHI.

Exercising consumer privacy rights: California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia consumers have certain rights with respect to the collection and use of their Personal Information. Those rights vary by state. You may exercise the consumer privacy rights applicable to you under the applicable US state comprehensive privacy law through the methods mentioned below. We will respond to your request consistent with applicable law.

United States residents in the states listed above may submit a privacy rights request by:

- Completing our [Privacy Rights Request Form](#), or
- Calling **1-866-639-6907 (toll-free)**.

You do not need to create an account to submit a request.

Your potential consumer privacy rights may include:

- **Right to know** what personal information Medtronic has collected about you, including
 - the categories of personal information
 - the categories of sources from which the personal information is collected
 - the business or commercial purpose for collecting, selling, or sharing personal information
 - the categories of third parties to whom Medtronic discloses personal information
 - the specific pieces of personal information Medtronic has collected about you
 - the specific third parties to whom Medtronic has disclosed personal information
- **Right to delete** personal information that Medtronic has collected from you, subject to certain exceptions.
- **Right to correct** inaccurate personal information that a Medtronic maintains about you.
- **Right to opt-out of the sale or sharing** of your personal information by Medtronic. Note: Medtronic does not sell your personal data for money or other consideration, nor share it for direct or behavioral marketing purposes, with unrelated third parties, except as described in the [cookies and similar technologies](#) paragraph.
- **Right to portability:** Where required, you may request that we provide your personal information in a portable and readily usable format.
- **Right to non-discrimination:** We will not discriminate against you for exercising your privacy rights. This includes not denying products or services, charging different prices, or offering different levels of quality.

- **Right to appeal:** If we deny your request, you may have the right to appeal that decision. To do so, please submit your appeal via the Privacy Rights Request form, reference the decision and include the Reference ID associated with your request. We will respond consistent with applicable law.

California consumers may have the additional right to:

- **Limit the Use and Disclosure of Sensitive Personal Information** where Medtronic uses sensitive data for purposes beyond those permitted under the California Consumer Privacy Act, as amended

Verification of consumer privacy rights requests: To safeguard personal information, Medtronic must verify your identity before processing certain requests. Verification may include confirming your name, email address, telephone number, or other information previously provided to us.

You may also designate an authorized agent to submit requests on your behalf. Agents must provide:

- Documentation showing authorization to act on your behalf, and
- Information necessary for Medtronic to verify your identity, or where required, to verify the agent's authority.

We may request additional information if needed to protect personal information.

Global Privacy Control (GPC) signals: Our website recognizes and honors Global Privacy Control (GPC) signals sent by your browser as a valid request to opt-out of sale or sharing of your personal information. When a GPC signal is detected, our website will display "Opt-Out Request Honored" in your privacy settings, and the toggle will reflect your opt-out status.

To turn on the GPC signal, you can download one of the supported browsers or extensions. You may visit <https://globalprivacycontrol.org/> for a list of the available browsers or

extensions. If you choose to use the GPC signal, you will need to turn it on for each supported browser or browser extension you use.

Updates to this Privacy Notice

This privacy notice may be updated periodically to reflect changes in our personal data practices. We will indicate at the top of the privacy notice when it was most recently updated.

How to contact us

If you have any questions about this privacy notice you may contact us as follows:

General inquiries (all geographies): By email: rs.globaldataprivacyoffice@medtronic.com

US inquiries: By email via the general inquiries email address or phone: +1-866-639-6907.

You may also mail our general-purpose corporate mailing address is at Medtronic, Inc. 710 Medtronic Parkway Northeast, Attention: Data & Privacy - United States (Mail Stop: LS320), Fridley, Minnesota 55432-5603, United States.