

Privacy Shield Policy

This Privacy Shield Policy (“Policy”) describes how UDG Healthcare US Holdings, Inc and its subsidiaries and affiliates in the United States (“US”) (“Company,” “we,” or “us”) collect, use, and disclose certain person information (as described below) that we receive from the European Union and its Member States, the European Economic Area, the United Kingdom and/or Switzerland (“EU”) in the United States.

UDG Healthcare US Holdings, Inc and all its US affiliated entities have self-certified to the U.S. Department of Commerce that they adhere to the Privacy Shield Principles of notice, choice, accountability for onward transfer, security, data integrity and purpose limitation, access, recourse, enforcement, and liability for onward transfer to third parties, the Privacy Shield Supplemental Principles and the Swiss-U.S. Privacy Shield Principles. If there is any conflict between the terms of this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program visit <https://www.privacyshield.gov> and to view UDG Healthcare US Holdings, Inc.’s certifications, please visit <https://www.privacyshield.gov/list>.

This Policy supplements our Website Privacy Policy located at <https://www.udghealthcare.com/privacy-policy/>, and unless specifically defined in this Policy, the terms in this Policy have the same meaning as the Website Privacy Policy.

We comply with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

Personal Data Collection and Use

Our Website Privacy Notice located at <https://www.udghealthcare.com/privacy-policy/> describes the categories of EU Personal Data that we may receive in the US as well as the purposes for which we use that EU Personal Data. We process EU Personal Data for the following purposes: to receive and process information about existing and potential corporate customers, clients, suppliers, business partners, job applicants and employees. We will only process EU Personal Data in ways that are compatible with the purpose that we collected it for, or for purposes the individual later authorizes. Before we use your EU Personal Data for a purpose that is materially different than the purpose we collected it for or that is later authorized, we will provide the individual with the opportunity to opt out. We maintain reasonable procedures to help ensure that EU Personal Data is reliable for its intended use, accurate, complete, and current.

Data Transfers to Third Parties

Third-Party Agents or Service Providers. We may transfer EU Personal Data to our third-party agents or service providers who perform functions on our behalf as described in our Website Privacy Notice. Where required by the Privacy Shield, we enter into written agreements with those third-party agents and service providers requiring them to provide the same level of protection the Privacy Shield requires

and limiting their use of the data to the specified services provided on our behalf. We take reasonable and appropriate steps to ensure that third-party agents and service providers process EU Personal Data in accordance with our Privacy Shield obligations and to stop and remediate any unauthorized processing. Under certain circumstances, we may remain liable for the acts of our third-party agents or service providers who perform services on our behalf for their handling of EU Personal Data that we transfer to them.

Disclosures for National Security or Law Enforcement. Under certain circumstances, we may be required to disclose an individual's EU Personal Data in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

Security

We maintain reasonable and appropriate security measures to protect EU Personal Data from loss, misuse, unauthorized access, disclosure, alteration, or destruction in accordance with the Privacy Shield.

Our employees are trained in-line with and required to adhere to the principles of the applicable Data Protection laws and Privacy Shield Principles in their country of employment.

Access Rights

Individuals whose personal information is covered by this Privacy Shield Policy have the right to access the personal information that we maintain about them as specified in the Principles. Individuals may contact us to correct, amend or delete such personal information if it is inaccurate or has been processed in violation of the Principles (except when the burden or expense of providing access, correction, amendment, or deletion would be disproportionate to the risks to the individual's privacy, or where the rights of persons other than the individual would be violated). Requests for access, correction, amendment or deletion should be sent to the address provided below. We may request specific information to confirm an individual's identity.

Choice/Opt-Out

We collect and process personal information from certain individuals and for the purposes described in this Privacy Shield Policy. Personal information covered by this Privacy Shield Policy is collected and processed only as permitted by the Principles. Notice to individuals regarding the personal information collected from them and how that information is used may be provided through this Privacy Shield Policy, other UDG website notices, or other direct forms of communication with appropriate parties, such as contracts or agreements. Where necessary and appropriate, consent for personal information to be collected, used, and/or transferred may also be obtained through these same means of communication (including opt-in consent for sensitive personal information).

Should you no longer wish to receive information or future communications about our relevant services, please contact us using one of the following options. You may send your request via email stating your desire to opt out of further communications to data.protection@udghealthcare.com or alternatively you may write to us at:

Data Protection Officer
UDG Healthcare plc
20 River Walk
Citywest Business Campus
Dublin 24 D24 NR23
Ireland

We also provide an opt-out option with all marketing email communications by either clicking the unsubscribe link at the bottom of the email or replying to the email stating your request to opt-out of further communications. If we intend to use personally identifiable information in a manner different from that stated within this Privacy Policy or as otherwise previously notified, we will notify all affected users; users will be able to opt out of any new use of their personal information.

Contact Us, Questions or Complaints

You can direct any questions or complaints about the use or disclosure of your EU Personal Data to us at: data.protection@udghealthcare.com or alternatively you can write to us at:

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In compliance with data privacy laws and the Privacy Shield Principles, we commit to resolve complaints about your privacy and our collection or use of your personal information.

We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of your EU Personal Data within 30 days of receiving your complaint.

We have further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the ICDR/AAA, operated by the American Arbitration Association located in the U.S. If you do not receive timely acknowledgement of your privacy complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit the ICDR/AAA web site at <https://go.adr.org/privacyshield.html> for more information or to file a complaint. EU and Swiss complainants may invoke binding arbitration under the Privacy Shield Principles if a complaint has not been resolved by UDG Healthcare US Holdings Inc. or by other recourse and enforcement mechanisms. UDG

Healthcare US Holdings Inc and its US businesses are also subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

UDG Healthcare US Holdings, Inc has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU and Switzerland in the context of the employment relationship.. If the dispute involved human resources personal information, or information collected in the context of an employment relationship, we will cooperate with the competent EU or Swiss data protection authorities and comply with the advice of such authorities.

Binding Arbitration You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps: (1) raised your complaint directly with us and provided us the opportunity to resolve the issue; (2) made use of the independent dispute resolution mechanism identified above; and (3) raised the issue through the relevant data protection authority and allowed the US Department of Commerce an opportunity to resolve the complaint at no cost to you. For more information on binding arbitration, see US Department of Commerce's Privacy Shield Framework: Annex I (Binding Arbitration).

Contact Us

If you have any questions about this Policy or would like to request access to your EU Personal Data, please contact us as follows: data.protection@udghealthcare.com or you can write to us at:

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Changes To This Policy

We reserve the right to amend this Policy from time to time consistent with the Privacy Shield's requirements.

Effective Date: 18 May 2018

Last modified: 05 Jun 2020