

Novartis Binding Corporate Rules (BCR)

Version 24.04.2012

Individual's Rights

Novartis is committed to respect your privacy and to appropriately protect your personal information when it collects and shares the data with others to pursue its legitimate business purposes. To complement the [Novartis Policy on the Protection of Personal Information](#), Novartis has adopted Binding Corporate Rules (BCR), a set of principles governing the international transfer of personal information of Novartis associates, customers, business partners and other individuals whose data is collected or processed in the EU and in Switzerland. The approval of the Novartis BCR by EU and Swiss Data Protection Authorities allows Novartis to transfer your personal information from the EU and Switzerland to Novartis affiliates in other countries in compliance with EU and Swiss data protection laws.

WHICH DATA PROTECTION PRINCIPLES APPLY?

Novartis companies that transfer your personal information from the EU or Switzerland to other countries must comply with applicable laws, Novartis policies and the BCR. In particular, these companies will:

- Collect and process your personal information by fair and lawful means;
- Process your personal information only for specific and legitimate purposes and not further use it for other purposes;
- Where required by local laws inform you of the transfer of your information and, where appropriate, obtain your consent;
- Keep your personal information accurate, complete and, where necessary, up to date;
- Keep your personal information only for so long as necessary, unless longer or shorter retention periods are required or permitted by law;
- Keep your personal information confidential and take appropriate and reasonable security measures to protect it against unauthorized access, accidental loss or damage, misuse and unauthorized alteration and deletion.

Novartis companies may disclose your personal information to third parties, for example to service providers for IT or other administrative purposes. Novartis companies will only

disclose your personal information to such third parties based on contractual provisions ensuring the appropriate safeguards to protect your information.

WHAT RIGHTS DO I HAVE?

If you are a Novartis associate, customer, business partner or any other individual whose personal information Novartis collects and processes in the EU or in Switzerland you have the following rights:

- You can request Novartis to inform you about the collection and use of your personal information by Novartis according to applicable local laws;
- You can request Novartis to correct, erase or block your personal information if it is incomplete or inaccurate;
- You can object to the processing of your personal information and require Novartis to not further process your data where you have legitimate grounds for doing so.
- You can request to review decisions made through automatic processing of your personal information, if you are significantly affected by such decisions.

HOW CAN I EXERCISE MY RIGHTS?

Where your personal information has been transferred to a Novartis company located in a country outside the EU and Switzerland that does not provide an adequate level of protection and you believe that your personal information has been processed in violation of the BCR, you can do the following:

- File a complaint with the Novartis Business Practices Office (BPO) by sending an email to: business.practicesofficer@novartis.com. Your complaint will be investigated according to internal procedures.
- Lodge a complaint with the data protection authority or with the courts located in the EU country or Switzerland from where your personal information has been transferred out.

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