

E&C REPORTING PRIVACY NOTICE

Effective date: November 1, 2024

Vantive and its affiliates and subsidiaries, including Vantive US Healthcare LLC (collectively, “**Vantive**,” “**us**,” “**we**,” or “**our**”), are committed to protecting your privacy. This E&C Reporting Privacy Notice (“**Privacy Notice**”) describes how we may use and collect information about you in the context of reporting, and your rights in relation to this information.

This Privacy Notice applies to all personal information we collect or process about you in connection with our [Ethics and Compliance Helpline](#) (“**E&C Helpline**”) and any other local avenue and external reporting channel provided by Vantive for raising a concern regarding a potential violation of Vantive’s Code of Conduct, other Vantive policy, law or regulation.

1. Who this Privacy Notice concerns

This Privacy Notice primarily applies to:

- Reporters who submit reports through the E&C Helpline or any other reporting channel provided by Vantive;
- Subjects of the report (i.e. individuals under investigation/incriminated persons); and
- Other third parties involved in the relevant case, such as impacted individuals, witnesses, etc.

2. What personal information we may collect

When a report is submitted through the E&C Helpline or otherwise, Vantive captures the following information:

- Full name and contact details of the reporter (unless the reporter files an anonymous report);
- Relationship of the reporter with Vantive (e.g. employee, customer, contractor, vendor/supplier); and
- Information related to the issue raised, such as details of the incident reported and information about the subject of the report and other implicated persons, such as witnesses, potential impacted individuals etc.

As a result of the investigation, Vantive may also collect additional information about the persons involved with the incident, including by contacting the concerned individuals.

Vantive does not request, or intentionally collect, sensitive information (also known in some jurisdictions as special categories of personal information, such as health information) or criminal offence information. If, however, Vantive receives or otherwise processes such information as part of its investigations, it will do so in accordance with applicable data protection laws.

3. How we use your personal information

We may use your personal information to:

- Assess and investigate the reports, including where necessary conducting interviews and gathering evidence.
- Take appropriate follow-up action based on the findings of the investigation, including disciplinary actions, legal proceedings or other remediation measures as deemed necessary under the circumstances.
- Communicate with the reporter or other related individuals regarding their involvement or knowledge of the reported incident.
- Comply with our legal and regulatory obligations, including reporting requirements and cooperating with law enforcement or regulatory authorities and in the context of litigation proceedings, as necessary.

4. Our lawful grounds for processing personal information

In most cases, Vantive relies on the following lawful bases to process personal information in connection with its reporting program:

- to comply with Vantive's legal obligations; and
- to meet Vantive's legitimate interests in operating the E&C Helpline and other reporting mechanisms and investigate reported incidents.

Also, to the extent that sensitive information (also known in some jurisdictions as special categories of personal information) is collected, this will be processed in accordance with applicable data protection laws. In many instances, this may include:

- processing information which is necessary for reasons of public interest, such as preventing/detecting unlawful acts, and/or protecting the public against dishonesty, and
- processing information which is necessary for establishing, exercising, or defending legal claims.

In the exceptional case that Vantive receives or otherwise processes criminal offense information, it will only do so as permitted by local law.

5. How we share your personal information

We may share your personal information with:

- NAVEX, which is a third-party service company that provides us with the E&C Helpline on a global basis. NAVEX administers, operates and hosts the systems, and provides ongoing

technical support. We have entered into contractual commitments with NAVEX to ensure the protection of the information you share, in accordance with applicable law.

- Other service providers acting on our behalf, including other local vendors that offer external reporting tools and translation agencies, where necessary.
- Authorized personnel within the Vantive Group of companies.
- Law enforcement, agency, court, regulator, government authority or other third party, where necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of third parties.
- External advisors (e.g. legal counsels).

6. How long do we retain your personal information?

Your personal information will be retained for as long as it is necessary to investigate allegations and to comply with Vantive's legal and compliance obligations and practices. We take reasonable steps to minimize the retention of personal information and ensure that it is securely disposed of when no longer needed.

7. Your Rights

Depending on the country in which you are located, you may have the following rights under applicable data protection laws and subject to the specific circumstances of the case:

- Request access to personal information that we hold about you.
- Update and correct inaccuracies in your personal information.
- Request deletion of your personal information.
- Restrict or object to our processing of your personal information.
- Whilst we encourage you to always contact us first at privacy@vantive.com, where applicable, you may lodge a complaint with your relevant data protection supervisory authority.

8. Security and Confidentiality

We implement technical and organizational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the ongoing integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

9. Data transfers

Vantive is a global company with global affiliates, and therefore we use global vendors, subcontractors, systems, and applications. To the extent permitted by local law, personal information that we collect and generate about you in the context of reporting may be transferred, stored, or accessed in a destination outside of your country which may have less

strict, or no, data protection laws, when compared to the laws in your country. Any transfers of personal information to Vantive affiliates or third parties outside your local country will be conducted in compliance with the international data transfer framework that applies under applicable data protection laws.

We take required steps under applicable data protection laws to ensure that adequate safeguards are in place (e.g., data transfer agreements, standard contractual clauses, along with supplementary measures to ensure that all data recipients will provide an adequate level of protection for the personal information, and that appropriate technical and organizational security measures are in place) to protect your personal information. You may contact us at privacy@vantive.com for more information about the safeguards that we have put in place to protect your personal information and your privacy rights when we make cross-border transfers of your personal information.

10. Changes to this Privacy Notice

We may periodically update this Privacy Notice. If we make material changes, we will post these changes to the Privacy Notice with a new effective date.

11. Contact us

You can exercise any of your rights or get additional information about your rights, this Privacy Notice, and how we process your personal information, by contacting Vantive's Privacy Office by email to: privacy@vantive.com.

**U.S. STATE LAW SUPPLEMENT:
SUPPLEMENTAL PRIVACY STATEMENT FOR U.S. RESIDENTS AS APPLICABLE
Effective Date: November 1, 2024**

Vantive and its affiliates and subsidiaries, including Vantive US Healthcare LLC (“Vantive,” “we,” “our” or “us”) provides this supplemental privacy statement for U.S. residents as applicable (“Supplement”) to the E&C Reporting Privacy Notice to provide you (“Consumers,” “you”) with additional information, as required by applicable state law, on how we use and disclose your personal information that we collect from you.

If you would like to receive a copy of this Supplement in an alternate format (e.g., printable) or language, please contact us using the information provided below.

We may periodically update this Supplement and how it may affect our use of personal information about you. If we make material changes to this Supplement, we will post these changes to the Supplement with a new effective date. Should this Supplement conflict with the Privacy Notice above, this Supplement will apply to the extent applicable to U.S. residents.

1. Personal Information Collected and Disclosed

“Personal Information” as used in this Supplement means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or household. The Personal Information Vantive collects from you is listed in the Privacy Notice. In particular, Vantive will collect and disclose the below listed statutory categories of Personal Information from Consumers for the following purposes.

Categories of Personal Information Collected & Disclosed
Identifiers - A real name, email address.
Personal information categories listed in the California customer records law (note that some personal information included in this category may overlap with other categories) - A name, telephone number, email address, title and employment. Some personal information included in this category may overlap with other categories.
Professional or employment-related information - Information regarding your title and your profession, including your place of employment and/or affiliation.
Sensitive personal information – Passport number, social security numbers, financial accounts.

Please see also the section entitled, “What personal information we may collect” and “How we use your personal information” in our Privacy Notice above for a description of how Vantive collects this Personal Information.

The above listed categories of Personal Information are disclosed to the categories of third parties discussed in the section entitled “How we share your personal information” in our Privacy Notice above.

The above listed categories of Personal Information are collected and disclosed for the business purposes stated in the Privacy Notice (sections entitled “What personal information we may collect” and “How we use your personal information”). Your Personal Information will be kept as set forth in the Privacy Notice section entitled “How long do we retain your personal information.”

2. Sale, Cross-Context Behavioral Advertising, Targeted Advertising

Certain state laws regulate the “sale” of Personal Information, which may include not only the traditional selling of data, but also many sharing arrangements where the recipient can use the personal information that they receive for the recipient’s own commercial purposes. State laws may also regulate the disclosure of Personal Information to third parties for cross-context behavioral advertising (referred to as “sharing” under the California Consumer Privacy Act of 2018 or “targeted advertising,” as such practice is more commonly referred to). Please note, that for purposes of this Supplement, “sale” may be broadly defined to include exchanges of Personal Information for monetary or other valuable consideration.

We do not “sell” “share,” or use your Personal Information for purposes of targeted advertising. We also do not knowingly “sell” or “share” the Personal Information of individuals under the age of 16.

3. Your Privacy Rights

Depending on your location, you may be afforded certain privacy rights. In general, you may exercise your privacy rights with respect to your Personal Information as set forth in the table below by following the instructions set forth below in this Supplement. Please note that applicable law sets forth a process to follow when evaluating your request, and there are also some exceptions to these rights.

Privacy Rights	Description
Notice	You may have the right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared.
Right to Know/Access	<p>You may have the right to confirm whether your Personal Information is being processed. You may have the right to request that we disclose to you what Personal Information of yours has been collected, used, disclosed, and sold or shared, including, depending on your location:</p> <ul style="list-style-type: none"> • The categories of Personal Information collected about you; • The categories of sources from which the Personal Information is collected; • The business or commercial purpose for collecting, selling, or sharing the Personal Information;

	<ul style="list-style-type: none"> • The categories of Personal information, if any, that were disclosed for a business purpose or sold to third parties; • The categories of third parties to whom the information was disclosed or sold; and • The specific pieces of personal information collected about you.
Data Portability	You may have the right to receive copies of your Personal Information that we have collected in a commonly used and machine-readable format.
Right to Delete	You may have the right to request deletion of the Personal Information collected about you.
Right to Correct	You may have the right to request the correction of inaccurate personal information that is maintained about you.
Right to Opt-Out of Sale, Cross-Context Behavioral Advertising, Targeted Advertising	Certain laws may provide you the right to opt-out of the sale of your Personal Information and the use or disclosure of your Personal Information for cross-context behavioral advertising (i.e., “sharing” under the California Consumer Privacy Act) or targeted advertising. We do not use or disclose your Personal Information in these ways.
Profiling through Automated Decision-Making	We do not apply automated processing to your Personal Information for purposes of profiling. However, if we did, you may have the right to request information about the logic involved in certain types of automated practices and a description of the likely outcome of such processes, and the right to opt out.
Right to Limit the Use of Sensitive Personal Information	We do not collect your Sensitive Personal Information. We do not use or disclose your Sensitive Personal Information for purposes other than those specified in Section 7027(m) of the California Consumer Privacy Act regulations. If we did, you may have the right to limit certain uses of your Sensitive Personal Information.
Right to Non-Discrimination	You have the right to not receive discriminatory treatment if you exercise any of the rights conferred to you by law.

4. How to Exercise Your Rights

If you would like to exercise any of your rights listed above, please contact us using the information below. You may also designate an authorized agent to make a request to exercise your rights on your behalf. In order to do so, you must contact us using the information below.

When contacting us to exercise your rights, please adhere to the following guidelines:

- **Tell Us Which Right You Are Exercising:** Specify which right you want to exercise and the Personal Information to which your request relates (if it does not relate to you). If you are acting as an authorized agent on behalf of someone else, please clearly indicate this fact and indicate your authority to act on their behalf.

- **Help Us Verify Your Identity:** Contact us using the information below and provide us with enough information to verify your identity. Please note that if we cannot initially verify your identity, we may request additional information to complete the verification process. Any Personal Information you disclose to us for purposes of verifying your identity will solely be used for the purpose of verification.

- **Direct Response Delivery:** Inform us of the delivery mechanism with which you prefer to receive our response. You may specify, for example, email, mail, or through your account (if you have one with us).

Please note that you do not need to create an account with us in order to make a request to exercise your rights hereunder. Please contact us to appeal any decision made on your request.

5. Responses to Your Requests

Receipt of your request will be confirmed consistent with applicable law. You will generally receive a response to your request within forty-five (45) days. However, where reasonably necessary and where permitted by law, the response time may be extended by an additional forty-five (45) days, provided you are given notice of such extension first. If the information is provided to you electronically, it will be in a portable format and, to the extent technically feasible, in a machine readable, readily useable format that allows you to freely transmit this information without hindrance.

Please note that you will not be charged for making a request, provided that you make no more than two (2) requests per year. Where permitted by law, your request may be denied, for example, if your requests are determined to be unfounded or excessive (e.g., repetitive in nature), or a reasonable fee may be charged. In these circumstances, you will receive a notice regarding this denial and the reason for such denial.

6. Other Privacy Rights for California Residents

Under California Civil Code Section 1798.83, individuals who reside in California and who have an existing business relationship with us may request information about the disclosure of certain categories of personal information to third parties for the third parties' direct marketing purposes, if any. To make such a request, please use the information in the Contact Information section below. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in the response. This request may be made no more than once per calendar year.

7. Contact Information

To exercise one or more of your rights, or to contact us with questions and concerns about this Supplement, please contact us at privacy@vantive.com.