

Data Protection and Privacy Policy

Last updated on 15th November 2021

This Data Protection and Privacy Policy (the “Privacy Policy”) describes how Terumo Asia Holdings and its affiliates (hereinafter collectively "Terumo", "we", “our” or “us”) may collect, use, store, process and manage your Personal Data. Terumo may update this Privacy Policy from time to time, therefore please read and understand this Privacy Policy each time you share your Personal Data with Terumo or visit our website(s) etc.

1. What is Personal Data?

For the purpose of this Notice, Personal Data or Data means the information that identifies you (a natural person) or allows you to be identified either on its own or in combination with other information, such as your first and last name, gender, date of birth, home address, phone number, email address or other contact details, preferred language, identification numbers and license plate numbers.

2. We collect your Data in several ways

In general, we may collect your personal data in several ways, including but not limited to the following:

- 2.1 When you voluntarily provide your personal data to us for example by applying or registering for an event, visiting our booth at a congress, participating in trade fairs, webinars, seminars, training events, by submitting your resume or business card, responding to a survey, or participating in a Website feature.
- 2.2 When we receive or indirectly collect personal data about you, for example, from the company or organization you work for, from our business partners, from data brokers, or from public sources such as social networks or public websites.
- 2.3 When you visit our website(s) or use on-line applications through the use of commonly used tracking technologies such as cookies. Such data includes the pages you visited, the date, time and duration of your visit, your web browser, your IP address, the type of operating system you are using and the domain name of your Internet service provider. Read more about it in “Terumo Cookies Policy”.

3. We process different categories of Data

- 3.1 Your Personal data collected by TERUMO depend on your relationship with Terumo and may include some or all the following categories of personal information:

Category of Personal Data	Examples
<i>Contact information and identification data</i>	such as your name, address, e-mail address, telephone or mobile phone number, your signature, gender, birth date, your account details (e.g. log-

	in to portal or website)
<i>Official identification numbers</i>	your VAT Tax number, your passport number (when we help you obtaining a permit), your national ID number, your license plate number (when you visit our premises), social security number, professional registration number.
<i>Financial data</i>	such as your bank account number and bank details, payment terms and credit limits (for suppliers)
<i>Professional data</i>	such as your language skills, professional knowledge or expertise, certifications, references and other information you could find on a resume, your job title and the company you work for, any mandates you may hold, your professional location and travel data (for business contacts we know are flying in to attend an event), your professional remuneration, evaluation and performance reports (e.g. for our consultants), your memberships or network contacts (e.g. when we meet you at an event or get in touch with you through someone within your network), other details on your CV or resume etc.
<i>Electronic localization data</i>	such as your whereabouts on our premises and facilities (based on badge data)
<i>Preferences, interests, lifestyle or behavior</i>	such as the products or activities you are interested in, the events you attend, the news or information you have requested or, your purchasing history (e.g. also through cookies, logs, expenses, ...)
<i>Health and clinical data</i>	medical certificates of contactor; clinical data, medical history, testing results, medical images and other relevant data included in the hospital patient file
<i>Image data</i>	photographs, pictures, surveillance images recorded when you are at our premises or attending any of our webinar, conferences, or events

3.2 In addition to the Data categories listed above, we may use other types of Data relating to you that you may have voluntarily provided to us, that were provided to us in the context of our business relations or that we have deducted or generated from Data that were already in our possession.

4. **We use your Data for various specific purposes.**

4.1 Generally, TERUMO collects, uses and/or discloses your Data for the following purposes:

- a. Responding to your specific requests, queries, or inquiries, and resolving complaints, for example about products and services etc.
- b. Manage the performance of our (contractual) engagements and our business relations.
- c. Communicate with you (via regular mail, email or telephone) about our products and

related services.

- d. Identify your interest as an existing or potential customer in particular products for marketing and product promotion (prospecting and profiling), to provide you better support and to better respond to your inquiries and needs and of those of our patients.
 - e. Invite you to provide feedback or participate in customer surveys, market research and surveys to develop or improve our products and related services.
 - f. Use this information for our overall customer relationship management (CRM);
 - g. Protect our legal rights (including disputes and litigation) and ensure security and protection of our organization, our customers, patients, and the public in general.
 - h. To comply with laws, regulations and industry standards (such as transparency reporting), to detect fraud and to ensure compliance.
 - i. To manage product failures and recalls.
 - j. To perform pre- and post-market research, including clinical trials (with patients)
 - k. To consider and handle your recruitment (for example when you apply for a job through our website) or contactor relationship.
 - l. Employment related purposes (including but not limited to salary, personal income tax. work pass and residential)
- 4.2 The legal basis for using and processing your Data are, as the case may be, your consent for the use for specific purposes such as direct marketing to prospects, the performance of contracts, services and business transactions, compliance with our legal obligations, protection of your vital interests or our legitimate business interests such as proper handling of our activities, developing and improving our products, informing and communicating with our customers, vendors and partners, protecting our organization, our activities, partners, patients and the general public.

5. Minimizing and securing your Personal data

- 5.1 We strive to minimize the Personal Data we process, to make sure we only use your Data when and in so far we need it. Where possible we also pseudonymize or key-code your Data so that you cannot be directly identified. For example, the hospitals and clinical centers involved in our clinical studies link your clinical data to a patient number before sharing the data with us and we only process such key-coded data.
- 5.2 We also take other reasonable measures to protect your personal data from unauthorized access or modification, improper collection, use or disclosure, unlawful destruction, or accidental loss. However, you should be aware that no method of transmission over the internet or electronic storage is 100% secure. While security cannot be guaranteed, we strive to protect the security of the personal data and will constantly review and enhance our information security measures.

6. Sharing your Personal Data

- 6.1 Within Terumo we restrict access to your data to employees and any person acting under our

authority on a need-to-know basis, who respect our confidentiality rules and comply with our instructions.

- 6.2 We may share your Data to selected third parties outside Terumo who provide services to us or on our behalf, such as advertising and marketing services, IT services, hosting services, data analytics services, event management services and other professional services.
- 6.3 We may also share your Data with authorized distributors, business partners or other suppliers, who are involved in providing our products and services to you, to communicate with you or to respond to your queries.
- 6.4 We may also need to transfer your Data to other recipients if we believe in good faith that this is necessary or useful, such for example Hospitals, HCPs, or ethical committees in the context of pre- and post-market research and clinical trials; attorneys, insurance companies, auditors, public prosecutors, enforcement authorities and courts to safeguard the rights and interests of our organization, our people, our customers and partners or the public in general.
- 6.5 We may also share your Data to other Terumo companies to optimize the use of information or to improve the quality of our products and effectiveness of our activities.
- 6.6 Terumo is an international organization, operating globally and may therefore transfer your Personal Data outside the jurisdiction where it collects your Data. For such intercompany transfers within Terumo affiliates, Terumo ensures data transfer agreements in line with applicable laws and regulations. Likewise, when your personal data is shared by us with or transferred by or to a third party outside of jurisdiction, Terumo affiliate(s) enter into an appropriate data transfer agreement(s) or otherwise make sure appropriate safeguards are in place by such third party.

7. We may use Data Intermediaries to process your Data

- 7.1 To provide the best possible services, we may engage a data intermediary to process and handle your Data on our behalf. In these cases, we will only work with recognized personal data management firms and shall enter into appropriate contracts with these data intermediaries to include provisions that clearly set out the data intermediaries' responsibilities and obligations to ensure appropriate confidentiality and security of your Data.

8. Data Retention: We keep your Data only for a limited period

- 8.1 Your personal data will be retained by TERUMO for as long as necessary for the fulfilment of the purposes stated above or is required to satisfy any legal, regulatory, or accounting requirements.
- 8.2 In this respect, we have established a data classification and retention policy in the framework of our internal Data Retention Policy.

9. We are mindful of your consent for collection, use and/or disclosure of your Data

- 9.1 By submitting your Data to TERUMO, you agree and consent to the collection, use and/or disclosure of your personal data by TERUMO for some or all of the purposes mentioned above.
- 9.2 If at any time we decide to collect, use or disclose your personal data in a different manner as to the purposes set out above, we will request your consent to the additional purpose(s) in writing, in which you may refuse to give at your discretion.
- 9.3 If you provide us with Data relating to a third party (e.g. information of your spouse, children, parents, relatives or other natural person), you represent to us that you have obtained the consent of that third party to provide us with their Data for the relevant purposes.
- 9.4 **You may at any time withdraw any consent** given in respect of the collection, use or disclosure of your personal data by giving prior notice in the form of a formal written request addressed to the Data Protection Officer.
- 9.5 ***If you withdraw your consent to TERUMO in relation to the purposes mentioned above, TERUMO shall cease to collect, use and/or disclose your personal data within [30 days] upon receiving your withdrawal request. Please note that once consent is withdrawn, it may not be possible for us to accomplish the purposes as set out previously above, and hence, we may be unable to continue providing the requisite services to you.***
10. **You have right to access your Data and request corrections etc.**
- 10.1 You may apply for a copy of your personal data held by TERUMO, or request for your personal data to be updated or corrected, by sending a formal written request to our Data Protection Officer. Please be informed that we are entitled to charge a fee to recover the costs directly related to the access of the personal data for the time and effort spent by us in responding to the same, and will let you know the amount accordingly.
- 10.2 Upon receiving your request, within 30 days, We shall strive (on best effort basis) to:
- a. Provide you with a copy of your personal data under our custody and/or other relevant information in accordance with the applicable laws;
 - b. Correct your personal data as soon as practicable and inform you that the relevant correction has been made; or
 - c. Inform you that your request for access or correction of your personal data is rejected, if the request was made in circumstances predefined by the Act where such access or correction is prohibited or not required.
- 10.3 You should ensure that all personal data submitted to us is complete and accurate. Failure to do so may result in our inability to provide you with the information or services you requested.
- 10.4 We shall make a reasonable effort to ensure that the personal data collected by or on behalf of Terumo is accurate.

10.5 For security of your Data and avoid any misuse, we may require to verify the legitimacy of your request and establish your identity. Therefore, we may request you to provide an acceptable proof of your identity.

11. Complain about the handling of your Data

11.1 If you have a complaint about how we have dealt with your personal information, please contact us using the details below. We will investigate your complaint and provide you with a formal response, usually within 30 days. If the circumstances of your complaint are complex and we need additional information or time to provide you with a formal response, we will contact you to let you know. We may also need to verify your identity in order to resolve your complaint.

11.2 If you are not satisfied with our response, please contact us. If you still not satisfied, then you may lodge a formal complaint with the Office of the Australian Information Commissioner (enquiries@oaic.gov.au or www.oaic.gov.au).

12. Contact Information

When you have any questions or concerns about the way we collect, store and use your Data, or You may have a request concerning your Data, please contact our Data Protection Officer at:

Email: privacy_australia@terumo.co.jp

Data Protection Officer (DPO): Company Secretary

Terumo Australia Pty Ltd

Address; P.O. Box 312, North Ryde NSW 1670