PRIVACY NOTICE FOR DOSE CHECK

Effective date: September 09, 2025

When you access, navigate through, and use the Site, and its related services, you provide Amalgam with your Personal Data. Depending on whether you use the Site as a Patient, a Healthcare Professional, or Account Administrator, the way we collect, store, and use your Personal Data may be different. So please read this Privacy Notice carefully as it explains how Amalgam uses your Personal Data and how you can exercise your privacy rights. If you do not agree with the terms of this privacy notice, you should not use the Site.

If you have any questions about this Privacy Notice or regarding your privacy, you may contact Amalgam's Data Protection Officer directly at privacy@amalgamrx.com.

1. **DEFINITIONS**

- "Amalgam" means Amalgam Rx, Inc., a corporation incorporated under the laws of the United States of America, having its business address at 1007 N. Orange Street Suite 400, 19801 Wilmington, Delaware, USA, also referred to as "we", "us" or "our".
- "App" means the Dose Check app, a mobile application for patient use that is compatible with a mobile phone or tablet.
- "User" means the end users of the Site and may include Patients, Healthcare Professionals, supervisors/legal representatives, or other persons involved in the treatment or care of Patients, also referred to as "you" or "your."
- "Healthcare Professional's User Guide" means the instruction manual for the Healthcare Professionals.
- "Patient User Guide" means the user manual for the Patient.
- "Data Protection Laws" means all laws or regulation relating to data protection, confidentiality, and the processing of Personal Data applicable to Amalgam from time to time, in each case as amended or replaced.
- "Documentation" means the Healthcare Professional User Guide, the Patient User Guide, the Account Administration User Guide, and any related documentation, including online or electronic documentation.
- "Account Administrator" means Users who have the permissions of the Site to manage and create user profiles for an enterprise account.
- "Healthcare Professionals" means the healthcare professionals who monitor and manage the treatment of patients and configure the App according to the treatment via the Website. In this Privacy Notice, any reference to Healthcare Professionals also applies to employees, agents or contractors of the Healthcare Professionals or other Users who are authorized to act on behalf and under the responsibility of the Healthcare Professionals, as applicable and in accordance with applicable laws.
- "Account Administrator User Guide" means the User Guide for the Account Administrator Site.
- "Patients" means Users of the App who have been granted access to the App through their Healthcare Professional and are at least 21 years of age.
- "Personal Data" means any "personal data" or "personal information" as defined in the Data Protection Laws.
- "Site" means:
 - o all functions of the App and the Website, and

- o any content accessible through the App or Website, whether accessible online wirelessly, electronically or later in offline mode (i.e. after downloading or printing).
- "Website" means the web-based solution that allows Healthcare Professionals to provide Patients with access to the App as well as monitor their Patients' treatment in conjunction with the App.

2. SCOPE

This Privacy Notice applies only to Personal Data, including health data, collected through or via the Site, as well as Personal Data you provide directly to us when communicating with us about your use of the Site.

3. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

Amalgam is the legal manufacturer of the Site and is responsible for the processing of your Personal Data under the Data Protection Laws.

Users can contact Amalgam's Data Protection Officer by writing to privacy@amalgamrx.com.

4. HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect your Personal Data in the following ways:

- Directly from you, when you provide your Personal Data to use or interact with the Site (for example, when you input your Personal Data into the Site, or when you contact us);
- Automatically while you use the Site;
- If you are a Patient, from your Healthcare Professional when they provide you with access to the App; and
- Via our service providers if you contact them for technical support for the Site.

5. WHAT KIND OF PERSONAL DATA DOES AMALGAM COLLECT?

Amalgam collects different types of Personal Data, depending on whether you use the Site as a Patient, Healthcare Professional, or Account Administrator. For details on what data we collect, see below.

Type of data	Explanations of the data categories		
	Patients		
Identification and contact details*	 First and last name Contact information (e.g. phone number and email address) Login details (e.g. ID and password) 		
Registration Information and Preferences*	 Country/region of residence Year or date of birth Date of registration Sex Consent preferences 		
Medical data*	Insulin Brand		

	 Blood glucose data (e.g. blood glucose levels, date and time of measurement, target blood glucose levels, hypoglycemic event information). Blood glucose data can be provided manually by you or collected automatically if you choose to connect a device. Dose data (e.g. dose value, date and time of intake, dose schedule provided by your doctor) 		
Optional medical data	Other medical information you decide to provide when using optional features (e.g. height, weight, gender, race/ethnicity, side effect and symptom data).		
Connected Medical Device Data	Information about medical devices that you use in your treatment when you choose to connect a device (e.g. device name, device ID, device battery, serial number, software version, hardware version).		
Other	Information provided in correspondence with us or our service providers in connection with Site support. We ask that you do not provide any health information when reaching out for Site support unless you believe it is necessary to resolve your concern.		
Healthcare Professionals			
Identification and contact details*	 First and last name Sex Contact information (e.g. email address) Login details (e.g. ID and password) 		
Professional Information*	 Name of the hospital (if applicable) Region/Postal Code Country Occupation License Number Website usage data (e.g. number of activated patients, number of updated patients). 		
Account Administrators or related Users			
Identification and contact details*	 First and last name Sex Contact information (e.g. email address) Login details (e.g. ID and password) 		
Professional Information*	 Name of the hospital (if applicable) Region/Postal Code Country Occupation 		

 License Number Website usage data (e.g. number of activated patients, number of updated patients)

The Site also automatically collects the following data for the purposes described below:

Type of data	Explanations of data categories	Purpose
Internet or Other Electronic Network Activity Information*	Date and time of navigation, IP address, device type, browser type, operating system; general location information (i.e. region)	This data is necessary for the proper functioning of the website and related services, as well as for internal business analysis purposes such as audience measurements.
Technical Data*	App or web portal ID, information about the device you are pairing, information about your computer or smartphone (such as model, operating system, and error messages), third-party account data and related data, information about how you use the Site.	This data is necessary for the registration and pairing of your device, including, if necessary, to connect to our service providers. Additional technical data is collected when you choose to use optional Site features, such as connecting a medical device (e.g. device name, device ID, device battery, serial number, software version, hardware version).
Usage Data	Mouse movements, button clicks, page visits, general location data (i.e. region); time spent on a page.	This data is optional and used to analyze how our Users interact with the Site and to monitor and improve Site performance. For more information about this data, please see Section 6 – Cookies.

Data categories with an asterisk (*) are required for you to use the Site. Required fields will be marked as such at the time of collection. You can opt out of having certain data provided. However, if you refuse to provide the required data, Amalgam may not be able to process all or part of your request (e.g. creation of your User account, use of certain features, etc.). The amount of data that the website automatically collects also depends on your use of the Site and whether you choose to use any optional features.

6. COOKIES AND OTHER TRACKING TECHNOLOGIES

We use different cookies and tracking technologies depending on whether you are using the Website as a Healthcare Professional or the App as a Patient. For more detailed information on the kinds of cookies and tracking technologies we use, please see below.

What is a cookie?

Cookies are small text files that many websites automatically download to a User's computer or other device when they browse online. Cookies are primarily used to collect standard internet log information and visitor behavior data. This information is typically used to track visitor use of a website, improve the functionality of the website and to compile statistical reports on website activity.

Cookies allow a website to recognize a User's device. Cookies allow you to navigate between pages efficiently, remember preferences and generally improve the User experience for you. They can also be used to tailor advertising to your interests through tracking your browsing across websites.

Cookies are one of two types. Session cookies, which are deleted automatically when you close your browser, and persistent cookies, which remain on your device after the browser is closed (for example to remember your User preferences when you return to the website). Persistent cookies, also known as permanent cookies, are cookies that are stored on your hard drive until they expire or until you delete the cookie.

Necessary Cookies. These cookies are essential in order to enable you to move around the Website and use the Website features. Without these cookies, services you have asked for (such as navigating between pages) cannot be provided.

Performance cookies. These cookies allow us to analyze how our visitors use the Website and to monitor Website performance. This allows us to provide a high-quality experience by customizing our offering and quickly identifying and fixing any issues that arise. For example, we might use performance cookies to keep track of which pages are most popular, which method of linking between pages is most effective, and to determine why some pages are receiving error messages.

What types of cookies do we use?

When you visit the Website, our web server will temporarily record certain information from the device you use to access the Website, the domain name or IP address of the requesting computer, the access date, the file request (file name and URL), the HTTP response code and the Website from which you are visiting, the number of bytes transferred during the connection and, if applicable, other technical information that we use and statistically evaluate for the technical implementation of the Website's use (such as delivery of the content, guaranteeing the website's functionality and security, etc.).

This processing will take place with your explicit consent which you may provide when you sign up for the Website. The information we collect from the cookies will be used to help us monitor the Website and ensure that it is as user-friendly, safe, and functional as possible.

When you access the Website, we use the following cookies:

Cookie Type	Cookie Name	Data Collected	Purpose	Opt-Out Available
Performance	Fullstory (Third- Party)	 Mouse movements; Button clicks; Page visits; How long you spend on a page; Region; and 	To analyze how our visitors use the Website and to monitor Website performance	Yes

Other details of your	
actions on our	
website	

You may opt-out of performance cookies by making the corresponding selection in the privacy preferences screen of the Website or by reaching out to us at privacy@amalgamrx.com.

App Monitoring

We do not use cookies when you access the App. Instead, we use a different kind of tracking technology, similar to a cookie called a software development kit or "SDK", to monitor and replicate the user experience, including button taps, page visits, and time spent on each page. These technologies capture the usage data as mentioned above in Section 6. They do not capture your Personal Data while you use the App and these technologies will not be implemented without your explicit consent which you may choose to provide during onboarding. We use the data collected from the SDK to identify bugs, inform bug fixes, and improve the functionality of the App.

You may opt out of this SDK by making the corresponding selection in the privacy preferences screen of the App, or by reaching out to us at <u>privacy@amalgamrx.com</u>.

7. FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS/JUSTIFICATION DOES AMALGAM USE YOUR PERSONAL DATA?

Amalgam uses your Personal Data for the purposes described below.

Users in Canada, Japan, and India

If you are using the Website in a jurisdiction that is subject to Data Protection Laws where consent is the sole or most appropriate justification for processing and/or disclosing Personal Data, such as in Canada, Japan or India, Amalgam will process your Personal Data on the basis of your consent or in the manner otherwise permitted by Data Protection Laws. The way in which Amalgam obtains your consent, including whether it is given explicitly or implicitly, depends on the circumstances and sensitivity of the Personal Data concerned. In general, Amalgam will obtain your consent at the time Amalgam collects your Personal Data, either verbally, electronically or in writing.

Purpose	Explanation of the use of your Personal Data	Legal basis and/or justification
Creating and managing your account	 to install the App creating your user account to verify your identity to update your user account as needed to check the information of the medical authorization 	Provision of the Site Your explicit consent when required by law. If you do not provide us with your data for this purpose, it will not be possible for Amalgam to provide you with the features of the Site.

To provide you with the Site and the features you wish to use. To display possible treatment pathways, such as treatment Provision of the Site example features, which are Your explicit consent when required by provided by Novo Nordisk via Provision of the a separate app integration, and Site and Site which are included for general If you do not provide us with your data **functions** educational and information for this purpose, it will not be possible purposes only. for Amalgam to provide you with the To inform you about updates treatment example features of the Site. and to provide important safety advisories To assist you with your use of the Site or in the event of a service request to facilitate your navigation through the Site to take measures to protect the security of the Site To improve the Site and related services, as well as our other If you use the Site as a Healthcare products and services Professional, we process your data on (improving health, the safety of the basis of Amalgam's legitimate medical devices, and the interests. Amalgam's legitimate interest To improve the quality of our services and in improving the websites as well as our Site and our products) products and services and in conducting products and conduct studies and research and studies services and to research, in particular to conduct If you use the App as a patient, we determine and improve the process your data, including health data, scientific effectiveness of techniques for on the basis of your explicit consent. research and the control and treatment of statistics diabetes and other serious If you have opted in to consent, you chronic diseases. and to have the right to withdraw your consent include results in scientific at any time and this will not affect your publications use of the Site. to generate anonymized data sets from which you can no longer be identified such as statistics for research purposes

	To comply with our regulatory obligations and/or safety reporting obligations under any law, regulation, court order, legal or government	
Reporting in the context of product safety	request (e.g., surveillance of functionality of the Site, evaluation of incident reports which might be connected to the use of the services, tracking of Users, safety reporting, product recall notification. o For example, legal obligation according to Article 87 Regulation (EU) 2017/745 (Medical Device Regulation); and investigations of compliance with GDPR.	Legal and regulatory obligations of Amalgam
Marketing Communications	To send you informative and marketing communications about Amalgam activities (which includes, but are not limited to, Amalgam products, services, programs and events)	Your explicit consent
Management of pre-litigation steps or litigation	 To prevent abuse by Users or to establish, exercise or defend legal claims To manage disputes or litigation 	Amalgam's legitimate interest in asserting, defending or exercising legal claims

8. HOW LONG WILL YOUR PERSONAL DATA BE STORED?

Amalgam will retain your Personal Data for as long as necessary to fulfil the purpose of the processing (e.g. until you decide to delete your account or if the application is no longer available in your region). In addition, Amalgam may retain your Personal Data if it is necessary for evidentiary purposes, and during all applicable statutory retention periods, in particular with regard to Art. 80 (EU) 2017/745 (Medical Devices Regulation) and investigations or legal actions related to the GDPR. Under no circumstances will Amalgam retain your Personal Data for more than 15 years from the date of receipt.

If Amalgam processes your Personal Data with your consent, you have the right to withdraw your consent and ask us to stop this processing. In this case, Amalgam will process your Personal Data for a short period

of time thereafter (and only to enable us to comply with your request) unless there is another legal basis for further processing.

After that, your Personal Data will be deleted or anonymized. In the event that your Personal Data is used for research purposes, Amalgam will ensure that the results of this research are published in such a way that you are no longer identifiable. Please note that the lawfulness of previous processing is not affected by the withdrawal of consent.

9. HOW DOES AMALGAM SHARE YOUR PERSONAL DATA?

Subject to strict security and confidentiality conditions, Amalgam may disclose your Personal Data to third parties as follows:

Third-Party	Disclosure Activity	Legal Basis and/or Justification
Your Healthcare Provider (when using the App as a Patient)	If you are a Patient and you link your account to a Healthcare Professional, in accordance with the process described in the User Manual, we will share your Personal Data, including the health information you provide via the App, with that Healthcare Professional and their authorized staff.	Provision of the App and App features
Your Patients (when using the Website or App as a Healthcare Professional)	Your first and last name will be displayed in the App and made visible to Patients so they can search for their doctor within the App.	Provision of the Site and Site functions.
Novo Nordisk A/S (when using the App as a Patient)	For Novo Nordisk product and service research and improvement	Your explicit consent as provided when onboarding
For more information about how Novo Nordisk processes the data we share with them, please refer to their privacy policy. Available https://dosecheckapp.com/inen1.		

Novo Nordisk A/S (when using the Site as a Healthcare Professional or Account Administrator) For more information about how Novo Nordisk processes the data we share with them, please refer to their privacy policy. Available https://dosecheckapp.com/inen1.	For Novo Nordisk business insights and scientific research.	Novo Nordisk legitimate interest in enabling Novo Nordisk to develop new medicines and medical devices with the aim to prevent and/or treat serious chronic diseases, as well as increase knowledge about these diseases.
Parties to Legal Process	We will share your Personal Data with our lawyers and advisors, as well as any other parties who have a right to information in connection with a subpoena, court order, or other legal processes as needed to exercise our legal rights, to defend ourselves against legal claims, or when required by law.	To establish, defend, or exercise legal claims.
Authorities	We will share your Personal Data with regulatory authorities as required by law or as needed for us to address a regulatory inquiry.	To establish, defend, or exercise legal claims.

In addition, Amalgam may share your Personal Data with our service providers listed below [(processors within the meaning of Article 4 (8) GDPR)] who help us to provide or improve our services, including hosting providers, User support providers or IT service providers (e.g. AWS or storage providers). These contracted service providers are carefully selected, operate in accordance with our instructions and the terms of this Privacy Notice, and are regularly monitored by Amalgam.

Service provider	Data Categories	Processing activities	Legal basis and/or Justification
Amazon Web Services, Inc.	 Identification and Contact Data Registration Information and Preferences Connected Device Data Professional information Medical data Other medical information you may provide when using optional features (e.g., height, weight, gender, race/ethnicity, side effect and symptom data). 	Web hosting and data storage	Provision of the Site and Site functions. As it pertains to your health information, with your explicit consent

	 Internet or Other Electronic Network Activity Information Technical Data 		
Alopa Infotech Pvt Ltd	 Identification and Contact Data Registration Information and Preferences Connected Device Data Professional information Internet or Other Electronic Network Activity Information Technical Data Usage Data 	IT support	Provision of the Site and Site functions.
Novo Nordisk – India	 Identification and Contact Data Registration Information and Preferences Connected Device Data Professional information Usage Data Information provided in correspondence with us or Novo Nordisk in connection with product support cases. 	Technical Support	Provision of the Site and Site functions.
Fullstory, Inc.	 Usage Data Internet or Other Electronic Network Activity Information Technical Data 	Site Monitoring	Your explicit consent

10. WILL YOUR PERSONAL DATA BE TRANSFERRED TO THIRD COUNTRIES?

Amalgam and its service providers may not be located within your country of residence. This means your Personal Data may be processed outside of your country of residence, which may not provide the same level of data protection as your country of residence.

If your Personal Data is transferred outside of your country of residence, Amalgam will take steps to protect your Personal Data. These measures include, but are not limited to, obtaining consent where required by Data Protection Laws or, in the absence of adequate Data Protection Laws in the recipient country, entering into appropriate contracts with the data recipients and conducting an assessment of your rights in the territory of the third country.

You may request further information about these transfers and, subject to applicable Data Protection Laws, a copy of the relevant contracts or a further description of the supplementary measures taken to protect your Personal Data by contacting us using the contact information provided in the introduction to this Privacy Notice.

Third-Party and Country	Type of Personal Data	Protective Measures
Amalgam Rx, Inc. (USA)	 Identification and Contact Data Registration Information and Preferences Connected Device Data Professional information Medical data Other medical information you may provide when using optional features (e.g., height, weight, gender, race/ethnicity, side effect and symptom data). Internet or Other Electronic Network Activity Information Technical Data Usage Data 	Supplementary measures such as technical security measures (encryption of Personal Data during transmission and at rest) as well as organizational and technical measures to secure and monitor access to Personal Data. Organizational, technical, and administrative safeguards in accordance with industry standards.
Alopa Infotech Pvt Ltd (India)	 Identification and Contact Data Registration Information and Preferences Connected Device Data Professional information Internet or Other Electronic Network Activity Information Technical Data Usage Data 	Supplementary measures such as technical security measures (encryption of Personal Data during transmission and at rest) as well as organizational and technical measures to secure and monitor access to Personal Data. Contractual safeguards ensuring adequate technical, administrative, and operational protections for information shared.
Amazon Web Services, Inc. (USA)	 Identification and Contact Data Registration Information and Preferences Connected Device Data Professional information Medical data Other medical information you may provide when using optional features (e.g., height, weight, gender, race/ethnicity, side effect and symptom data). 	Contractual safeguards ensuring adequate technical, administrative, and operational protections for information shared.

	 Internet or Other Electronic Network Activity Information Technical Data 	
Fullstory, Inc. (USA)	 Usage Data Internet or Other Electronic Network Activity Information Technical Data 	Contractual safeguards ensuring adequate technical, administrative, and operational protections for information shared.

11. WHAT RIGHTS DO YOU HAVE IN RELATION TO YOUR PERSONAL DATA?

Depending on your country of residence, you may have certain individual data protection rights under Data Protection Laws, as described below. You may exercise your rights under the Data Protection Laws by contacting Amalgam's Data Protection Officer using the contact information provided in Section 3 of this Privacy Notice. In certain circumstances, Amalgam may ask you for specific information to confirm your identity and ensure the exercise of your rights. This is another appropriate security measure to ensure that personal information is not disclosed to a person who is not authorized to receive it.

Under certain Data Protection Laws, subject to certain conditions and exceptions, you have the right to:

- Request review, correction or deletion of your Personal Data if it is out of date, inaccurate or incomplete.
- Request that Amalgam restrict the processing of Personal Data relating to you if you, as a data subject, contest the accuracy of the Personal Data or consider the processing to be unlawful, or if the data controller no longer needs the Personal Data for the purposes of processing or you object to the processing.
- Object to any processing of Personal Data which is based on the legal basis of a legitimate interest or which is necessary for the performance of a task carried out in the public interest. Amalgam will then no longer process the Personal Data unless Amalgam demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, such as compliance with a legal obligation (e.g. regulatory obligations or document retention obligations), or the processing is for the establishment, exercise or defense of legal claims.
- To object at any time to the use of Personal Data for marketing purposes.
- Exercise your right to data portability if the data has been provided by you and the processing is based on consent or the performance of a contract. You may request that Amalgam provide a copy of your Personal Data in a commonly used machine-readable format to a third party designated by you, the data subject.
- Withdraw consent to the processing of Personal Data if the processing is based on (explicit) consent. The withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal. You have the right to withdraw your consent at any time and, with the exception of your consent to the collection of health data necessary for the Site to function, this will not affect your use of the Site.

Request access to your Personal Data. Depending on your country of residence, you may have other rights in relation to the processing of your Personal Data. For more information about which rights apply to you, please see Appendix 1 – Summary of Individual Rights.

In addition, Users have the right to contact the relevant data protection authority (i.e., the data protection authority in the User's country) if they have concerns about the rights of data subjects. For a quick and satisfactory resolution of concerns, you should first contact Amalgam before filing a complaint with the relevant data protection authority, but you can also contact the authority directly if you wish.

12. HOW DOES AMALGAM PROTECT YOUR PERSONAL DATA?

Amalgam has implemented physical, technical, and organizational security measures to protect your personal information, in particular from potential personal information breaches. These measures aim to ensure an adequate level of security for the Personal Data and take into account the state of the art and the costs of implementation in relation to the risks and the nature of the Personal Data to be protected.

Amalgam requires that its employees and any other person who processes your personal information comply with Amalgam's internal rules and procedures related to the protection of personal information, including the physical, technical, and organizational security measures put in place to protect your personal information. In this regard, Amalgam regularly reviews and updates its practices to enhance your privacy and ensure that its internal rules and procedures are properly followed.

Amalgam may also require that you assist us in protecting your personal information (for example, you should use a unique and strong password when creating an account through our website and not disclose your password to anyone else).

If you have identified a vulnerability or wish to report a security incident, you may contact Amalgam's Data Protection Officer directly using the contact information provided in Section 3 of this Privacy Notice.

13. CHANGES TO THIS POLICY

This Privacy Notice may be amended from time to time, in particular to reflect changes to the Website and/or the App or applicable Data Protection Laws. In the event of a material change, Amalgam will notify you of the updated Privacy Notice either via in-app communication or direct communication via email. Updates will be effective as soon as they are posted in a revised Privacy Notice on our website. Amalgam encourages you to read this Privacy Notice each time you use the Website or App.

ANNEX 1 – SUMMARY OF INDIVIDUAL RIGHTS

This summary supplements Section 8 of the Dose Check Privacy Statement.

Residents of India

If you are a resident of India, you have the following rights under Indian Data Protection Laws:

- You may request a summary of your Personal Data processed by Amalgam and the processing activities carried out by Amalgam in relation to such Personal Data.
- Request the identity of all data trustees and data processors with whom Amalgam has shared your Personal Data, together with a description of such shared Personal Data.
- Request review or correction of your Personal Data if it is out of date, inaccurate or incomplete.
- Request deletion of your Personal Data.
- Request that Amalgam restrict the processing of your Personal Data if you contest the accuracy of your Personal Data, consider the processing to be unlawful, believe that Amalgam no longer needs your Personal Data for the purposes of the processing, or have objected to the processing.
- You can object to the use of your Personal Data for marketing purposes at any time.
- Withdraw consent to the processing of your Personal Data if the processing is based on (explicit) consent. The withdrawal of consent will not affect the lawfulness of the processing based on consent before its withdrawal. You have the right to withdraw your consent at any time and, with the exception of your consent to the collection of health data, which is necessary for the website to function, this will not affect your use of the website.
- Request access to your personal information. In a request for access, you must specify the type(s) of information that are the subject of the request.