

Patient Privacy Notice

October 2025

At Smith+Nephew we care about your privacy and understand that trust is paramount when handling your personal information. This Patient Privacy Notice explains our practices relating to the processing of your personal information.

When we refer to 'Smith+Nephew,' 'S+N,' 'we,' 'us' and 'our,' we are referring to the Smith+Nephew group of companies.

This privacy notice applies to patients using Smith+Nephew products and/or services, to the extent that Smith+Nephew obtains and processes the personal information of such individuals on behalf of their healthcare professional/provider.

'Personal information' or 'personal data' means any information or piece of information which could identify you either directly (e.g. your name) or indirectly (e.g. a unique ID number).

1. Who is the responsible entity for your personal information?

The responsible entity for your personal information will be the Smith+Nephew entity which is responsible for the sale of Smith+Nephew products in your country. For more information on the locations in which Smith+Nephew's entities operate please see [here](#).

2. Contact information and your privacy point of contact

If you:

- (a) want to exercise your rights in connection with your personal information (please also see Section 8 'What are your rights regarding your personal information?');
- (b) have any questions about this privacy notice;
- (c) need more information; or
- (d) would like to raise a concern, please contact us at privacy@smith-nephew.com or via our speak up line [here](#).

3. What personal information or categories of information do we collect about you?

The personal information that your healthcare professional/healthcare provider or their representative collects and shares with us so that we can provide the services to your healthcare professional/healthcare provider may include:

- Personal Information, such as your name, surname (including prefix or title), alias, gender, age, date of birth, and in some cases a hospital or medical record number (MRN);
- Sensitive health data including medical images, e.g., CT or MRI or x-rays used to create pre-operative surgical plan for use by your surgeon.

4. How do we collect your personal information?

(a) Directly from your healthcare professional/provider or clinician when they use our products or services and your health information is shared via these products

(b) From other sources, including your healthcare professional/provider when they:

- order Smith+Nephew products relating to your treatment, to the extent your information is shared with us for the purpose of the order or cost reimbursement purposes;
- share adverse events with us relating to your treatment.

5. How do we use your personal information?

We use your personal information via the Smith+Nephew products healthcare professional/provider uses as part of your treatment.

6. Why are we allowed to collect and use your personal information?

You have specifically given us your consent via your healthcare professional/provider to collect and use your personal information via the Smith + Nephew products used as part of your treatment.

7. How do we protect your personal information?

- We make sure your personal information is treated with the utmost care and in accordance with our policies and procedures and we take appropriate steps to protect it.
- We use a variety of security measures and technologies to help protect your personal information and regularly monitor these for vulnerabilities and attacks.
- We apply protection in compliance with global privacy regulation.

8. What are your rights regarding your personal information?

Local privacy laws may give you rights with respect to your personal information. You may exercise your rights by contacting us (see Section 2 'Contact information and your privacy point of contact'). We will handle any request to exercise your rights in accordance with applicable law, but please note that these rights only arise in certain circumstances and may not be absolute. Depending on our reason for processing your personal information and to the extent the local law in your jurisdiction grants the applicable rights to you, you may be entitled to:

- Withdraw your consent to us processing your personal information;
- Ask us about the processing of your personal information including to be provided with copies of your personal information;
- Ask us to correct information you think is inaccurate or incomplete;
- Ask us to delete your personal information;
- Ask us to restrict the processing of your personal information;
- Object to our processing of your personal information;
- Ask that we transfer personal information you have given us from one organisation to another, or to give it to you;
- Appeal the response received related to your rights request where you deem it inadequate or insufficient; and
- Complain to your local data protection authority. For your protection, and to protect the privacy of others, we may need to verify your identity before completing what you have asked us to do.

Where we have relied upon your consent to use your personal information, and you later withdraw that consent, we may not be able to complete some of the activities described in Section 5 'How do we use your personal information?'.

Please also note that under certain local laws and applicable regulations, there are situations within which the right to withdraw your consent will not apply.

9. How long do we keep your personal information?

Personal Information used to develop the plan with your surgeon is deleted within 72 hours of producing the final pre-op plan. The final version of the pre-op plan is retained as part of the provision of services to your healthcare professional/provider and to meet our regulatory requirements.

10. With whom do we share your personal information?

We share your personal information with your healthcare professional/provider via the Smith+Nephew products they use as part of your treatment.

11. In what instances do we transfer your personal information outside of your home country?

Because of the international nature of our business, we may transfer your personal information within the Smith+Nephew group or to third parties located outside of your jurisdiction, including the United States. Such countries may have different laws and data protection compliance requirements to those that apply in the country in which you are located. For more information on the locations in which Smith+Nephew's entities operate please see [here](#).

To the extent permitted by local law, by providing your personal information to Smith+Nephew you consent to the transfer, use and storage of your personal information in other countries.