

Online Privacy Policy Statement

Vocera Communications, Inc.

Last Updated: January 11, 2022

Vocera Communications, Inc. (“Vocera,” “we,” “our,” or “us”) operates the website located at www.vocera.com (“Site”) and provides the content (including email and electronic communications) and our products and services (collectively “Services”) offered on or through the Site. “Platform” means the “Site” and/ or “Service.”

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

1. Scope

This Privacy Statement applies to information we collect from our customers and from visitors and registered users who use our Platform, including, the Services known as Vocera Enterprise Platform, Patient and Family Engagement Services and our Smartbadge, Badge and Smartphone Services. This Privacy Statement also applies to information we collect from users who interact with us through our social media accounts, who contact us by email, mail, or telephone, or who register for our events or email distribution list. It also applies to information we may obtain from third parties.

This Privacy Statement does not apply to (1) personal information our customers collect from third parties using devices, services, systems and software that we provide; (2) personal information we collect in employment relationships; (3) personal information collected by third party websites to which the Platform may link; or (4) personal information that we collect through our mobile applications. Please see our [Mobile Application Privacy Policy](#) for information regarding our data collection through our mobile applications.

Except for third parties providing services on our behalf, we do not endorse and are not responsible for third party website content, policies or practices, or any product or service they may offer. Any activity you perform on these third party websites will be subject to their privacy policies and other terms and conditions.

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.

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.

2. How We Obtain Information

We (and our service providers) obtain information about visitors who use our Platform from the visitor's browser, through a visitor's activities offline (such as providing information to us in a telephone call), through a visitor's activities online when using the Service, through a visitor's social media account if connected to the visitor's account on the Platform, through cookies and other technologies to analyze Platform use and performance, and from third parties such as entities that collect information about interest in the Platform.

3. What Information We Obtain

a. Information We Collect Automatically

When a visitor uses or interacts with our Platform, the visitor's browser automatically provides, and we automatically collect and store, certain information about the visitor's device and activities such as:

- Preferences and settings: time zone, language, and character size;
- Identifiers: IP address; mobile device advertising identifier, Media Access Control (MAC) address;
- Technical information: type of device, operating system name and version, device manufacturer, model, browser information (type, version), screen resolution, applications;
- Connection: Internet service provider or mobile carrier's name, country, connection speed and connection type, Bluetooth settings;
- Information about use of the Platform: date stamp, URL of the last webpage visited before visiting our Platform, and URL of the first page visited after leaving our Platform, pages viewed, time spent on a page, click through, clickstream data, queries made, search results selected, comments made, search history, type of service requested, purchases made;
- Information collected through cookies, pixel tags, and other technologies; and
- General geographic location down to city and state level.

b. Information from Our Communications with Visitors

When a visitor communicates with us through the Platform, we collect and store certain information about the visitor, such as their name, address and email, the visitor's device and activities, such as log-in information, the nature of the communication, pages viewed, and any actions taken in response to the communication.

c. Information Collected from Areas Limited to Use by Our Customers and our Customers' Employees

Access to certain Vocera web pages on the Site, such as our Customer Technical Support Portal, requires registration and use of a login and a password. The use of those web pages, and the information or programs downloadable from those web pages, is also subject to the terms of the written agreement between your employer and Vocera ("Services Agreement"). To register as a user for the Customer Technical Support Portal, we collect your name, email address and company or facility name. We use personal information from registered users to verify compliance with the Services Agreement, log software licenses granted, track software downloaded from those pages, or track usage of other applications available on those pages. We also collect credit cards for payment from customers when customers contact us to pay via credit card.

d. Social Media

Our Platform includes social media features that may be managed by us or by third parties. These features may collect a visitor's IP address and which pages the visitor is visiting, and a cookie enables the feature to function properly. Your use of these social media services may result in the collection or sharing of information about you by these social media services. We encourage you to review the privacy policies of these social media services.

Vocera maintains an online presence on social media platforms ("Social Media Platforms") such as LinkedIn, Instagram and Twitter, to provide information about our Platform and communicate with users and/or visitors to those pages. When you interact with our account, we process your personal information. In some cases, the Social Media Platforms are service providers or processors.

e. Information We Obtain from Third Parties

We may obtain information such as names and contact information of individuals from third parties with whom we do business, such as strategic business partners, service providers, public databases, or social media services to which our Platform might be linked, or providers of databases of leads. In addition, our visitors and registered users may provide us with contact information of other individuals who they think might be interested in Vocera, for example, co-workers or other professional colleagues.

Individuals who do not wish to receive information from us can opt-out of future communications by clicking on the link included at the bottom of all Vocera marketing emails or contact us using the information provided below.

f. Analytics

We work with third party analytics services. These analytics service providers use cookies and similar technologies to collect information about the content visitors view, what websites visitors visit immediately prior to and after visiting the Platform, or the visitor's system's information and basic geographic information. The information generated by cookies and other technologies is transmitted to and stored by the applicable analytics services.

Information collected by Google Analytics is transmitted to, and stored by, Google in accordance with its privacy practices. To see an overview of privacy at Google and how this applies to Google Analytics, please see below.

4. How We Use Information

Vocera uses information to:

- Facilitate and enhance the visitor's use of the Platform and perform customer service activities;
- Communicate with the visitor regarding Platform use and announcements;
- Respond to your queries and requests, or otherwise communicate directly with you;
- Provide individuals with notices regarding the Platform 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;
- Keep records of contact information and correspondence;
- Conduct automated processing of personal information to support use of the Platform;
- Administer and maintain the Platform, develop and improve Platform features, and manage our business;
- Detect fraud, illegal activities, or security breaches; and
- Perform data analysis, audits, IT support, security and fraud monitoring and prevention.

5. Information Disclosure

Except as described below, Vocera will not transfer information to third parties without the individual's consent.

a. 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

b. 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.

c. Legal Requests and Preventing Harm

We may share personal information:

- When we have a good faith belief it is required by law, such as pursuant to a subpoena, warrant or other judicial or administrative order;
- To establish, protect, or exercise our legal rights or defend against legal claims;
- If we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, fraud, or situations involving potential threats to the safety of any person or property; and/or
- If we believe it is necessary to investigate, prevent, or take action regarding misuse of our Platform.

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 Statement. 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 Statement. 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.

6. Your Privacy Choices

Visitors have numerous choices regarding information pertaining to them. To exercise any of these options, please submit a request [here](#) or refer to the "How to Contact Us" section below.

a. Advertising Choices

Please visit the section on Direct Marketing Purposes/Opt-Out and "Advertising Choices" [here](#).

b. Direct Marketing Purposes /Opt-Out

You have the opportunity to "opt out" of our using your personal information to send you direct marketing or market research information. If you would like to "opt-out," please let us know either by clicking or checking the appropriate option or box at the point of collection of information, by updating your communications preferences [here](#), or by contacting us as indicated in the "How to Contact Us" section. See also our Advertising

Choices disclosures [here](#). These requests may take up to ten (10) business days to process.

We reserve the right to send you administrative or transactional messages relating to the Platform (e.g., about changes to this Privacy Statement), to contact you regarding orders you have placed (e.g., order confirmations and shipment tracking information), and to share your information with third parties as permitted under this Privacy Statement. **If you opt out of receiving emails from us, we may still send you important administrative messages (such as updates about your account), and you cannot opt out from receiving these messages as long as you or your Employer maintains a relationship with us.**

c. Changing and Managing Your Information

If you are a registered user of the Service, you may make changes to the information you have provided in connection with your account by logging in to your account. You may also request changes by contacting us at the address provided in the “How to Contact Us” section. Following receipt of a request from you, we will take reasonable steps to update, correct or delete your information as requested.

d. Review, Correction, and Deletion of Your Account and Information

If you are a registered user, you can contact us as shown in the “How to Contact Us” section, below, to request that your personal information be updated, corrected, or deleted from our database.

Please see General Retention Periods below for more information.

7. Information Security

Vocera takes reasonable measures, including the imposition of administrative, technical, and physical controls, to protect the personal information that we collect and create against loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

To notify us of the loss or compromise of user ID and password or of other unauthorized account activity, or to ask questions about our security practices as they relate to personal information, please contact us as shown in the “How to Contact Us” section, below. While we strive to protect the information that we collect, we cannot ensure the security of the information you transmit to us. We urge you to take every precaution to protect your personal data when you are on the Internet.

8. Security of Your Payment Information

We work with a third-party payment processor to securely receive and process online payments in compliance with applicable privacy and data security laws and industry security practices, including the PCI-DSS standard. We do not have access to payment card information details.

9. Children and Privacy

Our website 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, we will promptly delete that information and account, if any, upon notification as shown in the “How to Contact Us” section, below.

10. Links to Third Party Sites or Applications

The Platform may contain links to application or services operated by other companies. These links are provided for your convenience only and should be used at your discretion. Except to the extent that the linked third-party is providing services to Vocera or otherwise acting on Vocera’s behalf, these links do not constitute sponsorship, endorsement, or approval of the content, policies or practices of such third-parties’ applications.

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

We collect, use, protect, and share the personal data that we collect from individuals while they are in the European Union and European Economic Area as stated in this Privacy Statement.

The Platform is 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 Platform, 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 Platform 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. For example, we may conduct profiling activities to select personalized offers or recommendations based on use of the Platform and browsing history. These decisions do not have legal or similar effects, and all such marketing decisions are subject to opt-out and to requests to delete data, as discussed in “Your Privacy Choices” section, above.

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. 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.

12. 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 Platform 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 Platform.

13. Additional Information for California Residents

a. Scope of this Privacy Notice

This Privacy Statement describes the personal information that Vocera collects or processes about California residents in connection with the Platform, 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 Statement, “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 Vocera Collects and Shares, and For What Purpose

In the past 12 months, Vocera has collected and shared personal information from individuals in the following circumstances, as described in detail above in “What Information we Obtain”. 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 visitors for a variety of business purposes as set forth in the How we Use Information section, including to operate, assess activity on, and improve the performance of the Platform.

As described above, Vocera shares personal information with certain categories of third parties, such as service providers, as set forth in the Information Sharing and Disclosure 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, Platform users 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, subject to certain exceptions. Upon receiving a verified request to delete your personal information, we will do so unless otherwise authorized by law.

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 email Vocera at privacyofficer@vocera.com.

In order to protect your privacy and the security of your information, we verify consumer requests by using information provided to us at the time of the consumer request. Any 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 for exercising your California privacy rights described above.

14. 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.

15. 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 our Platform, 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.

16. 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.

17. Changes to this Privacy Statement

Vocera may amend this Privacy Statement from time to time and we will post an updated Privacy Statement. 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 Statement will be effective as of the date set forth therein.

18. How to Contact Us

If you have questions or concerns about this Privacy Statement or our collection, use, or disclosure of your personal information, please contact us as follows:

Email: info@vocera.com or privacyofficer@vocera.com

Phone: (866) 306-0876

Mail: Vocera Communications

525 Race Street

San Jose, CA 95126

Attn: Privacy Officer

Pursuant to article 27 of the GDPR, we have designated Kaleidoscope Consultants (KC UK) as our representative in the United Kingdom. You can contact KC UK as follows:

Kaleidoscope Consultants (KC UK)

Email: privacylead.vocera@kaleidoscopeconsultants.com

Phone: +44 (0) 20 3637 1111

Mail: Kaleidoscope Consultants

East Side, Kings Cross, London, N1C 4AX

19. Advertising Choices

a. Cookies and other Tracking Technologies

We use cookies, beacons, pixels, tags, statistical IDs, flash cookies, and similar tracking technologies to collect information about the activities of our visitors and registered users over time and across different Sites, such as the pages a visitor views, the links on which a visitor clicks, how frequently a visitor accesses the Platform, and other actions a visitor takes. We also collect log file information from a visitor's browser such as web request, IP address, browser type, referring / exit pages and URLs, and landing

pages. We may use statistical modeling tools to attempt to recognize visitors across multiple devices.

We may retain the services of third party service providers who may link personal information about a visitor - such name or email address - to other information they may have – for example, past purchases. This information may allow us to identify assumed interests or preferences of that visitor, so that we can provide a visitor with more useful and relevant ads.

b. How to block Cookies

When you visit the Platform, we provide you with the opportunity to manage receipt of certain cookies.

Please note that blocking or disabling certain cookies may interfere with certain functionalities of some parts of our Platform. Choices you make about cookies are also browser and device specific. Further, while disabling a cookie may prevent the future collection of information, it does not prevent the use of information collected before the cookie was disabled. For more information on our use of cookies and the data that they collect, [Cookie List](#).

c. Analytics

Information collected by Google Analytics is transmitted to, and stored by, Google in accordance with its privacy practices. To see an overview of privacy at Google and how this applies to Google Analytics, please click here: <https://support.google.com/analytics/answer/6004245>.

To opt out of Google Analytics, please go to <https://tools.google.com/dlpage/gaoptout>.

d. Do Not Track (DNT)

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>