



## PRIVACY AND COOKIE POLICY

Last modified Date: [17 March 2026]

This Privacy and Cookie Policy (“**Privacy Policy**”) describes the information practices of **VVT MED Inc.**, a Canadian corporation, and its wholly-owned subsidiary, **VVT MED Ltd.**, an Israeli company located at 6 Hasadna st. Kfar-Saba, 4442405 Israel (collectively referred to as the “**Company**”, “**we**”, “**us**”, or “**our**”), in connection with the access and use of our website at (the “**Website**” or “**Site**”) and contains details about how we collect, use, access, and share personal information that we obtain from and about you when you interact with us via our Website. Please read this Privacy Policy carefully, so you can understand our practices and your rights in relation to personal information. “personal data” or “personal information” means any information about an identifiable individual, and any information deemed as personal information or personal data by privacy laws.

Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Use available at <http://www.vvtmed.com> which this Privacy Policy is incorporated thereto by reference.

**If you do not agree to this Privacy Policy, do not access or otherwise use the Site.**

**This policy relates strictly to personal information you provide relating to use of our Websites and does not relate to any personal information that we may collect, or that you may provide to us, relating to any of our products or services, including but not limited to any medical device or use thereof. If you provide us with information relating to any of our products or services via our Website such information shall be handled in accordance with our policies and procedures relating to such products or services.**

### Data Collection

The Site is a promotional site only. If you wish to contact us, you have the option in the Site to fill out a contact form that includes your first and last name, email address, a phone number, and your comment., which requires us to contact you and comply with your notice. In addition, you have the option in the Site to subscribe to our newsletter. that you are not legally obligations to use the contact form or subscribe to our newsletters. By filling out the contact form or subscribing to our newsletters, you acknowledge that you are providing us with your personal information voluntarily.

We also may collect technical information, or information that may be inferred from your online interactions with us, such as your IP address. This information may be collected through various technologies, including but not limited to cookies and web beacons (see Cookie section below).

### Data Use

We may use both personal and non-personal information that we collect from you for our business purposes. For example, we may use your information in the following ways:

1. To respond to your messages, inquiries, and requests;
2. To operate, maintain, and improve our Website and products and services, including to maintain security;
3. For our statistical, research, recordkeeping, and reporting purposes;

4. To personalize and improve your experience when you use our Website and services;
5. To monitor our Website and services for compliance with our terms of use;
6. For any other purpose identified at the point of collection;
7. For legal obligations to which we are subject, including regulatory requirements relating to medical device safety and reporting.

Personal information may be accessed by persons within our organization, our third party service providers and those persons described in this Privacy Policy, who require such access to carry out the purposes described in this Privacy Policy, or such other purposes as may be permitted or required by the applicable law.

We distinguish between information provided for inquiry responses and information provided for marketing subscriptions. If you contact us through our 'Contact Us' form, we will use your personal information solely to respond to your specific inquiry or request. We will not use such information for marketing purposes or add you to our promotional distribution lists unless you provide your explicit opt-in consent (for example, by checking a separate, non-pre-ticked box). You may withdraw your consent for marketing at any time as described in the Marketing section below.

### **Consent**

Privacy legislation requires Company to obtain the consent of an individual to the collection, use or disclosure of personal information in many circumstances.

By providing your personal information to us, you agree that we may collect, use and disclose your personal information in accordance with this Privacy Policy and as otherwise permitted or required by law.

When Company receives personal information from you for the purposes of providing you with our Website or services or for other uses identified herein by us, you are providing us with consent as follows:

1. to allow us to deal with that personal information in a reasonable manner;
2. to allow us to provide your personal information to third parties it engages to provide or support our Website or services;
3. to allow us to use and store your personal information for the purpose of providing you with the products and services you purchase from us and to utilize the Website;
4. to allow us to transfer your personal information outside of Canada, the jurisdiction from which you provide the personal information and/or your jurisdiction of residence (whereby your personal information will be treated in accordance with applicable foreign laws) for the purpose of storage and use of your personal information by us or on our behalf; and
5. to allow us to transfer your personal information between Canadian provinces and territories (whereby your personal information will be treated in accordance with applicable laws of the provinces and/or territories to which it is transferred) for the purpose of storage and use of your personal information by us or on our behalf.

If you need to provide us with personal information about other individuals, you represent and warrant to us that, where required by law and prior to your disclosure to us, you will obtain the consent of each individual to the collection, use and disclosure by us for the specific purpose(s) that the disclosure is made by you.

Providing us with your personal information is always your choice. When you request products and/or services from us, or utilize our Website, we ask that you provide information that enables us to respond to your request and/or provide you with our products or services. In doing so, you consent to our collection, use and disclosure to appropriate third parties of such personal information for these purposes.

There are legal exceptions whereby we will not need to obtain consent or explain the purposes for the collection, use or disclosure of personal information. Some examples of situations where consent is not required include an emergency that threatens the life, health or security of an individual, or if we must comply with a court order or governmental order.

If we sell our organization or merge with another party, your consent will be implied to transfer your information to our successor for the same purposes as set out in this privacy policy.

## Data Sharing

We do not share personal information with unaffiliated third parties other than as follows:

- With government entities including in connection with evaluating proposals, or as needed to provide our Website or services and where required by law, and as required under applicable privacy and data security laws;
- With our affiliates including parents, subsidiaries, business units and other companies that share common ownership and service providers. These third-party service providers and affiliates may be located outside of Canada. Whenever we hire other organizations to provide support services, they will be required to conform to our privacy standards. These third parties shall use the personal information only for purposes related to the supply of services to us and they will also respect strict contractual conditions that oblige them to maintain the confidentiality of all information;
- Pursuant to a subpoena, court order, or other legal process;
- To investigate, respond to, or resolve problems or inquiries (including law enforcement requests) or to protect, enforce, or defend our rights, assets, and/or interests;
- As part of an acquisition or merger with another company, a partial or total sale of assets, or another corporate change, including at bankruptcy;
- To prevent or respond to a violation of any law, regulation, or our terms of service; or
- With your consent or as otherwise disclosed at the time of collection.
- We will comply with applicable privacy laws in relation to sharing of your personal information. For example, if so required by applicable privacy laws we will: (i) require third party service providers (such as data processors) who handle personal data on our behalf to be bound by written agreements (such as data processing agreements) that obligate them to implement appropriate

technical and organizational measures to protect such personal data; and/or (ii) impose Standard Contractual Clauses in relating to handling of personal data of individuals located in the European Economic Area (EEA), your data may be transferred to countries outside of Europe, as if so required. In cases where a country does not have an 'adequacy decision' from the European Commission, we use Standard Contractual Clauses (SCCs). These contracts ensure that the recipient of your data protects it to the same high standards required within the EU.

- In accordance with your rights, you may request a copy of these safeguards or a link to our provider's data processing terms by applicable laws.

### **Third Party Websites and Apps**

Our Website may contain links to third-party websites or mobile apps. Please be aware that we do not control these linked websites or apps, and that this privacy policy does not apply to those websites or apps. We encourage you to read the privacy notice of any third-party website or app you visit before providing information to its owner.

### **Cookies**

We collect information via cookies. We use strictly necessary cookies required for the operation of the Website and with your consent we also use analytics cookies (such as Google Analytics) for statistical purposes. Analytics cookies are not essential and you can accept or decline them via our cookie consent banner.

Such information may include your Internet Service Provider and IP address, the date and time you access our website, the pages you accessed while visiting our website, and the Internet address from which you accessed our website. Some cookies exist only during a single session and some are persistent over multiple sessions over time.

We periodically review our data retention practices to ensure that information is not kept longer than required by applicable laws. Some third parties may set cookies when you choose to use embedded features such as social sharing buttons or when you consent to analytics. If you choose to use social sharing buttons (for example, LinkedIn), the relevant social network may set cookies or collect information according to its own policies. We do not control these third parties and recommend reviewing their privacy and cookie policies.

The cookies we use may include:

Google Analytics: that may use cookies to collect information about your online activities across this and other sites over time for non-advertising purposes. Please note that Google Analytics is used for statistical purposes and is not essential for the functionality of the Website functionality. You can choose to accept or decline these cookies via our cookie consent banner.

To learn more about how Google Analytics collects and processes data and the choices Google may offer to control these activities, visit <https://www.google.com/intl/en/policies/privacy/partners/>

### **Children's Privacy**

Company does not knowingly collect personal information from visitors to our Website under the age of 13. In the event that we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information.

## Updating this Policy

We may change this Policy from time to time. We will post changes in this notice, or as otherwise required by law. We suggest that you periodically revisit this notice to stay informed of any changes.

## Security, Retention and Destruction of Personal Information

We take reasonable steps to protect the security and confidentiality of your personal information. We protect the personal information within our custody or control with appropriate organizational, technological and physical safeguards.

The amount of time we will retain personal information varies, depending on the requests we receive from you or services we have provided and the nature of the personal information that we hold. We retain personal information for such period of time as is necessary for us to maintain sufficient information so we may respond to any issues that arise at a later date or as is required by law.

When personal information is no longer required by us or by law, we will either convert it into an aggregated non-identifying form or we will appropriately destroy or erase the personal information in a manner that is in accordance with our current policies and procedures.

## Withdrawal of Consent

You may, at any time, withdraw your consent to our collection, use and disclosure of your personal information, subject to reasonable notice and any legal and/or contractual restrictions.

Should you choose to withdraw your consent, we may be unable to provide, or continue to provide some services that can only be provided if we receive appropriate and required personal information. (for example, your complaint regarding the product or customer support).

Specifically, for personal data related to product complaints for our medical implants, we will retain such information until the expiration date of the last product on the market, as required by applicable medical device regulations.

## Your Data Privacy Rights

Depending on the jurisdiction where you live or from where you provide your personal information you may have certain data protection rights. For example, specific data protection rights are granted under the GDPR, the UKGDPR, the California Consumer Privacy Act, the privacy laws of Quebec, etc. Examples of such rights that may apply to you include the following:

1. the right to access, update or to delete the personal information we have relating to you;
2. the right of rectification, which grants you the right to have your information rectified if that information is inaccurate or incomplete;
3. the right to object to our processing of your personal data;
4. the right of restriction, which grants you the right to request that we restrict the processing of your personal information;
5. the right to data portability, which grants you the right to be provided with a copy of your personal data in a structured, machine-readable and commonly used format; and



6. the right to **withdraw** consent your consent at any time where we rely on your consent to process your personal information.

The data protection rights applicable to you will be provided in accordance with the privacy and data protection laws applicable to your personal information. To exercise the rights that are applicable to you please contact us at: [info@vvtmed.com](mailto:info@vvtmed.com).

### **Access, correction and accountability**

We will strive to keep all personal information in our files complete, up-to-date and accurate.

You or a person authorized on your behalf has the right to request to see and obtain a copy of your personal information and to request changes or corrections to inaccurate or incomplete information.

### **Contact Us.**

If you have questions regarding our Privacy Policy or our data processing practices, please contact us at: [info@vvtmed.com](mailto:info@vvtmed.com), or via the following mailing address: **VVT MED** 6 Hasadna st. Kfar-Saba, 4442405 Israel

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