

Mobile Privacy Policy Notice

VOCERA Communications, Inc.

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Vocera's mobile applications (individually and collectively, "Vocera App" or "Service") are operated by Vocera Communications, Inc. ("Vocera," "Company," "we," "our," or "us"). For the purposes of this Privacy Notice, the Vocera App or Service includes Vocera Edge, Vina, Collaboration Suite, Ease and any other mobile applications that Vocera makes available and subject to this Privacy Notice.

You may print a copy of this Privacy Notice by clicking [here](#). If you have a disability, you may access this Privacy Notice in an alternative format by contacting us at info@vocera.com or privacyofficer@vocera.com.

1. Scope

This Privacy Notice establishes terms and conditions that apply to "Customers" and "Authorized Users." "Customers" are businesses and other entities that have separately entered into a contract with Vocera for the provision of a suite of software applications, the Vocera App, and other services ("Service Agreement"). "Authorized Users" are employees (and contractors or other authorized third parties, as applicable), of the Customers who are required to download and use the Vocera App on smart phones or tablets ("Device(s)"). Vocera processes information of Authorized Users on behalf of the Customers.

This Privacy Notice does not apply to other information that Vocera collects or obtains through other means, including directly from Customers, its website and social media activities. Please see our [Online Privacy Policy Statement](#) for information regarding our data collection through our website and social media activities.

To the extent that the Vocera App and related Services are used to collect or transmit information about individuals other than Authorized Users, for example clients or patients of a Customer, Vocera does so solely as a processor acting on behalf of the Customer, and all collection and transmission is governed by the Customer's privacy policy.

IF YOU ARE CALIFORNIA RESIDENT: If you are a resident of California, this entire Privacy Statement applies to you. However, please see the section titled [Additional Information for California Residents](#) below, which will inform you in detail about our information collection practices and your specific rights.

IF YOU ARE A NEVADA RESIDENT: If you are a resident of Nevada, this entire Privacy Statement applies to you. However, please see the section titled [Additional Information for Nevada Residents](#) below, which will inform you in detail about our information collection practices and your specific rights.

IF YOU ARE AN INDIVIDUAL LOCATED IN THE EEA OR THE U.K.: If you are located in the European Economic Area (“EEA”) or the United Kingdom (“U.K.”), this entire Privacy Statement applies to you. However, please see the section titled [Additional Information for Users in the EEA and the U.K.](#), which provides more information about which rights you have regarding the processing of your personal data.

2. Basis and Purpose for Collecting and Using Information

The Vocera App and related Services are provided to support business communications by, between, among, and with that business’s Authorized Users. Vocera collects the information that it needs to provide those services in accordance with the contract terms of its Service Agreement with its Customer and to protect the security of the Vocera App and the Customer’s data. Except as described in this Privacy Notice, Vocera does not collect, use, disclose, or share the information that it collects from Authorized Users or the information that its Customers communicate using the Vocera App and related Services.

3. What Information We Obtain

We collect the following categories of information from Authorized Users when they interact with the Vocera App:

- *Registration Information:* Information the Authorized User provides when first accessing the Vocera App: the Authorized User’s name, customer-assigned password, and in some instances a user specific PIN;
- *Electronic Communications:* Electronic communications that the Authorized User initiates by interacting with Vocera, such as support requests, questions about the Authorized User’s own information, and queries regarding this Privacy Notice;
- *Device Information:* The type of Device on which the Vocera App is downloaded, operating system name and version, device manufacturer, application version, device ID, IP address, SSID, and connection strength. Customers may also choose to use the device’s location to associate the Authorized User with a Customer facility;
- *Log file information:* Log files that record each time a Device accesses our servers, and information about the Device;
- *Usage Information:* Information about how the Authorized User uses the Vocera App, such as time, Authorized User name and manner of use and interaction with the Vocera App, date stamp, type of access;
- *Photos:* If the Customer chooses to permit Authorized Users to access the Device’s camera from the Vocera App, Authorized Users can use the Vocera App to access,

select and upload photos to the Vocera App for transmittal to the Customer and/or other Authorized Users;

- *Messages*: Text messages that are sent using the Vocera App; and
- *Metadata*: When an Authorized User uploads photos, the Vocera App stores any metadata associated with the photo based on the Authorized User's camera settings, such as time and location information associated with that specific photo.

4. How We Use Information

In addition to the specific uses of information that are described below, we may use the information that we have collected to:

- Facilitate and enhance the use of the Vocera App and related Services;
- Send Authorized Users electronic communications about the Vocera App and related Services and respond to inquiries or requests for support;
- Respond to your queries and requests, or otherwise communicate directly with you;
- Provide individuals with notices regarding the Vocera App and Services that you have purchased or may wish to purchase in the future including, in some cases, to send you direct marketing communications regarding our services that we may think are of interest to you;
- Improve, test, and monitor the effectiveness of the Vocera App;
- Compile statistics regarding the use of the Vocera App to identify usage trends;
- Develop features on the Vocera App that may be of interest to Authorized Users;
- Detect fraud, illegal activities, or security breaches;
- Perform data analysis, audit, fraud monitoring and prevention; and
- Perform any other functions that we believe in good faith are necessary to protect the security or proper functioning of the Vocera App and to prevent fraud and unauthorized use.

5. Cookies

We (and certain authorized third parties) uses cookies and similar technologies in order to collect certain information regarding your device. Some cookies are necessary to make the Vocera App and our content available to you, while others are meant to improve the Vocera App and enable us to analyze and measure audience and traffic. For more information on our use of cookies and the data that they collect, [Cookie List](#).

6. Information Disclosure

We will not disclose an Authorized User's information to third parties without giving the Authorized User and the Customer prior notice, except as stated in this Privacy Notice.

a. Customer

Unless otherwise agreed to between Customer and Vocera, all data or information collected or stored by the Vocera App or communicated using the Vocera App belongs to the Customer. Thus, we may, upon a Customer's request, provide the Customer with access to all data or information created, received, sent, stored or otherwise processed by its Authorized Users who have installed the Vocera App on their Device or our reseller partners who support Customers on our behalf. All such third parties are only permitted to use the information to support Vocera and its Customer's business activities and may not use, sell, or otherwise share it for marketing or purposes other than Vocera's.

b. Employees and Service Providers

We have employees in the United States, United Kingdom, Canada and India who may have access to personal information in order to provide a product or service that a visitor requested. We also may share personal information with third parties who provide services to us (e.g., credit card processing services) or who work on our behalf to provide a product or service that a visitor requested. In those circumstances, we disclose the personal information that is necessary for such third parties to perform those services. Service providers process your personal information for the specific purpose of providing their services to us (and in accordance with our instructions).

Below is a list of categories of service providers that we may use to perform these functions (subject to change):

- Analytics services
- Customer support services
- Billing services and payment gateway providers
- Hosting and content delivery network services
- Communication tools
- Professional service providers, such as auditors, lawyers, consultants, accountants and insurers

c. Legal Requests and Preventing Harm

We may disclose information about, or associated with, an Authorized User to a third party in response to a facially valid request from a government agency or a private litigant in the form of a subpoena, court order or search warrant, or where we believe, in good faith, that it is necessary to do so for the purposes of a civil action, criminal investigation, regulatory compliance proceeding, or other legal matter. We may also disclose information to the extent we believe, in our sole discretion, that disclosure is necessary to prevent harm or otherwise protect Vocera and its employees, Customer and its employees, Authorized Users, or third parties.

d. Affiliates

We may share visitors or registered users' information with our parent company, subsidiaries, or other companies under common control with us; in this case we will require such entities to honor this Privacy Notice. If you would like us to stop providing your information to our affiliates, you may opt-out of this sharing by contacting us using the methods provided in the "How to Contact Us" section.

e. Change of Control and Purchases

As we continue to grow, we may purchase websites, applications, subsidiaries, or other businesses or business units. Alternatively, we may sell businesses or business units, merge with other entities, obtain financing, and/or sell assets or stock, in some cases, as part of a reorganization or liquidation in bankruptcy. In order to evaluate and/or as part of these transactions, we may transfer your personal information to a successor entity upon a merger, consolidation, or other corporate reorganization in which Vocera participates, to investors and/or to a purchaser or acquirer of all or a portion of Vocera's assets, bankruptcy included.

Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred visitor information will be subject to this Privacy Notice. However, any information that you submit or that is collected after this type of bankruptcy transfer may be subject to a new privacy policy adopted by the successor entity.

f. Aggregated Information

We may share personal information with third parties after it has been aggregated or otherwise deidentified sufficiently that individuals are no longer identifiable and cannot be reidentified using reasonable efforts.

7. Links to Third-Party Applications

The Vocera App may, at the Customer's discretion, allow Authorized Users to directly access applications operated by third parties that have been selected and approved by the Customer. We are not responsible for, and this Privacy Notice does not address, any information that these Customer-selected third-party applications may collect. Authorized Users and Customers should review the privacy policies of these third parties to understand how they may use information.

8. General Retention Periods

We use the following criteria to determine our retention periods: the amount, nature and sensitivity of your information, the reasons for which we collect and process your personal data, the length of time we have an ongoing relationship with you and provide you with access to the Vocera App and services, and applicable legal requirements. We will retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to comply with applicable legal, tax or

accounting requirements). Additionally, we cannot delete information when it is needed for the establishment, exercise or defense of legal claims (also known as a “litigation hold”). In this case, the information must be retained as long as needed for exercising respective potential legal claims.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), we will securely store your personal information and isolate it from any further processing until deletion is possible.

9. Anonymization

In some instances, we may choose to anonymize your personal data instead of deleting it, for statistical use, for instance. When we choose to anonymize, we make sure that there is no way that the personal data can be linked back to you or any specific user.

10. Account Deactivation

Customers have the ability to deactivate, suspend or terminate an Authorized User’s Vocera account. For assistance, Customers should contact us as set forth in their Service Agreement or in the “How to Contact Us” section below, and we will provide any required assistance.

Any Authorized User who wishes to deactivate or terminate his/her account or remove specific data in his/her account should first contact the Customer. We will follow written instructions sent by or on behalf of the Customer unless they conflict with the terms of the “General Retention Periods” section.

11. Rights of Authorized Users to Control Their Information

Any Authorized User may at any time, in consultation and with the approval of the Customer, delete or remove the Vocera App from the Authorized User’s Device by following the Device manufacturer’s instructions.

When an Authorized User uses the Vocera App on the Authorized User’s Device, a copy of certain information collected, generated, or stored by the Vocera App on that Device may be stored on Vocera’s servers to allow the Authorized Users to access the same information on multiple devices. When the Vocera App is removed from an Authorized User’s Device, all information previously collected, generated or stored by the Vocera App, while no longer accessible from the Device, will remain stored on the Vocera servers in accordance with the General Retention Periods section above.

Unless Vocera is required by applicable law or court order to take a specific action (e.g., preservation, duplication, storage, disposal) with respect to such data or information stored on its servers, Vocera will follow the Customer's written instructions with respect to the preservation or disposal of such data or information, or if there are not such instructions, will retain such information in accordance with Vocera's applicable data retention policy.

12. Information Security

We take reasonable measures, including the imposition of administrative, technical, and physical controls, to protect any personal information that we may collect, store, share, or transmit through the Vocera App against loss, misuse, and unauthorized access, disclosure, alteration and destruction.

Authorized Users should not disclose their user ID or password required to access the Vocera App to any third party. Each Authorized User will be responsible for any use of the Vocera App under their user ID and password unless they have notified Vocera, in addition to notifying Customer, in writing of the loss or compromise of such information and subsequently requested that their password be reset (and Vocera has acknowledged receipt of the notice). To provide Vocera with notice, see the "How to Contact Us" section.

13. Additional Information for California Residents

California law requires website operators to make certain disclosures:

a. Scope of this Privacy Notice

This Privacy Notice describes the personal information that the Vocera App collects or processes about California residents in connection with the Vocera App, as well as how we use, share, and protect that personal information, and what your rights are concerning personal information that we collect or process.

In this Privacy Notice, "personal information" has the same meaning as under the California Consumer Privacy Act (CCPA), California Civil Code Section 1798.83: information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include information that has been de-identified or aggregated.

b. Personal Information the Vocera App Collects and Shares, and For What Purpose

In the past 12 months, Vocera has collected and shared personal information from Vocera App Authorized Users in the following circumstances, as described in detail above in the “Information We Collect” section This information includes the following categories under the CCPA:

A. Identifiers , such as a real name, unique personal identifier, online identifier, IP Address, email address, or account name

B. Personal information categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)) , such as a name, signature or telephone number

D. Commercial information , such as records of products purchased, obtained, or considered, or other purchasing or consuming histories or tendencies

F. Internet or other similar network activity, such as browsing history or information on a Consumer’s interaction with a website or application.

G. Geolocation data , such as physical location.

I. Professional or employment-related information.

K. Inferences drawn from other personal information, such as profile information reflecting a person’s preferences.

As described in detail above, Vocera uses personal information from Authorized Users for a variety of business purposes set forth in the “Use of Information” section, including to operate, assess activity on, and improve the performance of the Vocera App and related Services.

As described above, Vocera shares personal information with certain categories of third parties, such as service providers, as set forth in the “Sharing Information” section. Vocera does not sell personal information to third parties and has not done so in the last 12 months.

c. Your Rights as a California Resident

Under California law, Authorized Users of the Vocera App who are California residents have specific rights regarding their personal information. These rights are subject to certain exceptions described below. When required, Vocera will respond to most requests within 45 days unless we need to extend the response time as permitted under the CCPA.

i. Right to Disclosure of Information

You have the right to request that Vocera disclose certain information regarding our practices with respect to personal information. If you submit a valid and verifiable request, and we confirm your identity and/or authority to make the request, we will disclose to you any of the following at your direction:

- The categories of personal information we have collected about you in the last 12 months.
- The categories of sources for the personal information we have collected about you in the last 12 months.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold your personal information for a business purpose, a list of the personal information types that each category of recipient purchased.
- If we disclosed your personal information to a third party for a business purpose, a list of the personal information types that each category of recipient received.

ii. Right to Delete Personal Information

You have the right to request that Vocera delete any of your personal information collected from you through the Vocera App, subject to certain exceptions, including employment related considerations arising from your employment relationship and our Service Agreement with your Employer. Upon receiving a verified request to delete your personal information, we will communicate that request to your Employer (our Customer), and we will delete the information unless otherwise required to retain it to satisfy our legal and contractual obligations.

iii. How to Exercise these Rights

You may submit a verifiable consumer request to Vocera for disclosure or deletion of personal information by clicking [here](#).

Alternatively, you may call Vocera at (866) 306-0876 or contact us by email at privacyofficer@vocera.com.

In order to protect your privacy and the security of your information, we verify consumer requests by using information you provided to us at the time of your request. Any such additional information you provide will be used only to verify your identity and not for any other purpose.

You may designate an authorized agent to make requests on your behalf. You must provide an authorized agent written permission to submit a request on your behalf, and Vocera may require that you verify your identity directly with us. Alternatively, an

authorized agent that has been provided power of attorney pursuant to Probate Code sections 4000-4465 may submit a request on your behalf.

iv. Right to Opt Out of Sales or Sharing of Your Personal Information

We do not sell or share your personal information (each as defined under the CCPA and the California Privacy Rights Act) and therefore do not provide any mechanism to opt out of such activity.

v. Right to Non-Discrimination

You have the right not to be discriminated against by Vocera, the Vocera App, and your Employer (our Customer) for exercising your California privacy rights described above.

14. Do-Not-Track

Some browsers allow individuals to communicate they do not wish to be tracked when browsing the Internet. Due to gaps in industry and regulatory guidance, we have not yet developed features to recognize or respond to browser-initiated DNT signals. However, please note the resources below.

<http://optout.aboutads.info/#/>

<http://www.aboutads.info/choices>

<http://optout.networkadvertising.org/#/>

http://www.networkadvertising.org/managing/opt_out.asp.

<http://www.aboutads.info/appchoices>

15. Additional Information for Nevada Residents

We do not sell your personal information within the scope of, and according to the defined meaning of, a “sale” under NRS 603A.

16. Additional Information for Users in the EEA and the U.K.

If you are located outside the United States, please be aware that the information that our Customer (your Employer) authorizes us to collect from and about Authorized Users

will be transferred for processing to the United States and to other countries or jurisdictions that may not have the same data protection laws as your jurisdiction.

The Vocera App and Services are hosted and operated in the United States (“U.S.”) through Vocera, its affiliates and its service providers. Laws in the U.S. may differ from the laws where you reside and may be less protective than the laws of your region or country, such as the GDPR. By using the Vocera App and Services, you consent and acknowledge that any personal data about you, regardless of whether provided by you or obtained from a third party, is being provided to Vocera in the U.S. and will be hosted on U.S. servers by Vocera and/or its service providers, and you authorize Vocera and/or its service providers to transfer, store and process your information to and in the U.S., and possibly other countries.

Although by using our Vocera App and Services, you automatically send your personal data to the U.S., which is not deemed an “adequate” jurisdiction by the European Union for data transfers, on our customer’s request we will enter into the Standard Contractual Clauses and require parties to whom we disclose your information to adhere to the Standard Contractual Clauses to the extent not located in the EEA.

Some of our processing activities may involve automated processing of personal information. Some of our processing activities may involve automated processing of personal information. For example, we may collect usage statistics to identify usage trends or to improve our Services or prevent fraud.

You have the right to request access to and rectification or erasure of your personal data, or a restriction of processing that concerns you, or to object to processing, as well as the right to data portability. Any such request should be first directed to the Customer (your Employer), and we will follow written instructions sent by or on behalf of the Customer unless they conflict with the terms of the “General Retention Periods” section. If we process personal data based on your consent, you have the right to withdraw it at any time. You also have the right to lodge a complaint with a supervisory authority.

For additional information, please contact us at the address provided in the “How to Contact Us” section.

17. Lawful Bases for Processing Personal Information

In most cases the legal bases for our processing of personal information will be one of the following:

- Legal obligation: to comply with our legal and/or regulatory obligations, for example obtaining proof of your identity to enable us to meet our anti-money laundering obligations; and/or
- Legitimate interests: to understand how you use the Vocera App and services and to enable us to use this knowledge to improve our products and services and to develop new ones; to communicate with you about the products and services that you use or we offer; maintain our accounts and records; to assess patterns of use; and to plan and evaluate our marketing and business development programs. For example, we may send you information about new industry developments, new products and communications about events. We also use appropriate safeguards designed to protect your privacy interests, freedoms, and rights under applicable laws.
- Consent: We may obtain your consent to collect and use certain types of personal information when we are required to do so by law. You may withdraw your consent at any time by contacting us using the methods provided in the “How to Contact Us” section.
- Performance of a Contract: We may process your personal data for the purpose of performing under the terms of a contract to which you are a party - in other words, your ability to use and register for the Vocera App and Services.

18.Children and Privacy

The Vocera App is directed to businesses and professionals. It does not target and is not intended to attract children under the age of 18. Vocera does not knowingly collect or maintain personal information of children under the age of 18, including them in our marketing communications, or otherwise seek personal information from and about them. To the extent that we have collected information from anyone under the age of 18 and the Customer has not obtained proper consent (as noted below), we will promptly delete that information and account, if any, upon notification as shown in the “How to Contact Us” section, below. Vocera’s Customers and their Authorized Users may choose to use the Vocera App and related Services to communicate information from and about children under the age of 18 As a processor that provides communication services, Vocera generally does not have access to that information and does not have control over its Customers’ collection and use of personal information or the information it chooses to communicate via the Vocera App. Such Customers must obtain any required consents for children under the age of 18 to use the Vocera App.

19.Changes to this Privacy Notice

Vocera may amend this Privacy Notice from time to time and we will post an updated Privacy Notice. If we make any material changes to the way in which we collect or process information we may inform our visitors as required by applicable law. Any updated version of this Privacy Notice will be effective as of the date set forth therein.

20.How to Contact Us

If you have any questions about this Privacy Notice or our practices regarding the Vocera App and your personal information, please call us at (866) 306-0876 or contact us by email at privacyofficer@vocera.com. If you are located in the United Kingdom, you may contact us by email at privacylead.vocera@kaleidoscopeconsultants.com.