

SpeakUp – Data Protection Notice (“Notice”)

The Confidential Reporting Website ‘SpeakUp’ (“**SpeakUp**”) is provided by Otsuka Pharmaceutical Europe Ltd. (“**Otsuka**”). The website through which you may make a report is operated by Navex Global, Inc. (“**NAVEX**”), Otsuka’s independent service provider of SpeakUp.

SpeakUp may generally be used to provide a safe, secure and anonymous helpline enabling staff to report misconduct.¹

The data controller of your personal data is Otsuka Pharmaceuticals Europe Ltd., which is registered with the Information Commissioner’s Office with registration number Z9584844. For more information about Otsuka and the contact details of its affiliates, please visit the following webpage: <https://www.otsuka-europe.com/otsuka-in-europe>.

In this Notice, when we talk about personal data, we mean any information that relates to an identified or identifiable person – in this case, you or any other individual whose personal data is processed as part of a report submitted through SpeakUp.

All personal data processed through the SpeakUp will be done so in accordance with applicable legislation. You should read this Notice, so you know what personal data we collect about you, what we do with it and how you can exercise your rights in connection with it. You should also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances from time to time.

What personal data does Otsuka collect and why?

Otsuka may collect and use some or all of the following information for the purpose(s) described below:

- Personal details, such as your name, title and contact details;²
- Personal details, such as names, titles and contact details related to individuals named in your report;³
- A description of the alleged misconduct, as well as the circumstances involved (including the dates and locations involved);⁴ and

¹ Please note the subjects that may be reported through SpeakUp vary by country.

² Use of SpeakUp is entirely voluntary. Reports are anonymous by default, unless you provide your explicit consent to be identified. We encourage you to identify yourself in order for us to follow up with questions we may have, but this is at your discretion and anonymous reports will also be accepted (unless not possible under local law).

³ In some countries, the categories of persons who can be reported may be limited to persons in key positions or managerial roles in a company. Otsuka aims to inform each person included in a report within an appropriate period, but will not seek to disclose your identity (regardless of whether you have provided your identity or not). Individuals will have the right to react to the information reported by you.

⁴ Please be aware that the information you supply about yourself, your colleagues, or any aspect of Otsuka’s operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true and accurate. In addition, unless it is strictly required in order to make a report, please do not share any special categories of personal data through SpeakUp. This includes data such as racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, data concerning health or data concerning a natural person’s sex life or sexual orientation. You will not be subject to retaliation from Otsuka for any report that is made in good faith, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated.

- Any other relevant information.

Otsuka will process the above information, including personal data, for the purposes of ensuring compliance with applicable legislation and internal policies, for the defence of legal claims and ensuring the well-being of Otsuka personnel.

In addition, we may require your personal data to comply with our regulatory monitoring and reporting obligations, including those related to adverse events, product complaints and patient safety.

Legal basis for processing personal data

Our legal basis for collecting and using the personal data described above is because it is necessary for compliance with a legal obligation to which we are subject. In some cases, we may also process personal data because we have a legitimate interest to investigate the submission of reports.

In circumstances where special categories of personal data are deemed relevant for inclusion and are required to be submitted, this will be processed on the basis of substantial public interest.

Who does Otsuka share my personal data with?

The information provided by you will be treated confidentially and only shared on a strict need-to-know basis. Personal data submitted as part of a report may be processed by the relevant personnel of Otsuka, including authorised recipients and, depending on the nature of the report, members of Human Resources, Finance, Audit, Legal and Ethics and Compliance. Personal data may also be shared with third parties (for example, NAVEX) in order to provide SpeakUp and external advisors (for example, legal advisors) to assist with the investigation of any report submitted.

In addition, we may also share your personal data with competent law enforcement bodies, regulatory and trade associations, government agencies, courts or other third parties where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.

Finally, we also share information related to the usage of SpeakUp with Otsuka's management and other group companies, however, this will never contain personal data and is restricted to statistical or aggregated data.

How does Otsuka keep my personal data secure?

Otsuka has contracted with NAVEX to protect the confidentiality and security of your personal data. We use appropriate technical and organisational measures to protect the personal data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the categories of personal data processed.

International data transfers

We may transfer your personal data outside of the United Kingdom ("UK") and/or the European Economic Area ("EEA"). For example, in limited circumstances, to provide administrative services and for the purpose of translation by NAVEX, its subsidiaries or subcontractors. Those individuals may be located in the United States, the United Kingdom or elsewhere.

Please note that countries outside of the UK and the EEA may not provide the same level of protection for your personal data. Where we transfer your personal data outside of the UK and the

EEA, we ensure that appropriate safeguards are put in place and that all transfers of your personal data comply with applicable data protection laws.

The appropriate safeguards that Otsuka uses are based on the model clauses approved by the European Commission.

How long will your information be kept?

We retain personal data we collect from you for as long as necessary where we have an ongoing legitimate need to do so (for example, to comply with applicable legal requirements).

Information relating to a report made via SpeakUp will be archived or deleted based on the following criteria: when the investigation has been closed and no further action is needed; when the time period for any relevant litigation has lapsed; and when our obligations for record keeping relating to investigations has lapsed.

Your rights

You have the following rights regarding personal data processed by Otsuka that may apply depending on the circumstances:

Right	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how your information is used and your rights. This is provided in this Notice.
2. The right of access	You have the right to obtain access to your information (if an organisation is processing it), and certain other information (similar to that provided this Notice).
3. The right to rectification	You are entitled to have your information corrected if it is inaccurate or incomplete.
4. The right to erasure	This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for an organisation to keep using it. This is not a general right to erasure; there are exceptions (for example, where you have provided consent to processing, this applies only where you have withdrawn your consent, if we are processing in connection with performance of a contract or for compliance with law, this applies only where such data are no longer necessary and where we are relying on our legitimate interests this applies only if there are no overriding legitimate interests).
5. The right to restrict processing	You have rights to ‘block’ or suppress further use of your information in certain circumstances. When

processing is restricted, the relevant organisation can still store your information, but may not use it further. Please note that your right to restrict processing is limited in certain situations; for example, when we are processing personal data that we collected from you with your consent, you can only request restriction on the basis of inaccuracy of data or where our processing is unlawful and you don't want your personal data erased or you need it for a legal claim. You do not have this right where we are processing your personal data for compliance with law.

6. The right to data portability

You have rights to obtain and reuse your personal data in a structured, commonly used and machine readable format in certain circumstances, which do not include where we are processing on the basis of legitimate interests or for compliance with law.

7. The right to object

You have the right to object to certain types of processing, in certain circumstances such as when we rely on our legitimate interests.

Where your personal data is processed on the basis of your consent, you have the right to **withdraw your consent** at any time.

You also have the right to **complain to a data protection authority** about our collection and use of personal data. For more information, please contact your local data protection authority.

How to contact us?

Should you have any questions in regards to the protection of your personal data or if you wish to exercise your legal rights, please submit your query [here](#) or contact Otsuka by emailing: privacy@otsuka-europe.com.