

Summary of Organon Canada Privacy and Data Protection Policy

OUR PRIVACY VALUES ARE BASED ON RESPECT, TRUST, PREVENTION OF HARM AND COMPLIANCE

- The goal of Organon’s Privacy Program is to build and maintain employee, customer, patient, and other stakeholders trust by respecting their privacy and protecting and ensuring appropriate use of their information.
- Every employee of Organon and our agents, are accountable for understanding and upholding Organon’s privacy values and principles.
- Eight Company privacy principles summarize Organon’s privacy standards and core requirements:

1.	Necessity	Prior to collecting, using, or sharing information about people, we define and document the specific, legitimate business purposes for which it is needed.
2.	Fairness	We do not process information about people in ways that are unfair to them.
3.	Transparency	We do not process information about people in ways or for purposes that are not transparent.
4.	Purpose Limitation	We only use personal information in accordance with the Necessity and Transparency principles.
5.	Data Quality	Information about people must be kept accurate, complete, current, and consistent with its intended use.
6.	Security	We secure personal information and sensitive data from loss, misuse, unauthorized access, disclosure, alteration, or destruction.
7.	Data Transfer	We preserve the privacy protections for information about people when it is transferred to or from other organizations or across country borders.
8.	Legally Permissible	We do not process information about people unless the requirements by applicable laws have been met.

PROCEDURES

Consent

As a rule, when collecting personal information (PI) there is a requirement to obtain consent from that individual. A person’s consent to the collection of his/her PI must be clear and appropriate to the nature of the PI being collected. Express consent must always be obtained when collecting sensitive data.

Commercial Initiatives

When collecting PI from customers, health care professionals (HCPs), consumers, patients or any other stakeholders, proper Notice must be issued, and we must obtain their consent prior to collecting their PI. The wording of a consent form will vary depending on the nature and circumstances of the initiative.

Medical Affairs Activities

- **Collection of PI from Study Staff:** appropriate privacy notice will be given to the site personnel prior to the start of a project, and as new site personnel are assigned throughout the trial, through a Notice of Use & Disclosure of Personal Information document specifically designed for these activities.
- **Collection of PI from Patients:** Collection of PI from patients during research activities must be limited to the extent provided by applicable laws. The patient’s PI must not be disclosed or made publicly available, except as described in the informed consent.

Privacy Notices

Organon Canada’s privacy notices explain how PI is processed. Details regarding external stakeholders can be found in the “Notice of Data Practices for Canadian Healthcare Professionals and Canadian Stakeholders” and for employees in the “Data Practices for Employment and Workplace Related Purposes”. The notices can be found in the privacy section of our corporate web site www.organon.ca.

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Privacy by Design

At Organon, we practice the “privacy-by-design” approach which is a proactive mindset of embedding privacy and privacy controls into the design and operation of Business Technology (BT) systems and processes, to achieve business objectives in a privacy compliant manner. For example:

- We conduct a concept review prior to developing or modifying an initiative which involves the processing of PI. When PI is hosted or processed by third parties for, or on behalf of, the Company, we ensure that the proper privacy due diligence is performed on these third parties.
- We conduct privacy due diligence to identify and evaluate privacy risks, for example:
 - **Supplier Privacy Assessment** to identify and evaluate the risks associated with exchanging PI with the supplier.
 - **Data Protection Impact Assessment** to identify privacy related factors for any new or modified initiative that processes PI.
 - **Business Technology Risk Assessments** to evaluate security risks associated with utilizing a supplier’s IT products/services.
- Reasonable steps are taken by Organon and its agents to ensure that PI processed by, or on behalf of, Organon is secured from loss, misuse, unauthorized access, disclosure, alteration, or destruction. The type and level of security must be appropriate to the sensitivity of the information.

Privacy Incident Reporting Process

All Company employees and external workers/contractors who become aware of an incident involving: i) Company held PI, ii) PI held by a third party obtained by the Company, and iii) third parties who process PI for, or on behalf of, the Company, must report the incident and take appropriate corrective and preventative measures.

Access or correction, to existing PI held by Organon

Former employees and external stakeholders may request access to their PI by submitting a request to the Canada Privacy Office (CPO) by email or mail, as follows:

Attention: Chief Privacy Officer
Organon Canada Inc.
16766 Trans Canada Hwy
Suite 300
Kirkland, Qc, H9H 4M7
E-mail: canadaprivacy@organon.com

The above information can also be found on our corporate web sites, www.organon.ca and www.organon.com. The CPO will reply in writing to a request for access or correction of PI, no later than 30 days after the date the request is received.