

General Notice of Data Collection and Processing

Intuitive Surgical, Inc., Intuitive Surgical Operations, Inc., Intuitive Surgical Sarl, and affiliated companies (collectively, “Intuitive”) collect a variety of information related to individuals.

This Notice describes the following:

1. [Data Privacy Contact](#)
2. [Intuitive’s Collection and Use of Personal Data](#)
3. [Intuitive’s Disclosure of Personal Data](#)
4. [Changes to This Notice](#)

For purposes of this Notice, “Personal Data” means any information received by Intuitive relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We also provide distinct privacy notices for selected services that collect Personal Data. If you are a user of such services, please refer to service specific privacy notices for additional details. Similarly, we also provide privacy notices with more information for specific regions.

1. Data Privacy Contact

Our data protection office may be reached by emailing data.privacy@intusurg.com.

2. Intuitive’s Collection and Use of Personal Data

Intuitive collects and uses Personal Data about individuals, including the following:

- Administrative contacts of Intuitive’s customers and contacts at suppliers, distributors, business contacts, and other third parties, e.g. regulatory agencies (collectively, “Administrative and Commercial Contacts”);
- Surgeons, hospital residents, medical students, proctors, and other individuals who use, have used, or may use medical devices manufactured by Intuitive or services provided by Intuitive (collectively, “System Users”); and
- Users of websites and other online applications operated by Intuitive (“Website Users”).

If you are an Administrative or Commercial Contact, or a System User:

Intuitive may collect Personal Data from Administrative and Commercial Contacts including identification data (e.g. name, email address, and country), professional data (e.g. employer, work contact information, and job title), financial data (e.g. compensation details), recordings (e.g. pictures or videos), profiling data (e.g. interests and memberships) and any other data you choose to provide to Intuitive.

Intuitive may collect Personal Data from System Users including identification data (e.g. name and date of birth), personal characteristics (e.g. dietary restrictions for planning conference meals), professional data (e.g. resume and business contact information), financial data (e.g. compensation details), recordings (e.g. photographs and videos), profiling data (e.g. interests, memberships, and training and procedure related information) and any other data you choose to provide to Intuitive.

Intuitive may use the Personal Data of Administrative and Commercial Contacts as well as System Users for purposes including, but not limited to:

- Providing support and preventative maintenance of Intuitive products, including but not limited to order fulfilment including shipping and invoicing, customer training, quality assurance, providing information about our products and services, training and recommendations for training, simulation and simulator data including modules used and scores, learning plan/training course enrollments, online data storage, and site visits;
- Relationship management, including but not limited to:
 1. Proctoring and other activities;
 2. Procedure reporting
 3. Customer efficiency and cost saving, for example, contract management, including to negotiate and submit contracts with customers and/or purchasers, accounting, individual, process and program performance;
- Improving Intuitive products, services and processes including marketing and sales, e.g. compensation analysis, budgeting, planning and headcount, market analysis, satisfaction surveys, benefits and expenses, providing performance information, sponsored agreements and complaints handling;
- Ensuring compliance with applicable laws and regulations, e.g. legal advice, negotiation, fraud prevention and network security, and including EU and US laws and regulations such as the French Sunshine Act and the Physician Payments Sunshine Act;
- Providing a resource for Intuitive's research and business development.

If you are a Website User:

Intuitive may collect Personal Data from Website Users such as personal identification data (e.g. online identifier (such as IP address when applicable), name, phone number, email address, country, state, time zone, preferred language, username and password to the website), professional data (e.g. title, role, hospital, specialty, interested procedures, identification number, simulator data including modules used and scores, learning plan/training course enrollments, answers and completions, and certificates of completion earned), profile data (e.g. user account, online profile, video views, content preferences, and usage metrics and engagement) and any other data you choose to provide to Intuitive.

Intuitive may use the Personal Data of Website Users for purposes including, but not limited to:

- Responding to your interactions with the website, such as confirming information in forms that you fill out or informing you of system and website updates;
- Providing support and preventative maintenance of Intuitive products;

- Submission of complaints and ordering;
- Improving Intuitive products or services;
- Providing a general resource for Intuitive’s research and business development;
- Providing you with information about our products at your hospital or available to you through the website;
- Analyzing our business effectiveness and conducting market research;
- Creating statistics on website usage, identifying material of interest, and assisting with engagement;
- Providing you with training, and recommendations for training, including simulator training as well as certificates of completion and courses taken;
- As necessary for fraud prevention, reporting suspected criminal acts, and for ensuring compliance with the applicable laws and regulations;
- Network and information security, fraud prevention, and reporting suspected criminal acts.
- If you opt-in, providing you with other information about our products and services that we think may be of interest to you, including promotional and sales content to improve your understanding of the product capabilities, new advanced technology, and enhancements available;
- If you opt-in to the leaderboard, tracking your simulator scores in comparison with others.

3. Intuitive’s Disclosure of Personal Data

Intuitive may disclose Personal Data, subject to written agreement, to authorized service providers who provide services related to the purposes for which Intuitive collects that Personal Data. For example, the Personal Data of customer contacts entered into Intuitive’s customer relationship management database, which is hosted by an authorized service provider. Other authorized service providers include providers of communications services, logistics service providers, database and analytics providers, attorneys, accountants, and banks. Intuitive may share data related to customers or partners with those same customers or partners. When Intuitive’s affiliated companies use the Personal Data for the purposes for which Intuitive collects that Personal Data, such transfers between Intuitive’s affiliated companies are subject to appropriate onward transfer agreements. In addition, Intuitive may disclose the Personal Data to other third parties as described above.

Intuitive may be required to disclose, and may disclose, Personal Data in response to lawful requests as part of a legal proceeding or by public authorities, including for the purpose of meeting national security or law enforcement requirements.

Intuitive is accountable for Personal Data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party as described in the Privacy Shield Principles. In particular, Intuitive remains liable under the Privacy Shield Principles if third-party agents that it engages to process the Personal Data on its behalf do so in a manner inconsistent with the Principles, unless Intuitive is not responsible for the event giving rise to the damage.

4. Changes to This Notice

If we change this Notice, we will update the Notice and the Notice effective date.

Effective Date: **September 9, 2019**