PRIVACY NOTICE

Stay•Safe MyTraining VR

Last Updated On: October 1, 2025

What is this Privacy Notice about?

Fresenius Medical Care Deutschland GmbH and its affiliated entities (together "FME" or "we") offer an innovative training tool, that can support you in preparing your patients for their peritoneal dialysis therapy at home with virtual reality technology "*Stay•Safe MyTraining VR"* (the "VR Training").

This Privacy Notice explains how FME processes your personal data in the context of VR Training and related services and why. This Privacy Notice also describes your rights and how you can exercise them.

Who is the Data Controller for my personal data?

The Stay•Safe MyTraining VR is a digital training tool made available by FME to healthcare professionals who can enrolled patients independently.

To access the VR Training, you require a Meta device (e.g., headset) and a Meta App Store account. All personal data collected for the creation of your Meta Account, applications you download, purchases, device data, information collected while you create users' profiles and usage data is processed solely by Meta. Thus, Meta is the data controller of your data associated with your Meta Account and your use of its hardware. For further information on how Meta processes your personal data, please visit the manufacturer sites.

The data controller of personal data limited to your Meta Account ID and subscription status is Fresenius Medical Care Deutschland GmbH, Else-Kröner-Straße 1, 61352 Bad Homburg, Germany.

The VR Training is intended for information and training, and we do not collect patients' data for these purposes.

What personal data we collect, use, disclose and transfer?

In order to made content related to VR training available to you, FME enables health care professionals to create profiles which may, but are not required to include ID, username, year of birth, gender, training language, handed (all voluntary fields) and training history, such as status of completion, steps, attempts, errors, session data and retrieve results. The details that the health care professionals choose to select while creating profiles is collected and stored at your headset and FME has no access to it. We still encourage you to collect the minimum information possible on these voluntary fields while creating profiles, since the details may be accessible by Meta.

FME will only your Meta Account ID and subscription status and oonly FME employees who are authorized to do so and are bound by confidentiality duties may access to this information. Where necessary for making the VR training available to you, we may grant third parties or other companies in the Fresenius Medical Group access to this information. This is always done according to a "*need to know*" principle and in case of a legitimate business need.

Countries outside the European Economic Area ("EEA") may provide different data protection rules than in your country. In case your personal data is transferred to countries outside of your country of residence, including to countries outside the EEA, FME will ensure that adequate measures are in place to protect your personal data.

Remember that Meta as supplier of the headset and application used for VR training will also receive, process and transfer your personal data when you create the account, download the app, create profiles and use its hardware.

For how long do we keep your personal data?

FME will store your Account ID and subscription status for up to one (1) year after the cancellation of your subscription for auditing purposes. FME may keep these data for a longer period if it is subject to mandatory retention terms, to protect or defend its rights or if your information is anonymized, for statistical purposes.

What is the legal basis for processing your data and which are your rights?

The legal basis for personal data processing is performance of a contract with our customers (Article 6.1.b GDPR) to enhance their training experience and understating of our products and services.

You have the right to request access to your personal data and to request correction of personal data that is incomplete or inaccurate. You may also have the right to receive the personal data which you provided to us in an electronic format so that you can transmit it or request us to transmit this to another company. You also have the right to complain to a data protection authority.

In certain circumstances, you can ask us to erase your personal data or to request that we restrict the processing of your personal data for certain purposes. These rights can be limited, for example where we need your personal data (i) to comply with the law; (ii) to protect your vital interests or where providing your personal data would reveal personal data about another person; or (iii) to defend FME's rights.

Changes to this Privacy Notice and how to contact us to exercise your rights:

This Privacy Notice may be updated from time to time. FME will notify you of material changes to our Privacy Notice and for any concerns relating to data protection or in order to exercise your rights you may contact:

Mr. Giovanni Brugugnone | Data Protection Officer
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Tel.: +49 6172 609 0 | email: Datenschutzbeauftragter@fmc-ag.com

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