

Data Protection & Privacy Notice

The Integrity Hotline (“Hotline”) is a web and phone-based intake system provided by Otsuka America, Inc. (“OAI,” “we,” “us” or “our”), One Embarcadero Center, Suite 2020, San Francisco, CA 94111, on behalf of OAI and the following Otsuka affiliates: A&P Inphatec, Advanced Biochemical Compounds GmbH, Astex Pharmaceuticals, Cambridge Isotope Laboratories, Inc., Crystal Geyser Water Company, Daiya Foods, EurisoTop, MegaFood, Otsuka Precision Health, Inc, Otsuka America, Inc., Otsuka America Pharmaceutical, Inc., Otsuka Canada Pharmaceutical, Inc., Otsuka Pharmaceutical Development & Commercialization, Inc., Pharmavite, Recor Medical, Ridge Vineyards, Uqora, Visterra, to individuals for reporting suspected violations of laws or regulations or company policies. The Hotline is hosted by NAVEX, Inc. (“NAVEX”), a company headquartered in the United States, on behalf of OAI.

1. Use of the Hotline

Use of the Hotline is entirely voluntary. You are encouraged to report possible violations directly to your supervisor or manager. If you feel that you are unable to do so, you may use the Hotline to make your report.

The Hotline is a confidential online reporting system that allows you to report on certain matters related to suspected violations of law or company policies, as well as other concerns you may have. However, in some jurisdictions, reports may be limited in topics pursuant to applicable law. Any issues or concerns relating to topics not permitted by law to be reported via the Hotline should be reported directly to your Manager or Supervisor or a representative of the Human Resources, Legal or Compliance Departments as appropriate for the subject matter of the possible violation. In some countries, anonymous reports may not be permitted under the law except under extremely restrictive circumstances.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company’s operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation for any report of a suspected violation 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. The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively. We encourage you to identify yourself in order for us to follow up with questions we may have, although we also respect your right to report anonymously.

2. What personal information is collected and processed?

The Hotline captures the following personal information that you may provide when you make a report: (i) your name, contact details, and your relationship to the Otsuka entity you are reporting about (unless you report anonymously) ; (ii) the name and

other personal information of the persons you name in your report if you provide such information (i.e.: description of functions and contact details); and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident. Note that the laws of some countries do not permit reports to be made anonymously; however, your personal information will be treated confidentially and will only be disclosed as set out in this Notice.

3. How will the personal information be processed after your report and who may access personal information?

The personal information you provide will be stored in a database which is located on servers hosted and operated by NAVEX in the United States on behalf of OAI. OAI and NAVEX have put in place various safeguards and the security measures to protect your personal information when it is transferred internationally, for example, by entering into the appropriate agreements containing relevant data protection provisions as required by applicable local law.

For the purpose of processing and investigating your report and subject to the provisions of local law, the personal information you provide may be accessed, processed and used by the relevant personnel of the affiliate you are reporting about or OAI, including Human Resources, Finance, Internal Audit, Legal, Corporate Compliance, management, external advisors (e.g. legal advisors), or, in limited circumstances, by technical staff at NAVEX.

Personal information and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities. The relevant bodies that receive and process personal information can be located in the US or in another country.

4. Lawful Basis for Processing

Please see below the lawful bases that we use to process your personal information, subject to the requirements of applicable local law:

- Legitimate interests: Our legitimate interests include preventing or taking action regarding suspected or actual illegal activities, fraud, or potential threats to the safety of any person.
- Compliance with legal obligations: personal information are processed to comply with relevant laws, regulatory requirements and to respond to lawful requests, court orders, and legal process.

5. Accessing information concerning the report

OAI and Otsuka entities will seek to promptly notify any person who is the subject of a report to the Hotline except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information. With some exceptions, the subject of the report may request access to information concerning the report (with the exception of the identity of the reporter) and request correction of

personal information that is inaccurate or incomplete in accordance with applicable law.

With some exceptions, reporters may also access information about the report and request corrections of their personal information in accordance with applicable law. To make any such corrections, please contact us using the process described below.

6. Your Privacy Rights

OAI will fully support you in the exercise of any privacy rights you may have as a data subject under applicable local law, depending on the country of your residence, this may include one or more of the following:

- right of access to your data;
- right to rectification of incorrect data;
- right to erasure of data (“right to be forgotten”);
- right to data portability; and
- right to object to processing.

To exercise your privacy rights under applicable local law, you may contact us at:

- Phone: 1-888-964-0320
- Email: otsuka@otsuka-america.com
- Web: Submitting a request through our [Webform](#)

7. Retention of Personal Information

Your personal information will be held for only so long as it is necessary for the purpose for which it was originally collected, and in accordance with applicable local law. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Notice at Collection. When assessing retention periods, we first examine whether it is necessary to retain the personal information collected and, if retention is required, work to retain the personal information for the shortest possible period permissible under applicable law.