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	Standard Operating Procedure	MedAffairs & Business Compliance	sop-017734	2 . 0	Effective	20 Aug 2018
Binding Corporate Rules (BCRs)						

Binding Corporate Rules for Data Protection and Privacy

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1 INTRODUCTION

As a global biopharmaceutical company, UCB S.A. and its representation offices and affiliates (collectively, “**UCB**”) are engaged in the business of researching, developing, manufacturing, selling and distributing medicinal products to meet the needs of the patients, the healthcare professionals and society as a whole.

To successfully pursue its activities globally, UCB routinely collects, uses, stores, discloses and Transfers across national borders a variety of data, including personal data relating to individuals (“**Data Subjects**”, as further defined below), that may, directly or indirectly, identify these individuals (hereinafter referred as “**Personal Data**” and as further defined below).


UCB is committed to ensure the privacy of Personal Data throughout the world and expects its employees and business partners to take the necessary measures to protect all Personal Data collected, held and Processed in the name of or on behalf of UCB. To demonstrate such commitment, UCB has included privacy as one of the group’s core values in its global Code of Conduct and designed a comprehensive Data Protection and Privacy Program in support of UCB global business processes, taking into consideration the benefits as well as the risks of innovative technologies. As an essential component of this program, UCB adopted a Global Policy on the Protection of Personal Data.

These BCRs build upon and expand this Global Policy on the Protection of Personal Data to ensure compliance by UCB with applicable data protection and security requirements around the world. In particular, these BCRs provide baseline standards of protection for the Processing and Transfer of Personal Data subject to the provisions of the General Data Protection Regulation (EU) 2016/679 (the “GDPR”)¹ and, where applicable, the ePrivacy Directive 2002/58/EC (the “Directive 2002/58/EC”)², or to any other relevant national data privacy laws and regulations.

The BCRs consist of the present document together with its appendices and the Global Policy on the Protection of Personal Data. . In case of contradiction between these documents, the present document of the BCRs shall prevail.


¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

² Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (also called the Cookie Directive)

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2 DEFINITIONS

- **Binding Corporate Rules (“BCRs”).** It refers to the internal rules detailed in this document and the Global Policy on the Protection of Personal Data to ensure data protection and privacy compliance worldwide, especially with regard to the international Transfers of Personal Data within UCB.
- **Competent Supervisory Authority.** It refers to any supervisory authority responsible for the protection of Personal Data.
- **Controller.** It refers to a natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the Processing, including Transfer of Personal Data.
- **Data Protection Officer (“DPO”).** It refers to the nominated person who has the overall responsibility for developing and implementing the Data Protection and Privacy Program within UCB and for monitoring overall compliance with these BCR’s.
- **Data Subjects.** It refers to any individuals whose Personal Data are Processed by UCB.
- **Functional Privacy Officers.** It refers to the nominated persons in each PV Organization (PV Unit, PV Practice, PV Function and PV Ops), who are responsible for data protection and privacy compliance within their respective PV Organization.
- **Lead Supervisory Authority.** It refers to the Supervisory Authority competent to act as Lead Supervisory Authority for the cross-border Processing carried out by UCB BCRs Entities. UCB’s Lead Supervisory Authority is the Belgian Data Protection Authority.
- **Local Privacy Officers.** It refers to the nominated persons in each country, who are responsible for data protection and privacy compliance in their countries, including local compliance with the BCRs.
- **Personal Data - also known as “Personal Information”.** It refers to data in any form relating to an identified or identifiable natural person. An “identifiable person” is a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, address, telephone number, e-mail address, bank account number, image, video, patients’ key-coded information used in clinical trials, employees’ performance records, an online identifier etc. or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person .
- **Personal Data Breach.** It refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- **Processor.** It refers to a natural or legal person, public authority, agency or any other body which Processes Personal Data for or on behalf of the Controller.
- **Processing.** It refers to any operation or set of operations that are performed upon Personal Data by automatic means or otherwise. This includes the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, disclosure by transmission, dissemination, visual access or making available in any other form, linking, alignment or combination, blocking, erasure or destruction of Personal Data.
- **Special Categories of Personal Data (also known as “Sensitive Data”).** It refers to Personal Data benefitting from a higher protection, referred to in Articles 9 and 10 of the

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GDPR, including Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation and personal data relating to criminal convictions and offences.

- **Transfers.** It refers to the transmission of Personal Data from one country to another, or from European Economic Area³ ("EEA") countries to locations outside the EEA. The term "transmission" includes remote access with the intent to undergo Processing.
- **UCB S.A.** It refers to the parent company of the UCB group, established under Belgian law, with registered offices at Allée de la Recherche 60, 1070 Brussels, Belgium, with enterprise number 403.053.608, RPR/RPM Brussels.

Unless otherwise specified, words or expressions, which would not be defined in the BCRs, shall have the meaning used in the GDPR. When applicable and insofar as possible, any reference to the GDPR in the BCRs will include any subsequent European data protection legislation that would replace the current GDPR as well as all related implementing EEA member state laws and regulations.

Furthermore, in case of doubt, the content of the BCRs should be interpreted according to the provisions of the GDPR, and, where applicable, the provisions of the Directive 2002/58/EC.

3 SCOPE

- **UCB entities bound by the BCRs:**


The BCRs will be binding on UCB S.A. and all UCB entities (including branches) listed in Appendix 1 (collectively, the "UCB BCRs Entities"), as updated from time to time by the Data Protection Officer.

- **Data Subjects and Personal Data Processing and Transfers covered by the BCRs:**

In the event a UCB BCR Entity is a Data Controller or Data Processor, the BCRs shall apply to all Personal Data Processing by such Entity, as well as Transfers of such Personal Data among UCB BCR Entities for the purposes specified in Appendix 2, whether such Personal Data relate to:

- "Patients and caregivers": Patients and their relatives/family members as well as caregivers
- "UCB employees": Employees of UCB BCRs Entities (current and former employees) and their relatives/immediate family members as well as prospective employees applying for jobs to UCB BCRs Entities and directors/officers of UCB BCRs Entities
- "External workers": Any individuals, who are not UCB employees but who provide services under a contract or similar agreement for or on behalf of UCB BCRs Entities, including contractors, independent consultants and interim workers

³ EEA countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Republic of Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, The Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, UK.

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- “Healthcare professionals”: Any individuals who are professionally engaged in diagnosis, treatment, and delivery of healthcare, including, but not only, physicians, physician assistants, nurses, pharmacists, researchers, employees of payers, government officials
- “External vendors”: Employees and legal representatives of external vendors/business partners providing services and/or products to UCB BCRs Entities, including, but not only, consulting firms, Contract Research Organizations (CROs), external laboratories, distributors.

▪ **Compliance by UCB entities with data protection requirements:**

- When Processing or Transferring Personal Data specified in Appendix 2 throughout the world, UCB BCRs Entities will take all reasonable and necessary measures to comply with applicable data protection laws.
- To ensure a harmonized level of protection of Personal Data, even where there is no such data protection laws in a country or the local data protection laws do not meet the standards set out in the BCRs, the UCB BCRs Entities will Process Personal Data in compliance with the BCRs.
- Where applicable data protection laws in a country require a higher level of protection for Personal Data than the BCRs, such laws will prevail over these BCRs.
- The fact that UCB BCRs Entities comply with all the rules specified in the BCRs does not release them from their obligation to fulfill all the prior formalities with the relevant national authorities as required by the applicable legislation.

▪ **Compliance by UCB’s employees with the BCRs:**

The employees of UCB BCRs Entities may only Process or Transfer Personal Data specified in Appendix 2 in accordance with these BCRs and any other relevant applicable laws and regulations.


Adherence to these BCRs is the responsibility of all UCB BCRs Entities’ employees and shall be part of their employment terms and conditions. Any employee of UCB BCRs Entities who breaches these BCRs may be subject to disciplinary action, up to and including dismissal.

4 COMMON RULES APPLICABLE TO PROCESSING AND INTRA-GROUP TRANSFERS

For Processing and Transfers of Personal Data described in Appendix 2, UCB BCRs Entities and their employees agree to apply the following rules set out in these BCR’s, including the Global Policy on the Protection of Personal Data:

▪ **Transparency, fairness and lawfulness:**

- Personal Data detailed in Appendix 2 will be Processed and Transferred by UCB BCRs Entities lawfully, fairly and in a transparent manner in relation to the Data Subject.
- In particular, UCB BCRs Entities explain to the Data Subjects, at the time when their Personal Data is collected, how their Personal Data will be Processed within the framework of trans-border transfers. To that end, UCB BCRs Entities provide the Data Subjects with clear and comprehensive information in the form of data protection

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policies or other data protection notices.

▪ **Purpose limitation:**

- Personal Data detailed in Appendix 2 will be Processed and Transferred by UCB BCRs Entities for specified, explicit and legitimate purposes, in line with the purposes defined in Appendix 2. The Personal Data Processed and Transferred shall not be further Processed in a manner incompatible with these purposes.
- In practice, this means that UCB BCRs Entities only transfer the Personal Data for the purposes indicated in Appendix 2 as relevant to each UCB BCRs Entity. If any UCB BCRs Entity intends to Transfer the Personal Data for purposes other than those indicated in Appendix 2, it will inform the relevant Data Subjects - prior to that further processing - on the other purpose(s) as well as on any other relevant further information as referred to in paragraph 2 of Article 13 GDPR.


▪ **Data minimization, accuracy and storage limitation:**

- UCB BCRs Entities will limit the Processing of Personal Data detailed in Appendix 2 to what is adequate, relevant and limited to what is necessary in light of the pursued purpose(s). UCB BCRs Entities do not request Data Subjects to provide Personal Data which would not be required to properly fulfil their purposes within the framework of trans-border Transfers as described in Appendix 2 and stop processing such Personal Data when it becomes irrelevant to fulfil such purposes. In addition, UCB BCRs Entities only Process Special Categories of Personal Data to the extent it is necessary to fulfil the abovementioned purposes
- UCB BCRs Entities will use reasonable means to keep Personal Data accurate, complete, up-to-date and reliable for their intended use. In order to keep the Personal Data accurate and up to date, UCB BCRs Entities have put in place internal processes encouraging the Data Subjects to inform them whenever their Personal Data is modified or needs to be updated (in so doing, they also provide access to selfcare tools enabling Data Subjects to amend their Personal Data at their own initiative).
- UCB BCRs Entities will retain Personal Data for only as long as needed to meet the legitimate business purposes for which the Personal Data was collected and in compliance with UCB's data retention policies, unless otherwise required by applicable laws or regulations.

▪ **Legal basis for Processing Personal Data:**

Each of the Processing activities shall be based upon one of the following legal bases:

- the Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract; or
- the Processing is necessary for compliance with a legal obligation to which UCB is subject; or
- the Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller; or
- the Processing is necessary for the purposes of legitimate interests pursued by UCB or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject.

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In addition, the Processing may also take place when the Data Subject has given his/her freely given, specific, informed and unambiguous consent, provided that his/her refusal or withdrawal of consent does not lead to any negative consequences for him/her (e.g. in relation to the grant of benefits which employees are free to accept or refuse).]

Insofar all of the legal requirements under the GDPR are fulfilled, the Processing may take place where it is necessary in order to protect the vital interests of the Data Subject or another natural person.

▪ **Processing Special Categories of Personal Data:**

The Processing of Special Categories of Personal Data shall be allowed, if one of the following applies:

- the Data Subject has given his/her explicit consent (if the Data Subject is an employee of UCB, this will occur in a context where there is no imbalance of power, e.g. in relation to the awarding of benefits which employees are free to accept or refuse); or
- the Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of UCB or of the Data Subject in the field of employment and social security and social protection law in so far as it is authorized by EU, Member State or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the Data Subject; or
- the Processing relates to Special Categories of Personal Data which are manifestly made public by the Data Subject; or
- the Processing of Special Categories of Personal Data is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity; or
- the Processing of the Special Categories of Personal Data is required for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health-care or social care systems and services on the basis of EU or Member State law or pursuant to contract with a health professional under the obligation of professional secrecy under EU or Member State law or rules established by national competent bodies or by another person also subject to an equivalent obligation of secrecy; or
- the Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with [Article 89\(1\)](#) of the GDPR based on EU or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the Data Subject; or
- the Processing is otherwise permitted under (i) the GDPR or (ii) the applicable law of the country of establishment of the relevant UCB BCRs Entity - where that UCB entity is based in the EU or in place where Member State law applies by virtue of public international law .

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Insofar all of the legal requirements under the GDPR are fulfilled, the Processing may take place where it is necessary to protect the vital interests of the Data Subject or of another natural person where the Data Subject is physically or legally incapable of giving consent.

▪ **Limited Access to Personal Data:**

- The Processing of Personal Data shall be limited to only those UCB BCRs Entity employees whose job role(s) and responsibility(ies) necessitate this activity.

5 TRANSPARENCY, INFORMATION AND OTHER DATA SUBJECT RIGHTS

▪ **Availability of the BCRs to Data Subjects:**


The BCRs will be made publicly available on UCB websites to all Data Subjects whose Personal Data is subject to these BCRs.

The Data Subjects may also receive a copy of the BCRs upon request, by contacting either the relevant UCB BCRs Entities, or the DPO. At a minimum, each UCB BCRs Entity shall provide a postal mail address and email address for Data Subjects to submit their request.

▪ **Information related to the Processing of Personal Data:**

Where UCB BCRs Entities collect Personal Data directly from Data Subjects, they will provide a notice written in clear and plain language before Data Subjects are first asked to provide their Personal Data. The minimum amount of information to be communicated to the Data Subject is:

- the identity and the contact details of the controller and, where applicable, of the controller's representative;
- the contact details of the data protection officer;
- the purposes and the legal basis for the Processing for which the Personal Data are intended;
- where the processing is based on the legitimate interests of the controller or a third party, it shall be clearly communicated what those legitimate interests are;
- where applicable, the (categories of) recipients, i.e. natural or legal person(s), public authority, agency or another body, to which the personal data are disclosed;
- where applicable, the fact that the controller intends to transfer Personal Data to a third country and/or international organisation, as well as explanation on and reference to the appropriate or suitable safeguards to be used in case of such transfer (e.g. adequacy decision) and the means by which to obtain a copy of them or where they have been made available;
- the period for which the Personal Data will be stored, or if that is not possible, the criteria used to determine that period;
- the existence of the right to request from the controller access to and rectification or erasure of Personal Data or restriction of Processing concerning the data subject or to object to processing as well as the right to data portability;

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- where the Processing is based on consent, the existence of the right to withdraw consent at any time, without affecting the lawfulness of Processing based on consent before its withdrawal;
- the right to lodge a complaint with a Competent Supervisory Authority;
- whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the Data Subject is obliged to provide the Personal Data and of the possible consequences of failure to provide such data;
- the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Data Subject.

Where Personal Data is collected indirectly, the same set of information (listed above) with the addition of the categories of Personal Data concerned and their source (and if applicable, whether it came from publicly accessible sources) will be provided to the Data Subjects.

The obligation to inform Data Subjects does not apply if Data Subjects already have the information, the provision of such information proves impossible or would involve a disproportionate effort, or if obtaining or disclosure of the Personal Data is expressly required by EU or Member State law where personal data must remain confidential subject to an obligation of professional secrecy regulated by EU or Member State law.


UCB BCRs Entities shall ensure Data Subjects are provided with any additional information required by local law.

- **Rights of access, rectification, erasure, restriction, objection to Processing of Personal Data , right to data portability and right not to be subject to decisions based solely on automated processing, including profiling:**

UCB BCRs Entities comply with these BCRs, including the Global Policy on the Protection of Personal Data . UCB BCRs Entities handle requests from Data Subjects to exercise their rights, in accordance with these BCRs including the Global Policy on the Protection of Personal Data.

UCB BCRs Entities shall ensure Data Subjects are provided with the right:

- to access Personal Data which have been collected concerning them by UCB BCRs Entities, and to exercise that right easily and at reasonable intervals, in order to be aware of, and verify, the lawfulness of the processing as foreseen in Article 15 of the GDPR;
- to obtain the rectification of inaccurate Personal Data concerning them without undue delay as foreseen in Article 16 of the GDPR.;
- to obtain the erasure of Personal Data, restriction of Processing as foreseen in Articles 17-18 of the GDPR;
- to data portability as set out in Article 20 of the GDPR;
- to object on grounds relating to their particular situation, at any time to Processing of Personal Data concerning them which is based on performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or legitimate interest, including profiling based on those bases as foreseen in Article 21 of the GDPR;
- to object to the Processing of Personal Data relating to the Data Subject for the purposes of direct marketing as foreseen in Article 21 of the GDPR;

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- not to be subject to decisions based solely on automated Processing, including profiling as foreseen in Article 22 of the GDPR.

At a minimum, each UCB BCRs Entity shall provide a postal mail and email address for Data Subjects whose Personal Data is governed by these BCRs to exercise their rights as described above.

Alternatively, Data Subjects may also contact the DPO by letter or by email to dataprivacy@ucb.com.

Employees of UCB BCRs Entities may request access and modifications to their Personal Data by sending a written request, by letter or email, to the local Human Resources Department.

UCB will respond to Data Subject right(s) requests in accordance with Article 12 of the GDPR, as further explained under Section 15 (Internal Complaints/Requests Handling Procedure) of these BCRs.

6 ACCOUNTABILITY

Each of UCB BCRs Entities is responsible for its compliance with the BCRs. In order to demonstrate compliance, UCB BCRs Entities shall, as applicable:


- maintain a written record of Personal Data processing activities in line with the requirements set forth in Article 30 of the GDPR. This record shall be made available to the Competent Supervisory Authorities on request;
- perform data protection impact assessments for the processing activities that are likely to result in a high risk to the rights and freedoms of natural persons as set out in Article 35 of the GDPR. The Competent Supervisory Authorities shall be consulted prior to processing where a data protection impact assessment indicates that the Processing would result in a high risk in the absence of measures taken by the controller to mitigate the risk,;
- implement appropriate technical and organisational measures designed to implement and ensure compliance with data protection principles and to facilitate compliance with “Privacy by Design” and “Privacy by Default” principles as set forth in Articles 24 - 25 of the GDPR.

7 AUTOMATED INDIVIDUAL DECISIONS

UCB BCRs Entities shall not make any decision that would significantly affect Data Subjects based solely on Processing of Personal Data by automated means with no human involvement, unless they have taken measures to protect Data Subjects’ legitimate interests in accordance with applicable laws and regulations.

8 SECURITY AND CONFIDENTIALITY

UCB BCRs Entities will establish and maintain security policies providing for appropriate administrative, technical, and physical measures to safeguard and appropriately protect Personal Data from unauthorized use, disclosure, destruction, and alteration, in particular where the Processing involves the transmission of data over a network. These security measures shall

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be updated regularly to take into account the state of the art and will be commensurate with the risks associated with the types of Processing, the nature of the Personal Data involved, and related implementation cost. Considering their peculiar nature, Special Categories of Personal Data might require additional protective measures.

Employees are instructed to report to the DPO via a specific mailbox any Personal Data Breach of which they become aware. Where necessary, the DPO will report Personal Data Breaches to the Competent Supervisory Authority without undue delay. In cases where such Personal Data Breach is likely to result in a high risk to the rights and freedoms of Data Subjects, they shall be notified.

Furthermore, the Local Privacy Officers are responsible for documenting any Personal Data Breaches. Such documentation shall include the facts relating to the Personal Data Breach, its effects and the remedial action taken and shall be made available to the Competent Supervisory Authorities on request.


9 RELATIONSHIPS WITH PROCESSORS THAT ARE UCB BCRS ENTITIES

If one UCB BCRs Entity Processes Personal Data on behalf of another UCB BCRs Entity, the UCB BCRs Entity carrying out the Processing commits to act only in accordance with the instructions of the UCB BCRs Entity on whose behalf the Processing is being conducted. The UCB BCRs Entity(ies) acting as controller(s) and the UCB BCRs Entity(ies) acting as processor(s) will enter into a written agreement in compliance with Article 28 of the GDPR.

Furthermore, the UCB BCRs Entity carrying out the Processing on behalf of another UCB BCRs Entity must have in place technical and organizational security measures to safeguard the Personal Data that are state of the art and that are appropriate having regard to the risks associated with the types of Processing, the nature of the Personal Data involved and related implementation cost.

10 RESTRICTIONS ON TRANSFERS AND ONWARD TRANSFERS TO EXTERNAL PROCESSORS AND CONTROLLERS THAT ARE NOT UCB BCRS ENTITIES

- If a UCB BCRs Entity uses an external Processor to Process Personal Data on UCB's behalf, the UCB BCRs Entity will conclude a written agreement with such Processor incorporating the contractual obligations required pursuant to Article 28 of the GDPR . In particular, such agreement will provide that the Processor commits to (i) only act on the instructions of the UCB BCRs Entity (ii) have in place technical and organisational security measures to safeguard the Personal Data disclosed by the UCB BCRs Entity that are state of the art and that are appropriate having regard to the risks associated with the types of Processing, the nature of the Personal Data involved and related implementation cost; and (iii) the other obligations as set out in Article 28 of the GDPR.
- In addition of the above rules specific to external Processors, UCB BCRs Entities will only Transfer Personal Data to external Processors or Controllers that are located outside of the EEA, after ensuring an adequate level of protection for the Personal Data to be Transferred, in accordance with Articles 45, 46, 47 and 48 of the GDPR, or that a derogation according to Article 49 of the GDPR applies.

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11 INTERNAL INFORMATION AND TRAINING

In order to ensure that all employees of UCB BCRs Entities are adequately informed, UCB (globally and locally) will take all suitable steps to make these BCRs as well as related data protection procedures available to the employees.

Furthermore, all employees of UCB BCRs Entities or third parties, who have regular access to Personal Data or are involved in data collection or development of IT tools, will be provided, by UCB, globally or locally, with appropriate awareness and training materials on these BCRs and data protection rules in general.

12 AUDIT

The Global Internal Audit Department of UCB shall evaluate and report to the Audit Committee and the Board of Directors, in coordination with the DPO, on applicable aspects of UCB's compliance with the BCRs on a periodic basis or whenever specifically requested by the DPO and as approved by the Audit Committee. Audits of compliance with the BCRs may be undertaken by external auditors, if UCB so decides.

The results of the audit will be reported by Global Internal Audit to the DPO and UCB S.A.'s Board of Directors through the Audit Committee, which will evaluate that procedures are in place to ensure that corrective action takes place as soon as reasonably practicable.


Where any non-compliance with the BCRs is identified during the audits, the auditors will work with the relevant employees to assist them in developing their actions to design and implement remediation measures. The audit team will periodically monitor the progress of the remediation plans.

If requested by a Competent Supervisory Authority, the Global Internal Audit Department will also provide a copy of the results of the audit to such Competent Supervisory Authority, subject to applicable laws and respect for any confidential, privileged or commercially sensitive information provided. Furthermore, a Competent Supervisory Authority shall be given a power to carry out an audit of any of UCB BCRs Entities.

13 COMPLIANCE AND SUPERVISION OF COMPLIANCE

UCB has appointed a DPO responsible for overseeing all privacy and data protection issues, including ensuring compliance with all aspects of these BCRs. The DPO reports to the VP & Chief Compliance Officer, who in turn reports to the Executive VP Global Legal Affairs.

The DPO is supported in the countries by the team of Local Privacy Officers, and among UCB departments by the team of Functional Privacy Officers. The Local Privacy Officers and the Functional Privacy Officers proactively address data privacy matters and ensure "Privacy by Design" compliance on an ongoing basis, respectively, in their Country or Function, ensuring compliance with the BCRs on a day-to-day basis both at a local and departmental level. Any other staff support may be called for from time to time and at the discretion of the DPO.

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14 ACTIONS IN CASE OF NATIONAL LEGISLATION PREVENTING RESPECT OF BCRS

If a UCB BCRs Entity discovers that the legislation applicable to it prevents it from fulfilling its obligations under the BCRs or has substantial effect on the guarantees provided by these rules, such UCB BCRs Entity must immediately contact the Local Privacy Officer of its country and the DPO, except where such notification is prohibited by a law enforcement authority e.g. under criminal law to preserve the confidentiality of a law enforcement investigation. The Local Privacy Officer in cooperation with the DPO will then decide what action(s) (if any) to take.

If a UCB BCRs Entity is subject to any legal requirement in a third country (including any legally binding request for disclosure of personal data by a law enforcement authority or state security body) which is likely to have a substantial adverse effect on the guarantees provided by the BCRs, the Local Privacy Officer in cooperation with the DPO shall notify the Competent Supervisory Authorities, except where such notification is prohibited e.g. under criminal law to preserve the confidentiality of a law enforcement investigation.

If cases where notification to the Competent Supervisory Authorities is prohibited, the relevant UCB BCRs Entity shall use its best efforts to obtain the right to waive such prohibition in order to communicate as much information as it can and as soon as possible, and be able to demonstrate that it did so.

If in the above cases such UCB BCRs Entity is not in a position to notify the Competent Supervisory Authorities, it shall provide general information on the requests received to the Competent Supervisory Authorities (e.g. number of applications for disclosure, type of data requested, requester if possible, etc.) on annual basis.


As a general rule, UCB BCRs Entities shall ensure that any Personal Data Transfer(s) to any public authority is not massive, disproportionate and indiscriminate in a manner that would go beyond what is necessary in a democratic society.

15 INTERNAL COMPLAINTS/REQUESTS HANDLING PROCEDURE

▪ UCB complaints handling procedure:

Any Data Subject who believes his/her Personal Data in Appendix 2 may have been Processed in violation of these BCRs by any UCB BCRs Entity or any Data Subject wishing to exercise their rights as set out under Section 5 (Transparency, Information and other Data Subject Rights) of these BCR's, may submit his/her questions/request or complaint by mail or by email to the Local Privacy Officer of UCB in the country where the Data Subject is located. When requested by the Data Subject, the information may also be provided orally by contacting [the Local Privacy Officer of UCB in the country where the Data Subject is located], provided that the identity of the Data Subject is proven by other means.

Any employee of UCB BCRs Entities who believes that his/her Personal Data may have been improperly Processed can either contact the local Human Resources Department or the Local Privacy Officer by mail or by email. When requested by the Data Subject, the information may also be provided orally by contacting the Local Privacy Officer or the local Human Resources Department, provided that the identity of the Data Subject is proven by other means.

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The complaint must identify the UCB BCRs Entity concerned and describe the alleged breach in as much detail as possible and must be accompanied by all relevant documents and evidence.

Except in the case of exceptional circumstances, the Local Privacy Officer or the local Human Resources Department (concerning UCB employees' Personal Data), will send acknowledgment of receipt of a request or complaint to the individual who submitted the request, respectively the complaint within five (5) working days.

The recipient of the complaint may at his/her discretion forward the request or complaint to the DPO/UCB Legal Department, for review, where appropriate.

The Local Privacy Officer or, if relevant, the local Human Resources Department concerning UCB employees' Personal Data, will investigate and liaise with colleagues from relevant departments as necessary to deal with the request or complaint. The Local Privacy Officer or local Human Resources Department shall provide a substantive response to the individual who made the request or complaint without undue delay, but no later than one (1) month upon receiving the request or complaint. Such decision is motivated and communicated by mail to the Data Subject (or by email if the Data Subject complained by email, unless the Data Subject has requested that the UCB BCRs Entity answers by mail).

If, due to the complexity and number of the requests, the Local Privacy Officer or local Human Resources Department cannot provide a substantive response within one (1) month, it will notify the individual who made the request or the complaint of an extension within one month of receipt of the request, together with the reasons for the delay and provide a reasonable estimate of the timeframe (not exceeding two (2) further months) within which a response will be provided.


If the individual who made the request or the complaint disputes the response from the Local Privacy Officer or local Human Resources Department, he/she may appeal by notifying the DPO. The DPO shall review the original request or complaint and appeal request, and either accept the original finding or substitute a new finding. The DPO will respond to the individual as soon as reasonably practicable, (but, in any event, within three (3) months after the filing of the request or complaint).

If the request or complaint is justified, the Local Privacy Officer, the local Human Resources Department or the DPO will ensure all necessary steps are taken as a result, including for instance giving access to the Data Subject to his/her Personal Data and/or ensuring that the Personal Data is deleted or no longer processed. In addition, appropriate sanctions can be applied to employees, in accordance with local rules.

If the request of the Data Subject may/cannot be satisfied, the Local Privacy Officer, local Human Resources Department or the DPO will justify such refusal and give the underlying reasons in his/her response as well as inform the Data Subject on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

▪ **Additional reporting obligations for employees of UCB BCRs Entities:**

Any employee of UCB who has reasons to believe these BCRs have been violated shall contact his/her immediate manager, Compliance, Human Resources, or the Legal Department.

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Violations or suspected violations of these BCRs may also be reported using UCB's compliance reporting systems, e.g. the UCB Integrity Line.

▪ **Additional rights to lodge a claim before a court or a Competent Supervisory Authority:**

Irrespective of UCB's internal complaints handling procedure, the Data Subjects shall at all times be entitled to seek advice and submit a complaint to the Competent Supervisory Authority and/or to make a claim in a competent court of the Member States as per Section 16 of these BCRs.

16 THIRD PARTY BENEFICIARY RIGHTS

Data Subjects whose Personal Data is (i) subject to the GDPR or the Swiss Federal Act on Data Protection (as amended or replaced from time to time) and (ii) Transferred to UCB BCRs Entities outside of the EEA under these BCRs shall have the right to enforce the rules provided in Sections 4, 5, 6, 7, 8, 9, 10, 14, 15, 16, 17 and 18 of these BCRs as third party beneficiaries of the BCRs for Personal Data detailed in Appendix 2 and bring the issue before the authorities/courts as specified below to seek judicial remedy arising from a breach of the rights guaranteed, including the payment of compensation.

The Data Subjects residing within the EEA or in Switzerland and whose Personal Data has been Transferred to UCB BCRs Entities located outside of the EEA or Switzerland will have the right to take their case, at their option:

- (i) to the Competent Supervisory Authority in the EEA Member State (/ Switzerland) of the Data Subject's habitual residence, place of work or place of the alleged infringement or
- (ii) to the competent courts of EEA Member State (/ Switzerland) where the Controller or Processor has an establishment or where the Data Subject has his / her habitual residence.

The Data Subjects benefiting from the third party beneficiary rights will be informed by UCB of such rights and the means to exercise them. In addition to this information, the third party beneficiaries will receive information listed in Sections 4,5 and 17 of these BCRs.


17 EEA LIABILITY

UCB BCRs Entity within the EEA

Each UCB BCRs Entity within the EEA shall bear the sole responsibility for any violation of Sections 4, 5, 6, 7, 8, 9, 10, 14, 15, 16, 17 and 18 of these BCRs within the EEA which fall under its responsibility vis-à-vis the Data Subjects, to the extent provided under the GDPR.

Each UCB BCRs Entity may however demonstrate that it is not liable for the violation resulting in the damage claimed by the Data Subject, in which case such UCB BCRs Entity may discharge itself from any liability.

UCB BCRs Entity outside the EEA

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For Personal Data originating from the EEA (i.e. Personal Data that have been initially collected and, for the first time processed in the EEA) and Transferred outside the EEA, UCB S.A. will be liable and accept to remedy the acts of any UCB BCRs Entity located outside of the EEA and to pay compensation for any harm an EEA resident Data Subject may suffer due to a breach of these BCRs caused by such non-EEA UCB BCRs Entity to the extent ordered by courts and/or Competent Supervisory Authorities.

In case EEA resident Data Subjects can demonstrate that they have suffered damages and establish facts that show that it is likely that the damages have occurred because of a breach of the BCRs, it shall be for UCB S.A. to prove that it or the relevant non-EEA UCB BCRs Entity was not responsible for the breach of the BCRs giving rise to those damages or that no such breach took place.

18 COOPERATION WITH SUPERVISORY AUTHORITIES

The UCB BCRs Entities shall agree to cooperate with the Competent Supervisory Authorities regarding matters related to these BCRs, to the extent such recommendations and advice do not conflict with applicable law.

The UCB BCRs Entities also undertake to respond within a reasonable timeframe to requests the Competent Supervisory Authorities may make regarding these BCRs, including audit requests, to the extent such requests are consistent with applicable law.

19 UPDATES OF THESE BCRs


The DPO undertakes to inform the Lead Supervisory Authority and UCB BCRs Entities of any modifications to these BCRs. UCB will also ensure that the Data Subjects are kept informed about the changes to these BCRs. Where a modification would possibly affect the level of the protection offered by the BCRs or significantly affect the BCRs, it shall be promptly communicated to the Lead Supervisory Authority.

The DPO is responsible for updating the BCRs as well as the list of UCB BCRs Entities. The DPO shall keep track of and record any changes to the BCRs, including the list of the UCB BCRs Entities and their contact details. The DPO shall make such changes available to the Competent Data Protection Authorities and the Data Subjects upon request and shall report those changes to the Lead Supervisory Authority once a year, with a brief explanation of the reasons justifying the updates.

No Transfer of Personal Data as specified in Appendix 2 to a UCB BCRs Entity, that is not listed in Appendix 1 and bound by the BCRs, can take place until this UCB BCRs Entity is effectively bound by the BCRs and can deliver compliance with the BCRs.

20 EFFECTIVE DATE AND TERM OF THE BCRs


The BCRs shall become effective for all the UCB BCRs Entities upon the execution of an intra-group agreement by the UCB BCRs Entities (it being understood that for those countries where the applicable law requires the approval by the Competent Data Protection Authority and/or the completion of certain formalities before the BCRs can become effective, the BCRs will only become effective in such countries upon receipt of the relevant approval and/or completion of

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the relevant formalities). This agreement may be executed in one or more counterparts, each of which shall be deemed an original but all of which taken together shall constitute one and the same instrument.

The BCRs shall remain in force for an indefinite period of time.

In the event of termination of the above-mentioned intra-group agreement by any of the UCB BCRs Entities, the BCRs shall cease to be binding and enforceable upon such UCB BCRs Entity for all Personal Data Processed or Transferred after the date of termination. The obligations derived from the BCRs for Personal Data Processed and/or Transferred up until termination shall remain, until these Personal Data have been erased or as long as and to the extent required by applicable laws and regulations. In the event of such change, the DPO will take any required steps to update the BCRs, in accordance with the provisions of Section 19 forewith.

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Appendix 1 – UCB BCRs Entities

AUSTRALIA

UCB Australia Pty. Ltd. – Level 1, 1155 Malvern Road – 3144 Malvern, Victoria

AUSTRIA

UCB Pharma Gesellschaft m.b.H. – Twin Tower, Wienerbergstrasse 11/12a, 1110 Wien

BELGIUM

UCB Fipar SA – Allée de la Recherche, 60 – 1070 Brussels (BE0403.198.811)

UCB Biopharma SPRL – Allée de la Recherche, 60 – 1070 Brussels (BE0543.573.053)

UCB Belgium SA – Allée de la Recherche, 60 – 1070 Brussels (BE0402.040.254)

UCB Pharma SA – Allée de la Recherche, 60 – 1070 Brussels (BE0403.096.168)

Sifar SA – Allée de la Recherche, 60 – 1070 Brussels (BE0453.612.580)

UCB Ventures SA – Allée de la Recherche, 60 – 1070 Brussels (BE0667 816 096)

UCB Ventures Belgium SA – Allée de la Recherche, 60 – 1070 Brussels (BE0668 388 891)

BRAZIL

UCB Biopharma Ltda – Av. Brigadeiro Faria Limal Itaim Bibi – CEP: 04538-132 Sao Paulo

BULGARIA

UCB Bulgaria EOOD – 15, Ljubata Str., Fl. 4 apt. 10-11, Lozenetz, Sofia 1407

CANADA

UCB Canada Inc. – 2060 Winston Park Drive, Suite 401 – ON L6H5R7 Oakville

CHINA

UCB Trading (Shanghai) Co Ltd – Suite 317, 439 No.1 Fu Te Road West, Shanghai (Pilot Free Trade Zone)

UCB Pharma (Hong Kong) Ltd – Unit 3713-18,37F, Tower 1, Millenium City 5, 388 Kwun Tong Road, Kwun Tong, Kowloon, Hong Kong

UCB Pharma (Zhuhai) Company Ltd – Section A., Workshop, No.3 Science & Technology 05th Road, Innovation Coast, National Hi-Tech Industrial Development Zone – Zhuhai Guangdong Province

CZECH REPUBLIC

UCB S.R.O. – Thámova 13 – 186 00 Praha 8

DENMARK


UCB Nordic AS – Edvard Thomsens Vej 14, 7 – 2300 Copenhagen

FINLAND

UCB Pharma Oy Finland – Bertel Jungin aukio 5 , 6.krs – 02600 Espoo

FRANCE

UCB Pharma SA – Défense Ouest 420, rue d’Estienne d’Orves – 92700 Colombes

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GERMANY

UCB Pharma GmbH – Alfred-Nobel-Strasse 10 – 40789 Monheim am Rhein

UCB GmbH – Alfred-Nobel-Strasse 10 – 40789 Monheim am Rhein

UCB BioSciences GmbH – Alfred-Nobel-Strasse 10 – 40789 Monheim am Rhein

UCB Innere Medizin GmbH & Co. KG – Alfred-Nobel-Strasse 10 – 40789 Monheim am Rhein

UCB Primary Care GmbH – Alfred-Nobel-Strasse 10 – 40789 Monheim am Rhein

GREECE

UCB A.E. – 63 Agiou Dimitriou Street – 17456 Alimos – Athens

HUNGARY

UCB Hungary Ltd – Obuda Gate Building Arpád Fejedelem útja 26-28 – 1023 Budapest

INDIA

UCB India Private Ltd – 504, Peninsula Corporate Park, Ganpatrao Kadam Marg, Lower Parel – 400 013 Mumbai

Uni-Mediflex Private Ltd – 504, Peninsula Corporate Park, Ganpatrao Kadam Marg, Lower Parel – 400 013 Mumbai

IRELAND

UCB (Pharma) Ireland Ltd – United Drug House Magna Drive, Magna Business Park, City West Road – Dublin 24

UCB Manufacturing Ireland Ltd – Shannon Industrial Estate – Shannon, County Clare

ITALY

UCB Pharma SpA – Via Varesina 162 – 20166 Milano

JAPAN

UCB Japan Co Ltd – Shinjuku Grand Tower, 8-17-1 Nishi-Shinjuku 160-0023 Shinjuku, Tokyo

MALAYSIA

UCB Trading (Malaysia) Sdn. Bhd. – Level 21, Suite 21.01, The Gardens South Tower, Mid Valley City, Lingkaran Syed Putra, 59200 Kuala Lumpur

MEXICO

UCB de Mexico SA de C.V. – Homero #440, 7fl Col. Chapultepec Morales – 11570 Mexico D.F.

Vedim SA de C.V. – Homero #440, 7fl Col. Chapultepec Morales – 11570 Mexico D.F.


NETHERLANDS

UCB Finance N.V. – Hoge Mosten 2 – 4822 NH Breda

UCB Pharma B.V. (Netherlands) – Hoge Mosten 2 – 4822 NH Breda

NORWAY

UCB Pharma A.S. – Grini Naeringspark 8b – 1361 Osteras, Baerum

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POLAND

Vedim Sp. z.o.o. – ul. Z. Herberta 8 – 00-380 Warszawa

UCB Pharma Sp. z.o.o. – ul. Z. Herberta 8 – 00-380 Warszawa

PORTUGAL

UCB Pharma (Produtos Farmaceuticos) Lda – Rua Victor Câmara, Edifício Q 60,
D. Maria I, Piso 1, Fracção D, Quinta da Fonte, 2770-229 Paço de Arcos

ROMANIA

UCB Pharma Romania S.R.L. – 40-44 Banu Antonache, 4th fl., district 1 – 011665
Bucharest

RUSSIA

UCB Pharma LLC – Shturvaluaya 5 bldg 1 – 125364 Moscow

UCB Pharma Logistics LLC – Perevedenovsky pereulok 13 bldg 21 – 105082 Moscow

SINGAPORE

UCB Trading (SG) Pte. Ltd. – 8 Marina Boulevard #05-02, Marina Bay
Financial Centre Tower 1, 18981 Singapore

SLOVAKIA

UCB s.r.o. (Slovakian Branch) Uprkova 4 – 811 04 Bratislava, Slovak Republic

SOUTH KOREA

UCB Korea Co Ltd. – 4th Fl., A+ Asset Tower, 369 Gangnam-daero, Seocho-gu, 06621
Seoul

SPAIN

Vedim Pharma SA – Plaza de Manuel Gómez Moreno, s/n, Edificio Bronce, 5th floor –
28020 Madrid

UCB Pharma SA – Plaza de Manuel Gómez Moreno, s/n, Edificio Bronce, 5th floor –
28020 Madrid

SWEDEN

UCB Pharma AB (Sweden) – Klarabergsgatan 29 – 111 21 Stockholm

SWITZERLAND

UCB Farchim SA (A.G. – Ltd.) – ZI de Planchy, Chemin de Croix Blanche 10 – 1630 Bulle


UCB Investissements SA – ZI de Planchy, Chemin de Croix Blanche 10 – 1630 Bulle

Doutors Réassurance SA – ZI de Planchy, Chemin de Croix Blanche 10 – 1630 Bulle

UCB-Pharma AG – ZI de Planchy, Chemin de Croix Blanche 10 – 1630 Bulle

Medeva Pharma Suisse SA – Chemin de Croix Blanche 10 – 1630 Bulle

UCB Medical Devices SA – ZI de Planchy, Chemin de Croix Blanche 10 – 1630 Bulle

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TAIWAN

UCB Pharmaceuticals (Taiwan) Ltd – 12F.-2, No.88, Dunhua N. Rd., Songshan Dist. – 10595 Taipei

THAILAND

UCB Trading (Thailand) Ltd – 98 Sathorn Square, 37/F, Room 3780, North Sathorn Road, Khwaeng Silom, Khet Bangrak – 10500 Bangkok

TURKEY

UCB Pharma A.S. – Palladium Tower, Barbaros Mah., Kardelen Sok. No.2, Kat.24/80 – 34746 Istanbul

U.K.


UCB Fipar Ltd, subs. of UCB Inc. – 208 Bath Road – SL1 3WE Slough, Berkshire
Fipar U.K. Ltd, subs of UCB Fipar Ltd. – 208 Bath Road – SL1 3WE Slough, Berkshire
UCB (Investments) Ltd – 208 Bath Road – SL1 3WE Slough, Berkshire
Celltech Group Ltd – 208 Bath Road – SL1 3WE Slough, Berkshire
Celltech R&D Ltd – 208 Bath Road – SL1 3WE Slough, Berkshire
Celltech Ltd – 208 Bath Road – SL1 3WE Slough, Berkshire
Darwin Discovery Ltd – 208 Bath Road – SL1 3WE Slough, Berkshire
UCB Pharma Ltd – 208 Bath Road – SL1 3WE Slough, Berkshire
Schwarz Pharma Ltd – 208 Bath Road – SL1 3WE Slough, Berkshire

UKRAINE

UCB Ukraine LLC – 19 Grygoriya Skovorody Str., Business – center ”Podol Plaza” – 04070 Kiev

U.S.

UCB Holdings Inc. – Corporation Trust Center, 1209 Orange Street – 19801 Wilmington, Delaware
UCB Inc. – Corporation Trust Center, 1209 Orange Street – 19801 Wilmington, Delaware
UCB Biosciences Inc. – Corporation Trust Center, 1209 Orange Street – 19801 Wilmington, Delaware
UCB Manufacturing Inc. – Corporation Trust Center, 1209 Orange Street – 19801 Wilmington, Delaware
Upstate Pharma LLC – C T Corporation System, 111 Eight Avenue, NY, 10011 New York
Beryllium LLC – 251 Little Falls Drive – 19808 Wilmington, Delaware
Beryllium Discovery Corp. – 3 Preston Court – 01730 Bedford, Massachusetts
The RNA Medicines Company Inc. – 2711 Centerville Road, Suite 400 – 19808 Wilmington, Delaware

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Appendix 2 – Personal Data and Purposes of Processing/Transfers covered by the BCRs

1. Categories of Personal Data Processed/Transferred between UCB BCRs Entities

Depending on the location of the Data Subjects, the nature of their interactions with UCB BCRs Entities, and the requirements of applicable laws and regulations (in particular, data protection requirements relating to the Processing of Special Categories of Personal Data), the types of Personal Data that may be Processed by UCB BCRs Entities and Transferred between them, may include, when relevant, among other things:

- **UCB employees related data:** contact details (e.g., name, home and business addresses/telephone numbers/e-mail addresses, business fax number, emergency contact information), personal characteristics (e.g., gender, date of birth, birth place, marital status, family composition, nationality), national identification numbers (e.g., social security number), educational background, employment history, areas of expertise, professional details (e.g., job title, position, work location), employee performance, salary, bonus, compensation and benefits, payment-related information (e.g., bank account number), internal employee identification number, training records, pictures, audio/visual recordings, individual profile (including, e.g., business and personal related interests)
- **Patients and caregivers related data:** contact details (e.g., name, initials, postal and email addresses, telephone number), personal characteristics (e.g., gender, date of birth/age), health-related data (e.g., weight, height, medical history, pregnancy status), individual patient identification number, ethnic origin, lifestyle, personal experience, payment-related information (including bank account number), pictures, audio/visual recordings, patients' relatives/family members related information
- **Healthcare professionals related data:** contact details (e.g., name, postal address, email address, telephone and fax numbers), internal and external identification numbers, payment-related information (including bank account number), professionals details (including job title and activities), education and qualifications, interactions with UCB BCRs Entities (e.g., field-based events, sponsored events, clinical studies), outlook on therapeutic concepts and approach to the products and/or therapeutic areas of UCB BCRs Entities, lifestyle (e.g., personal communication preferences)
- **External workers and vendors' related data:** contact details (e.g., name, addresses, telephone and fax numbers, email addresses), payment-related information (including bank account details)

The types of Personal Data indicated above may be amended by the DPO as needed.

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2. Purposes for Processing and intra-group Transfers

The BCRs apply to any Personal Data that may be Processed by UCB BCRs Entities and Transferred between them as part of the global activities of the UCB group and to the extent permitted by applicable laws, for legitimate business purposes that include primarily the following purposes and any other purposes as required or expressly authorized by law:

(i) Employment related activities: UCB BCRs Entities may Process/Transfer UCB employees' Personal Data for employment purposes including, recruitment; payroll and administration management; implementation of employment-related actions and obligations (including required government reporting); managing compensation, benefits and, long-term incentives; training, development and education; objectives setting and management by objectives process; international assignment and mobility; health and safety related data processing; monitoring and evaluating employees' conducts and performances; managing talent & organizational review; monitoring and managing UCB's collaborative web tools, mailboxes, and instant messaging solution, as well as other UCB information systems and all forms of electronic and digital media and services for employees' use; monitoring and managing employees' professional travels and business expenses; complying with reporting obligations required by law and similar activities.


In addition to the above employment purposes, some Personal Data (such as contact details) of UCB employees, external workers and employees of external vendors may also be Processed and Transferred by UCB BCRs Entities for intra-group communication related purposes, for instance via intranet directories.

Furthermore, some Personal Data of UCB BCRs Entities' employees may also be Processed and Transferred by UCB BCRs Entities to support operational processes, for managing user's access rights to UCB IT resources (data, services and applications) and to allow collaboration between teams and individuals. The same applies to external workers and employees of external vendors.

(ii) Research and development activities: UCB BCRs Entities may Process/Transfer to other UCB BCRs Entities Personal Data from patients and healthcare professionals (e.g., investigators) who participate in research activities initiated by UCB BCRs Entities, including clinical trials, epidemiological studies and similar medical research activities.

(iii) Pharmacovigilance and product quality activities: UCB BCRs Entities may Process/Transfer to other UCB BCRs Entities Personal Data from patients and healthcare professionals in connection with drug safety and pharmacovigilance activities, in particular when handling adverse events as well as other types of product complaints, in order for UCB BCRs Entities to comply with relevant legal requirements.

(iv) Activities with patients/caregivers other than (ii) and (iii): UCB BCRs Entities may Process/Transfer to other UCB BCRs Entities Personal Data from patients/caregivers having interactions with UCB, including patients who may be involved in patients assistance support programs, prescription discounts, reimbursement support programs, patient insight related activities.

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(v) Handling of medical questions: UCB BCRs Entities may Process/Transfer to other UCB BCRs Entities Personal Data relating to persons contacting them with medical questions, including healthcare professionals, patients and caregivers.

(vi) Commercial related activities (including sales, marketing, market research/access): UCB BCRs Entities may Process/Transfer Personal Data to other UCB BCRs Entities for customer relationship management related purposes, market research, market access and any other sales and marketing activities completed in the normal course and scope of business activities of UCB BCRs Entities.


(vii) External workers and vendors related activities: UCB BCRs Entities may Process/Transfer to other UCB BCRs Entities Personal Data relating to external workers and employees of external vendors in connection with the execution of the contracts signed with these external workers and vendors.

(viii) Compliance, internal investigations and auditing: UCB BCRs Entities may Process/Transfer Personal Data to other UCB BCRs Entities for compliance, internal investigation and audit purposes. Such type of Processing may be required in certain countries for example, for transparency purposes of relationships between UCB BCRs Entities and healthcare professionals to comply with public disclosure requirements.

(ix) Legal proceedings and government investigations: UCB BCRs Entities may Process and Transfer Personal Data to other UCB BCRs Entities in connection with legal proceedings and investigations by regulatory bodies.

3. Description of intra-group Transfers between UCB BCRs Entities

To effectively conduct their global activities, the Processing of Personal Data by UCB BCRs Entities, in connection with purposes identified in the BCRs, may involve international transfers of Personal Data from their employees or any other types of Data Subjects mentioned above, from any UCB BCRs Entity to any other UCB BCRs Entity, including, to a large extent but not only, from EEA countries and, in particular, Belgium, where the UCB group has several central servers located.

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Document Approvals
Approved Date: 17 Aug 2018

Approval Task Verdict: Approve	Name: Jean-Marie Schollaert Role: Owner Approval Date of signature: 13-Aug-2018 11:39:53 GMT+0000
Approval Task Verdict: Approve	Name: Peter Moeller Role: Management Approval Date of signature: 14-Aug-2018 12:15:12 GMT+0000
Approval Task Verdict: Approve	Name: Christophe Cabrera Role: Subject Matter Expert Approval Date of signature: 14-Aug-2018 14:46:01 GMT+0000
Approval Task Verdict: Approve	Name: Jean-Marie Schollaert Role: Subject Matter Expert Approval Date of signature: 16-Aug-2018 10:06:36 GMT+0000
Final Approval (QA, QP, Legal) Task Verdict: Approve	Name: Ann-Sophie De Graeve Role: Legal Approval Date of signature: 17-Aug-2018 11:21:06 GMT+0000

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