**Campaign Privacy policy**

*Last updated: 24 November 2021*

Allurion Technologies, Inc., (“**Allurion**”, “**our**”, “**we**”, “**us**”) sets out in this privacy policy (“**Privacy** **Policy**”) how it collects and handles your personal data in connection with your participation in the “Allurion Patient Celebration 2021” (“**Campaign**”) in accordance with the EU General Data Protection Regulation 2016/679 (“**GDPR**”), the GDPR in such form as incorporated in the laws of the United Kingdom, and other applicable national data protection laws, as amended and integrated from time to time (“**Data Protection Laws**”).

Allurion Technologies Inc., with its registered office in 11 Huron Drive, Natick, Massachusetts, 01760, USA, email: marketing@allurion.com, will be the controller of your personal data. Allurion has appointed Allurion S.a.s., with its address at rue de Tehéran, 75008, Paris, France as its EU data protection representative.

**1) Personal data we collect**

When you submit an entry as a Campaign participant we will collect personal data from you such as your name, e-mail address, age, feedback you have provided and photographs.

**2) How we use your personal data**

We use your personal data for the purposes, and rely on the legal bases (in respect of individuals located in the European Economic Area (“**EEA**”) and the United Kingdom), listed below. Note, that in circumstances detailed below, we will process personal data on more than one legal basis depending on the specific purpose for which we are using personal data.

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| --- | --- |
| **Purpose**  | **Legal Basis**  |
| To allow you to participate in the Campaign and to verify your eligibility to join | Performance of contract; our legitimate interests;  |
| To share your feedback on your treatment experience on our affiliate and third party partner platforms | Our legitimate interests;  |
| To randomly select winners in draws and contact individuals to process awards | Our legitimate interests |
| To provide you with information about Allurion’s, our affiliate’s and third party partner products, services, news and events. You can opt out of marketing communication at any time by contacting us at marketing@allurion.com or by following the details on how to unsubscribe in each communication.  | Our legitimate interests or your consent  |
| To detect, prevent and address technical issues. | Performance of contract or our legitimate interests |

**3) Third party sharing of personal data**

In carrying out our activity and in pursuing the purposes described above, your personal data will be communicated or shared by Allurion with third parties, as set forth below:

* **Legal requirements**: Allurion may disclose personal data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Allurion, (iii) act in urgent circumstances to protect the personal safety of individuals or the public, or (iv) protect against legal liability.

Your personal data may be transferred to countries outside of the EEA and/or the United Kingdom, such as to the United States where Allurion is based and where our service providers are based, which may not provide the same level of data protection as under data protection laws in the EEA and/or United Kingdom. In such case, the transfer of your personal data will be carried out with the guarantees provided by the Data Protection Laws. For example, if required we will implement certain safeguards to govern such transfers in line with Data Protection Laws (such as implementation of the European Commission approved standard contractual clauses). For any further details please contact Allurion at the following email address: marketing@allurion.com.

**4) Retention**

To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

**5) Your rights**

With respect to your personal data held by Allurion, you can exercise all rights set forth by Data Protection Laws.

If you are based in the EEA or the United Kingdom, you may:

1. request confirmation as to whether we are processing personal data and, if so, provide a copy of that personal data along with certain other details. If additional copies are required, we may need to charge a reasonable fee;
2. ask us to correct, delete or remove your personal data;
3. object to the processing of your personal data. You may also ask us to restrict or ‘block’ the processing of your personal data in certain circumstances, such as where you contest its accuracy or object to us processing it. If these rights are exercised, we will consider these requests in accordance with our legal obligations;
4. exercise the right to portability, within the limits provided by Data Protection Laws;
5. where applicable, withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
6. lodge a complaint with your local data protection authority.

For the purpose of exercising the rights listed in this section, as well as for any clarification, you can directly contact Allurion by sending an email to the following email address: marketing@allurion.com.

**6) Changes to this Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

**7) Contact us**

We have appointed Allurion S.a.s., with its address at rue de Tehéran, 75008, Paris, France as our EU data protection representative. If you have any questions about this Privacy Policy, please contact us at: marketing@allurion.com.