

## AZETHICS.COM PRIVACY NOTICE



### How we will use your data that you choose to share on AZethics.com:

This AZethics.com privacy notice supplements, and should be read in conjunction with, the general employee privacy notice that We provide to our employees which can be found here (link: <https://azcollaboration.sharepoint.com/sites/AB599/Global%20Employee%20Data%20Privacy%20Notice/Forms/AllItems.aspx>) and our external-facing privacy notice which can be found here (link: <https://www.azprivacy.astrazeneca.com/europe/unitedkingdom/en/privacy-notice.html#tab-container-item-1e488da704-tab>). ("General Notices")

This supplemental notice provides additional and specific detail relating to the processing of personal data for the purposes of reporting certain non-compliance issues as further detailed below.

A reference to "AstraZeneca", "We", "Us" in this notice is a reference to the AstraZeneca or Alexion entity / entities identified in the General Notices in conjunction with AstraZeneca UK Limited, 1 Francis Crick Avenue Cambridge Biomedical Campus CB2 0AA Cambridge, as data controller.

AZethics.com is an online reporting channel and incident management software used across AstraZeneca to capture and record potential breaches of Our Code of Ethics, internal standards and/or policies, process deficiencies, and/or potential breaches of law or regulation. It allows you to ask questions and report incidents where permitted by local law. Use of AZethics.com is entirely voluntary. If your location, or the location of the matter about which you are reporting, restricts the potential issues of non-compliance that you may report via AZethics.com, then you should address your query and/or allegation to your manager, local Human Resources, Legal Department or Compliance representative.

The purpose of processing your personal data is based on our legal obligations and/or our legitimate interest to investigate any alleged, potential or actual breaches of our Code of Ethics, internal standards and/or policies, or local laws, including (but not limited to) to protect AstraZeneca's assets, property and security, Our reputation or Our employees' rights.

In order to achieve this purpose, to investigate any issues raised in your report and to take follow-up action (if any is required), in accordance with applicable law, We will:

- conduct investigative steps and take remedial action (if necessary) as a result of the outcome of the investigation
- store your data in Our database(s)
- engage with law enforcement or external regulators, if applicable
- use your personal data in an aggregated form (information identifying you is removed) for the purposes of statistics and analytics.

We may also receive information about you from other sources as part of verifying the information you provide (for example information from witnesses to the actions reported) which We will add to the information which We already hold about you.

### **What personal information will be collected:**

We may process the following data: your name and contact details, your location, your relationship to AstraZeneca, any question you may have, the name and title of all individuals you may be reporting and a description of the conduct you are reporting including all relevant details. If you choose to give us further information, including Sensitive Personal Data, we will only use this to the extent to which it may be relevant to achieve the purposes of processing your data.

For any countries in relation to which reporting via AZethics.com should be limited to, for example issues of anti-bribery, auditing and accounting, and banking and financial issues, no Sensitive Personal Data should be provided as part of reporting the case in AZethics.com, and if any Sensitive Personal Data is identified in one of these countries it will be deleted.

Sensitive Personal Data is any information about a person's ethnicity, political opinions, religious or philosophical beliefs, trade-union membership, health or sex life.

### **How your data will be processed:**

Your data will be processed both by manual and automatic means. Please be aware that the information you supply about yourself, your colleagues, or any aspects of the company's operations may result in decisions that affect others. We therefore ask you to provide only information that, to the best of your knowledge, is correct and in good faith. You will not be subject to any less favourable treatment because you submit information for the purpose of doing the right thing and in good faith, even if it later turns out to be incorrect.

For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide may be accessed, processed and used by Our relevant personnel, including Human Resources, Finance, Internal Audit, Legal, Compliance, management, external advisors (e.g. legal advisors), or, in limited circumstances, by technical staff at NAVEX. Those individuals may be located in the United States, the United Kingdom or elsewhere.

### **Sharing your information:**

Typically, the subject of your report through AZethics.com will learn that a report identifying them has been received by us, such notice being given as soon as possible whilst maintaining the integrity of the investigation and the preservation of potentially relevant information. However, the subject will not directly learn of your identity unless you have agreed to this; in some instances, the fact of investigation itself may enable the subject indirectly to speculate regarding the identity of the person that raised the concern.

Your Personal Data will be available to AstraZeneca's Investigation's team. A limited number of people from Our legal, HR and Compliance teams may also have access depending on the nature of the query/allegation. These AstraZeneca employees can be employed by any company in the AstraZeneca group of companies (<https://www.astrazeneca.com/global/en/AstraZeneca-Websites.html>) so your personal data may be shared with these companies. A small number of employees from our service provider hosting AZEthics.com will have access to your Personal Data in order to provide technical support and case management.

We may also share your personal data with certain third parties, such as (but not limited to): IT providers for the purposes of system development and technical support; auditors and consultants to verify our compliance with external and internal requirements; statutory bodies, law enforcement agencies and litigants, as per a legal reporting requirement or claim; and a successor or business

partner to AstraZeneca or to an AstraZeneca group company in the event that it sells, divests or sets up a collaboration/joint venture for all or part of its business. If personal data and information you provide is disclosed to the police and/or other enforcement or regulatory authorities, the relevant bodies that receive and process personal data can be located in the US or in another country that may not provide the level of data protection available in your country (for example the EU).

### **International Transfers:**

Such AstraZeneca entities and third parties may be based anywhere in the world, which could include countries that may not offer the same legal protections for personal data as your country of residence. AstraZeneca will follow local data protection requirements and its internal global privacy standard ([https://www.astrazeneca.com/content/dam/az/PDF/Data\\_Privacy\\_Policy\\_v30.pdf](https://www.astrazeneca.com/content/dam/az/PDF/Data_Privacy_Policy_v30.pdf)) and will apply the necessary safeguards under the applicable law of the country transferring the data for such transfers. Irrespective of which country your personal data is transferred to, We would only share it under a strict 'need to know' basis and under appropriate contractual restrictions (such as AstraZeneca's Binding Corporate Rules and EU Standard Contract Clauses or equivalent instruments approved by the European Commission or by the Supervisory Authority). You are entitled to receive a copy of AstraZeneca's Binding Corporate Rules and/or the AstraZeneca's EU Standard Contract Clauses upon request by contacting AstraZeneca on [Privacy@astrazeneca.com](mailto:Privacy@astrazeneca.com).

### **Retention:**

AstraZeneca will store your personal data for 6 years following the closure of an investigation, unless there is a local legal requirement to delete your Personal Data earlier or later. However, reports and files on the investigation of reports (or parts of such reports or files) and personal data in such reports or files may be placed in an archive if there is a clear and overriding public interest or legal interest of AstraZeneca in retaining the data, subject to such restrictions on access to the data aimed at safeguarding the rights and freedoms of the data subjects as may be allowed by applicable law. When your personal data are no longer necessary for these purposes, the personal data will be securely deleted. For more information on AstraZeneca internal Document Retention policy you may go to [www.astrazenecapersonaldataretention.com](http://www.astrazenecapersonaldataretention.com)

### **Your rights:**

You may contact AstraZeneca at <http://www.astrazenecapersonaldataretention.com> to request access to the personal data we hold about you, to correct any mistakes or to request deletion of the same. If such a request places AstraZeneca or its affiliates in breach of its obligations under applicable laws, regulations or codes of practice, then AstraZeneca may not be able to comply with your request, but you may still be able to request that we block the use of your personal information for further processing.

### **How your information will be protected:**

AstraZeneca has assigned a Data Protection Officer responsible for overseeing AstraZeneca's compliance with EU data protection law, which you may contact at [Privacy@astrazeneca.com](mailto:Privacy@astrazeneca.com) in case of any questions or concerns regarding the processing of your personal data. If AstraZeneca's processing of your personal data is covered by EU law you may also lodge a complaint with the corresponding Data Protection Supervisory Authority in your country of residence. You can find the relevant Supervisory Authority name and contact details under [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm) .