

On-line Privacy Notice for AZethics.com

For the purposes of this Privacy Notice AstraZeneca UK Ltd will be the Data Controller. However, where there is a local AstraZeneca entity it will be joint Data Controller with AstraZeneca UK Ltd or sole data controller depending on applicable local privacy laws (“AstraZeneca” “We” “Us” and “Our”) The Data Processor is EthicsPoint Ltd, a 3rd party who hosts AZethics.com on Our behalf.

Background

AZethics.com is an online reporting system which allows you to ask questions and report incidents where permitted by local law. Use of AZethics.com is entirely voluntary. When you indicate your location, or the location of the matter about which you are reporting, you will be presented with a list of non-compliance issues which you can report against. If your concern relates to other types of non compliance issues you should address your query and/or allegation to your manager, local Human Resources, Legal Department or Compliance representative.

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 sanctioned for submitting information in good faith, even if it later turns out to be incorrect. At the same time, knowingly providing false or misleading information will not be tolerated.

What information do We collect?

We may collect Personal Data and Sensitive Personal Data about you if you voluntarily choose to provide it to Us. Personal Data is any information about an identified or identifiable natural person. Sensitive Personal Data is any information about a person’s ethnicity, political opinions, religious or philosophical beliefs, trade-union membership, health or sex life.

For those countries where the types of reporting available via AZethics.com are limited to anti-bribery, auditing and accounting, banking and financial issues, no Sensitive Personal Data should be provided as part of reporting a case in AZethics.com. Any Sensitive Personal Data which is provided by one of the limited reporting countries will be deleted.

The types of information you may provide Us via AZethics.com include:

- 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,
- a description of the conduct you are reporting including all relevant details.

Information relating to your relationship to AstraZeneca and details of the conduct you are reporting is mandatory and a case will not be able to be reported via AZethics.com without this information being provided.

We may 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.

How do We use the information you provide?

The information you provide Us will be used for the purposes of conducting investigations and taking any remedial action necessary as a result of the outcome of the investigation.

We may also process information which has had all Personal Data removed for the purposes of statistics and analysis.

Who do We share your information with?

In order to respond to your query and/or allegation 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.

A small number of EthicsPoint employees will have access to your Personal Data in order to provide technical support and case management.

All individuals whom you identify through AZethics.com will be informed about the fact that a report has been made, however, they will not be given your identity unless you have agreed to this. In addition, all individuals you identify will have the right to respond to or correct information you reported.

We may disclose your Personal Data in order to comply with legal and/or regulatory obligations and/or to establish, exercise or defend legal rights. We may also disclose your Personal Data in other circumstances where it is legally permitted.

Retention

It is our policy to only collect as much Personal Data as is needed to respond to your query and/or allegation. Your Personal Data will be retained for 6 years following the closure of an investigation, unless there is a local legal requirement to delete your Personal Data earlier or later. For example, in Germany, Austria and France, your Personal Data will be retained for 2 months following the closure of an investigation.

Access, Correction and Queries

Where required by law, AstraZeneca will provide you with the ability to access and correct your Personal Data following verification of your identity. For information about accessing or correcting your Personal Data or if you have any queries in relation to this Privacy Notice please, contact privacy@astrazeneca.com.

Security

AZ is committed to ensuring your Personal Data is protected. As well as the Global Data Privacy Policy which is applicable to all AstraZeneca group companies, both AstraZeneca and EthicsPoint employ a variety of security technologies and procedures to help protect your Personal Data from unauthorized access, use or disclosure. We also have a written contract in place with EthicsPoint which requires them to process your Personal Data under our instructions and only under the terms set out in the contract. More information about Our security practices can be found here. Further information about the security arrangements surrounding our communications with EthicsPoint and the security of your Personal Data while EthicsPoint processes it on our behalf, please read the EthicsPoint Privacy Policy at www.ethicspoint.com.

Transfer

In order to respond to your query and/or allegation We may need to transfer your Personal Data outside your country of origin. Your Personal Data may be shared between AstraZeneca's group companies, a list of which is available at www.astrazeneca.com. Your Personal Data will also be held by EthicsPoint in the U.S. EthicsPoint has Privacy Shield certification for transfers of EU Personal Data to the U.S. No matter which country your Personal Data is available in, it will be held in line with the privacy and security measures described above.

Changes To This Privacy Notice

We may change this Privacy Notice from time to time. Therefore, We ask you to check this Privacy Notice occasionally to ensure that you are aware of the most recent version which will apply from the time you access this website.

Links

Links to other websites maintained by independent third parties may be available on this website. This Privacy Notice applies solely to the information collected on this website for and on behalf of AstraZeneca. We are not responsible for the privacy practices of other websites. We encourage you to be aware when you leave this website and to read the privacy notices of any website that you may visit.