

# Invacare Privacy Policy

Effective: October 22, 2012

Updated on: October 10, 2023

Click [here](#) to view our verification status.

Invacare Corporation and its subsidiaries Adaptive Switch Laboratories, Inc., Freedom Designs, Inc., and Medbloc, Inc. (collectively “Invacare”, “we”, “our” or “us”) have long recognized that individuals with whom we conduct business value their privacy. However, in order to conduct global business in this increasingly electronic economy, the collection of personal information is often necessary and desirable. It is our goal to balance the benefits of e-commerce with the rights of individuals to prevent the misuse of their personal information. This privacy policy describes how Invacare collects, uses, shares and secures the personal information you provide. It also describes your choices regarding use, access and correction of your personal information. This privacy policy applies to Invacare owned and operated websites that are linking to this policy. In addition to this privacy policy, we have a separate privacy policy that applies to Invacare owned and operated websites in the European Union (“EU Privacy Policy”). If you are in the European Union, then the EU Privacy Policy applies to you, even if the website you are viewing also links to this privacy policy.

Please click on the following links for more information.

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## EU-U.S. Data Privacy Framework and Swiss-U.S. Data Privacy Framework

Invacare complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the Swiss-U.S. Data

Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Invacare has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. Invacare has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland under the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

Invacare is responsible for the processing of personal data it receives, under the EU-U.S. DPF and Swiss-U.S. DPF, and subsequently transfers to a third party acting as an agent on its behalf. Invacare complies with the EU-U.S. DPF and Swiss-U.S. DPF Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

The Federal Trade Commission has jurisdiction over Invacare's compliance with the EU-U.S. DPF and Swiss-U.S. DPF. In certain situations, Invacare may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the EU-U.S. DPF and the Swiss-U.S. DPF, Invacare commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.

For complaints regarding EU-U.S. DPF and Swiss-U.S. DPF compliance not resolved by any of the other DPF mechanisms, you have the possibility, under certain conditions, to invoke binding arbitration. Further information can be found on the official DPF website: <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>.

## **Collecting Information on All Site Visitors**

Invacare gathers certain generic information with respect to visitors' use of our websites. Information such as the number of visitors, the frequency with which they visit, and the areas on the website that they favor, very much like television ratings that tell the networks how many people tuned in to a program. We only use this type of data in aggregate — that is, we look at the data on a collective basis, in summary form, rather than on an individual basis. This collective data helps us determine the extent to which our customers use certain parts of the website, which, in turn, enables us to make the website as appealing as we can for as many of you as possible, and provide you with the best possible Web experience. **These statistical ratings do not contain any personal information about you or any of our users.**

## **Personal Information**

In some circumstances, Invacare may request personal and professional information from you, such as your name, job title, email address, company name, telephone number or address. Your response to these inquiries is completely voluntary and you therefore have a choice whether or not to disclose this information. Invacare uses this information to allow you to register for an account on most of our websites or to customize your experience on our websites. In addition, we may use this information for other business purposes, such as alerting you to products and services that can assist you in your business, sending you email alerts, providing brochures or catalogs, sales manuals, service manuals, demo videos, promoting website registration and assisting in order processing.

In some instances, we may collect, provider, prescriber, end user or insurance information (such as providers name, insurance company name). We use this information in order to provide you with the services you requested and for the reasons stated above.

In general, you can visit our websites without divulging any personal information. However, there may be areas of our websites that require this information to complete customization functions. Such areas of our websites may not be available to those choosing not to reveal the information requested.

If you fill out a credit application to be submitted back to us offline, we will collect additional information such as social security number, date of birth, reference information (such as name, email address and phone number), lender information if you have any current loans (such as lender name, address, contact person and phone number). We use this information to determine whether or not we will be able to provide you with a line of credit. Whether we are or are not able to do so we will use your name, email address or phone number to contact you regarding your application. Where you are unable to provide us with all of the details that we need to provide you with a line of credit, we may also collect personal information about you from third parties, such as your employer, service providers, agents, advisers, as well as other trade credit providers and credit reporting bodies. If we do not receive all of the information that we request, we may be unable to provide you with a line of credit, our products, our services, or otherwise engage with you.

### **Order Forms**

If you submit an offline order form we will collect your name, shipping address, PO number, purchasing contact and phone number. If you submit an online order we will collect your credit card number, expiration date and billing address. We will use this information to fulfill your order and to call the purchasing contact if we are unable to process your payment or have any questions regarding your order.

### **Careers**

If you choose to use the career section of our websites, in some instances you will be directed to our third party service providers' website although it may have the look and feel of our website. All information collected within the career section of our websites is covered by the privacy policy of our service provider and is shared back with us so that we may determine your eligibility for the position in which you applied and to contact you regarding an interview. Please refer to the privacy policy of our service provider for information on your privacy choice options. You can also contact us for your privacy choice options (see [Contact Information](#) section below) or you can find more information in the [Access to Personal Information](#) section below.

### **Surveys and Contests**

We may provide you the opportunity to participate in surveys or contests on our websites. If you participate, we will request certain personal information from you. Participation in these surveys and contests is completely voluntary and you therefore have a choice whether or not to disclose this information. The requested information typically includes contact information (such as name and shipping address), and demographic information (such as zip code).

We use this information to determine which of our products produce a high volume of interest and determine what additional products we should offer in the future.

We may use a third party service providers to conduct these surveys and contests. Any such service providers will be prohibited from using our users' personal information for any other purpose, however, such service providers generally retain the right to use information collected from their websites in an anonymous or aggregated manner for the purposes of improving their websites and services. Before

participating in any of these surveys or contests, please refer to the service provider's privacy policy for more information on their use of the information collected from their websites. Except as otherwise provided in this privacy policy, or the survey or contest communications, we will not share the personal information you provide through a survey or contest with other third parties unless we give you prior notice and choice.

## **Communications from the Site**

### **Special Offers, Updates and Newsletters**

We will occasionally send you information on products, services, special deals, promotions and newsletters. We will use your name and email address to send these communications to you.

Out of respect for your privacy, you may opt-out of receiving these types of communications at any time by following the unsubscribe link located at the bottom of each communication or by emailing us at [privacy@invacare.com](mailto:privacy@invacare.com).

### **Service-related Announcements**

We will send you strictly service-related announcements on rare occasions when it is necessary to do so. For instance, if our service is temporarily suspended for maintenance, we might send you an email. Generally, you may not opt-out of these communications, which are not promotional in nature. If you do not wish to receive them, you have the option to deactivate your account.

### **Customer Service**

Based upon the personal information you provide us, we will send you a welcoming email to verify your username and password. Please remember to protect your Invacare account by preventing others from accessing your password (and your computer) and by signing out of your Invacare account when finished using the account. We will also communicate with you in response to your inquiries, to provide the services you request, and to manage your account. We will communicate with you by email or telephone, in accordance with your wishes.

## **Domain Information**

Invacare also collects domain information as part of its analysis of the use of our websites. This information enables us to become more familiar with customers who visit our websites, how often they visit, and what parts of a website they visit most often. Invacare uses this information to improve its web-based offerings. This information is collected automatically and requires no action on your part.

## **Cookies and other Tracking Technologies**

Invacare and its partners use cookies or similar technologies to analyze trends, administer our websites, track users' movements around our websites, and to gather demographic information about our user base as a whole. Invacare uses a technology nicknamed "cookies." Cookies are pieces of information, or data, sent to your browser from a web server and stored on your computer's hard drive for record-keeping purposes. Our websites use cookies to make visiting our websites easier. We also use cookies to help us track how many unique visitors we have to our websites, as a type of aggregate counter. We do not link the information stored in cookies to any personal information you submit while on our websites.

While most browsers are initially set up to accept cookies, if you prefer, you can reset your browser to notify you when you've received a cookie or, alternatively, to refuse to accept cookies. It is important to note that you may not be able to use certain features on our websites if you choose not to accept the

cookies we send to your computer.

An IP address is a unique number assigned to your computer when you are using your browser on the Internet. Our websites collect and track website traffic by IP address. We log this information for the sole purpose of tracking the number of visitors to our websites.

### **Clear Gifs (Web Beacons/Web Bugs)**

We employ or our third party tracking utility partners employ a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), that help us better manage content on our websites by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of website users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on website pages and are about the size of the period at the end of this sentence. We do not tie the information gathered by clear gifs to our customers' personal information.

### **Log Files**

As is true of most websites, we gather certain information automatically. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our website (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and to administer our websites.

### **Advertising**

We may partner with third parties to display advertising on our websites or to manage our advertising on other websites. Our third party partners may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests. Those third party advertisers and other organizations may use their own cookies to collect information about your activities on our sites. This information may be used by them to serve advertisements that they believe are likely to be of interest to you based on content you have viewed. Third party advertisers may also use this information to measure the effectiveness of their advertisements. We do not control these cookies. To disable or reject third-party cookies, please refer to the relevant third party's website. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking [here](#) [or if located in the European Union click [here](#)]. Opting out of interest-based advertising will not opt you out of all advertising, but rather only interest-based advertising from us or our agents or representatives. Please note you will continue to receive generic ads.

### **Sharing Personal Information**

We will share your personal information with third parties only in the ways that are described in this privacy policy and as follows:

- We share your personal information with other companies so that they can market their products or services to you. If you do not want us to share your personal information with these companies, contact us at [privacy@invacare.com](mailto:privacy@invacare.com). We do not sell your personal information to third parties.
- We may provide your personal information to companies that provide services to help us with our business activities such as hosting our websites, cloud storage, sending emails on our behalf, shipping your order, processing your payment, or offering customer service. These companies are authorized to use your personal information only as necessary to provide these services to us.
- When you apply for a line of credit with us, we may disclose your personal information (including information regarding your credit worthiness or credit history) to other credit

providers to assess an application for a line of credit where you are the borrower or a guarantor, to notify them of defaults under the line of credit, and to inform other credit providers who allege that you are in default with them. We may disclose your information to any person reasonably necessary for the purposes of that person taking an assignment of any debt you owe us.

- We may also disclose your personal information:
  - as required by law, such as to comply with a subpoena, or similar legal process when we believe in good faith that disclosure is necessary to protect our rights,
  - protect your safety or the safety of others, investigate fraud, or respond to a government request,
  - if Invacare is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information, and
  - to any other third party with your prior consent to do so.

## **Protecting Children**

Invacare is committed to protecting the privacy and rights of children online. We believe that children should be able to use the Internet in a safe, productive and efficient manner and should be afforded the highest protection available with respect to their personal information.

**In addition, we will not solicit nor knowingly collect any personal information from children under the age of 13 who use our websites. If after registration, we receive notice that the registrant is actually less than 13 years old, we will immediately close their account and delete their personal information.**

## **Links to Other Sites**

Our websites contain links to other websites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other websites. We encourage you to be aware when you leave our website and to read the privacy statements of each and every website that collects personal information. This privacy policy applies only to information collected by our websites.

## **Access to Personal Information**

Upon request Invacare will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information please contact us at [privacy@invacare.com](mailto:privacy@invacare.com).

If your personal information changes, or if you no longer desire our service, you may correct, update, amend, delete inaccuracies, or deactivate it by making the change on our member information page or by emailing our Customer Support at [privacy@invacare.com](mailto:privacy@invacare.com) or by contacting us by postal mail at the address listed in the [Contact Information](#) section below. We will respond to your request to access within a reasonable timeframe.

## **Data Retention**

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, then contact us at the email address above. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **Social Media (Features) and Widgets**

Our websites may include Social Media Features, such as the Facebook Like button and Widgets, such as the Share this button or interactive mini-programs that run on our websites. These Features may collect your IP address, which page you are visiting on our websites, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our websites. Your interactions with these Social Media Features and Widgets are governed by the privacy policy of the company providing it.

### **Tell-A-Friend**

If you choose to use our referral service to share news articles with a friend, we will ask you for your friend's name and email address. We will automatically send your friend a one-time email inviting him or her to read the article. Invacare stores this information for the sole purpose of sending this one-time email.

Your friend may contact us at [privacy@invacare.com](mailto:privacy@invacare.com) to request that we remove this information from our database.

### **Public Forums**

Some of our websites offer publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, contact us at [privacy@invacare.com](mailto:privacy@invacare.com). In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why. In some instances, the comments that you leave on our blog posts are hosted on a third party service providers' website and therefore we may not be able to remove the personal information you submit along with your comments.

### **Testimonials/Videos/Photographs**

We post testimonials, videos and/or photographs provided by our customers that may contain personal information. We do obtain the customer's consent prior to posting the testimonial, video or photograph along with their personal information. To request removal of your personal information from the testimonial, video or photograph or to request that we remove your testimonial, video or photograph from our websites please contact us at [privacy@invacare.com](mailto:privacy@invacare.com).

### **Terms of Use & Privacy Policy**

By visiting any Invacare website linking to this privacy policy, you are accepting the practices described in this privacy policy and agree that any disputes over a privacy related matter is subject to this privacy policy and to any limitations of liability or damages described in Invacare's Terms of Use for such websites.

### **Security**

The security of your personal information is important to us. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

When you enter sensitive information (such as a credit card number) on our order forms, we encrypt the transmission of that information using secure socket layer technology (SSL). If you have any questions about the security of your personal information, you can contact us at [privacy@invacare.com](mailto:privacy@invacare.com).

### **Changes to Our Privacy Notice**

We may update this privacy policy to reflect changes to our information practices. If we make any material changes, then we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on our websites prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, please do not hesitate to contact us at:

Website: <http://www.invacare.com/cgi-bin/imhqprd/contact.jsp>

email: [privacy@invacare.com](mailto:privacy@invacare.com)

Postal Address:     Invacare Corporation  
                          One Invacare Way  
                          Elyria, OH 44035  
                          Attn: Legal Dept. - Privacy

# THE FOLLOWING APPLIES TO CALIFORNIA RESIDENTS ONLY

## Invacare Privacy Notice for California Residents

Effective: January 1, 2020

Updated on: N/A

This privacy notice for California Residents supplements the information contained in the Invacare Privacy Policy above and applies solely to visitors and users of our websites who reside in the State of California (“consumers” or “you”). If a conflict exists between the Invacare Privacy Policy above and this privacy notice for California Residents, then this privacy notice for California Residents will prevail for California residents. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”). Any terms defined in the CCPA have the same meaning when used in this privacy notice. Please click on the following links for more information.

[Information We Collect](#)  
[Use of Personal Information](#)  
[Sharing Personal Information](#)  
[Your Rights and Choices](#)  
[Non-Discrimination](#)  
[Changes to Our Privacy Notice](#)  
[Contact Information](#)

This privacy notice does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals. If you are a California-based employee, job applicant, contractor, or similar individual, then please contact [invacare@privacy.com](mailto:invacare@privacy.com) or the Company’s Human Resource department at the phone number described

in the [Contact Information](#) section below, to obtain a copy of the Company's CCPA Employee Disclosure.

Where noted in this privacy notice, the CCPA temporarily exempts personal information reflecting a written or verbal business-to-business communication ("B2B personal information") from some its requirements.

### Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device ("personal information"). Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples Only (not all information is collected)	Collected
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, Social Security number, email address, account name, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law	Characteristics of protected classifications under California or federal law, such as sex, age, race, religion, national origin, disability, medical conditions and information, citizenship, immigration status, marital status, and veteran or military status.	YES
D. Commercial information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your activity on our websites.
- From third-parties that interact with us in connection with the products or services we provide. For example, a third party that purchases products or services from us and requests that we provide such products or services directly or indirectly to you.

## **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment, facilitate delivery of the products and/or services you ordered and otherwise support your use of those products and/or services. We may also save your information to facilitate new product orders or process returns.
- To provide support, personalize, and develop our websites, products, and services.
- To create, maintain, customize and secure your account with us.
- To process your requests, purchases, transactions and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our websites, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our websites, products and services, databases and other technology assets, and business.
- For testing, research, analysis and product development, including to develop and improve our websites, products and services.
- To provide you with email alerts, event registrations and other notices concerning our products and services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about users of our websites is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## **Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and

requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties in connection with the delivery, safety and maintenance of products or services we provide to you.

### ***Disclosures of Personal Information for a Business Purpose***

In the preceding twelve (12) months, we have shared the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial information.

Category E: Internet or other similar network activity.

### ***Sales of Personal Information***

In the preceding twelve (12) months, we have not sold any personal information.

### **Your Rights and Choices**

The CCPA provides California residents (California consumers) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### ***Access to Specific Information and Data Portability Rights***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see [Exercising Access, Data Portability, and Deletion Rights](#)), we will disclose any of the following (at your option) to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling 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 (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

We do not provide these access and data portability rights for B2B personal information.

### ***Deletion Request Rights***

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see [Exercising Access, Data Portability, and Deletion Rights](#)), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the deletion of the information may likely render impossible or seriously impair achievement of the research, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We do not provide these deletion rights for B2B personal information.

### ***Exercising Access, Data Portability, and Deletion Rights***

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either calling us, emailing us or sending us a written request, as described in the [Contact Information](#) section below.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, the agent must produce a signed authorization from you (e.g., notarized power of attorney). We reserve the right to also require that consumers using agents separately verify their identify (as described in this Privacy notice) to help us detect or prevent fraud. We reserve the right to deny a request from an agent that does not submit proof that they have been authorized by the consumer to act on their behalf.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information, which may include:
  - requiring that you submit the request, or re-authenticate, through your Invacare account if you have one;
  - requiring that you provide us with two or more personal information data points to compare

- against personal information that we already have, based on the type of request submitted and the sensitivity of the information; and
- confirming the authenticity of your authorized agent, if any.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### ***Response Timing and Format***

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response to a mailing address or email address provided by you, at your option; however, if you have an account with us, we may deliver our written response to that account. Any disclosures we provide you will only cover the 12-month period preceding our receipt of a verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### ***Personal Information Sales***

We do not sell your personal information.

### ***Non-Discrimination***

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you products or services.
- Charge you different prices or rates for products or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of products or services.
- Suggest that you may receive a different price or rate for products or services or a different level or quality of products or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

### ***Changes to Our Privacy Notice***

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on our websites and update the notice's

“Updated on” date. Your continued use of our websites following the posting of changes constitutes your acceptance of such changes.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 800.333.6900

Website: <http://www.invacare.com/cgi-bin/imhqprd/contact.jsp>

email: [privacy@invacare.com](mailto:privacy@invacare.com)

Postal Address:     Invacare Corporation  
                          One Invacare Way  
                          Elyria, OH 44035  
                          Attn: Legal Dept. - Privacy