

Arthrex Data Protection Notice for Use of the Corporate Compliance Helpline

You are submitting information through the Arthrex Corporate Compliance Helpline (the "**Helpline**"), a confidential reporting system provided by Arthrex Inc. and its affiliates (together "**Arthrex**"). For a list of Arthrex affiliates please go to [Arthrex Affiliates](#). For the purposes of European data protection laws, Arthrex Inc. and the relevant affiliate are considered controllers of your personal data. Arthrex Inc.'s representative in the EU is Arthrex Germany and can be contacted at [Arthrex GmbH](#).

Use of the Helpline. You are encouraged in the first instance to report concerns directly to the local Country Manager, Human Resources, the Local/Regional Risk Management and Compliance representative, the Global Compliance Office or Arthrex's General Counsel (as applicable) ("**Arthrex Representative**"). If you feel that you are unable to contact an Arthrex Representative, and depending on the nature of the concern, you may use the Helpline to report your concern. Use of the Helpline is entirely voluntary. In certain countries, Arthrex may only accept reports through the Helpline that relate to financial, accounting, auditing, competition or bribery matters. If your concern relates to a matter that, under local law, may not be accepted by Arthrex through the Helpline, you will need to contact the appropriate Arthrex Representative to report the concern. For further information on the functioning of the Helpline please refer to *Section 1: Using Our Code* in the [Arthrex Code of Conduct](#).

Individuals you identify through the Helpline may be informed that a report has been submitted. However, the information we provide will not reveal your name or identity, unless otherwise required by law. In addition, all such individuals you identify will have the right to respond to or correct information you reported.

Personal Data Collected. The following information is collected via the Helpline (where disclosed by you): your name and contact details, the name and title of all individuals you may be reporting, and details of the conduct being reported. You will be assigned a unique username and password.

Use of the Personal Data Collected. Personal data are processed where Arthrex has a legal obligation to do so or where in the legitimate interests of Arthrex in order to: (i) detect and legally evaluate reported violations; (ii) conduct further investigations with regards to reports; and (iii) determine compliance with laws in the state or country where the reported incident occurred. If you do not provide certain information when requested, Arthrex may be prevented from complying with its legal obligations.

Disclosure and International Transfer of Personal Data. The Helpline is hosted by a third party, NAVEX Global, Inc. in the US ("**NAVEX**"). All personal data submitted via the Helpline from individuals in the EU and/or Switzerland will be transferred to and hosted by NAVEX pursuant to NAVEX's EU/Swiss-US Privacy Shield certification. Access to personal data submitted via the Helpline will also be accessed on a need-to-know basis by relevant employees of Arthrex, including Arthrex Inc., in the US. Arthrex Inc. has also self-certified to the Privacy Shield. To learn more about the Privacy Shield program, and to view the certifications, please visit <http://www.privacyshield.gov>. Personal data may also be disclosed to consultant and professional advisors of Arthrex, and to governmental or administrative bodies where Arthrex determines that it is necessary or desirable in order to comply with applicable laws, court orders, or government regulations.

Retention of Personal Data. Any information you submit that is not needed to answer your question or for the investigation of any incident will be deleted or archived if needed and as permitted by local law. In addition, once we have answered your question or any investigation is complete, all information submitted by you will be deleted or archived if needed and as permitted by local law. Where legal proceedings or disciplinary measures are initiated against the individual identified in a report or you (in case of false or slanderous declaration), personal data will be kept until the conclusion of the proceedings and the period allowed for any appeal.

Your Rights. Under European data protection laws you may have certain rights which may be subject to limitations and/or restrictions. These include the right to: (i) request access to and rectification or erasure of your personal data; (ii) obtain restriction of processing or to **object to the processing of your personal data (including, where the processing is carried out for Arthrex's legitimate interests)**, and (iii) ask for a copy of your personal data to be provided to you, or a third party, in a digital format. You also have the right to lodge a complaint about the processing of your personal data with a data protection authority.

Enquiries, Requests or Concerns. All enquiries, requests or concerns relating to the Helpline should be sent to Arthrex, Inc. at askcompliance@arthrex.com. Alternatively you may contact the Arthrex Data Protection Officer, Leif-Eric Langguth, at dataprotection@arthrex.de.