



PFIZER, INC.
EU/EEA/UK Compliance Helpline
Guidance & Privacy Notice by Country

The Compliance Helpline Guidance & Privacy Notice explains your privacy rights when you voluntarily contact the Pfizer Helpline, what personal information we may gather from you, and how this information may be used or shared. Pfizer reserves the right to modify, revise or alter country-specific privacy statements subject to changes in local laws or regulations.

Country	Language	Country	Language	Country	Language
Austria	English	Germany	English	Poland	English
	German		German		Polish
Belgium	English	Greece	English	Portugal	English
	Dutch		Greek		Portuguese
	French	Hungary	English	Romania	English
Bulgaria	English		Hungarian		Romanian
	Bulgarian	Iceland	English	Slovakia	English
Croatia	English	Ireland	English		Slovak
	Croatian	Italy	English	Slovenia	English
Cyprus	English		Italian		Slovene
	Greek	Latvia	English	Spain	English
Czech Republic	English		Latvian		Spanish
	Czech	Lithuania	English	Sweden	English
Denmark	English		Lithuanian		Swedish
	Estonia	English	Luxembourg	English	Switzerland
Estonian		French		French	
Finland	English	Malta	English	German	
	Finnish	Netherlands	English	UK	English
France	English		Dutch		
	French	Norway	English		

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Language: English
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PFIZER, INC.

EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](#)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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PFIZER, INC.

COMPLIANCE-HELPLINE FÜR EU/EWR/VEREINIGTES KÖNIGREICH ANLEITUNG UND DATENSCHUTZHINWEIS

Die Pfizer Compliance-Helpline (die Helpline) wird von Pfizer, Inc. („Pfizer“, „**wir**“ oder „**uns**“) als ein für Ihre personenbezogenen Daten verantwortliches Unternehmen zur Verfügung gestellt. Die Website und die Telefonnummer, über die Sie einen Vorfall melden können, wird derzeit von der NAVEX Global UK Limited, einer Tochtergesellschaft der NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Vereinigtes Königreich (NAVEX), betrieben, Pfizers unabhängigem Dienstleistungsanbieter der Helpline.

Allgemein

Der Verantwortliche der Helpline ist: Pfizer, Inc., 66 Hudson Boulevard East, New York, NY 10001 USA.

Sie können den Datenschutzbeauftragten von Pfizer unter den oben genannten Kontaktdaten, unter privacy.officer@pfizer.com oder unter DPO.Pfizer.com erreichen.

Grundsätzlich kann die Helpline für die Meldung von Bedenken im Zusammenhang mit der finanziellen und geschäftlichen Integrität genutzt werden, z. B. in Bezug auf Buchhaltung, interne Rechnungsprüfung, Unternehmensrevision, Bestechung und Korruption sowie Banken- und Finanzkriminalität sowie Verstöße gegen EU-Recht, einschließlich: Vergabe öffentlicher Aufträge, Finanzdienstleistungen, Produkte und Märkte, Verhinderung von Geldwäsche und Terrorismusfinanzierung, Produktsicherheit, Verkehrssicherheit, öffentliche Gesundheit, Umweltschutz, Verbraucherschutz, Verstöße, welche die finanziellen Interessen der EU betreffen oder sich auf den Binnenmarkt beziehen (z. B. Wettbewerb und staatliche Beihilfen), Strahlenschutz und nukleare Sicherheit, Lebensmittelsicherheit, Tiergesundheit und Tierschutz sowie Schutz der Privatsphäre, Datenschutz und Datensicherheit. Zusätzlich zu den oben genannten Punkten können Sie in einigen Ländern weitere Angelegenheiten melden. Weitere Informationen finden Sie in unserem Web-Reporting-Tool unter pfizer.ethicspoint.com.

Die Nutzung der Helpline erfolgt freiwillig¹. Sie werden gebeten, sich gegenüber der Helpline zu identifizieren, wenn Sie eine Meldung machen; je nach Gesetzeslage des jeweiligen Landes sind Sie dazu eventuell nicht verpflichtet.

Zweck der Verarbeitung von personenbezogenen Daten

Der Zweck der Verarbeitung personenbezogener Daten im Zusammenhang mit der Helpline besteht darin, die Einhaltung der geltenden internationalen und lokalen Gesetze und internen Richtlinien zu gewährleisten. Mangelnde Compliance kann, je nach anwendbarem Recht, hohe Geldstrafen, Gefängnisstrafen, Haftungsfälle und andere Verwarnungen zur Folge haben.

Wir erheben und verarbeiten Ihre personenbezogenen Daten, die Sie uns über die Helpline zur Verfügung stellen, zu folgenden Zwecken:

- Prüfung der Plausibilität Ihrer Meldung und der darin enthaltenen Daten, um Rechtsverstöße zu vermeiden,

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- Untersuchung angeblicher Verstöße gegen Gesetze und Richtlinien, insbesondere gegen die oben genannten,
- Sicherstellung der Einhaltung aller anwendbaren Gesetze,
- Zusammenarbeit mit den Tochtergesellschaften von Pfizer im Hinblick auf ihre Verpflichtung zur Untersuchung von Verstößen,
- Verteidigung gegen Ansprüche Dritter sowie Vorbereitung von Ansprüchen gegen Dritte,
- Weiterentwicklung unserer Helpline und ihrer Prozesse.

Erhebung und Verarbeitung von Informationen und personenbezogenen Daten

Pfizer kann über die Helpline folgende Daten erheben und verarbeiten: Ihren Namen, Ihren Titel, Ihre Position und Ihre Kontaktdaten (es sei denn, die Meldung erfolgt anonym), Namen und andere Daten der von Ihnen in Ihrer Meldung genannten Personen, Namen und Position Ihrer Vorgesetzten, eine Beschreibung des von Ihnen in Ihrer Meldung angegebenen Verhaltens einschließlich Datum und Ort, sowie andere sachdienliche Informationen als auch alle Fragen, die Sie Pfizer unter Umständen stellen. Pfizer kann im Rahmen von Nachforschungen auch Informationen von Dritten einholen. Unter bestimmten Umständen können wir auch sensible Daten verarbeiten, wie z. B. Gesundheitsdaten oder die Mitgliedschaft in einer Gewerkschaft, wenn Sie uns diese zur Verfügung stellen und/oder wenn sie für den Zweck der Untersuchung relevant sind.

Die von Ihnen bereitgestellten Informationen werden in Übereinstimmung mit den geltenden Gesetzen vertraulich behandelt.

Pfizer kann die oben genannten Informationen verwenden, weil wir entweder einer gesetzlichen Verpflichtung nachkommen müssen (Artikel 6 Absatz 1 Buchstabe c der EU-Datenschutz-Grundverordnung [DSGVO]) oder weil wir ein berechtigtes Interesse an der Untersuchung der von Ihnen eingereichten Meldung haben (Artikel 6 Absatz 1 Buchstabe f DSGVO) oder weil Sie gemäß Ihres Arbeitsvertrags dazu verpflichtet sind, bestimmte Vorfälle zu melden (Artikel 6 Absatz 1 Buchstabe b DSGVO). Im Hinblick auf sensible Daten wie Gesundheitsdaten oder Informationen zur Gewerkschaftsmitgliedschaft (eine Liste sensibler Daten finden Sie in Artikel 9 Absatz 1 DSGVO) kann Pfizer diese Informationen zur Geltendmachung, Ausübung oder Verteidigung von Rechtsansprüchen (Artikel 9 Absatz 2 Buchstabe f DSGVO) verwenden, wenn dies aus Gründen eines wichtigen öffentlichen Interesses erforderlich ist, wenn die Verwendung auf Grundlage des Unionsrechts basiert oder des Rechts eines Mitgliedstaats beruht, das in angemessenem Verhältnis zu dem verfolgten Ziel steht (Artikel 9 Absatz 2 Buchstabe g DSGVO), oder wenn die Verarbeitung aus Gründen des öffentlichen Interesses im Bereich der öffentlichen Gesundheit erfolgt, wie zur Gewährleistung hoher Qualitäts- und Sicherheitsstandards bei der Gesundheitsversorgung, bei Arzneimitteln und Medizinprodukten, auf der Grundlage des Unionsrechts oder des Rechts eines Mitgliedstaats (Artikel 9 Absatz 2 Buchstabe i DSGVO).

Wir werden die betroffenen Personen in Bezug auf die Helpline keinen Entscheidungen unterwerfen, die ausschließlich auf einer automatisierten Verarbeitung, einschließlich Profiling, beruhen (Artikel 22 DSGVO).

Funktionsweise und Verfahren der Helpline

Ein Mitarbeiter von NAVEX nimmt Ihren Anruf bei der Helpline entgegen. NAVEX speichert keine Telefonnummern eintreffender Anrufe, sodass Ihre Anrufinformationen anonym bleiben. NAVEX zeichnet die Anrufe auch nicht auf. Der Mitarbeiter bittet Sie im Auftrag von Pfizer um eine Reihe von Informationen zu Ihrer Meldung, dokumentiert Ihre Informationen und stellt unter Umständen weitere Fragen zur Klärung. Bitte beachten Sie, dass der NAVEX-Mitarbeiter keine Fragen zu ethischen Belangen oder Richtlinien beantworten kann und Ihnen keine Ratschläge zu Handlungsempfehlungen geben kann. NAVEX darf nicht über Maßnahmen oder Untersuchungen im Zusammenhang mit Ihrer Meldung entscheiden. NAVEX befolgt die von Pfizer herausgegebenen Anweisungen.

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Wenn Sie sich für die Nutzung des Web-Reporting-Tools entscheiden, werden die gleichen Informationen elektronisch erfasst.

Nach der ersten Meldung oder der Anfrage wird ein detailliertes Protokoll erstellt und von NAVEX direkt an die Compliance-Abteilung von Pfizer gesendet. Je nach Art der Angelegenheit kann die Compliance-Abteilung die Meldung und die damit zusammenhängende Dokumentation unter Berücksichtigung ihrer Vertraulichkeitsverpflichtungen zur weiteren Untersuchung und Klärung an die zuständigen Mitarbeiter von Pfizer, die möglicherweise informiert werden müssen, weiterleiten, z. B. Vertreter der Rechtsabteilung, von People Experience (**PX**) oder der Audit-Abteilung. Es kann sein, dass wir im Laufe der Untersuchung weitere Informationen und Klarstellungen von Ihnen benötigen. In diesem Fall wenden wir uns direkt an Sie. Gegebenenfalls muss die Compliance-Abteilung zur Festlegung von Disziplinarmaßnahmen und aus Gründen der Transparenz auch die People Experience Vertreter oder Führungskräfte von Pfizer über festgestellte Verstöße informieren. Die Informationen können auch an externe Berater von Pfizer wie Rechtsanwälte oder Wirtschaftsprüfer weitergegeben werden, die zur strikten Vertraulichkeit verpflichtet sind. Wir werden Sie über den Fortgang der Untersuchung und die nach dem Ergebnis der Untersuchung getroffenen Maßnahmen informieren.

Im Rahmen der Untersuchung ist Pfizer bestrebt, jede Person, die in eine Meldung verwickelt ist, innerhalb eines angemessenen Zeitraums über die gegen sie erhobenen Vorwürfe zu informieren, wird sich jedoch bemühen, Ihre Identität nicht preiszugeben. Betroffene Personen haben das Recht, auf die von Ihnen gemeldeten Informationen zu reagieren. Bitte beachten Sie stets, dass die von Ihnen übermittelten Angaben zu Entscheidungen führen können, die Auswirkungen auf Personen bei Pfizer und auf involvierte Drittparteien haben. Dementsprechend bitten wir Sie, nur solche Informationen zu übermitteln, die nach Ihrem besten Wissen richtig sind. Die vorsätzliche Übermittlung von falschen oder irreführenden Informationen kann disziplinarische Maßnahmen sowie straf- und zivilrechtliche Schritte nach sich ziehen. Darüber hinaus sollten sich die Angaben auf solche Fakten beschränken, die für den jeweiligen Fall und die sich daraus ergebenden Untersuchungen relevant sind.

Benachteiligungen gegen Personen, die um Rat fragen, Bedenken äußern oder Fehlverhalten melden, oder gegen Vermittler, Einzelpersonen oder Einrichtungen, die mit meldenden Personen in Zusammenhang stehen, sind streng verboten. Wenn jemand Vergeltungsmaßnahmen gegen eine Person ergreift, die wahrheitsgemäß einen Verstoß gemeldet hat, wird Pfizer entsprechende Maßnahmen ergreifen – auch dann, wenn sich später herausstellt, dass die Person die Angelegenheit ursprünglich zu Unrecht gemeldet hat. Wenn Sie der Meinung sind, dass gegen Sie oder eine andere beteiligte Person Vergeltungsmaßnahmen ergriffen wurden, sollten Sie sich an die Compliance-Abteilung wenden (Kontaktinformationen siehe unten).

Verwendung, Aufbewahrung und Weitergabe von Informationen

Pfizer hat mit NAVEX, einem Datenverarbeiter, einen Vertrag geschlossen, der strengen Vertraulichkeitsverpflichtungen unterliegt, um die Vertraulichkeit und Sicherheit Ihrer personenbezogenen Daten zu schützen. NAVEX darf Ihre personenbezogenen Daten nur für die Bereitstellung der Helpline verwenden. Von NAVEX erhaltene Daten sowie von Ihnen übermittelte personenbezogene Daten werden in einer Pfizer-Datenbank mit Zugriffsbeschränkung gespeichert (und in der Datenbank unserer Lieferanten, wenn dies zur Unterstützung der Untersuchung notwendig ist).

Wir können Ihre personenbezogenen Daten, insofern zur Untersuchung der Meldung und zur Verwaltung der Helpline notwendig, anderen Tochtergesellschaften oder Anbietern von Pfizer zur Verfügung stellen, falls diese Ihre personenbezogenen Daten kennen müssen. Dabei können Ihre personenbezogenen Daten auch in Länder übermittelt werden, deren Datenschutzbestimmungen von den im Land Ihrer Tätigkeit geltenden Bestimmungen abweichen. Insbesondere können wir Ihre personenbezogenen Daten an die Compliance-Abteilung der Pfizer, Inc. übermitteln. Bitte beachten Sie, dass einige Länder, die nicht dem EWR angehören, einschließlich der USA, von der Europäischen Kommission nicht als Länder anerkannt werden, die ein angemessenes Schutzniveau gemäß den EWR-Standards bieten. Die Länder, die anerkanntermaßen ein angemessenes Schutzniveau bieten, finden Sie hier: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/eu-justice/european-data-protection-board/adequacy-decisions).

Wir haben angemessene Maßnahmen ergriffen, wie zum Beispiel von der Europäischen Kommission angenommene Standardvertragsklauseln, um die Übermittlung und den Schutz Ihrer personenbezogenen Daten in die Länder zu

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ermöglichen, die laut der Europäischen Kommission kein angemessenes Datenschutzniveau bieten. Wenn Sie eine Kopie dieser Maßnahmen erhalten möchten, wenden Sie sich bitte an den lokalen Datenschutzbeauftragten von Pfizer. Sie finden die Kontaktdaten unter DPO.Pfizer.com.

Darüber hinaus kann Pfizer verpflichtet sein, Ihre personenbezogenen Daten ganz oder teilweise an die Strafverfolgungsbehörden oder an andere Behörden der betreffenden Länder weiterzuleiten. Die mit Ihrer Meldung an die Helpline zusammenhängenden Informationen werden bei Bedarf für eine begrenzte Zeit nach folgenden Kriterien archiviert oder gelöscht: wenn die Untersuchung abgeschlossen ist und keine weiteren Maßnahmen ergriffen werden müssen, es sei denn, Pfizer ist gesetzlich dazu verpflichtet, die Daten für einen längeren Zeitraum aufzubewahren; wenn die Frist für relevante rechtliche Schritte abgelaufen ist, es sei denn, Pfizer ist gesetzlich dazu verpflichtet, die Daten für einen längeren Zeitraum aufzubewahren; und wenn die Aufbewahrungsfrist für Unterlagen im Zusammenhang mit Untersuchungen abgelaufen ist. Weitere Einzelheiten zur Datenaufbewahrung finden Sie in der Unternehmensrichtlinie zu diesem Thema. Wenn Sie Fragen haben, wenden Sie sich bitte an die Compliance-Abteilung.

Ihre Rechte

Vorbehaltlich der von der DSGVO und/oder anderen anwendbaren Gesetzen festgelegten Bestimmungen, haben Sie das Recht, auf Ihre personenbezogenen Daten zuzugreifen (Artikel 15 DSGVO), Ihre personenbezogenen Daten berichtigen zu lassen (Artikel 16 DSGVO), Ihre personenbezogenen Daten löschen zu lassen (Artikel 17 DSGVO), die Verarbeitung Ihrer personenbezogenen Daten einzuschränken (Artikel 18 DSGVO), das Recht auf Datenübertragbarkeit (Artikel 20 DSGVO) und das Recht, der Verarbeitung Ihrer personenbezogenen Daten unter bestimmten Umständen zu widersprechen (Artikel 21 DSGVO).

Wenn Sie eines Ihrer Rechte gemäß der DSGVO ausüben möchten, wenden Sie sich an den Datenschutzbeauftragten von Pfizer (siehe DPO.Pfizer.com). Wir werden Ihre Anfrage in Übereinstimmung mit dem geltenden Recht beantworten.

Sie sind darüber hinaus berechtigt, eine Beschwerde bei Ihrer zuständigen Datenschutzbehörde in Ihrem Land oder in Ihrer Region einzureichen.

Bei Fragen oder Bedenken zur Helpline selbst kontaktieren Sie uns bitte telefonisch unter +1 212 733 3026, per E-Mail unter corporate.compliance@pfizer.com oder auf dem Postweg unter der Adresse 66 Hudson Boulevard East, New York, NY 10001, USA.

¹In bestimmten EU-Ländern bietet Pfizer darüber hinaus lokale Berichterstattung an. Weitere Informationen zur lokalen Berichterstattung, einschließlich Datenschutzhinweise der lokalen Berichterstattung und darüber, was über den lokalen Berichtskanal gemeldet werden kann, finden Sie im lokalen Intranet von Pfizer oder bei der Compliance-Abteilung.

BELGIUM

Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

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The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

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Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/eu-justice/european-data-protection-board/adequacy-decisions/).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Language: Dutch
Last Updated: Dec 2022

PFIZER, INC.

EU/EEA/UK COMPLIANCE HELPLINE RICHTLIJNEN EN PRIVACYVERKLARING

De Pfizer Compliance Helpline (“de Helpline”) wordt verzorgd door Pfizer, Inc. (“Pfizer”, “**wij/we**” of “**ons/onze**”) in de hoedanigheid van de voor uw persoonsgegevens verantwoordelijke onderneming. De website en telefoonverbinding waarlangs u mogelijk melding doet van een incident worden momenteel aangeboden door NAVEX Global UK Limited, een deelneming van NAVEX Global gevestigd te Vantage London, 4th Floor, Great West Road, Brentford, TW8 9AG, Verenigd Koninkrijk (‘NAVEX’), de zelfstandige dienstverlener die namens Pfizer de Helpline verzorgt.

Algemeen

De gegevensverwerker van de Helpline is: Pfizer, Inc., gevestigd aan de Hudson Boulevard East 66, New York, NY 10001, Verenigde Staten.

U kunt contact opnemen met de functionaris voor gegevensbescherming van Pfizer aan de hand van de voornoemde contactgegevens of door een e-mail te sturen aan privacy.officer@pfizer.com of DPO.Pfizer.com.

De Helpline kan in het algemeen worden gebruikt voor het melden van werkgerelateerde zorgen op het gebied van financiële en zakelijke integriteit, zoals kwesties in verband met de boekhouding, interne boekhoudcontroles, auditing, omkoping en corruptie, bancaire en financiële criminaliteit en schendingen van de EU-wetgeving, waaronder op het gebied van openbare aanbestedingen, financiële diensten, producten en markten, de preventie van witwassen van geld en terrorismefinanciering, productveiligheid, transportveiligheid, volksgezondheid, milieubescherming, consumentenbescherming, schendingen die de financiële belangen van de EU schaden of verband houden met de interne markt (bijv. mededingings- en staatssteunregels), stralingsbescherming en nucleaire veiligheid, voedselveiligheid, de gezondheid en het welzijn van dieren en de bescherming van de persoonlijke levenssfeer, gegevensbescherming en gegevensbeveiliging. Daarnaast mag u in sommige landen ook van andere aangelegenheden melding doen. Ga naar pfizer.ethicspoint.com om onze online meldingstool te raadplegen voor meer informatie.

Het gebruik van de Helpline is vrijwillig¹. Medewerkers worden aangemoedigd zich te identificeren wanneer ze iets melden bij de Helpline; indien anoniem melden wettelijk is toegestaan, bent u niet verplicht om dat te doen.

Doel van de verwerking van persoonsgegevens

Het doel van de verwerking van persoonsgegevens in het kader van de activiteiten van de Helpline is om ervoor zorg te dragen dat de toepasselijke internationale en plaatselijke wetgeving en het interne beleid van Pfizer worden nageleefd. Als we geen zorg dragen voor dergelijke naleving, krijgen we mogelijk te maken met hoge boetes, gevangenisstraffen, aansprakelijkheden en andersoortige berispingen uit hoofde van de toepasselijke wetgeving.

We verzamelen en verwerken uw persoonsgegevens zoals deze aan ons via de Helpline worden verstrekt omwille van de volgende doelen:

- Het controleren van de plausibiliteit van uw melding en de daarin vervatte gegevens, teneinde schendingen van wetgeving te voorkomen,
- Het onderzoeken van vermeende inbreuken op wetgeving en beleidsmaatregelen, met name de bovengenoemde;
- Het zorg dragen voor de naleving van de toepasselijke wetgeving,

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- Het samenwerken met de aangesloten bedrijven van Pfizer in het kader van de verplichtingen waartoe zij gehouden zijn met betrekking tot het onderzoeken van inbreuken,
- Het verdedigen van vorderingen van derden en het voorbereiden van vorderingen tegen derden,
- Het ontwikkelen van onze Helpline en van onderzoeksprocessen.

Verzameling en verwerking van persoonlijke gegevens

Pfizer kan de volgende gegevens van u verzamelen en verwerken via de Helpline: uw naam, titel, positie en contactgegevens (tenzij de melding anoniem wordt gedaan); de naam en andere gegevens van personen die vermeld worden in uw melding; naam en positie van uw leidinggevenden; een beschrijving van het gedrag in kwestie in uw melding, waaronder de datum en locatie en andere relevante informatie; en eventuele vragen aan Pfizer die u mogelijk hebt. Pfizer kan ook informatie van anderen verzamelen tijdens verder onderzoek. Onder bepaalde omstandigheden verwerken wij mogelijk ook gevoelige gegevens, zoals gezondheidsgegevens of lidmaatschap van een vakbond, indien u deze aan ons verstrekt en/of indien deze relevant zijn met het oog op het doel van het onderzoek.

De door u opgegeven informatie zal vertrouwelijk worden behandeld, in overeenstemming met de toepasselijke wetgeving.

Pfizer mag de hierboven genoemde informatie gebruiken omdat wij ofwel aan een aan Pfizer opgelegde wettelijke verplichting moeten voldoen (artikel 6, lid 1, sub c) van de Algemene verordening gegevensbescherming van de EU ("AVG"), dan wel een legitiem belang hebben bij het onderzoeken van de melding die u bij ons heeft ingediend (artikel 6, lid 1, sub f) AVG), dan wel omdat u op grond van uw arbeidsovereenkomst verplicht bent bepaalde incidenten te melden (artikel 6, lid 1, sub b) AVG). Met betrekking tot gevoelige gegevens, zoals gezondheidsgegevens of lidmaatschap van een vakbond (raadpleeg voor een lijst van gevoelige gegevens artikel 9, lid 1 AVG), is Pfizer gerechtigd de informatie gebruiken voor de vaststelling, uitoefening of verdediging van rechtsvorderingen (artikel 9, lid 2, sub f) AVG) indien zulks noodzakelijk is om redenen van zwaarwegend algemeen belang, uit hoofde van wetgeving van de Unie of van een lidstaat die in verhouding staat tot het nagestreefde doel (artikel 9, lid 2, sub g) AVG), of indien zulks noodzakelijk is om redenen van algemeen belang op het gebied van volksgezondheid, zoals het waarborgen van hoge kwaliteits- en veiligheidsnormen voor gezondheidszorg en voor geneesmiddelen of medische hulpmiddelen, uit hoofde van wetgeving van de Unie of van een lidstaat (artikel 9, lid 2, sub i) AVG).

Wij onderwerpen de betrokkenen niet aan besluiten uitsluitend op basis van geautomatiseerde verwerking, met inbegrip van profilering, in verband met de Helpline (artikel 22 AVG).

Functioneren en processen van de Helpline

Een vertegenwoordiger van NAVEX zal uw oproep aan de Helpline beantwoorden. NAVEX zal de telefoonnummers van binnenkomende oproepen niet registreren zodat uw gegevens anoniem blijven. NAVEX neemt de oproepen evenmin op. De vertegenwoordiger mag u namens Pfizer om verschillende vormen van informatie verzoeken, uw antwoorden vastleggen en vervolgvragen stellen om informatie te verduidelijken. Houd er rekening mee dat de NAVEX-vertegenwoordiger geen ethische of beleidsvragen kan beantwoorden en u geen advies kan geven over het eventuele verloop van acties. NAVEX is niet gerechtigd om over eventuele maatregelen of onderzoeken naar aanleiding van uw melding te beslissen. NAVEX volgt de door Pfizer afgegeven instructies op. Als u uw melding online doet, dan zal dezelfde informatie elektronisch worden vastgelegd.

Nadat de aanvankelijke melding of vraag is gemaakt/ingediend, zal er een gedetailleerd rapport worden opgemaakt dat direct door NAVEX naar de Compliance Division van Pfizer zal worden doorgestuurd. Afhankelijk van de aard van de zaak, alsmede in overeenstemming met haar verplichtingen op het gebied van geheimhouding, stuurt de Compliance Division het rapport en gerelateerde documenten mogelijk door naar de passende personen binnen Pfizer die ervan op de hoogte moeten worden gebracht, zoals vertegenwoordigers van de afdelingen Legal, People Experience ("PX") of Audit, voor verder onderzoek en nadere beslechting. In de loop van het onderzoek hebben wij mogelijk aanvullende informatie en verduidelijkingen van u nodig; in dat geval nemen wij rechtstreeks contact met u op. Waar nodig zal de Compliance Division mogelijk ook leden van PX of leiders van Pfizer op de hoogte brengen van eventuele bevindingen van overtreding voor het bepalen van disciplinaire maatregelen en voor transparantiedoelinden. De informatie wordt mogelijk ook gedeeld met externe adviseurs van Pfizer, zoals

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advocaten of auditors die aan handhaving van strikte vertrouwelijkheid gehouden zijn. Wij stellen u op de hoogte van de voortgang van het onderzoek en de maatregelen die naar aanleiding van de uitkomsten ervan worden genomen.

In het kader van het onderzoek zal Pfizer elk individu dat genoemd wordt in een rapport binnen de gepaste termijn informeren over de beschuldigingen die tegen hen gemaakt zijn, maar tracht daarbij uw identiteit niet te onthullen. Betrokken personen hebben het recht om te reageren op de informatie die door u is gemeld. Houd er rekening mee dat de informatie die u verstrekt kan leiden tot besluiten die invloed hebben op medewerkers van Pfizer en andere derden die betrokken zijn bij het incident in kwestie. U wordt daarom verzocht om uitsluitend informatie te verstrekken die naar uw beste weten accuraat is. Welbewust onjuiste of misleidende informatie verstrekken, kan leiden tot disciplinaire maatregelen of zelfs burgerlijke of strafrechtelijke aansprakelijkheid. Daarnaast moet een rapport, waar mogelijk, beperkt worden tot de feiten die relevant zijn voor het rapport en het vervolgonderzoek.

Represailles/vormen van vergelding tegen personen die om advies vragen, een probleem aan de orde stellen of wangedrag melden, of tegen facilitators, personen of rechtspersonen die verbonden zijn met personen die een melding doen, zijn ten strengste verboden. Als iemand wraak neemt op een individu die eerlijk een schending heeft gemeld, zal Pfizer passende maatregelen nemen – zelfs indien later mocht blijken dat het individu het, bij het melden van de oorspronkelijke kwestie, niet bij het rechte eind had. Als u denkt dat er tegen u, of tegen iemand anders, represailles zijn genomen, moet u contact opnemen met de Compliance Division (contactgegevens hieronder).

Informatiegebruik, retentie en gegevensoverdracht

Pfizer werkt samen met NAVEX, een gegevensverwerker, onder strikte geheimhoudingsverplichtingen, om de vertrouwelijkheid en veiligheid van uw persoonsgegevens te beschermen en NAVEX mag uw persoonsgegevens alleen gebruiken voor het leveren van de Helpline. Informatie die wij van NAVEX ontvangen en alle persoonsgegevens die u ons verstrekt, worden opgeslagen in een database van Pfizer (en in de database van onze leveranciers, indien dat nodig is om ons te helpen bij het onderzoek) met toegangsbeperkingen.

Wij dragen uw persoonsgegevens mogelijk over aan aangesloten bedrijven indien deze daar kennis van moeten nemen in het kader van uw melding, inclusief in landen die andere regels voor gegevensbescherming hanteren dan in het land waarin u werkzaam bent, bijvoorbeeld aan andere aangesloten bedrijven of leveranciers van Pfizer, wanneer dit noodzakelijk is voor het onderzoeken van het rapport en het verzorgen van de Helpline. Wij geven uw persoonsgegevens met name mogelijk door aan de Compliance-afdeling van Pfizer, Inc. Let erop dat sommige niet-EER-landen, waaronder de Verenigde Staten, door de Europese Commissie niet worden erkend als landen die een volgens de EER-normen adequaat beschermingsniveau bieden. Landen waarvan wordt erkend dat deze een adequaat beschermingsniveau bieden, zijn hier te vinden: [Adequacy decisions \(europa.eu\)](https://eudatadrif.ec.europa.eu/adequacy-decisions).

Wij hebben passende maatregelen getroffen, zoals gebruikmaking van door de Europese Commissie goedgekeurde modelcontractbepalingen, om de overdracht en bescherming van uw persoonsgegevens naar landen mogelijk te maken waarvan niet door de Europese Commissie wordt erkend dat ze een adequaat niveau van gegevensbescherming bieden. U kunt een exemplaar van deze maatregelen verkrijgen door contact op te nemen met uw plaatselijke functionaris voor gegevensbescherming van Pfizer. De contactgegevens van deze functionaris zijn te vinden op [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer is mogelijk ook verplicht om bepaalde, of al uw, persoonsgegevens over te dragen aan wetshandhavinginstanties of autoriteiten of aan andere autoriteiten in de desbetreffende landen.

Informatie met betrekking tot een rapport dat is ingediend via de Helpline wordt gedurende een beperkte periode gearchiveerd, afhankelijk van wat noodzakelijk is, of verwijderd op basis van de volgende criteria: wanneer het onderzoek is afgesloten en er geen verdere actie is vereist, tenzij Pfizer wettelijk verplicht is de gegevens gedurende een langere periode te bewaren; wanneer de termijn voor enige relevante procesvoering is verlopen, tenzij Pfizer wettelijk verplicht is de gegevens gedurende een langere periode te bewaren; en wanneer onze verplichting tot het bewaren van dossiers met betrekking tot onderzoeken is verlopen. Raadpleeg het desbetreffende bedrijfsbeleid over dossierbewaring voor meer informatie. Als u vragen hebt, neem dan contact op met de Compliance Division.

Uw rechten

Behoudens de in de AVG en/of andere toepasselijke wetgeving vastgelegde voorwaarden hebt u het recht op toegang tot uw persoonsgegevens (artikel 15 AVG), het recht op rectificatie van uw persoonsgegevens (artikel 16 AVG), het recht om uw persoonsgegevens te laten wissen (artikel 17 AVG), het recht op beperking van de

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verwerking van uw persoonsgegevens (artikel 18 AVG), het recht op overdraagbaarheid van gegevens (artikel 20 AVG) en het recht om onder bepaalde omstandigheden bezwaar te maken tegen de verwerking van uw persoonsgegevens (artikel 21 AVG).

Als u een van uw rechten uit hoofde van de AVG wilt uitoefenen, kunt u contact opnemen met de functionaris voor gegevensbescherming van Pfizer (zie [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We zullen in overeenstemming met de toepasselijke wetgeving reageren op uw verzoek.

Ook hebt u te allen tijde het recht om een klacht in te dienen bij een gegevensbeschermingsautoriteit die in uw land of regio bevoegdheid heeft.

Als u vragen of zorgen hebt met betrekking tot de Helpline zelf, neem dan telefonisch contact met ons op via +1-212-733-3026, door te mailen naar corporate.compliance@pfizer.com of per post op het volgende adres: Hudson Boulevard East 66, New York, NY 10001, Verenigde Staten.

¹ In bepaalde EU-landen geeft Pfizer u ook de mogelijkheid om gebruik te maken van een lokaal meldingskanaal. Voor meer informatie over lokaal melding doen, inclusief de privacyverklaring van het lokale meldingskanaal en waar er via het lokale meldingskanaal melding van kan worden gedaan, raadpleeg het lokale Pfizer-intranet of neem contact op met de Compliance Division.

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Language: French
Last Updated: Dec 2022

PFIZER, INC.

EU/EEU/UK COMPLIANCE HELPLINE

GUIDE ET DECLARATION DE CONFIDENTIALITE

La Compliance Helpline de Pfizer, (la « Helpline ») est fournie par Pfizer, Inc. (« Pfizer », « nous » ou « notre ») en tant qu'entreprise responsable de vos données personnelles. Le site Web et la ligne téléphonique par le biais desquels vous pouvez signaler un incident sont exploités actuellement par NAVEX Global UK Limited, filiale de NAVEX Global Holding, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Royaume-Uni (« NAVEX »), prestataire indépendant de Pfizer qui fournit la Helpline.

Généralités

Le responsable du traitement des données de la Helpline est : Pfizer, Inc., 66 Hudson Boulevard East, New York, NY 10001 États-Unis.

Vous pouvez contacter le délégué à la protection des données de Pfizer à l'adresse ci-dessus, par e-mail à privacy.officer@pfizer.com ou sur DPO.Pfizer.com.

La Helpline peut généralement être utilisée pour signaler des préoccupations professionnelles concernant des problèmes d'intégrité financière et commerciale, tels que ceux liés à la comptabilité, aux contrôles comptables internes, aux audits, à la corruption, à la criminalité bancaire et financière et aux violations de la législation européenne, notamment en ce qui concerne les marchés publics, les services, produits et marchés financiers, la prévention du blanchiment d'argent et du financement du terrorisme, la sécurité des produits, la sécurité des transports, la santé publique, la protection de l'environnement, la protection des consommateurs, les violations portant atteinte aux intérêts financiers de l'UE ou relatives au marché intérieur (par ex, les règles relatives à la concurrence et aux aides d'État), la radioprotection et la sûreté nucléaire, la sécurité alimentaire, la santé et le bien-être des animaux, ainsi que la protection de la vie privée, la protection des données et la sécurité des données. Dans certains pays, vous pouvez également signaler d'autres problèmes. Pour plus d'informations, consultez notre outil de signalement en ligne sur pfizer.ethicspoint.com.

L'utilisation de la Helpline est volontaire¹. Vous êtes encouragé à vous identifier lorsque vous contactez la Helpline, mais vous n'êtes pas obligé de le faire lorsque cela est prévu par la législation en vigueur.

Finalité du traitement des données personnelles

La finalité du traitement des données personnelles en relation avec la Helpline est d'assurer le respect des lois internationales et locales applicables et des politiques internes. Si nous n'assurons pas la conformité, nous nous exposons à de lourdes amendes, à des peines d'emprisonnement, à des mises en cause et à d'autres conséquences préjudiciables, en fonction des lois applicables.

Nous collectons et traitons vos informations personnelles qui nous sont fournies via la Helpline aux fins suivantes :

- Vérifier la crédibilité de votre signalement et des données qu'il contient, afin d'éviter toute infraction aux lois,
- Enquêter sur les prétendues violations des lois et des politiques, en particulier celles mentionnées ci-dessus,
- Assurer le respect des lois applicables,
- Coopérer avec les sociétés affiliées de Pfizer dans le cadre de leurs obligations d'enquêter sur les infractions,

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- Assurer la défense contre les recours de tiers et préparer des recours contre des tiers,
- Développer notre Helpline et nos processus d'enquête.

Collecte et traitement des informations et données personnelles

Pfizer peut collecter et traiter les informations suivantes via la Helpline : vos nom, titre, poste et coordonnées (sauf si le signalement est anonyme), le nom des personnes citées dans votre signalement et d'autres données les concernant, le nom et le poste de vos supérieurs, une description du comportement douteux signalé, y compris la date et le lieu, ainsi que toute autre information pertinente, ainsi que toute question que vous pourriez poser à Pfizer. Pfizer peut aussi recueillir des informations de tiers lors d'une enquête résultant du rapport. Dans certaines circonstances, nous pourrions également traiter des données sensibles, telles que des données de santé ou l'appartenance à un syndicat, si vous nous les fournissez et/ou si elles sont utiles à l'enquête.

Les informations que vous fournissez seront traitées de manière confidentielle, conformément aux lois applicables.

Pfizer pourrait utiliser les informations susmentionnées soit pour respecter une obligation légale à laquelle Pfizer est soumis (article 6, paragraphe 1, point c) du Règlement général sur la protection des données de l'UE (« RGPD »), soit parce que nous avons un intérêt légitime à enquêter sur le signalement que vous nous avez soumis (article 6, paragraphe 1, point f) du RGPD), ou vous pourriez avoir l'obligation, en vertu de votre contrat de travail, de signaler certains incidents (article 6, paragraphe 1, point b) du RGPD). Concernant les données sensibles, telles que les données de santé, l'appartenance à un syndicat (pour une liste des données sensibles, Cf. article 9, paragraphe 1, du RGPD), Pfizer pourrait utiliser les informations pour la constatation, l'exercice ou la défense de droits en justice (article 9, paragraphe 2, point f) du RGPD) si cela est nécessaire pour des motifs d'intérêt public important, sur la base du droit de l'Union ou du droit d'un État membre qui doit être proportionné à l'objectif poursuivi (article 9, paragraphe 2, point g) du RGPD), ou si le traitement est nécessaire pour des motifs d'intérêt public dans le domaine de la santé publique, notamment aux fins de garantir des normes élevées de qualité et de sécurité des soins de santé et des médicaments ou des dispositifs médicaux, sur la base du droit de l'Union ou du droit de l'État membre (article 9, paragraphe 2, point i) du RGPD).

Nous ne soumettrons pas les personnes concernées à des décisions fondées uniquement sur un traitement automatisé, y compris au profilage, en relation avec la Helpline (article 22 du RGPD).

Fonctionnement et processus de la Helpline

Tout appel sur la Helpline sera traité par un représentant de NAVEX. NAVEX n'enregistre pas le numéro de téléphone des appels entrants afin que vos coordonnées téléphoniques restent anonymes. NAVEX n'enregistre pas non plus les appels. Le représentant pourrait vous demander plusieurs éléments d'information pour le compte de Pfizer, et il documentera votre appel et vous posera des questions afin de clarifier les informations. Notez que le représentant de NAVEX n'est pas en mesure de répondre aux questions d'éthique ou de procédure, et ne peut vous conseiller sur la ligne de conduite à adopter. NAVEX ne peut pas décider des actions ou enquêtes à entreprendre en lien avec votre signalement. NAVEX suit les instructions données par Pfizer. Si vous optez pour l'outil de signalement Web, les mêmes informations sont saisies électroniquement.

Une fois la demande ou le signalement effectués, NAVEX prépare un dossier détaillé et l'envoie directement à la Division Compliance de Pfizer. Selon la nature du problème, et conformément à ses obligations de confidentialité, la Division Compliance peut transmettre le signalement et la documentation liée au personnel compétent de Pfizer devant être informé, comme les représentants des services juridique, People Experience (« PX ») ou Audit, pour une enquête plus approfondie. Nous pourrions avoir besoin d'informations supplémentaires ou de clarifications de votre part au fur et à mesure que l'enquête avance, auquel cas nous vous contacterons directement. Si besoin, la Division Compliance peut également informer les membres du service PX ou les dirigeants de Pfizer de toute constatation de violation afin de déterminer d'éventuelles mesures disciplinaires et à des fins de transparence. Les informations peuvent également être partagées avec les conseillers externes de Pfizer, tels que les avocats ou les auditeurs qui sont tenus de les tenir strictement confidentielles. Nous vous informerons de l'état d'avancement de l'enquête et des mesures prises suite aux conclusions de l'enquête.

Dans le cadre de l'enquête, Pfizer a l'intention d'informer en temps voulu chaque personne impliquée dans un signalement sur les accusations la concernant, tout en évitant de dévoiler votre identité. Les personnes impliquées auront le droit de répondre aux informations que vous rapportez. Veuillez noter que les informations que vous fournissez peuvent engendrer des décisions affectant des salariés de Pfizer ou d'autres tierces parties impliquées

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dans l'incident en question. Ainsi, nous vous remercions de n'indiquer que les informations qui, à votre connaissance, sont exactes. Fournir sciemment des informations inexactes ou erronées peut donner lieu à des mesures disciplinaires, voire à une responsabilité civile ou pénale. De plus, dans la mesure du possible, tout rapport doit se limiter à l'exposition de faits pertinents au rapport et à l'enquête en résultant.

Les représailles contre toute personne recherchant des conseils, soulevant un problème ou signalant une faute professionnelle, ou contre tout conseiller, personne physique ou entité liés à cette personne, sont strictement interdites. Pfizer prendra les mesures nécessaires en cas de représailles à l'encontre d'une personne qui aurait signalé une infraction en toute sincérité, même s'il s'avère par la suite que cette personne s'est trompée lorsqu'elle a signalé le problème. Si vous pensez que vous-même, ou une autre personne concernée, avez fait l'objet de représailles, contactez la Division Compliance (coordonnées ci-dessous).

Conservation des informations, rétention et transfert de données

Pfizer a engagé NAVEX, un sous-traitant soumis à des obligations de confidentialité strictes, pour assurer la confidentialité et la sécurité de vos données personnelles et NAVEX est la seule entité autorisée à utiliser vos données personnelles dans le cadre de la Helpline. Les informations que nous recevons de NAVEX et toutes les données personnelles que vous nous fournissez sont stockées dans une base de données Pfizer (et dans la base de données de nos prestataires, si nécessaire pour nous aider à mener l'enquête) dont l'accès est limité.

Nous pourrions transférer vos données personnelles vers nos sociétés affiliées qui ont un besoin d'en connaître, y compris vers des pays qui ont des règles de protection des données différentes de celles du pays dans lequel vous travaillez, notamment avec les autres filiales ou fournisseurs Pfizer, pour les besoins de l'enquête et la gestion de la Helpline. Nous pourrions notamment transférer vos données personnelles au service Compliance de Pfizer, Inc. Remarque : certains des pays non membres de l'EEE, y compris les États-Unis, ne sont pas reconnus par la Commission européenne comme offrant un niveau de protection adéquat selon les normes de l'EEE. La liste des pays reconnus comme offrant un niveau de protection adéquat est disponible ici : [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/commission/presscorner/detail/en/ip_18_1111).

Nous avons mis en place des mesures adéquates, telles que des clauses contractuelles types adoptées par la Commission européenne pour protéger vos données personnelles et permettre leur transfert vers des pays qui ne sont pas reconnus par la Commission européenne comme offrant un niveau adéquat de protection des données. Vous pouvez obtenir une copie de ces mesures en contactant le délégué à la protection des données de Pfizer, dont les coordonnées sont disponibles sur DPO.Pfizer.com.

Pfizer pourrait également être tenu de transférer tout ou partie de vos données personnelles à la police, à la justice ou à d'autres autorités des pays concernés.

Les informations concernant un signalement effectué via la Helpline seront archivées pendant une durée limitée, si nécessaire, ou supprimées selon les critères suivants : une fois l'enquête close et si aucune autre mesure n'est nécessaire à moins que Pfizer ait l'obligation légale de conserver les données pendant plus longtemps ; à la fin du délai de prescription à moins que Pfizer ait l'obligation légale de conserver les données pendant plus longtemps ; et lorsque nos obligations de tenue de registres relatives aux enquêtes ont expiré. Pour plus de détails, veuillez consulter la Politique de l'entreprise en vigueur sur la conservation des registres. Si vous avez des questions, veuillez consulter la division Conformité.

Vos droits

Sous réserve des conditions prévues par le RGPD et/ou d'autres lois applicables, vous avez le droit d'accéder à vos données personnelles (article 15 du RGPD), le droit de rectifier vos données personnelles (article 16 du RGPD), le droit d'obtenir l'effacement de votre données personnelles (article 17 du RGPD), le droit à la limitation du traitement de vos données personnelles (article 18 du RGPD), le droit à la portabilité des données (article 20 du RGPD) et, le droit de vous opposer au traitement de vos données personnelles dans certains cas (article 21 du RGPD).

Si vous souhaitez exercer un droit en vertu du RGPD, vous pouvez contacter le délégué à la protection des données de Pfizer (Cf. DPO.Pfizer.com). Nous répondrons à votre demande conformément au droit applicable.

Vous avez aussi le droit d'introduire une réclamation à tout moment auprès de l'autorité compétente en charge de la protection des données dans votre pays ou région.

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Pour toute question ou remarque concernant la Helpline, veuillez nous contacter au +1 212 733 3026, à l'adresse corporate.compliance@pfizer.com, ou à 66 Hudson Boulevard East, New York, NY 10001, États-Unis.

¹Dans certains pays de l'UE, Pfizer propose également des canaux de signalement local. Pour plus d'informations sur le signalement local, y compris pour consulter la Déclaration de confidentialité du canal de signalement local et ce qui peut être signalé via le canal de signalement local, veuillez consulter l'intranet local de Pfizer ou contacter la division Compliance.

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Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

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Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](#)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Language: Bulgarian
Last Updated: Dec 2022

PFIZER, INC.

ГОРЕЩА ЛИНИЯ ПО СЪОТВЕТСТВИЕТО ЗА ЕС/ЕИП/ОБЕДИНЕНОТО КРАЛСТВО НАСОКИ И ДЕКЛАРАЦИЯ ЗА ПОВЕРИТЕЛНОСТ

Горещата линия по съответствието на Пфайзер („Гореща линия“) се предоставя от Pfizer, Inc. („Pfizer“, „ние“ или „нас“) в ролята ѝ на компания, отговорна за Вашите лични данни. Уебсайтът и телефонната линия, през които можете да докладвате инцидент, в момента се администрират от NAVEX Global UK Limited, компания на NAVEX Global Holding, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG, Обединено кралство („NAVEX“), независимият доставчик на услуги на Пфайзер за Горещата линия.

Общи

Администраторът на данни на Горещата линия е: Pfizer, Inc., с адрес: 66 Hudson Boulevard East, New York, NY 10001 САЩ.

Можете да се свържете с длъжностното лице за защита на данните на Пфайзер чрез данните за контакт, посочени по-горе, или на: privacy.officer@pfizer.com или DPO.Pfizer.com.

Горещата линия може да се използва за докладване на притеснения в работен контекст относно въпроси за финансовата и бизнес почтеност, например такива, свързани с отчетността; вътрешния счетоводен контрол; въпроси, свързани с одита; борбата с подкупите и корупцията; банковите и финансовите престъпления, както и с нарушения на законодателството на ЕС, включително относно обществените поръчки, финансовите услуги, продукти и пазари, мерките срещу изпирането на пари и финансирането на тероризма, безопасността на продуктите, безопасността на транспорта, общественото здраве, опазването на околната среда, защитата на потребителите, нарушения, засягащи финансовите интереси на ЕС или свързани с вътрешния пазар (напр. правилата за конкуренцията и държавната помощ), радиационната защита и ядрената безопасност, безопасността на храните, здравето на животните и хуманното отношение към тях, както и защитата на поверителността, защитата на личните данни и сигурността на данните. В допълнение към по-горното в някои държави можете да докладвате и допълнителни въпроси. Разгледайте нашия сайт за докладване на: pfizer.ethicspoint.com за повече информация.

Използването на Горещата линия е по желание¹. Насърчаваме Ви да се идентифицирате, когато докладвате чрез Горещата линия; не сте задължени да го правите, когато това е позволено от приложимото законодателство.

Цел на обработването на лични данни

Целта на обработването на лични данни във връзка с Горещата линия е да се осигури съответствие с приложимите международни и местни закони, както и с вътрешните процедури. Ако не осигурим съответствие е възможно да ни бъдат наложени високи глоби, лишаване от свобода, отговорност за щети и други наказания в зависимост от приложимото право.

Ние събираме и обработваме личните Ви данни във вида, в който са ни предоставени чрез Горещата линия, за следните цели:

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- Проверка на достоверността на Вашия доклад и съдържащите се в него данни, за да избегнем всякакви закононарушения,
- Разследване на предполагаемите нарушения на закони и политики, особено на онези, споменати по-горе;
- Осигуряване на съответствие с приложимото право,
- Сътрудничество с филиалите на Пфайзер във връзка с техните задължения да разследват нарушения,
- Защита от искове на трети страни и подготовка на искове срещу трети страни,
- Развитие на нашата Гореща линия и разследващи процеси.

Събиране и обработване на лични данни

Пфайзер може да събира и обработва следната информация чрез Горещата линия: Вашето име, форма на обръщение, длъжност и данни за контакт (освен ако докладът е анонимен); името и други данни за лицата, посочени в доклада Ви; името и длъжността на Вашите мениджъри; описание на разглежданото поведение в доклада Ви, включително датата и местонахождението, както и друга подходяща информация; и всякакви въпроси, които желаете да зададете на Пфайзер. Пфайзер също може да събира информация от други лица по време на всяко последващо разследване. При определени обстоятелства може да обработваме и чувствителни данни, като например здравни данни и данни за членство в профсъюзи, ако ни ги предоставите и/или ако те са подходящи за целта на разследването.

Предоставената от Вас информация ще бъде обработвана поверително, в съответствие с приложимото право.

Пфайзер може да използва споменатата по-горе информация, тъй като е нужно да спазим законови задължения, наложени на Пфайзер (Член 6, параграф 1, буква в) от Европейския Общ регламент относно защитата на данните („ОРЗД“/GDPR), или понеже имаме легитимен интерес да разследваме доклада, който сте ни изпратили (Член 6, параграф 1, буква е) от ОРЗД), или тъй като Вие сте задължени съгласно Вашия трудов договор да докладвате определени инциденти (Член 6, параграф 1, буква б) от ОРЗД). Във връзка с чувствителните данни, като например здравни данни, членство в профсъюзи (вижте Член 9, параграф 1 от ОРЗД за списък с чувствителни данни), Пфайзер може да използва информацията за установяване, предявяване или обосноваване на законови искове (Член 9, параграф 2, буква е) от ОРЗД), ако това е необходимо поради значителен обществен интерес, въз основа на законите на ЕС или държавите членки, което ще бъде пропорционално на преследваната цел (Член 9, параграф 2, буква ж) от ОРЗД), или ако това е необходимо поради обществен интерес в областта на общественото здраве, като например за осигуряване на високи стандарти на качество и безопасност на здравните грижи и лекарствените продукти или медицински изделия, въз основа на законите на ЕС или държавите членки (Член 9, параграф 2, буква и) от ОРЗД).

По отношение на субектите на данните ние няма да използваме решения, основаващи се единствено на автоматизирана обработка, включително профилиране, във връзка с Горещата линия (Член 22 от ОРЗД).

Функциониране и процеси на Горещата линия

Представител от NAVEX ще отговори на Вашето обаждане на Горещата линия. За да бъде информацията за Вашето обаждане анонимна, NAVEX не прихваща телефонния номер при входящи повиквания. NAVEX също така не записва обажданията. От името на Пфайзер представителят може да поиска от Вас информация по няколко точки, да документира Вашите данни и може да Ви зададе последващи въпроси за изясняване на

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информацията. Моля, обърнете внимание, че представителят на NAVEX не може да отговори на никакви въпроси, свързани с етиката или политиката, и не може да Ви посъветва за каквито и да било действия. NAVEX не може да взема решения относно никакви действия или разследвания, свързани с Вашия доклад. NAVEX следва указанията, дадени от Пфайзер. Ако решите да използвате сайта за докладване, същата информация се събира по електронен път.

След първоначалния доклад или запитване се изготвя подробен запис, който се изпраща от NAVEX директно към Отдела по съответствието на Пфайзер. В зависимост от естеството на въпроса и в съответствие със своите задължения за конфиденциалност, Отделът по съответствието може да предаде доклада и свързаната с него документация за по-нататъшно разследване и разрешаване на подходящ персонал в Пфайзер, който може да е необходимо да бъде информиран, като например представители от отдел Правен, People Experience („PX“) или Одит. Възможно е да се нуждаем от допълнителна информация и разяснения от Ваша страна в процеса на разследването, като в такъв случай ще се свържем директно с Вас. При необходимост Отделът по съответствието може също да уведоми People Experience или ръководителите на Пфайзер за всяко установено нарушение с цел определяне на съответните дисциплинарни действия и постигане на прозрачност. Информацията може да бъде споделена и с външни съветници на Пфайзер, като адвокати или одитори, които са задължени да спазват строга конфиденциалност. Ние ще Ви информираме относно напредъка на разследването и предприетите действия след установяване на резултатите от разследването.

Като част от разследването Пфайзер има за цел да информира всяко лице, посочено в доклад, за обвиненията срещу него или нея в подходящ срок, но ще се стреми да не разкрива Вашата самоличност. Замесените лица ще имат право да реагират на докладваната от Вас информация. Имайте предвид, че предоставената от Вас информация може да доведе до решения, които засягат лица в Пфайзер и в други трети страни, участвали в съответния инцидент. Затова Ви молим да предоставяте само информация, която според Вашето знание е точна. Съзнателното предоставяне на неточна или подвеждаща информация може да доведе до дисциплинарни действия или дори до гражданска или наказателна отговорност. Също така, когато е възможно, всеки доклад трябва да бъде ограничен до факти, които са от значение за доклада и последващото разследване.

Строго е забранено предприемането на ответни мерки срещу лица, които търсят съвет, подават сигнал, докладват злоупотреби или срещу посредници, лица или организации, които са свързани с подаващите сигнала лица. Ако някой предприеме ответни мерки срещу лице, което правдиво е докладвало за нарушение, Пфайзер ще предприеме съответно действие – дори ако впоследствие се окаже, че лицето първоначално е сгрешило при докладването на проблема. Ако смятате, че Вие или някое друго замесено лице е било обект на ответни мерки, трябва да се свържете с Отдела по съответствието (вижте информацията за контакт по-долу).

Използване и съхранение на информация и прехвърляне на данни

Пфайзер има договор с NAVEX, администратор на данни, съдържащ строги изисквания за опазване на поверителността и сигурността на Вашите лични данни, като NAVEX има право да използва личните Ви данни само за предоставяне на Горещата линия. Информацията, която получаваме от NAVEX, и всички лични данни, които ни предоставяте, ще се съхраняват в база данни с ограничен достъп на Пфайзер (както и в база данни на нашите доставчици, когато това е нужно за подпомагане на разследването).

Възможно е да прехвърляме личните Ви данни към нашите филиали, ако е нужно те да са запознати с тях, в това число в държави, които имат правила за защита на данните, различни от правилата в държавата, в която работите, включително и в други филиали или доставчици на Пфайзер, според необходимостта, за да се разследва доклада и да се администрира Горещата линия. По-специално е възможно да прехвърлим личните Ви данни към Отдела по съответствието на Пфайзер, Inc. Обърнете внимание, че Европейската комисия счита, че някои държави извън ЕИП, включително САЩ, не предоставят подходящо ниво на защита в съответствие със стандартите на ЕИП. Можете да видите държавите, за които се счита, че предоставят подходящо ниво на защита, тук: [Adequacy decisions \(europa.eu\)](https://adequacy.ec.europa.eu/).

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Въвели сме подходящи мерки, като например стандартни договорни клаузи, приети от Европейската комисия, за да осигурим трансфера и защитата на Вашите лични данни в държави, за които Европейската комисия счита, че не предоставят подходящо ниво на защита на данните. Можете да получите копие от тези мерки, като се свържете с длъжностното лице за защита на данните на Пфайзер, чиито данни за контакт са налични на: DPO.Pfizer.com.

Пфайзер може също така да бъде задължена да прехвърли някои или всичките Ви лични данни на правоприлагащите органи или власти, както и на други власти в съответните държави.

Информацията, свързана с доклад, направен чрез Горещата линия, ще бъде архивирана за ограничен период от време, според необходимостта, или заличена въз основа на следните критерии: когато разследването е приключило и не са необходими други действия, освен ако Пфайзер е задължена по закон да задържи данните за по-дълъг период; когато изтече срокът за всички съответни съдебни спорове, освен ако Пфайзер е задължена по закон да задържи данните за по-дълъг период; и когато нашите задължения за водене на записи, свързани с разследвания, са изтекли. Моля, вижте приложимите корпоративни правила за съхранение на записи за повече подробности. Ако имате някакви въпроси, моля, свържете се с Отдела по съответствието.

Вашите права

В зависимост от условията, посочени в ОРЗД и/или други приложими закони, Вие имате правото на достъп до Вашите лични данни (Член 15 от ОРЗД), правото на коригиране на Вашите лични данни (Член 16 от ОРЗД), правото личните Ви данни да бъдат изтрети (Член 17 от ОРЗД), правото на ограничаване на обработването на личните Ви данни (Член 18 от ОРЗД), правото на преносимост на данните (Член 20 от ОРЗД), както и правото да възразите срещу обработването на личните Ви данни при определени обстоятелства (Член 21 от ОРЗД).

Ако желаете да упражните някое от правата според ОРЗД, можете да се свържете с длъжностното лице за защита на данните на Пфайзер (вижте: DPO.Pfizer.com). Ние ще отговорим на Вашата заявка в съответствие с приложимото законодателство.

Имате също така право по всяко време да подадете жалба до компетентен за Вашата държава или регион орган за защита на данните.

Ако имате някакви въпроси или притеснения във връзка със самата Гореща линия, моля, свържете се с нас на: + 1-212-733-3026, corporate.compliance@pfizer.com или 66 Hudson Boulevard East, New York, NY 10001 САЩ.

¹В определени държави в ЕС Пфайзер предлага и локални канали за докладване. За повече информация относно локалното докладване, включително декларацията за поверителност за локалния канал за докладване и информация за това какво може да се докладва чрез него, моля, вижте местния интранет на Пфайзер или се свържете с Отдела по съответствието.

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Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](#)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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PFIZER, INC.

DEŽURNI TELEFON ZA ZAKONITOST I USKLAĐENOST ZA EU/EGP/UK SMJERNICE I OBAVIJEST O PRIVATNOSTI

Dežurni telefon za zakonitost i usklađenost tvrtke Pfizer („Dežurni telefon”) osigurava Pfizer, Inc. („Pfizer”, „mi” ili „nas”) kao tvrtka odgovorna za vaše osobne podatke. Web-mjestom i dežurnim telefonom putem kojih možete prijaviti problem trenutno upravlja tvrtka NAVEX Global UK Limited, NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Ujedinjeno Kraljevstvo („NAVEX”), Pfizerov nezavisni pružatelj usluge Dežurnog telefona.

Općenito

Voditelj obrade podataka Dežurnog telefona je: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 SAD.

Možete se obratiti Pfizerovom Služeniku za zaštitu podataka putem gore navedenih podataka za kontakt ili na privacy.officer@pfizer.com ili DPO.Pfizer.com.

Dežurni telefon se općenito može koristiti za prijavu zabrinutosti u kontekstu posla o pitanjima financijskog i poslovnog integriteta, kao što su ona koja se odnose na računovodstvo; interne računovodstvene kontrole; revizijska pitanja; mito i korupciju; bankarski i financijski kriminal te kršenja prava EU-a, uključujući: javnu nabavu, financijske usluge, proizvode i tržišta, sprječavanje pranja novca i financiranja terorizma, sigurnost proizvoda, sigurnost prijevoza, javno zdravlje, zaštitu okoliša, zaštitu potrošača, kršenja koja utječu na financijski interes EU-a ili koja se odnose na unutarnje tržište (npr. pravila tržišnog natjecanja i državne potpore), zaštitu od zračenja i nuklearnu sigurnost, sigurnost hrane, zdravlje i dobrobit životinja te zaštitu privatnosti, zaštitu podataka i sigurnost podataka. Uz gore navedeno, u nekim zemljama možete prijaviti i dodatne stvari. Više informacija potražite u našem alatu za internetsko prijavljivanje na pfizer.ethicspoint.com.

Upotreba Dežurnog telefona je dobrovoljna¹. Potičemo vas da se identifikirate kada prijavljujete slučajeve preko Dežurnog telefona; na to niste obavezni u slučajevima propisanim zakonom.

Svrha obrade osobnih podataka

Svrha obrade osobnih podataka u vezi s Dežurnim telefonom je osigurati usklađenost s mjerodavnim međunarodnim i lokalnim zakonima i internim politikama. Ako ne osiguramo usklađenost, podliježemo visokim novčanim kaznama, kazni zatvora, kaznenoj odgovornosti i drugim sankcijama, u skladu s mjerodavnim zakonima.

Prikupljamo i obrađujemo vaše osobne podatke koje ste nam dali putem Dežurnog telefona u sljedeće svrhe:

- Provjera vjerodostojnosti vaše prijave i podataka sadržanih u njoj, kako bi se izbjeglo bilo kakvo kršenje zakona,
- Istraživanje navodnih kršenja zakona i politika, naročito gore navedenih,
- Osiguravanje usklađenosti s mjerodavnim zakonima,
- Suradnja s Pfizerovim podružnicama u pogledu njihovih obveza istraživanja kršenja,
- Obrana od tužbe trećih osoba i priprema tužbi protiv trećih osoba,
- Razvoj našeg Dežurnog telefona i postupaka istrage.

Prikupljanje i obrada informacija i osobnih podataka

Tvrtka Pfizer putem Dežurnog telefona može prikupljati i obrađivati sljedeće informacije: vaše ime, titulu, položaj i podatke za kontakt (osim ako je prijava anonimna); ime i ostale podatke o pojedincima koji su navedeni u vašoj prijavi; ime, prezime i položaj vaših nadređenih; opis spornog postupanja u vašoj prijavi, uključujući datum i lokaciju, kao i sve druge relevantne informacije te pitanja koja možete postaviti Pfizeru. Pfizer također može prikupljati informacije od drugih tijekom bilo kakvog naknadnog istraživanja. Pod određenim okolnostima također možemo obrađivati osjetljive podatke, kao što su zdravstveni podaci, članstvo u sindikatu, ako nam ih dostavite i/ili ako su relevantni za svrhu istrage.

Informacije koje nam pružite tretirat će se povjerljivima, u skladu s mjerodavnim zakonima.

Pfizer može koristiti gore navedene podatke zato što moramo poštovati zakonsku obvezu nametnutu Pfizeru (članak 6. stavak 1. točka (c) Opće uredbe EU-a o zaštiti podataka („GDPR“) ili imamo legitiman interes istražiti prijavu koju ste nam dostavili (članak 6. stavak 1. točka (f) GDPR-a) ili ste obvezni prema svom ugovoru o radu prijaviti određene probleme (članak 6. stavak 1. točka (b) GDPR-a). S obzirom na osjetljive podatke, kao što su zdravstveni podaci, članstvo u sindikatu (za popis osjetljivih podataka pogledajte članak 9. stavak 1. GDPR-a), Pfizer može koristiti informacije za postavljanje, izvršenje ili obranu pravnih zahtjeva (članak 9. stavak 2. točka (f) GDPR-a) ako je to potrebno zbog značajnog javnog interesa, na temelju zakona Unije ili države članice koji je razmjern cilju koji se želi postići (članak 9. stavak 2. točka (g) GDPR-a), ili ako je to potrebno zbog javnog interesa u području javnog zdravlja, kao što je osiguranje visokih standarda kvalitete i sigurnosti zdravstvene zaštite i medicinskih proizvoda ili medicinskih uređaja, na temelju zakona Unije ili države članice (članak 9. stavak 2. točka (i) GDPR-a).

Ispitanike nećemo podvrgavati odlukama koje se isključivo temelje na automatiziranoj obradi, uključujući profiliranje, u vezi s Dežurnim telefonom (članak 22. GDPR-a).

Funkcioniranje i postupci Dežurnog telefona

Predstavnik tvrtke NAVEX odgovorit će na vaš poziv putem Dežurnog telefona. NAVEX ne bilježi telefonski broj niti jednog dolaznog poziva kako bi vaše informacije predane putem poziva ostale anonimne. NAVEX također ne snima pozive. Predstavnik vas može u ime Pfizera pitati za nekoliko informacija, dokumentirati vaše komentare i postaviti dodatna pitanja kako bi razjasnio informacije. Imajte na umu da predstavnik tvrtke NAVEX neće moći odgovoriti na sva pitanja o etičnosti i pravilima te vas neće moći savjetovati u vezi s poduzimanjem bilo kojih koraka. NAVEX ne može odlučiti o bilo kakvim radnjama ili istragama u vezi s vašom prijavom. NAVEX slijedi upute koje je izdao Pfizer. Ako odlučite upotrijebiti alat za internetsko prijavljivanje, te se informacije bilježe elektronički.

Nakon početne prijave ili upita bit će pripremljen detaljan zapis koji će NAVEX izravno poslati Pfizerovom Odjelu za zakonitost i usklađenost. Ovisno o prirodi slučaja i u skladu sa svojim obvezama povjerljivosti, Odjel za zakonitost i usklađenost može proslijediti prijavu i s time povezanu dokumentaciju odgovarajućem osoblju tvrtke Pfizer koje treba biti upućeno u predmet, primjerice predstavnicima Pravnog odjela, odjela People Experience („PX“) ili Odjela za reviziju radi daljnjeg istraživanja i rješavanja. Kako istraga bude napredovala, možda će nam trebati dodatne informacije i pojašnjenja od vas, a u tom slučaju ćemo vas izravno kontaktirati. Po potrebi, Odjel za zakonitost i usklađenost također može obavijestiti članove PX-a ili direktore tvrtke Pfizer o bilo kojem slučaju kršenja kako bi se ustanovila odgovarajuća stegovna mjera te radi transparentnosti. Informacije se također mogu dijeliti s Pfizerovim vanjskim savjetnicima, poput odvjetnika ili revizora koji su obvezni čuvati strogu povjerljivost. Obavijestit ćemo vas o tijeku istrage i poduzetim radnjama po ishodu istrage.

Kao dio istrage, Pfizer nastoji obavijestiti svaku osobu koja je spomenuta u prijavi o optužbama protiv njega ili nje u prikladnom vremenskom okviru, no neće otkrivati vaš identitet. Takve će osobe imati pravo reagirati na informacije koje ste prijavili. Imajte na umu da informacije koje ste prijavili mogu rezultirati odlukama koje utječu na pojedince tvrtke Pfizer te ostale treće strane koje su uključene u dotični incident. Stoga vas molimo da prijavite samo informacije koje su prema vašim saznanjima točne. Svjesno pružanje netočnih ili zavaravajućih informacija može rezultirati stegovnim mjerama za zaposlenike ili čak građanskom ili kaznenom odgovornošću. Također, ako je moguće, prijave trebaju biti ograničene na činjenice koje su relevantne za prijavu i posljedičnu istragu.

Strogo je zabranjeno osvećivanje protiv bilo kojeg pojedinca koji traži savjet, iskazuje zabrinutost ili prijavljuje nedolično ponašanje, ili protiv posrednika, pojedinca ili entiteta koji su povezani s osobama koje prijavljuju. Ako se netko osvećuje pojedincu koji je iskreno prijavio kršenje, Pfizer će poduzeti odgovarajuće mjere – čak i ako se kasnije utvrdi da je pojedinac bio u krivu kada je prijavljivao problem. Ako mislite da ste vi, ili bilo tko drugi tko je

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uključen, podvrgnuti osvećivanju, trebate kontaktirati Odjel za zakonitost i usklađenost (podaci za kontakt su u nastavku).

Uporaba, zadržavanje i prijenos podataka

Pfizer je sklopio ugovor s NAVEX-om, izvršiteljem obrade podataka, pod strogim obvezama povjerljivosti radi zaštite povjerljivosti i sigurnosti vaših osobnih podataka, a NAVEX-u je dopušteno koristiti vaše osobne podatke samo za pružanje Dežurnog telefona. Informacije koje primimo od tvrtke NAVEX i sve osobne informacije koje nam otkrijete bit će pohranjene u Pfizerovoj bazi podataka (i u bazi podataka naših dobavljača, kada je to potrebno da nam pomognu u istrazi) s ograničenim pristupom.

Vaše osobne podatke možemo prenijeti našim podružnicama ako ih trebaju znati, uključujući zemlje koje imaju drugačija pravila o zaštiti podataka od onih u zemlji u kojoj radite, uključujući ostale Pfizerove podružnice i dobavljače, kako je potrebno za istraživanje prijave i upravljanje Dežurnim telefonom. Vaše osobne podatke osobito možemo prenijeti Odjelu za zakonitost i usklađenost tvrtke Pfizer, Inc. Imajte na umu da neke od zemalja koje nisu članice EGP-a, uključujući SAD, Europska komisija ne priznaje kao zemlje koje pružaju odgovarajuću razinu zaštite prema standardima EGP-a. Ovdje su dostupne države koje su priznate da pružaju odgovarajuću razinu zaštite: [Adequacy decisions \(europa.eu\)](https://www.eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679).

Uspostavili smo odgovarajuće mjere, poput standardnih ugovornih klauzula koje je usvojila Europska komisija, kako bismo omogućili prijenos i zaštitu vaših osobnih podataka u zemlje za koje Europska komisija ne priznaje da pružaju odgovarajuću razinu zaštite podataka. Primjerak tih mjera možete dobiti ako se obratite lokalnom Pfizerovom Službeniku za zaštitu podataka čiji su podaci za kontakt dostupni na [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer također može biti obvezan prenijeti određene ili sve vaše osobne podatke agencijama za provođenje zakona ili vlastima ili drugim tijelima relevantnih zemalja.

Informacije u vezi s prijavom podnesenom putem Dežurnog telefona bit će arhivirane na ograničeno vremensko razdoblje, prema potrebi, ili izbrisane na temelju sljedećih kriterija: kada se istraga završi i nisu potrebne daljnje radnje, osim ako Pfizer prema zakonu ne mora zadržati podatke na dulje razdoblje; kada istekne vremenski rok za bilo kakve tužbe, osim ako Pfizer prema zakonu ne mora zadržati podatke na dulje razdoblje te kada istekne naša obveza vođenja evidencije istraga. Više detalja o obvezi vođenja evidencije pogledajte u važećoj Smjernici korporativne poslovne politike. Ako imate bilo kakvih pitanja, obratite se Odjelu za zakonitost i usklađenost.

Vaša prava

U skladu s uvjetima propisanim u GDPR-u i/ili drugim mjerodavnim zakonima, imate pravo na pristup svojim osobnim podacima (članak 15. GDPR-a), pravo na ispravak vaših osobnih podataka (članak 16. GDPR-a), pravo na brisanje vaših osobnih podataka (članak 17. GDPR-a), pravo na ograničenje obrade vaših osobnih podataka (članak 18. GDPR-a), pravo na prenosivost podataka (članak 20. GDPR-a) te pravo na prigovor na obradu vaših osobnih podataka pod određenim okolnostima (članak 21. GDPR-a).

Ako želite ostvariti pravo prema GDPR-u, možete se obratiti Pfizerovom Službeniku za zaštitu podataka (pogledajte [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Odgovorit ćemo na vaš zahtjev u skladu s mjerodavnim zakonom.

Također imate pravo u svakom trenutku podnijeti pritužbu tijelu za zaštitu podataka nadležnom za vašu zemlju ili regiju.

Ako imate bilo kakvih pitanja ili nedoumica u vezi s Dežurnim telefonom, obratite nam se na +1-212-733-3026, corporate.compliance@pfizer.com ili 66 Hudson Boulevard East, New York, NY 10001 SAD.

¹ U određenim zemljama EU-a Pfizer također nudi lokalne kanale za prijavu. Za više informacija o lokalnom prijavljivanju, uključujući obavijest o privatnosti lokalnog kanala za prijavljivanje i što možete prijaviti putem lokalnog kanala za prijavljivanje, pogledajte lokalni intranet Pfizer-a ili kontaktirajte Odjel za zakonitost i usklađenost.

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Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](#)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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PFIZER, INC.

COMPLIANCE HELPLINE ΣΕ ΕΕ/ΕΟΖ/ΗΒ

ΔΗΛΩΣΗ ΑΠΟΡΡΗΤΟΥ & ΚΑΘΟΔΗΓΗΣΗΣ

Η Compliance Helpline της Pfizer («η Γραμμή Βοήθειας») παρέχεται από τη Pfizer, Inc. («Pfizer», «εμείς» ή «εμάς») ως εταιρεία υπεύθυνη για τα προσωπικά σας δεδομένα. Τον ιστότοπο και την τηλεφωνική γραμμή μέσω της οποίας μπορείτε να αναφέρετε ένα συμβάν, διαχειρίζεται επί του παρόντος η NAVEX Global UK Limited, μία εταιρεία της NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Ηνωμένο Βασίλειο ("NAVEX"), που είναι ο ανεξάρτητος πάροχος της Helpline της Pfizer.

Γενικά

Ο υπεύθυνος επεξεργασίας δεδομένων της Helpline είναι: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 ΗΠΑ.

Μπορείτε να επικοινωνείτε με τον Υπεύθυνο Προστασίας Δεδομένων της Pfizer μέσω των στοιχείων επικοινωνίας που αναφέρονται παραπάνω ή στο privacy.officer@pfizer.com ή στο DPO.Pfizer.com.

Η Helpline μπορεί γενικά να χρησιμοποιηθεί για την αναφορά προβληματισμών σε εργασιακό πλαίσιο σχετικά με θέματα οικονομικής και επιχειρηματικής ακεραιότητας, όπως αυτά που σχετίζονται με τη λογιστική, εσωτερικούς λογιστικούς ελέγχους, θέματα ελέγχου, τη δωροδοκία και τη διαφθορά, το τραπεζικό και χρηματοοικονομικό έγκλημα και παραβάσεις του δικαίου της ΕΕ, όπως: δημόσιες συμβάσεις, χρηματοοικονομικές υπηρεσίες, προϊόντα και αγορές, πρόληψη νομιμοποίησης εσόδων από παράνομες δραστηριότητες και χρηματοδότηση της τρομοκρατίας, ασφάλεια προϊόντων, ασφάλεια των μεταφορών, δημόσια υγεία, προστασία του περιβάλλοντος, προστασία των καταναλωτών, παραβάσεις που επηρεάζουν το οικονομικό συμφέρον της ΕΕ ή που σχετίζεται με την εσωτερική αγορά (π.χ. κανόνες ανταγωνισμού και κρατικών ενισχύσεων), προστασία από ακτινοβολία και τη ραδιενέργεια, ασφάλεια των τροφίμων, υγεία και καλή διαβίωση των ζώων και προστασία της ιδιωτικής ζωής, προστασία δεδομένων και ασφάλεια των δεδομένων. Επιπρόσθετα με τα παραπάνω, σε μερικές χώρες μπορείτε να αναφέρετε επιπλέον ζητήματα. Δείτε το εργαλείο αναφοράς μέσω διαδικτύου στο pfizer.ethicspoint.com για περισσότερες πληροφορίες.

Η χρήση της Helpline είναι οικειοθελής¹. Σας ενθαρρύνουμε να δηλώνετε την ταυτότητά σας όταν υποβάλλετε αναφορά στη Helpline. Δεν είστε υποχρεωμένοι να τη δηλώσετε, εφόσον προβλέπεται από την ισχύουσα νομοθεσία.

Σκοπός επεξεργασίας των προσωπικών δεδομένων

Ο σκοπός της επεξεργασίας των προσωπικών δεδομένων σχετικά με τη Helpline είναι η διασφάλιση της συμμόρφωσης με την ισχύουσα διεθνή και τοπική νομοθεσία και τις εσωτερικές πολιτικές. Αν δεν διασφαλίσουμε τη συμμόρφωση, ενδέχεται να μας επιβληθούν υψηλά πρόστιμα, φυλάκιση, υποχρεώσεις και άλλες επιπλήξεις, σύμφωνα με την ισχύουσα νομοθεσία.

Συλλέγουμε και επεξεργαζόμαστε τις προσωπικές σας πληροφορίες όπως μας τις παρέχετε μέσω της Helpline για τους ακόλουθους σκοπούς:

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- Έλεγχος της αξιοπιστίας της αναφοράς σας και των στοιχείων που περιλαμβάνει, έτσι ώστε να αποφύγουμε ενδεχόμενη παραβίαση της νομοθεσίας,
- Έρευνα για εικαζόμενες παραβιάσεις της νομοθεσίας και των πολιτικών, ειδικά αυτών που αναφέρονται παραπάνω,
- Διασφάλιση της συμμόρφωσης με την ισχύουσα νομοθεσία,
- Συνεργασία με τις θυγατρικές εταιρείες της Pfizer σύμφωνα με τις υποχρεώσεις τους να ερευνούν τις παραβιάσεις,
- Υπεράσπιση αξιώσεων τρίτου μέρους και προετοιμασία των αξιώσεων κατά τρίτων μερών,
- Ανάπτυξη της Helpline και των διαδικασιών έρευνας.

Συλλογή και επεξεργασία των πληροφοριών και των προσωπικών δεδομένων

Η Pfizer δύναται να συλλέξει και να επεξεργαστεί τις εξής πληροφορίες, μέσω της Helpline: το όνομα, τον τίτλο, τη θέση και τα στοιχεία επικοινωνίας σας (εκτός αν η αναφορά είναι ανώνυμη), το όνομα και άλλα δεδομένα σχετικά με άτομα που κατονομάζονται στην αναφορά σας, το όνομα και τη θέση των προϊσταμένων σας, μια περιγραφή της συμπεριφοράς που αποτελεί το θέμα της αναφοράς σας, συμπεριλαμβανομένης της ημερομηνίας και της τοποθεσίας, καθώς και άλλων σχετικών πληροφοριών, και τυχόν ερωτήσεις που ίσως θέσετε στη Pfizer. Η Pfizer δύναται, επίσης, να συλλέξει πληροφορίες από άλλα άτομα, κατά τη διάρκεια έρευνας που ενδέχεται να προκύψει. Υπό ορισμένες συνθήκες, μπορεί επίσης να επεξεργαστούμε ευαίσθητα δεδομένα, όπως δεδομένα για θέματα υγείας, συμμετοχή σε συνδικαλιστική οργάνωση, αν μας τα παρέχετε και/ή αν είναι σχετικά με τον σκοπό της έρευνας.

Οι πληροφορίες που παρέχονται από εσάς είναι εμπιστευτικές, σύμφωνα με την ισχύουσα νομοθεσία.

Η Pfizer ενδέχεται να χρησιμοποιήσει τις πληροφορίες που αναφέρονται παραπάνω είτε επειδή πρέπει να συμμορφωθούμε με μία νομική υποχρέωση που επιβλήθηκε στη Pfizer (Άρθρο 6(1)(γ) του Γενικού Κανονισμού για την Προστασία Δεδομένων της ΕΕ ("ΓΚΠΔ") ή επειδή έχουμε έννομο συμφέρον να ερευνήσουμε την αναφορά που μας υποβάλατε (Άρθρο 6(1)(στ) ΓΚΠΔ), ή επειδή μπορεί να είστε υποχρεωμένοι στα πλαίσια της σύμβασης εργασίας σας να αναφέρετε συγκεκριμένα συμβάντα (Άρθρο 6(1)(β) ΓΚΠΔ). Όσον αφορά τα ευαίσθητα δεδομένα, όπως τα δεδομένα για θέματα υγείας, τη συμμετοχή σε συνδικαλιστική οργάνωση (για τη λίστα με τα ευαίσθητα δεδομένα, δείτε το Άρθρο 9(1) ΓΚΠΔ), η Pfizer μπορεί να χρησιμοποιήσει τις πληροφορίες για τη θεμελίωση, άσκηση ή υποστήριξη νομικών αξιώσεων (Άρθρο 9(2)(στ) ΓΚΠΔ) αν είναι απαραίτητο για λόγους ουσιώδους δημοσίου συμφέροντος, βάσει της νομοθεσίας της Ένωσης ή του δικαίου κράτους μέλους το οποίο είναι αναλογικό προς τον επιδιωκόμενο στόχο (Άρθρο 9(2)(ζ) ΓΚΠΔ), ή αν είναι απαραίτητο για λόγους δημοσίου συμφέροντος στον τομέα της δημόσιας υγείας, όπως η διασφάλιση υψηλών προτύπων ποιότητας και ασφάλειας της υγειονομικής περίθαλψης και των φαρμάκων ή των ιατροτεχνολογικών προϊόντων, βάσει της νομοθεσίας της Ένωσης ή του δικαίου κράτους μέλους (Άρθρο 9(2)(θ) ΓΚΠΔ).

Δεν θα υποβάλλουμε τα υποκείμενα δεδομένων σε αποφάσεις που λαμβάνονται με βάση αποκλειστικά την αυτοματοποιημένη επεξεργασία, συμπεριλαμβανομένης της κατάρτισης προφίλ, σε σχέση με τη Helpline (Άρθρο 22 ΓΚΠΔ).

Λειτουργία και Διαδικασίες της Helpline

Όταν καλέσετε την Helpline, θα απαντήσει ένας εκπρόσωπος της NAVEX. Η NAVEX δεν καταγράφει τον αριθμό τηλεφώνου για καμία εισερχόμενη κλήση, έτσι ώστε τα στοιχεία της κλήσης σας να παραμείνουν ανώνυμα. Η NAVEX επίσης δεν καταγράφει τις κλήσεις. Ο εκπρόσωπος ενδέχεται να σας ζητήσει αρκετές πληροφορίες εκ μέρους της Pfizer, να τεκμηριώσει τα στοιχεία που παρέχετε και να υποβάλει ερωτήσεις για λόγους διευκρίνισης των

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πληροφοριών. Έχετε υπόψη ότι ο εκπρόσωπος της NAVEX δεν είναι σε θέση να απαντήσει σε καμία ερώτηση που αφορά θέματα δεοντολογίας ή πολιτικής και δεν μπορεί να σας συμβουλευτεί για καμία ενέργεια. Η NAVEX δεν θα αποφασίσει για οποιοσδήποτε ενέργειες ή έρευνες σε σχέση με την αναφορά σας. Η NAVEX ακολουθεί τις οδηγίες που έχει εκδώσει η Pfizer. Εάν επιλέξετε να χρησιμοποιήσετε το εργαλείο υποβολής αναφορών μέσω διαδικτύου, οι ίδιες πληροφορίες καταγράφονται ηλεκτρονικά.

Μετά την υποβολή της αρχικής αναφοράς ή του αρχικού ερωτήματος, καταρτίζεται λεπτομερές αρχείο το οποίο αποστέλλεται από τη NAVEX απευθείας στη Διεύθυνση Εταιρικής Συμμόρφωσης της Pfizer. Ανάλογα με τη φύση του θέματος, και σε συμμόρφωση με τις απαιτήσεις εμπιστευτικότητας, η Διεύθυνση Εταιρικής Συμμόρφωσης μπορεί να κοινοποιήσει την αναφορά και τα σχετικά έγγραφα στο κατάλληλο προσωπικό της Pfizer το οποίο χρειάζεται ενδεχομένως να ενημερωθεί, όπως οι εκπρόσωποι της Νομικής Διεύθυνσης, της Διεύθυνσης People Experience («PX») ή Ελέγχου για περαιτέρω διερεύνηση και επίλυση του ζητήματος. Ενδέχεται να χρειαστούμε επιπλέον πληροφορίες και διευκρινίσεις από εσάς καθώς η έρευνα εξελίσσεται, οπότε θα επικοινωνήσουμε απευθείας μαζί σας. Όπου είναι απαραίτητο, η Διεύθυνση Εταιρικής Συμμόρφωσης μπορεί επίσης να χρειαστεί να ενημερώσει μέλη της Διεύθυνσης PX ή ηγετικά στελέχη της Pfizer εάν διαπιστωθεί οποιαδήποτε παραβίαση για λόγους καθορισμού τυχόν πειθαρχικών μέτρων και για σκοπούς διαφάνειας. Οι πληροφορίες ενδέχεται, επίσης, να κοινοποιηθούν σε εξωτερικούς συμβούλους της Pfizer, όπως δικηγόρους ή ελεγκτές που είναι υποχρεωμένοι να τηρούν αυστηρή εμπιστευτικότητα. Θα σας ενημερώνουμε για την πρόοδο της έρευνας και τις ενέργειες που θα πραγματοποιούνται μετά την έκβαση της έρευνας.

Ως μέρος της έρευνας, στόχος της Pfizer είναι να ενημερώσει κάθε άτομο που εμπλέκεται σε αναφορά σχετικά με τους ισχυρισμούς εναντίον του, εντός εύλογου χρονικού πλαισίου, αλλά θα προσπαθήσει να μην κοινοποιήσει την ταυτότητά σας. Τα άτομα που εμπλέκονται θα έχουν το δικαίωμα να αντιδράσουν στις πληροφορίες που έχετε καταθέσει στην αναφορά σας. Σημειώστε ότι οι πληροφορίες που παρέχετε ενδέχεται να έχουν ως αποτέλεσμα αποφάσεις οι οποίες θα επηρεάσουν κάποια άτομα στην Pfizer και άλλα τρίτα μέρη, τα οποία εμπλέκονται στο σχετικό συμβάν. Ως εκ τούτου, σας παρακαλούμε να παρέχετε μόνο πληροφορίες οι οποίες, εξ όσων γνωρίζετε, είναι ακριβείς. Η σκόπιμη παροχή ανακριβών ή παραπλανητικών πληροφοριών ενδέχεται να έχει ως αποτέλεσμα την επιβολή πειθαρχικών μέτρων, ή ακόμα και την έκθεση σε αστική ή ποινική ευθύνη. Επίσης, όπου είναι εφικτό, οι αναφορές θα πρέπει να περιορίζονται στα γεγονότα που είναι σχετικά με την αναφορά και την επακόλουθη έρευνα.

Απαγορεύονται αυστηρά τα αντίποινα εις βάρος οποιουδήποτε ατόμου που επιζητά συμβουλές, εκφράζει έναν προβληματισμό ή αναφέρει κάποιο παράπτωμα, ή εναντίον διαμεσολαβητών, ατόμων ή φορέων που συνδέονται με την αναφορά ατόμων. Εάν κάποιος προβεί σε αντίποινα εις βάρος ενός ατόμου, το οποίο με κάθε ειλικρίνεια ανέφερε κάποια παράβαση, η Pfizer θα λάβει τα απαραίτητα μέτρα, ακόμη και αν αργότερα αποδειχθεί ότι ήταν αρχικά λάθος του ατόμου να αναφέρει το ζήτημα. Αν πιστεύετε ότι εσείς ή οποιοσδήποτε άλλος εμπλεκόμενος σε ένα θέμα έχετε υποστεί αντίποινα, πρέπει να επικοινωνήσετε με τη Διεύθυνση Εταιρικής Συμμόρφωσης (πληροφορίες επικοινωνίας παρακάτω).

Χρήση, διατήρηση πληροφοριών και μεταφορά δεδομένων

Η Pfizer έχει συνάψει σύμβαση με τη NAVEX προκειμένου να προστατεύει την εμπιστευτικότητα και την ασφάλεια των προσωπικών δεδομένων σας και η NAVEX θα χρησιμοποιεί τα προσωπικά δεδομένα σας μόνο για την παροχή της Helpline. Οι πληροφορίες που λαμβάνουμε από τη NAVEX και τυχόν προσωπικά δεδομένα που μας παραχωρείτε θα αποθηκεύονται σε βάση δεδομένων της Pfizer (και σε βάση δεδομένων των προμηθευτών μας, όταν απαιτείται να μας βοηθήσουν με την έρευνα) με περιορισμένη πρόσβαση.

Ενδέχεται να μεταφέρουμε τα προσωπικά σας δεδομένα σε θυγατρικές εταιρείες εάν έχουν «ανάγκη να γνωρίζουν», μεταξύ άλλων σε χώρες με διαφορετικούς κανόνες προστασίας δεδομένων από αυτούς που ισχύουν στη χώρα όπου εργάζεστε, συμπεριλαμβανομένων άλλων θυγατρικών ή προμηθευτών της Pfizer, όπως απαιτείται για τη διερεύνηση της αναφοράς και τη διαχείριση της Helpline. Ενδέχεται, συγκεκριμένα, να μεταφέρουμε τα προσωπικά σας δεδομένα στο Τμήμα Συμμόρφωσης της Pfizer, Inc. Σημειώστε ότι ορισμένες χώρες εκτός ΕΟΖ, όπως οι ΗΠΑ, δεν αναγνωρίζονται από την Ευρωπαϊκή Επιτροπή ως χώρες που παρέχουν επαρκή επίπεδα προστασίας σύμφωνα με τα πρότυπα του ΕΟΖ. Οι χώρες οι οποίες αναγνωρίζονται ως χώρες που διαθέτουν επαρκές επίπεδο προστασίας είναι διαθέσιμες εδώ: [Adequacy decisions \(europa.eu\)](https://www.europa.eu).

Έχουμε θέσει σε εφαρμογή κατάλληλα μέτρα, όπως τυπικές συμβατικές ρήτρες που υιοθετήθηκαν από την Ευρωπαϊκή Επιτροπή που επιτρέπουν τη μεταφορά και προστασία των προσωπικών σας δεδομένων σε χώρες που δεν αναγνωρίζονται από την Ευρωπαϊκή Επιτροπή ότι παρέχουν επαρκές επίπεδο προστασίας δεδομένων. Μπορείτε να λάβετε αντίγραφο των εν λόγω μέτρων επικοινωνώντας με τον τοπικό Υπεύθυνο Προστασίας Δεδομένων της Pfizer, τα στοιχεία επικοινωνίας του οποίου μπορείτε να βρείτε στο DPO.Pfizer.com.

Η Pfizer μπορεί επίσης να είναι υποχρεωμένη να μεταφέρει μερικά ή όλα τα προσωπικά σας δεδομένα σε υπηρεσίες ή αρχές επιβολής του νόμου ή άλλες αρχές των σχετικών χωρών.

Οι πληροφορίες που σχετίζονται με αναφορά, η οποία υποβλήθηκε μέσω της Helpline της Pfizer για Θέματα Συμμόρφωσης, θα αρχειοθετούνται για περιορισμένο χρονικό διάστημα, όταν χρειάζεται, ή θα διαγράφονται βάσει των ακόλουθων κριτηρίων: όταν η έρευνα έχει κλείσει και δεν απαιτείται περαιτέρω ενέργεια εκτός αν η Pfizer είναι υποχρεωμένη από το νόμο να διατηρήσει τα στοιχεία για μεγαλύτερο χρονικό διάστημα, όταν η χρονική περίοδος για οποιαδήποτε σχετική δικαστική διαμάχη έχει παρέλθει αν η Pfizer είναι υποχρεωμένη από το νόμο να διατηρήσει τα στοιχεία για μεγαλύτερο χρονικό διάστημα, και όταν οι υποχρεώσεις μας όσον αφορά την τήρηση αρχείων σχετικών με τις έρευνες έχουν εκπληρωθεί. Ανατρέξτε στην ισχύουσα εταιρική πολιτική σχετικά με τη διατήρηση αρχείων, για περισσότερες λεπτομέρειες. Εάν έχετε οποιοσδήποτε ερωτήσεις, επικοινωνήστε με τη Διεύθυνση Εταιρικής Συμμόρφωσης.

Τα δικαιώματά σας

Με την επιφύλαξη των προϋποθέσεων που ορίζονται στον ΓΚΠΔ ή/και σε άλλους ισχύοντες νόμους, έχετε το δικαίωμα πρόσβασης στα προσωπικά σας δεδομένα (Άρθρο 15 ΓΚΠΔ), το δικαίωμα διόρθωσης των προσωπικών σας δεδομένων (Άρθρο 16 ΓΚΠΔ), το δικαίωμα διαγραφής των προσωπικών σας δεδομένων (Άρθρο 17 ΓΚΠΔ), το δικαίωμα περιορισμού της επεξεργασίας των προσωπικών σας δεδομένων (Άρθρο 18 ΓΚΠΔ), το δικαίωμα στη φορητότητα των δεδομένων (Άρθρο 20 ΓΚΠΔ), και το δικαίωμα αντίρρησης στην επεξεργασία των προσωπικών σας δεδομένων υπό ορισμένες συνθήκες (Άρθρο 21 ΓΚΠΔ).

Εάν θέλετε να ασκήσετε ένα δικαίωμα υπό τον ΓΚΠΔ, μπορείτε να επικοινωνήσετε με τον Υπεύθυνο Προστασίας Δεδομένων της Pfizer (βλ. DPO.Pfizer.com). Θα ανταποκριθούμε στο αίτημά σας σύμφωνα με την ισχύουσα νομοθεσία.

Έχετε επίσης το δικαίωμα να υποβάλετε ανά πάσα στιγμή παράπονο σε αρχή προστασίας δεδομένων της χώρας ή της περιοχής σας.

Εάν έχετε οποιοσδήποτε απορίες ή προβληματισμούς, σχετικά με τη Helpline, επικοινωνήστε μαζί μας στον αριθμό +1-212-733-3026, ηλεκτρονικά στη διεύθυνση corporate.compliance@pfizer.com, ή ταχυδρομικά 66 Hudson Boulevard East, New York, NY 10001 ΗΠΑ .

¹ Σε μερικές χώρες της ΕΕ, η Pfizer παρέχει επίσης τοπικά κανάλια αναφορών. Για περισσότερες πληροφορίες σχετικά με τη δυνατότητα αναφοράς σε τοπικό επίπεδο, καθώς και για τη δήλωση απορρήτου του τοπικού καναλιού αναφοράς και τι μπορεί να αναφερθεί μέσω του τοπικού καναλιού αναφοράς, συμβουλευτείτε το τοπικό ενδοδίκτυο (intranet) της Pfizer, ή επικοινωνήστε με τη Διεύθυνση Εταιρικής Συμμόρφωσης.

CZECH REPUBLIC

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PFIZER, INC.

EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

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Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](#)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Last Updated: Dec 2022

PFIZER, INC.

LINKA COMPLIANCE HELPLINE PRO EU / EHS / SPOJENÉ KRÁLOVSTVÍ
POKYNY A OZNÁMENÍ O OCHRANĚ OSOBNÍCH ÚDAJŮ

Linku Pfizer Compliance Helpline („linka Compliance Helpline“) poskytuje Pfizer, Inc. („Pfizer“, „my“, „nás“ apod.) jako společnost odpovědná za vaše osobní údaje. Webové stránky a telefonickou linku, jejichž prostřednictvím můžete nahlásit incident, v současnosti provozuje společnost NAVEX Global UK Limited, společnost skupiny NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Spojené království („NAVEX“), nezávislý poskytovatel linky Compliance Helpline pro společnost Pfizer.

Obecné

Správce údajů pro účely linky Compliance Helpline je: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

Pověřence pro ochranu osobních údajů ve společnosti Pfizer můžete kontaktovat prostřednictvím výše uvedených kontaktních údajů nebo na adrese privacy.officer@pfizer.com či na stránkách DPO.Pfizer.com.

Linku Compliance Helpline lze obecně používat pro nahlášení obav v pracovním kontextu, týkajících se financí nebo obchodní integrity, jako obavy týkající se účetnictví, interních kontrolních postupů v účetnictví, obavy týkající se auditů, úplatkářství a korupce, kriminalita v oblasti bankovníctví a financí; porušování práva EU včetně v oblasti zadávání veřejných zakázek, finančních služeb, produktů a trhů, prevence praní špinavých peněz a financování terorismu, bezpečnosti výrobků, bezpečnosti dopravy, veřejného zdraví, ochrany životního prostředí, ochrany spotřebitele, porušení ovlivňující finanční zájmy EU nebo vztahující se k vnitřnímu trhu (např. pravidla hospodářské soutěže a státní podpory), radiační ochrany a jaderné bezpečnosti, bezpečnosti potravin, zdraví a dobrých životních podmínek zvířat a ochrany soukromí, ochrany údajů a bezpečnosti údajů. Kromě výše uvedených lze v některých zemích nahlásit také další záležitosti. Další informace naleznete v našem online nástroji pro nahlášení obav na stránkách pfizer.ethicspoint.com.

Použití Pfizer Compliance Helpline je dobrovolné¹. Doporučujeme, abyste při hlášení potenciálních problémů na lince pomoci uvedli svou totožnost. Nicméně tento krok není povinný, pokud to umožňují příslušné zákony.

Účely zpracování osobních údajů

Účelem zpracování osobních údajů je v případě linky Compliance Helpline zajistit dodržování platných mezinárodních a místních zákonů a interních zásad. Nebudeme-li je dodržovat, můžeme v souladu s platnými právními předpisy čelit vysokým pokutám, trestu odnětí svobody, právní odpovědnosti a dalším postihům.

Vaše osobní údaje shromažďujeme a zpracováváme, jak jsou nám prostřednictvím telefonické linky poskytnuty, za následujícími účely:

- kontrola věrohodnosti vašeho hlášení a obsažených údajů, s cílem vyhnout se jakémukoli porušení zákonů,
- šetření domnělého porušení zákonů a zásad, a to zejména výše uvedených,

- zajištění dodržování platných zákonů,
- spolupráce se společnostmi přidruženými ke společnosti Pfizer s ohledem na jejich povinnosti šetřit porušení zákonů a zásad,
- obhajoba právních nároků třetích stran a příprava právních nároků vůči třetím stranám,
- vylepšování linky Compliance Helpline a postupů šetření.

Shromažďování a zpracování informací a osobních údajů

Společnost Pfizer smí prostřednictvím Pfizer Compliance Helpline shromažďovat a zpracovávat následující údaje: vaše jméno, titul, pracovní pozice a kontaktní údaje (s výjimkou anonymních hlášení), jméno a jiné údaje jednotlivců jmenovaných ve vašem hlášení, jméno a pracovní pozice vašich nadřízených, popis problematického chování ve vašem hlášení včetně data a místa, kde k němu došlo, a jiné související informace a případné dotazy, které pro společnost Pfizer máte. Společnost Pfizer smí také v průběhu následného vyšetřování shromažďovat informace od jiných stran. Za určitých okolností můžeme zpracovávat také citlivé údaje, jako zdravotní údaje nebo členství v odborech, pokud nám tyto údaje poskytnete a/nebo jsou relevantní pro účely šetření.

Informace, které poskytnete, budou v souladu s platnými zákony považovány za důvěrné.

Společnost Pfizer může výše uvedené informace používat za následujících okolností: musíme-li plnit zákonnou povinnost, která byla společnosti Pfizer uložena (článek 6 odst. 1 písm. c) obecného nařízení EU o ochraně osobních údajů –“GDPR“), máme-li oprávněný zájem hlášení, které jste nám podali, prošetřit (článek 6 odst. 1 písm. f) nařízení GDPR) nebo máte-li podle své pracovní smlouvy povinnost určité incidenty nahlásit (článek 6 odst. 1 písm. b) nařízení GDPR). Citlivé údaje, jako jsou zdravotní údaje nebo členství v odborech (úplný seznam citlivých údajů najdete v článku 9 odst. 1 nařízení GDPR), může společnost Pfizer používat za účelem stanovení, výkonu nebo obhajoby právních nároků (článek 9 odst. 2 písm. f) nařízení GDPR), je-li to nezbytné z důvodů významného veřejného zájmu, na základě právních předpisů Evropské unie nebo členského státu, který by měl být úměrný sledovanému cíli (článek 9 odst. 2 písm. g) nařízení GDPR), nebo pokud je to nezbytné z důvodu veřejného zájmu s ohledem na veřejné zdraví, jako je zajištění vysokých standardů kvality a bezpečnosti zdravotnické péče a léčivých přípravků nebo lékařského zařízení, na základě právních předpisů Evropské unie nebo členského státu (článek 9 odst. 2 písm. i) nařízení GDPR).

V souvislosti s linkou Compliance Helpline nebudeme subjekty údajů vystavovat rozhodnutím založeným pouze na automatizovaném zpracování údajů včetně profilování (článek 22 nařízení GDPR).

Fungování linky Compliance Helpline a související postupy

Váš hovor na Pfizer Compliance Helpline přijme pracovník společnosti NAVEX. Společnost NAVEX neuchovává telefonní čísla přichozích hovorů, takže informace o vašem telefonátu zůstávají anonymní. Společnost NAVEX hovory také nenahrává. Pracovník se vás jménem společnosti Pfizer může zeptat na některé informace, zaznamenaná je a může vám položit pár doplňujících otázek pro objasnění záležitosti. Upozorňujeme, že pracovník společnosti NAVEX vám nemůže odpovědět na otázky týkající se etiky nebo zásad ani vám poradit, jak postupovat. Společnost NAVEX nesmí rozhodovat o krocích nebo šetření v souvislosti s vaším hlášením. Společnost NAVEX se řídí pokyny společnosti Pfizer. Pokud se rozhodnete využít online nástroj pro nahlašování obav, budou tytéž informace zaznamenány v elektronické podobě.

Po počátečním oznámení nebo žádosti bude vypracována podrobná zpráva a společnost NAVEX ji odešle přímo divizi Compliance společnosti Pfizer. V závislosti na povaze dané záležitosti a v souladu s povinnostmi zachování důvěrnosti může divize Compliance hlášení a související dokumentaci předat příslušným zaměstnancům společnosti Pfizer, které je třeba uvědomit, například pracovníkům právního oddělení, oddělení People Experience („PX“) nebo oddělení auditu, aby mohli provést další šetření a záležitost vyřešit. V průběhu šetření od vás můžeme potřebovat dodatečné informace a objasnění. V takovém případě vás budeme kontaktovat přímo. V případě potřeby může divize

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Compliance informovat pracovníky oddělení PX nebo vedení společnosti Pfizer také o zjištěném porušení předpisů, aby mohla stanovit disciplinární kroky a aby byla zachována transparentnost. Informace mohou být sdíleny rovněž s externími poradci společnosti Pfizer, například s právními poradci nebo auditory. Ti mají povinnost zachovat přísnou důvěrnost. O průběhu šetření a následných krocích vycházejících z výsledků šetření vás budeme informovat.

V rámci šetření společnost Pfizer usiluje o to, aby byly všechny osoby jmenované v hlášení v rozumném časovém horizontu informovány o obviněních, která proti nim byla vznesena, a pokud to nebude nutné, neodhalí vaši totožnost. Osoby zmíněné v hlášení budou mít právo reagovat na informace, které jste oznámili. Upozorňujeme, že vámi poskytnuté informace mohou vést k rozhodnutím, která budou mít vliv na jedince ve společnosti Pfizer a jiné třetí strany zapojené do příslušné události. Proto vás žádáme, abyste poskytovali pouze informace, které jsou podle vašeho nejlepšího vědomí přesné. Vědomé poskytnutí nepřesných nebo zavádějících informací může vést k disciplinárnímu řízení, nebo dokonce k občanskému či trestnímu řízení. Každé hlášení by se tak mělo omezovat na skutečnosti, které s tímto hlášením souvisejí a které jsou relevantní pro následné vyšetřování.

Odvěta vůči jedinci, který požádá o radu, vznesе obavu nebo nahlásí profesní pochybení, nebo vůči facilitátorům, jedincům, nebo subjektům, kteří jsou s osobou nahlašující obavu spojeni, je přísně zakázána. Jestliže se jakákoli osoba bude mstít jedinci, který pravdivě nahlásil potenciální porušení předpisů, společnost Pfizer přijme příslušná opatření – a to i pokud se později ukáže, že se jedinec při prvotním nahlášení záležitosti mýlil. Domníváte-li se, že vůči vám nebo komukoli jinému bylo podniknuto odvetné opatření, měli byste kontaktovat divizi Compliance (viz kontaktní údaje níže).

Použití a uchovávání informací a přenos údajů

Společnost Pfizer uzavřela smlouvu, která společnost NAVEX na základě přísných povinností uchování důvěrnosti zavazuje k tomu, aby dbala na důvěrnost a zabezpečení vašich osobních údajů a aby vaše osobní údaje využívala pouze pro účely poskytování služeb naší linky Compliance Helpline. Informace, které od společnosti NAVEX obdržíme, a jakékoli osobní údaje, které nám poskytnete, budou uloženy v databázi společnosti Pfizer (a v databázi našich dodavatelů, potřebujeme-li jejich asistenci s šetřením), a to s omezením přístupu.

Vaše osobní údaje můžeme předat našim přidruženým společnostem, pokud je potřebují znát, včetně přenosu do zemí s jinými předpisy na ochranu údajů, než jaké platí v zemi, kde pracujete, mimo jiné i k jiným partnerským společnostem nebo dodavatelům společnosti Pfizer, je-li to nutné k vyšetřování hlášení a k poskytování služeb linky Compliance Helpline. Vaše osobní údaje můžeme konkrétně předat oddělení Compliance společnosti Pfizer Inc. Upozorňujeme, že některé země mimo EHS včetně USA Evropská komise neuznává jako země poskytující adekvátní úroveň ochrany podle standardů EHS. Země, které Evropská komise neuznává jako země poskytující adekvátní úroveň ochrany, jsou k dispozici zde: [Adequacy decisions \(europa.eu\)](https://eudataprivacy.europa.eu/).

Zavedli jsme adekvátní opatření, jako jsou standardní smluvní doložky Evropské komise k povolení přenosu a ochrany vašich osobních údajů do zemí, které Evropská komise neuznává jako země poskytující adekvátní úroveň ochrany údajů. Kopii těchto opatření můžete vyžádat od pověřence pro ochranu osobních údajů ve společnosti Pfizer. Příslušné kontaktní údaje najdete na webu DPO.Pfizer.com.

Společnost Pfizer také může mít povinnost předat určité nebo veškeré vaše osobní údaje orgánům činným v trestním řízení nebo jiným orgánům v dané zemi.

Informace související s určitým hlášením přijatým prostřednictvím Pfizer Compliance Helpline budou dle potřeby po omezenou dobu archivovány nebo odstraněny na základě následujících kritérií: po uzavření vyšetřování, pokud nejsou nutné žádné další kroky, není-li společnost Pfizer ze zákona povinna je uchovávat po delší dobu; po uplynutí lhůty pro případný soudní spor, není-li společnost Pfizer ze zákona povinna je uchovávat po delší dobu; a po uplynutí doby, po kterou máme povinnost uchovávat záznamy související s vyšetřováními. Podrobnější informace najdete v příslušných firemních zásadách pro uchovávání záznamů. S veškerými dotazy se prosím obraťte na divizi Compliance.

Vaše práva

V souladu s podmínkami uvedenými v nařízení GDPR a/nebo platných právních předpisech máte právo na přístup ke svým osobním údajům (článek 15 nařízení GDPR), právo na opravu svých osobních údajů (článek 16 nařízení GDPR), právo na výmaz svých osobních údajů (článek 17 nařízení GDPR), právo na omezení zpracování svých osobních údajů (článek 18 nařízení GDPR), právo na přenositelnost údajů (článek 20 nařízení GDPR) a právo za určitých okolností se zpracováním vašich osobních údajů nesouhlasit (článek 21 nařízení GDPR).

Pokud si přejete některá z práv podle nařízení GDPR uplatnit, kontaktujte pověřence pro ochranu osobních údajů ve společnosti Pfizer (viz [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Na vaši žádost odpovíme v souladu s příslušnými právními předpisy.

Máte také právo kdykoli podat stížnost k příslušným orgánům pro ochranu osobních údajů pro vaši zemi nebo region.

Pokud máte jakékoli dotazy nebo připomínky týkající se linky Compliance Helpline, kontaktujte nás na čísle +1 212 733 3026, na e-mailové adrese corporate.compliance@pfizer.com nebo poštovní adrese 66 Hudson Boulevard East, New York, NY 10001, USA.

¹ Společnost Pfizer v určitých zemích EU také nabízí místní kanály pro nahlašování obav. Další informace o nahlašování obav na místní úrovni, včetně oznámení o ochraně osobních údajů v rámci místních kanálů pro nahlašování obav a podrobností o tom, co lze na místní úrovni nahlásit, najdete na intranetu Pfizer pro vaši zemi nebo kontaktujete-li divizi Compliance.

DENMARK

Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

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We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

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Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

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PFIZER, INC.

ELI/EMPI/ÜKI ÕIGUSKUULEKUSE ABILIIN
SUUNISED JA ISIKUANDMETE KAITSE TEATIS

Pfizeri õiguskuulekuse abiliini („abiliin“) pakub Pfizer, Inc. („Pfizer“, „meie“) kui teie isikuandmete eest vastutav ettevõtte. Veebilehte ja telefoniliini, mille kaudu saate teatada vahejuhtumist, haldab praegu NAVEX Global UK Limited, mis on NAVEX Global Holding ettevõtte aadressiga Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Ühendkuningriik („NAVEX“) ja Pfizeri abiliini sõltumatu teenusepakkuja.

Üldist

Abiliini andmete vastutav töötleja on: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

Pfizeri andmekaitseametnikuga saate ühendust ülaltoodud kontaktandmete või veebilehtede privacy.officer@pfizer.com või DPO.Pfizer.com kaudu.

Abiliini võib kasutada, et teatada tööga seotud finants- ja äritegevuse probleemidest, näiteks seoses raamatupidamisega, siseauditi meetmetega, auditeerimisega, pistise võtmise ja korruptsiooniga, pangandus- ja finantskuritegevusega ning EL-i seaduste rikkumistega, sh: avalikud pakkumised, finantsteenused, tooted ja turud, rahapesu ja terrorismi rahastamise tõkestamine, tooteohutus, transpordi ohutus, rahvatervis, keskkonnakaitse, tarbijakaitse, EL-i finantshuve mõjutavad või siseturgu puudutavad (nt konkurents ja riigiabi reeglid) rikkumised, kiirguskaitse ja tuumaohutus, toiduohutus, loomade tervise ja heaolu kaitse, isikuandmete kaitse, andmete kaitse ja turvalisus. Lisaks ülaltoodule võib mõnes riigis teatada veel muudest probleemidest. Rohkem teavet saab meie kaebuse esitamise veebirakendusest pfizer.ethicspoint.com.

Abiliini kasutamine on vabatahtlik¹. Töötajaid julgustatakse abiliini kasutades end tuvastama, kuid seda ei pea tegema, kui kohalik kehtiv seadus seda lubab.

Isikuandmete töötlemise eesmärk

Abiliiniga seotud isikuandmete töötlemise eesmärk on tagada vastavus kehtivate rahvusvaheliste ja kohalike seadustega ning ettevõttesiseste eeskirjadega. Seda mitte tehes võivad tagajärjeks olla suured trahvid, vangistus või muud kohustused ja karistused vastavalt kehtivatele seadustele.

Me kogume ja töötleme teie isikuandmeid, mis jõuavad meieni abiliini kaudu, järgmistel eesmärkidel.

- Teie teate usutavuse ja selles sisalduvate andmete kontrollimiseks, et vältida võimalikke seaduserikkumisi.
- Seaduste ja eeskirjade võimalike rikkumiste (eriti ülalmainitute) uurimiseks.
- Kehtivatele seadustele vastavuse tagamiseks.
- Pfizeri tüdarettevõtetega koostöötamiseks seoses nende kohustustega uurida rikkumisi.
- Kolmandate osapoolte kaebuste kaitsmiseks ja kolmandate osapooltele kaebuste esitamiseks.
- Abiliini ja uurimisprotsesside arendustegevuseks.

Teabe ja isikuandmete kogumine ja töötlemine

Pfizer võib abiliini kaudu koguda ja töödelda järgmist teavet: teie nimi, ametinimetus ja kontaktteave (v.a kui teade on anonüümne); teie teates nimetatud isikute nimed ja muud andmed; teie ülemuste nimed ja ametinimetused; teie kaebuses esitatud probleemse käitumise kirjeldus, sh kuupäev ja asukoht; ning muu asjakohane teave ja muud küsimused, mille võite Pfizerile esitada. Pfizer võib edasise uurimise käigus koguda teavet ka teistelt isikutelt. Teatud

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tingimustel võime töödelda ka tundlikke andmeid, nagu terviseandmed, ametiühingu liikmelisus, kui neid andmeid meile esitate ja/või need on uurimisel asjakohased.

Teie esitatud teavet käsitletakse konfidentsiaalselt vastavalt kehtivatele seadustele.

Pfizer võib kasutada ülalmainitud teavet, sest me kas peame vastavama Pfizerile kohaldatud õigusnõuetele EL-i isikuandmete kaitse üldmääruse („GDPR“) artikli 6 lõigu 1 punkt C) või meil on õigustatud huvi uurida teie esitatud teadet (GDPR-i artikli 6 lõigu 1 punkt f) või teil võib olla töölepingu kohaselt kohustus teavitada teatud vahejuhtumitest (GDPR-i artikli 6 lõigu 1 punkt b). Pfizer võib tundlike andmetega, nagu terviseandmed, ametiühingu liikmelisus (tundlike andmete loendit vt GDPR-i artikli 9 lõik 1), seoses kasutada seda teavet õigusnõuete esitamiseks, rakendamiseks või kaitsmiseks (GDPR-i artikli 9 lõigu 2 punkt f), kui see on vajalik olulise avaliku huvi põhjustel või Euroopa Liidu või liikmesriigi seaduse alusel, viisil, mis on proportsionaalne taotletud eesmärgiga (GDPR-i artikli 9 lõigu 2 punkt g), või kui see on vajalik avaliku huvi põhjustel rahvatervise valdkonnas, näiteks tagamaks tervishoiu ja ravimipreparaatide või meditsiiniseadmete kõrgeid kvaliteedi- ja ohutusstandardeid Euroopa Liidu või liikmesriigi seaduste alusel (GDPR-i artikli 9 lõigu 2 punkt i).

Me ei kohalda abiliiniga seoses andmesubjektidele otsuseid, mis põhinevad ainult automaattöötusel, sh profiilimine (GDPR-i artikkel 22).

Abiliini toimimine ja protsessid

Abiliinile tehtud kõnele vastab NAVEXi esindaja. NAVEX ei salvesta ühegi sissetuleva kõne telefoninumbrit. Seega jäävad teie telefoniandmed anonüümseks. Ühtlasi ei salvesta NAVEX kõnesid. Esindaja võib küsida teilt Pfizeri nimel erinevaid andmeid, dokumenteerida teie vastused ja küsida kontrollküsimusi, et täpsustada teavet. Arvestage, et NAVEXi esindaja ei saa vastata küsimustele eetika või eeskirjade kohta ega saa anda teile nõu, kuidas toimida. NAVEX ei tohi teie teatega seoses teha otsuseid toimingute või uurimiste kohta. NAVEX järgib Pfizerilt saadud juhiseid. Kui kasutate kaebuse esitamise veebirakendust, salvestatakse sama teave elektrooniliselt.

Pärast seda, kui esialgne teade või päring on esitatud, valmistatakse ette detailne dokument ja saadetakse NAVEXi poolt Pfizeri õiguskuulekuse osakonnale. Olenevalt küsimuse iseloomust võib õiguskuulekuse osakond, järgides talle seatud konfidentsiaalsusnõudeid, edastada teate ja sellega seotud dokumentatsiooni edasiseks uurimiseks ja lahendamiseks asjakohasele Pfizeri töötajale, keda on tarvis teavitada, näiteks õigus-, People Experience (PX)- või auditeerimisosakonna esindajatele. Meil võib uurimise edenes olla vaja saada teilt täiendavat teavet või täpsustusi ning sellisel juhul võtame teiega otse ühendust. Vajaduse korral võib õiguskuulekuse osakond teavitada ka personaliosakonda või Pfizeri juhte rikkumisi puudutavatest leidudest, et otsustada distsiplinaarmedmed ning tagada tegevuse läbipaistvus. Teavet võidakse jagada ka Pfizeri väliste nõustajatega, näiteks advokaatide või audiitoritega, kes on kohustatud rangelt järgima konfidentsiaalsusnõudeid. Me teavitame teid uurimise edenemisest ja uurimise tulemuse tõttu rakendatud meetmetest.

Pfizeri eesmärk on uurimise raames teavitada igat teates mainitud isikut tema vastu esitatud süüdistustest piisava aja jooksul, kuid ei avalda selle käigus teie isikuandmeid. Neil isikutel on õigus teie esitatud teabele reageerida. Arvestage sellega, et teie esitatud teabe põhjal võidakse langetada otsuseid, mis mõjutavad Pfizeri töötajaid ja asjasse puutuva sündmusega seotud kolmandaid osapooli. Seetõttu palume teil esitada üksnes sellist teavet, mis on teile teadaolevalt täpne. Ebatäpse või valejälgedele viiva teabe esitamine võib kaasa tuua distsiplinaarmenetluse või isegi tsiviil- või kriminaalvastutuse kohaldamise. Lisaks peaks iga kaebus piirnema võimaluse korral faktidega, mis haakuvad teate teema ja järgneva uurimisega.

Inimeste, kes otsivad nõu, tõstatavad küsimusi või teatavad väärsti käitumisest, või kaebust esitavate inimestega seotud abistajate (eraisikud või juriidilised isikud) karistamine on rangelt keelatud. Kui keegi karistab inimest, kes on tõetruult teatanud rikkumisest, võtab Pfizer kasutusele vastavad meetmed, isegi kui hiljem selgub, et see inimene on eksinud rikkumise tõlgendamisel. Kui arvate, et teid või kedagi teist seotud inimest on karistatud seoses kaebuse esitamisega, peate võtma ühendust õiguskuulekuse osakonnaga (kontaktandmed on esitatud allpool).

Teabe kasutamine, salvestamine ja andmete edastamine

Pfizer on sõlminud andmete vastutava töötlejaga NAVEX lepingu rangete konfidentsiaalsusnõuete alusel, et kaitsta teie isikuandmete konfidentsiaalsust ja turvalisust ning NAVEX võib kasutada teie isikuandmeid vaid abiliini teenuse osutamiseks. NAVEXilt saadud teavet ja kõiki isikuandmeid, mis meile esitate, salvestame Pfizeri andmebaasis (ja meie edasimüüjate andmebaasides, kui vajame nende abi uurimise käigus), millele on piiratud ligipääs.

ESTONIA

Me võime saata teie isikuandmeid meie tütarettevõtetele, kui nad peavad nendest teadma, sh sellistele, mis asuvad teie töökohariigist erinevate andmekaitsereeglitega riikides, sh Pfizeri tütarettevõtetele või edasimüüjatele, kui see on vajalik kaebuse uurimiseks ja abiliini teenuse pakkumiseks. Eriti võime saata teie isikuandmed Pfizer Inc.-i õiguskuulekuse osakonnale. Arvestage, et Euroopa Komisjon ei loe mõnda mitte-EMPi riiki, sh USA-d, piisavat kaitsetaset tagavaks riigiks vastavalt EMP-i standarditele. Piisavat kaitsetaset tagavateks riikides loetakse järgmises loendis toodud riike: [Adequacy decisions \(europa.eu\)](https://eudataprotection.eu/).

Oleme paika seadnud sobivad meetmed, nagu Euroopa Komisjoni vastu võetud standardsed lepingusätted, et lubada teie isikuandmete edastamist riikidesse ja nende kaitset riikides, mida Euroopa Komisjon ei loe piisavat kaitsetaset tagavaks riigiks. Kui asute EMP-is, võite saada koopia neist meetmetest, võttes ühendust kohaliku Pfizeri andmekaitseametnikuga, kelle kontaktandmed leiate aadressilt DPO.Pfizer.com.

Ühtlasi võib Pfizer olla kohustatud saatma kõik teie isikuandmed või teatud osa nendest õiguskaitseorganitele või -ametitele või vastavate riikide muudele asutustele.

Abiliini kaudu edastatud teave arhiveeritakse vajadusel teatud ajaks või kustutatakse järgmiste kriteeriumite alusel: kui uurimine on lõpetatud ja edasisi toiminguid ei ole vaja teha, kui just Pfizer ei pea seaduse alusel andmeid kauem säilitama; kui kõigi asjasse puutuvate kohtuvaidluste periood on möödunud, kui just Pfizer ei pea seaduse alusel andmeid kauem säilitama; ja kui meie kohustused uurimisega seotud andmete hoidmiseks on lõppenud. Vaadake lisateavet andmete hoidmist puudutavast asjakohasest korporatiivpoliitika dokumendist. Kui teil on küsimusi, siis võtke ühendust õiguskuulekuse osakonnaga.

Teie õigused

Vastavalt GPDR-is ja/või muudest kehtivates seadustes sätestatud nõuetele on teil õigus pääseda ligi enda isikuandmetele (GDPR-i artikkel 15), õigus parandada enda isikuandmeid (GDPR-i artikkel 16), õigus kustutada enda isikuandmed (GDPR-i artikkel 17), õigus piirata enda isikuandmete töötlemist (GDPR-i artikkel 18), õigus andmete ülekandmisele (GDPR-i artikkel 20), õigus teatud tingimustel esitada vastuväiteid enda isikuandmete töötlemisele (GDPR-i artikkel 21).

Kui soovite GDPR-i alusel kasutada mõnda oma õigust, võite võtta ühendust Pfizeri andmekaitseametnikuga (vt DPO.Pfizer.com). Vastame teie taotlusele kooskõlas kehtivate seadustega.

Samuti on teil õigus esitada kaebus oma riigi või piirkonna pädevale andmekaitseasutusele.

Kui teil on küsimusi või muresid seoses abiliiniga, võtke meiega ühendust telefonil +1 212 733 3026, corporate.compliance@pfizer.com või 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ Teatud EL-i riikides pakub Pfizer ka kohalikke kanaleid probleemidest teatamiseks. Rohkem teavet kohalikul tasandil teatamise kohta, sh teavet kohaliku kanali isikuandmete kaitse ja selle kaudu teatatavate probleemide kohta, saate, kasutades Pfizeri kohalikku sisevõrku või võttes ühendust õiguskuulekuse osakonnaga.

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PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/eu-justice/justice-portal/pages/adequacy-decisions.jsp).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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PFIZER, INC.

EU/ETA-ALUEEN JA YHDISTYNEEN KUNINGASKUNNAN COMPLIANCE-TUKILINJA OPASTUS JA TIETOSUOJAILMOITUS

Pfizerin Compliance-tukilinjan ("tukilinja") tarjoaa Pfizer, Inc. ("Pfizer", "me" tai "meidän") henkilötiedoistasi vastaavana yhtiönä. Verkkosivuston ja puhelinlinjan, joiden kautta voi tehdä ilmoituksia tapauksista, toiminnasta vastaa tällä hetkellä NAVEX Global UK Limited, NAVEX Globalin holdingyhtiö, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Yhdistynyt Kuningaskunta ("NAVEX"), Pfizerin tukilinjan itsenäinen palveluntarjoaja.

Yleistä

Tukilinjan rekisterinpitäjä on: Pfizer, Inc., 66 Hudson Boulevard East, New York, NY 10001 USA.

Voit ottaa yhteyttä Pfizerin tietosuojavastaavaan käyttämällä edellä mainittuja yhteystietoja, sähköpostiosoitetta privacy.officer@pfizer.com tai Internet-osoitetta DPO.Pfizer.com.

Tukilinjaa voidaan käyttää yleisesti ilmoittamaan työhön liittyvistä taloudellisista ja liiketoiminnallisista huolenaiheista, jotka liittyvät esimerkiksi kirjanpitoon, sisäisen kirjanpidon tarkistuksiin, tilintarkastusasioihin, lahjontaan ja korrupioon, pankki- ja talousrikoksiin tai EU-lainsäädännön rikkomuksiin, mukaan lukien julkisiin hankintoihin, rahoituspalveluihin, tuotteisiin ja markkinoihin, rahanpesun ja terrorismin rahoituksen estämiseen, tuoteturvallisuuteen, liikenneturvallisuuteen, kansanterveyteen, ympäristönsuojeluun ja kuluttajansuojaan liittyvien lakien rikkomukset, sekä EU:n taloudellisiin etuihin tai EU:n sisämarkkinoihin (esim. kilpailuun ja valtion tukiin liittyvät säännöt), säteilyturvallisuuteen ja ydinturvallisuuteen, elintarviketurvallisuuteen, eläinten terveyteen ja hyvinvointiin sekä yksityisyyden suojaan, tietosuojaan ja tietoturvaan vaikuttavat rikkomukset. Edellä mainittujen lisäksi joissakin maissa voidaan ilmoittaa myös muista asioista. Katso lisätietoja verkkoraportointityökalustamme osoitteesta pfizer.ethicspoint.com.

Tukilinjan käyttäminen on vapaaehtoista¹. Sinua kannustetaan tukilinjalle tehtävää ilmoitusta tehdessäsi kertomaan nimesi; sinulla ei ole tähän velvollisuutta, jos sovellettava laki tämän sallii.

Henkilötietojen käsittelyn tarkoitus

Henkilötietojen käsittelyn tarkoitus tukilinjan yhteydessä on sovellettavien kansainvälisten ja paikallisten lakien ja sisäisten käytäntöjen noudattamisen varmistaminen. Jos emme varmista sääntöjen noudattamista, meille saatetaan sovellettavien lakien nojalla määrätä suuret sakot, vankeutta, maksuvelvollisuuksia ja muita moitteita.

Keräämme ja käsittelemme tukilinjan kautta saamiamme henkilötietojasi seuraaviin tarkoituksiin:

- tarkistaaksemme raporttisi ja sen sisältämien tietojen uskottavuuden lakien rikkomisen välttämiseksi,
- tutkiaksemme oletettuja lakien ja käytäntöjen, etenkin edellä mainittujen rikkomuksia,
- varmistaaksemme sovellettavien lakien noudattamisen,
- tehdäksemme yhteistyötä Pfizerin tytäryhtiöiden kanssa niiden rikkomusten tutkintavelvoitteiden osalta,
- puolustautuaksemme kolmansien osapuolten vaatimuksilta ja esittääksemme vaatimuksia kolmansille osapuolille,
- kehittääksemme tukilinja- ja tutkintaprosessejamme.

Tietojen ja henkilötietojen kerääminen ja käsittely

Pfizer voi kerätä ja käsitellä seuraavia tietoja tukilinjan kautta: nimesi, tittelisi, asemasi ja yhteystietosi (ellei ilmoitus ole anonyymi); niiden henkilöiden nimet ja tiedot, jotka nimetään raportissasi; esihenkilöidesi nimi ja asema, kuvaus raportoidusta käytösongelmasta, mukaan lukien päivämäärä ja paikka sekä muita asiaankuuluvia tietoja; sekä ne kysymykset, joita sinulla voi olla Pfizerille. Pfizer voi kerätä tietoja myös muilta mahdollisen tutkinnan aikana. Tietyissä olosuhteissa saatamme käsitellä myös arkaluontoisia tietoja, kuten terveystietoja tai ammattiliiton jäsenyyttä, jos luovutat niitä meille ja/tai jos ne ovat olennaisia tutkinnan tarkoituksen kannalta.

Antamiasi tietoja kohdellaan luottamuksellisina sovellettavien lakien mukaisesti.

Pfizer voi käyttää edellä mainittuja tietoja, koska Pfizerin on täytettävä sen lailliset velvollisuudet (EU:n yleisen tietosuojasetuksen [”GDPR”] 6 artiklan 1 kohdan c alakohta) tai Pfizer haluaa oikeuksiensa puitteissa tutkia Pfizerille lähettämäsi raportin (GDPR-asetuksen 6 artiklan 1 kohdan f alakohta), tai sinulla saattaa olla työsopimuksen mukainen velvoite raportoida tiettyjä tapauksia (GDPR-asetuksen 6 artiklan 1 kohdan b alakohta). Arkaluontoisten tietojen, kuten terveystietojen ja ammattiliiton jäsenyyden, osalta (katso luettelo arkaluontoisista tiedoista GDPR-asetuksen 9 artiklan kohdasta 1) Pfizer voi käyttää tietoja oikeudellisten vaateiden muodostamiseen, soveltamiseen tai puolustamiseen (GDPR-asetuksen 9 artiklan 2 kohdan f alakohta), jos se on tarpeen merkittävän yleisen edun vuoksi unionin tai jäsenvaltion lain nojalla ja oikeassa suhteessa tavoitteeseen (GDPR-asetuksen 9 artiklan 2 kohdan g alakohta) tai jos se on tarpeen julkiseen terveydenhuoltoon liittyvät yleisen edun vuoksi, kuten terveydenhuollon, lääkevalmisteiden tai lääkinnällisten laitteiden korkean laadun ja turvallisuuden varmistamiseksi, unionin tai jäsenvaltion lain (GDPR-asetuksen 9 artiklan 2 kohdan i alakohta) nojalla.

Emme altista rekisteröityjä päätöksille, jotka perustuvat yksinomaan automaattiseen käsittelyyn, profilointi mukaan lukien, tukilinjan yhteydessä (GDPR-asetuksen 22 artikla).

Tukilinjan toiminta ja prosessit

NAVEX-edustaja vastaa tukilinjalle soittamaasi puheluun. NAVEX ei tallenna tulevien puheluiden puhelinnumeroita, joten puhelutietosi pysyvät nimettöinä. NAVEX ei myöskään nauhoita puheluita. Edustaja saattaa kysyä sinulta Pfizerin puolesta monia eri tietoja, dokumentoida ilmoittamasi asiat ja esittää lisäkysymyksiä tietojen selvittämiseksi. Huomaa, että NAVEX-edustaja ei pysty vastaamaan eettisiin tai menettelyihin liittyviin kysymyksiin eikä neuvomaan missään toimenpiteissä. NAVEX ei voi päättää mistään raporttiisi liittyvistä toimenpiteistä tai tutkimuksista. NAVEX noudattaa Pfizerin antamia ohjeita. Jos valitset verkkoraportointityökalun, samat tiedot kerätään sähköisesti.

Alkuraportin tai -kyselyn jälkeen laaditaan yksityiskohtainen asiakirja, jonka NAVEX lähettää suoraan Pfizerin Compliance-osastolle. Asian luonteesta riippuen ja luottamuksellisuuteen liittyvien velvoitteidensa mukaisesti Compliance-osasto saattaa siirtää raportin ja siihen liittyvät asiakirjat asiaankuuluvalla tavalla tarvitsevalle Pfizer-henkilöstön jäsenelle, kuten laki-, People Experience- (”PX”) tai tarkastushenkilöstölle lisätutkimuksia ja ratkaisua varten. Saatamme tarvita sinulta lisätietoja ja selvityksiä tutkimuksen edetessä, missä tapauksessa otamme yhteyttä sinuun suoraan. Compliance-osasto saattaa ilmoittaa tarpeen mukaan myös PX-henkilöstölle tai Pfizerin johtajille mahdollisesti havaitsemistaan rikkomuksista kurinpitotoimien määrittämiseksi ja avoimuuden turvaamiseksi. Tietoja saatetaan jakaa myös Pfizerin ulkopuolisille asiantuntijoille, kuten asianajajille tai tarkastajille, joilta vaaditaan ehdotonta luottamuksellisuutta. Pidämme sinut ajan tasalla tutkimuksen etenemisestä ja tutkimuksen tulosten perusteella suoritetuista toimenpiteistä.

Osana tutkimusta Pfizer pyrkii tiedottamaan jokaiselle raportissa nimetylle henkilölle häntä vastaan esitetyistä syytteistä kohtuullisen ajan kuluessa mutta pyrkii pitämään henkilöllisyytesi salassa. Tietoihin liittyvillä henkilöillä on oikeus reagoida raportoiמיי tietoihin. Otathan huomioon, että antamasi tiedot voivat johtaa päätöksiin, jotka vaikuttavat henkilöihin Pfizerilla ja muihin kolmansiiin osapuoliin, jotka olivat osallisina tapahtuneessa. Pyydämme sen tähden, että annat meille ainoastaan tietoja, jotka parhaiden tietojesi mukaan pitävät paikkansa. Väärien tai harhaanjohtavien tietojen antaminen tietoisesti saattaa johtaa kurinpitotoimiin tai jopa vastuuseen siviili- tai rikosoikeudellisissa asioissa. Kaikkien raporttien tulisi keskittyä ainoastaan tosiasioihin, jotka ovat tärkeitä kyseiselle raportille ja sitä seuraavassa tutkinnassa.

Kostotoimet on ehdottomasti kielletty sellaisia henkilöitä vastaan, jotka pyytävät neuvoja, esittävät huolenaiheen tai raportoivat väärinkäytöksestä, tai yhteyshenkilöitä, henkilöitä tai yksiköitä vastaan, jotka ovat yhteydessä raportoiviin henkilöihin. Mikäli joku kohdistaa kostotoimia henkilöön, joka on rehellisesti raportoinut rikkomuksesta, Pfizer ryhtyy

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asianmukaisesti toimiin – vaikka myöhemmin osoittautuisikin, että henkilö oli erehtynyt raportoidessaan ongelmasta. Jos sinuun tai johonkuhun muuhun asiaan liittyvään on mielestäsi kohdistettu kostotoimia, ota yhteyttä Compliance-osastoon (yhteystiedot jäljempänä).

Tietojen käyttäminen, säilyttäminen ja siirto

Pfizer on velvoittanut NAVEXin henkilötietojen käsittelijänä ehdotonta luottamuksellisuutta noudattaen suojelemaan henkilötietojasi ja pitämään ne turvassa, ja se saa käyttää henkilötietojasi vain tukilinjan tarjoamiseen. NAVEXilta saamamme tiedot ja meille mahdollisesti luovuttamasi henkilötiedot tallennetaan Pfizerin tietokantaan, johon on rajattu pääsy (ja toimittajiemme tietokantaan, jos tarvitsemme heitä avuksi tutkimuksessa).

Saatamme siirtää henkilötietojasi tytäryhtiöllemme, jos ne tarvitsevat niitä, myös maihin, joilla on eri tietosuojalait kuin maassa, jossa olet töissä sekä muille Pfizerin tytäryhtiöille tai toimittajille raportin tutkimuksen tarpeiden mukaisesti ja tukilinjan tarjoamiseksi. Erityisesti voimme siirtää henkilötietojasi Pfizer, Inc:n Compliance-osastolle. Otathan huomioon, että osa ETA-alueen ulkopuolisista maista, Yhdysvallat mukaan lukien, ei tarjoa Euroopan komission mukaan ETA:n standardien mukaista riittävää tietoturvasoa. Maat, joiden ei katsota tarjoavan riittävää tietoturvasoa, luetellaan täällä: [Adequacy decisions \(europa.eu\)](https://european-commission.eu/adequacy-decisions).

Olemme ottaneet käyttöön riittävät toimenpiteet, kuten Euroopan komission hyväksymät mallisopimuslausekkeet, henkilötietojesi suojaamisen ja sellaisiin maihin siirtämisen sallimiseksi, joiden Euroopan komissio ei katso tarjoavan riittävää tietoturvasoa. Voit saada kopion näistä toimenpiteistä ottamalla yhteyttä paikalliseen Pfizerin tietosuojavastaavaan, jonka yhteystiedot saat osoitteesta [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer voi myös olla velvollinen siirtämään tietyt tai kaikki henkilötietosi asianmukaisten maiden lainvalvontavirastoille tai -viranomaisille tai muille viranomaisille.

Tiedot, jotka liittyvät tukilinjan kautta tehtyyn raporttiin, arkistoidaan rajoitetuksi ajaksi tarpeen mukaan tai poistetaan seuraavien perusteiden mukaan: kun tutkinta on lopetettu eikä se vaadi muita toimenpiteitä, ellei laki vaadi Pfizeria säilyttämään tietoja pidempään; kun mahdollisten oikeudenkäynteihin liittyvien asioiden aikarajat täyttyvät, ellei laki vaadi Pfizeria säilyttämään tietoja pidempään; ja kun Pfizerin velvollisuus säilyttää tutkintaan liittyviä tietoja umpeutuu. Voit katsoa lisätietoja tietojen säilyttämisestä yrityksen käytäntöjen sitä koskevasta osasta. Jos sinulla on kysyttävää, ota yhteyttä Compliance-osastoon.

Oikeutesi

GDPR-asetuksessa ja/tai muissa sovellettavissa laeissa asetettujen ehtojen mukaan sinulla on oikeus saada pääsy omiin henkilötietoihisi (GDPR-asetuksen 15 artikla), oikeus oikaista henkilötietojasi (GDPR-asetuksen 16 artikla), oikeus saada henkilötietosi poistetuiksi (GDPR-asetuksen 17 artikla), oikeus rajoittaa henkilötietojesi käsittelyä (GDPR-asetuksen 18 artikla), oikeus tietojen siirrettävyyteen (GDPR-asetuksen 20 artikla) ja oikeus vastustaa henkilötietojesi käsittelyä tietyissä olosuhteissa (GDPR-asetuksen 21 artikla).

Jos haluat käyttää GDPR-asetuksen mukaista oikeuttasi, voit ottaa yhteyttä Pfizerin tietosuojavastaavaan (katso [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Vastaamme pyyntösi sovellettavan lain mukaisesti.

Sinulla on myös aina oikeus tehdä valitus alueellasi toimivaltaiselle tietosuojaviranomaiselle.

Jos sinulla on itse tukilinjaan liittyviä kysymyksiä tai huolenaiheita, ota meihin yhteyttä numeroon +1 212 733 3026, sähköpostiosoitteeseen corporate.compliance@pfizer.com tai osoitteeseen 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ Tietyissä EU-maissa Pfizer tarjoaa myös paikallisia raportointikanavia. Lisätietoja paikallisesta raportoinnista, mukaan lukien paikallisen raportointikanavan tietosuojailmoituksen ja tiedon siitä, mitä paikallisen raportointikanavan kautta voi raportoida, saat Pfizerin paikallisesta intranetistä tai ottamalla yhteyttä Compliance-osastoon.

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Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR). In addition, data related to criminal convictions and offenses may be collected, in compliance with GDPR (Article 10) and local laws.

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR) and, if applicable, the right to define directives concerning the fate of personal data after death.

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](#)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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PFIZER, INC.

FRANCE COMPLIANCE HELPLINE

GUIDE ET DECLARATION DE CONFIDENTIALITE

La Compliance Helpline de Pfizer, (la « Helpline ») est fournie par Pfizer, Inc. (« Pfizer », « nous » ou « notre ») en tant qu'entreprise responsable de vos données personnelles. Le site Web et la ligne téléphonique par le biais desquels vous pouvez signaler un incident sont exploités actuellement par NAVEX Global UK Limited, filiale de NAVEX Global Holding, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Royaume-Uni (« NAVEX »), prestataire indépendant de Pfizer qui fournit la Helpline.

Généralités

Le responsable du traitement des données de la Helpline est : Pfizer, Inc., 66 Hudson Boulevard East, New York, NY 10001 États-Unis.

Vous pouvez contacter le délégué à la protection des données de Pfizer à l'adresse ci-dessus, par e-mail à privacy.officer@pfizer.com ou sur DPO.Pfizer.com.

La Helpline peut généralement être utilisée pour signaler des préoccupations professionnelles concernant des problèmes d'intégrité financière et commerciale, tels que ceux liés à la comptabilité, aux contrôles comptables internes, aux audits, à la corruption, à la criminalité bancaire et financière et aux violations de la législation européenne, notamment en ce qui concerne les marchés publics, les services, produits et marchés financiers, la prévention du blanchiment d'argent et du financement du terrorisme, la sécurité des produits, la sécurité des transports, la santé publique, la protection de l'environnement, la protection des consommateurs, les violations portant atteinte aux intérêts financiers de l'UE ou relatives au marché intérieur (par ex, les règles relatives à la concurrence et aux aides d'État), la radioprotection et la sûreté nucléaire, la sécurité alimentaire, la santé et le bien-être des animaux, ainsi que la protection de la vie privée, la protection des données et la sécurité des données. Dans certains pays, vous pouvez également signaler d'autres problèmes. Pour plus d'informations, consultez notre outil de signalement en ligne sur pfizer.ethicspoint.com.

L'utilisation de la Helpline est volontaire¹. Vous êtes encouragé à vous identifier lorsque vous contactez la Helpline, mais vous n'êtes pas obligé de le faire lorsque cela est prévu par la législation en vigueur.

Finalité du traitement des données personnelles

La finalité du traitement des données personnelles en relation avec la Helpline est d'assurer le respect des lois internationales et locales applicables et des politiques internes. Si nous n'assurons pas la conformité, nous nous exposons à de lourdes amendes, à des peines d'emprisonnement, à des mises en cause et à d'autres conséquences préjudiciables, en fonction des lois applicables.

Nous collectons et traitons vos informations personnelles qui nous sont fournies via la Helpline aux fins suivantes :

- Vérifier la crédibilité de votre signalement et des données qu'il contient, afin d'éviter toute infraction aux lois,
- Enquêter sur les prétendues violations des lois et des politiques, en particulier celles mentionnées ci-dessus,

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- Assurer le respect des lois applicables,
- Coopérer avec les sociétés affiliées de Pfizer dans le cadre de leurs obligations d'enquêter sur les infractions,
- Assurer la défense contre les recours de tiers et préparer des recours contre des tiers,
- Développer notre Helpline et nos processus d'enquête.

Collecte et traitement des informations et données personnelles

Pfizer peut collecter et traiter les informations suivantes via la Helpline : vos nom, titre, poste et coordonnées (sauf si le signalement est anonyme), le nom des personnes citées dans votre signalement et d'autres données les concernant, le nom et le poste de vos supérieurs, une description du comportement douteux signalé, y compris la date et le lieu, ainsi que toute autre information pertinente, ainsi que toute question que vous pourriez poser à Pfizer. Pfizer peut aussi recueillir des informations de tiers lors d'une enquête résultant du rapport. Dans certaines circonstances, nous pourrions également traiter des données sensibles, telles que des données de santé ou l'appartenance à un syndicat, si vous nous les fournissez et/ou si elles sont utiles à l'enquête.

Les informations que vous fournissez seront traitées de manière confidentielle, conformément aux lois applicables.

Pfizer pourrait utiliser les informations susmentionnées soit pour respecter une obligation légale à laquelle Pfizer est soumis (article 6, paragraphe 1, point c) du Règlement général sur la protection des données de l'UE (« RGPD »), soit parce que nous avons un intérêt légitime à enquêter sur le signalement que vous nous avez soumis (article 6, paragraphe 1, point f) du RGPD), ou vous pourriez avoir l'obligation, en vertu de votre contrat de travail, de signaler certains incidents (article 6, paragraphe 1, point b) du RGPD). Concernant les données sensibles, telles que les données de santé, l'appartenance à un syndicat (pour une liste des données sensibles, Cf. article 9, paragraphe 1, du RGPD), Pfizer pourrait utiliser les informations pour la constatation, l'exercice ou la défense de droits en justice (article 9, paragraphe 2, point f) du RGPD) si cela est nécessaire pour des motifs d'intérêt public important, sur la base du droit de l'Union ou du droit d'un État membre qui doit être proportionné à l'objectif poursuivi (article 9, paragraphe 2, point g) du RGPD), ou si le traitement est nécessaire pour des motifs d'intérêt public dans le domaine de la santé publique, notamment aux fins de garantir des normes élevées de qualité et de sécurité des soins de santé et des médicaments ou des dispositifs médicaux, sur la base du droit de l'Union ou du droit de l'État membre (article 9, paragraphe 2, point i) du RGPD). En outre, des données relatives aux condamnations et aux infractions pénales pourraient être collectées, conformément au RGPD (article 10) et à la législation locale.

Nous ne soumettrons pas les personnes concernées à des décisions fondées uniquement sur un traitement automatisé, y compris au profilage, en relation avec la Helpline (article 22 du RGPD).

Fonctionnement et processus de la Helpline

Tout appel sur la Helpline sera traité par un représentant de NAVEX. NAVEX n'enregistre pas le numéro de téléphone des appels entrants afin que vos coordonnées téléphoniques restent anonymes. NAVEX n'enregistre pas non plus les appels. Le représentant pourrait vous demander plusieurs éléments d'information pour le compte de Pfizer, et il documentera votre appel et vous posera des questions afin de clarifier les informations. Notez que le représentant de NAVEX n'est pas en mesure de répondre aux questions d'éthique ou de procédure, et ne peut vous conseiller sur la ligne de conduite à adopter. NAVEX ne peut pas décider des actions ou enquêtes à entreprendre en lien avec votre signalement. NAVEX suit les instructions données par Pfizer. Si vous optez pour l'outil de signalement Web, les mêmes informations sont saisies électroniquement.

Une fois la demande ou le signalement effectués, NAVEX prépare un dossier détaillé et l'envoie directement à la Division Compliance de Pfizer. Selon la nature du problème, et conformément à ses obligations de confidentialité, la Division Compliance peut transmettre le signalement et la documentation liée au personnel compétent de Pfizer devant être informé, comme les représentants des services juridique, People Experience (« PX ») ou Audit, pour une

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enquête plus approfondie. Nous pourrions avoir besoin d'informations supplémentaires ou de clarifications de votre part au fur et à mesure que l'enquête avance, auquel cas nous vous contacterons directement. Si besoin, la Division Compliance peut également informer les membres du service PX ou les dirigeants de Pfizer de toute constatation de violation afin de déterminer d'éventuelles mesures disciplinaires et à des fins de transparence. Les informations peuvent également être partagées avec les conseillers externes de Pfizer, tels que les avocats ou les auditeurs qui sont tenus de les tenir strictement confidentielles. Nous vous informerons de l'état d'avancement de l'enquête et des mesures prises suite aux conclusions de l'enquête.

Dans le cadre de l'enquête, Pfizer a l'intention d'informer en temps voulu chaque personne impliquée dans un signalement sur les accusations la concernant, tout en évitant de dévoiler votre identité. Les personnes impliquées auront le droit de répondre aux informations que vous rapportez. Veuillez noter que les informations que vous fournissez peuvent engendrer des décisions affectant des salariés de Pfizer ou d'autres tierces parties impliquées dans l'incident en question. Ainsi, nous vous remercions de n'indiquer que les informations qui, à votre connaissance, sont exactes. Fournir sciemment des informations inexactes ou erronées peut donner lieu à des mesures disciplinaires, voire à une responsabilité civile ou pénale. De plus, dans la mesure du possible, tout rapport doit se limiter à l'exposition de faits pertinents au rapport et à l'enquête en résultant.

Les représailles contre toute personne recherchant des conseils, soulevant un problème ou signalant une faute professionnelle, ou contre tout conseiller, personne physique ou entité liés à cette personne, sont strictement interdites. Pfizer prendra les mesures nécessaires en cas de représailles à l'encontre d'une personne qui aurait signalé une infraction en toute sincérité, même s'il s'avère par la suite que cette personne s'est trompée lorsqu'elle a signalé le problème. Si vous pensez que vous-même, ou une autre personne concernée, avez fait l'objet de représailles, contactez la Division Compliance (coordonnées ci-dessous).

Conservation des informations, rétention et transfert de données

Pfizer a engagé NAVEX, un sous-traitant soumis à des obligations de confidentialité strictes, pour assurer la confidentialité et la sécurité de vos données personnelles et NAVEX est la seule entité autorisée à utiliser vos données personnelles dans le cadre de la Helpline. Les informations que nous recevons de NAVEX et toutes les données personnelles que vous nous fournissez sont stockées dans une base de données Pfizer (et dans la base de données de nos prestataires, si nécessaire pour nous aider à mener l'enquête) dont l'accès est limité.

Nous pourrions transférer vos données personnelles vers nos sociétés affiliées qui ont un besoin d'en connaître, y compris vers des pays qui ont des règles de protection des données différentes de celles du pays dans lequel vous travaillez, notamment avec les autres filiales ou fournisseurs Pfizer, pour les besoins de l'enquête et la gestion de la Helpline. Nous pourrions notamment transférer vos données personnelles au service Compliance de Pfizer, Inc. Remarque : certains des pays non membres de l'EEE, y compris les États-Unis, ne sont pas reconnus par la Commission européenne comme offrant un niveau de protection adéquat selon les normes de l'EEE. La liste des pays reconnus comme offrant un niveau de protection adéquat est disponible ici : [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/commission/presscorner/detail/en/ip_18_1111).

Nous avons mis en place des mesures adéquates, telles que des clauses contractuelles types adoptées par la Commission européenne pour protéger vos données personnelles et permettre leur transfert vers des pays qui ne sont pas reconnus par la Commission européenne comme offrant un niveau adéquat de protection des données. Vous pouvez obtenir une copie de ces mesures en contactant le délégué à la protection des données de Pfizer, dont les coordonnées sont disponibles sur [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer pourrait également être tenu de transférer tout ou partie de vos données personnelles à la police, à la justice ou à d'autres autorités des pays concernés.

Les informations concernant un signalement effectué via la Helpline seront archivées pendant une durée limitée, si nécessaire, ou supprimées selon les critères suivants : une fois l'enquête close et si aucune autre mesure n'est nécessaire à moins que Pfizer ait l'obligation légale de conserver les données pendant plus longtemps ; à la fin du délai de prescription à moins que Pfizer ait l'obligation légale de conserver les données pendant plus longtemps ; et lorsque nos obligations de tenue de registres relatives aux enquêtes ont expiré. Pour plus de détails, veuillez

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consulter la Politique de l'entreprise en vigueur sur la conservation des registres. Si vous avez des questions, veuillez consulter la division Conformité.

Vos droits

Sous réserve des conditions prévues par le RGPD et/ou d'autres lois applicables, vous avez le droit d'accéder à vos données personnelles (article 15 du RGPD), le droit de rectifier vos données personnelles (article 16 du RGPD), le droit d'obtenir l'effacement de vos données personnelles (article 17 du RGPD), le droit à la limitation du traitement de vos données personnelles (article 18 du RGPD), le droit à la portabilité des données (article 20 du RGPD), le droit de vous opposer au traitement de vos données personnelles dans certains cas (article 21 du RGPD) et, le cas échéant, le droit de donner des directives concernant le sort de vos données personnelles après votre décès.

Si vous souhaitez exercer un droit en vertu du RGPD, vous pouvez contacter le délégué à la protection des données de Pfizer (Cf. DPO.Pfizer.com). Nous répondrons à votre demande conformément au droit applicable.

Vous avez aussi le droit d'introduire une réclamation à tout moment auprès de l'autorité compétente en charge de la protection des données dans votre pays ou région.

Pour toute question ou remarque concernant la Helpline, veuillez nous contacter au +1 212 733 3026, à l'adresse corporate.compliance@pfizer.com, ou à 66 Hudson Boulevard East, New York, NY 10001, États-Unis.

¹Dans certains pays de l'UE, Pfizer propose également des canaux de signalement local. Pour plus d'informations sur le signalement local, y compris pour consulter la Déclaration de confidentialité du canal de signalement local et ce qui peut être signalé via le canal de signalement local, veuillez consulter l'intranet local de Pfizer ou contacter la division Compliance.

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Language: English
Last Updated: Dec 2022

PFIZER, INC.

EU/EEA/UK COMPLIANCE HELPLINE

GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

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Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](#)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Language: German
Last Updated: Dec 2022

PFIZER, INC.

COMPLIANCE-HELPLINE FÜR EU/EWR/VEREINIGTES KÖNIGREICH ANLEITUNG UND DATENSCHUTZHINWEIS

Die Pfizer Compliance-Helpline (die Helpline) wird von Pfizer, Inc. („Pfizer“, „wir“ oder „uns“) als ein für Ihre personenbezogenen Daten verantwortliches Unternehmen zur Verfügung gestellt. Die Website und die Telefonnummer, über die Sie einen Vorfall melden können, wird derzeit von der NAVEX Global UK Limited, einer Tochtergesellschaft der NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Vereinigtes Königreich (NAVEX), betrieben, Pfizers unabhängigem Dienstleistungsanbieter der Helpline.

Allgemein

Der Verantwortliche der Helpline ist: Pfizer, Inc., 66 Hudson Boulevard East, New York, NY 10001 USA.

Sie können den Datenschutzbeauftragten von Pfizer unter den oben genannten Kontaktdaten, unter privacy.officer@pfizer.com oder unter DPO.Pfizer.com erreichen.

Grundsätzlich kann die Helpline für die Meldung von Bedenken im Zusammenhang mit der finanziellen und geschäftlichen Integrität genutzt werden, z. B. in Bezug auf Buchhaltung, interne Rechnungsprüfung, Unternehmensrevision, Bestechung und Korruption sowie Banken- und Finanzkriminalität sowie Verstöße gegen EU-Recht, einschließlich: Vergabe öffentlicher Aufträge, Finanzdienstleistungen, Produkte und Märkte, Verhinderung von Geldwäsche und Terrorismusfinanzierung, Produktsicherheit, Verkehrssicherheit, öffentliche Gesundheit, Umweltschutz, Verbraucherschutz, Verstöße, welche die finanziellen Interessen der EU betreffen oder sich auf den Binnenmarkt beziehen (z. B. Wettbewerb und staatliche Beihilfen), Strahlenschutz und nukleare Sicherheit, Lebensmittelsicherheit, Tiergesundheit und Tierschutz sowie Schutz der Privatsphäre, Datenschutz und Datensicherheit. Zusätzlich zu den oben genannten Punkten können Sie in einigen Ländern weitere Angelegenheiten melden. Weitere Informationen finden Sie in unserem Web-Reporting-Tool unter pfizer.ethicspoint.com.

Die Nutzung der Helpline erfolgt freiwillig¹. Sie werden gebeten, sich gegenüber der Helpline zu identifizieren, wenn Sie eine Meldung machen; je nach Gesetzeslage des jeweiligen Landes sind Sie dazu eventuell nicht verpflichtet.

Zweck der Verarbeitung von personenbezogenen Daten

Der Zweck der Verarbeitung personenbezogener Daten im Zusammenhang mit der Helpline besteht darin, die Einhaltung der geltenden internationalen und lokalen Gesetze und internen Richtlinien zu gewährleisten. Mangelnde Compliance kann, je nach anwendbarem Recht, hohe Geldstrafen, Gefängnisstrafen, Haftungsfälle und andere Verwarnungen zur Folge haben.

Wir erheben und verarbeiten Ihre personenbezogenen Daten, die Sie uns über die Helpline zur Verfügung stellen, zu folgenden Zwecken:

- Prüfung der Plausibilität Ihrer Meldung und der darin enthaltenen Daten, um Rechtsverstöße zu vermeiden,

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- Untersuchung angeblicher Verstöße gegen Gesetze und Richtlinien, insbesondere gegen die oben genannten,
- Sicherstellung der Einhaltung aller anwendbaren Gesetze,
- Zusammenarbeit mit den Tochtergesellschaften von Pfizer im Hinblick auf ihre Verpflichtung zur Untersuchung von Verstößen,
- Verteidigung gegen Ansprüche Dritter sowie Vorbereitung von Ansprüchen gegen Dritte,
- Weiterentwicklung unserer Helpline und ihrer Prozesse.

Erhebung und Verarbeitung von Informationen und personenbezogenen Daten

Pfizer kann über die Helpline folgende Daten erheben und verarbeiten: Ihren Namen, Ihren Titel, Ihre Position und Ihre Kontaktdaten (es sei denn, die Meldung erfolgt anonym), Namen und andere Daten der von Ihnen in Ihrer Meldung genannten Personen, Namen und Position Ihrer Vorgesetzten, eine Beschreibung des von Ihnen in Ihrer Meldung angegebenen Verhaltens einschließlich Datum und Ort, sowie andere sachdienliche Informationen als auch alle Fragen, die Sie Pfizer unter Umständen stellen. Pfizer kann im Rahmen von Nachforschungen auch Informationen von Dritten einholen. Unter bestimmten Umständen können wir auch sensible Daten verarbeiten, wie z. B. Gesundheitsdaten oder die Mitgliedschaft in einer Gewerkschaft, wenn Sie uns diese zur Verfügung stellen und/oder wenn sie für den Zweck der Untersuchung relevant sind.

Die von Ihnen bereitgestellten Informationen werden in Übereinstimmung mit den geltenden Gesetzen vertraulich behandelt.

Pfizer kann die oben genannten Informationen verwenden, weil wir entweder einer gesetzlichen Verpflichtung nachkommen müssen (Artikel 6 Absatz 1 Buchstabe c der EU-Datenschutz-Grundverordnung [DSGVO]) oder weil wir ein berechtigtes Interesse an der Untersuchung der von Ihnen eingereichten Meldung haben (Artikel 6 Absatz 1 Buchstabe f DSGVO) oder weil Sie gemäß Ihres Arbeitsvertrags dazu verpflichtet sind, bestimmte Vorfälle zu melden (Artikel 6 Absatz 1 Buchstabe b DSGVO). Im Hinblick auf sensible Daten wie Gesundheitsdaten oder Informationen zur Gewerkschaftsmitgliedschaft (eine Liste sensibler Daten finden Sie in Artikel 9 Absatz 1 DSGVO) kann Pfizer diese Informationen zur Geltendmachung, Ausübung oder Verteidigung von Rechtsansprüchen (Artikel 9 Absatz 2 Buchstabe f DSGVO) verwenden, wenn dies aus Gründen eines wichtigen öffentlichen Interesses erforderlich ist, wenn die Verwendung auf Grundlage des Unionsrechts basiert oder des Rechts eines Mitgliedstaats beruht, das in angemessenem Verhältnis zu dem verfolgten Ziel steht (Artikel 9 Absatz 2 Buchstabe g DSGVO), oder wenn die Verarbeitung aus Gründen des öffentlichen Interesses im Bereich der öffentlichen Gesundheit erfolgt, wie zur Gewährleistung hoher Qualitäts- und Sicherheitsstandards bei der Gesundheitsversorgung, bei Arzneimitteln und Medizinprodukten, auf der Grundlage des Unionsrechts oder des Rechts eines Mitgliedstaats (Artikel 9 Absatz 2 Buchstabe i DSGVO).

Wir werden die betroffenen Personen in Bezug auf die Helpline keinen Entscheidungen unterwerfen, die ausschließlich auf einer automatisierten Verarbeitung, einschließlich Profiling, beruhen (Artikel 22 DSGVO).

Funktionsweise und Verfahren der Helpline

Ein Mitarbeiter von NAVEX nimmt Ihren Anruf bei der Helpline entgegen. NAVEX speichert keine Telefonnummern eintreffender Anrufe, sodass Ihre Anrufinformationen anonym bleiben. NAVEX zeichnet die Anrufe auch nicht auf. Der Mitarbeiter bittet Sie im Auftrag von Pfizer um eine Reihe von Informationen zu Ihrer Meldung, dokumentiert Ihre Informationen und stellt unter Umständen weitere Fragen zur Klärung. Bitte beachten Sie, dass der NAVEX-Mitarbeiter keine Fragen zu ethischen Belangen oder Richtlinien beantworten kann und Ihnen keine Ratschläge zu Handlungsempfehlungen geben kann. NAVEX darf nicht über Maßnahmen oder Untersuchungen im Zusammenhang mit Ihrer Meldung entscheiden. NAVEX befolgt die von Pfizer herausgegebenen Anweisungen.

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Wenn Sie sich für die Nutzung des Web-Reporting-Tools entscheiden, werden die gleichen Informationen elektronisch erfasst.

Nach der ersten Meldung oder der Anfrage wird ein detailliertes Protokoll erstellt und von NAVEX direkt an die Compliance-Abteilung von Pfizer gesendet. Je nach Art der Angelegenheit kann die Compliance-Abteilung die Meldung und die damit zusammenhängende Dokumentation unter Berücksichtigung ihrer Vertraulichkeitsverpflichtungen zur weiteren Untersuchung und Klärung an die zuständigen Mitarbeiter von Pfizer, die möglicherweise informiert werden müssen, weiterleiten, z. B. Vertreter der Rechtsabteilung, von People Experience (PX) oder der Audit-Abteilung. Es kann sein, dass wir im Laufe der Untersuchung weitere Informationen und Klarstellungen von Ihnen benötigen. In diesem Fall wenden wir uns direkt an Sie. Gegebenenfalls muss die Compliance-Abteilung zur Festlegung von Disziplinarmaßnahmen und aus Gründen der Transparenz auch die People Experience Vertreter oder Führungskräfte von Pfizer über festgestellte Verstöße informieren. Die Informationen können auch an externe Berater von Pfizer wie Rechtsanwälte oder Wirtschaftsprüfer weitergegeben werden, die zur strikten Vertraulichkeit verpflichtet sind. Wir werden Sie über den Fortgang der Untersuchung und die nach dem Ergebnis der Untersuchung getroffenen Maßnahmen informieren.

Im Rahmen der Untersuchung ist Pfizer bestrebt, jede Person, die in eine Meldung verwickelt ist, innerhalb eines angemessenen Zeitraums über die gegen sie erhobenen Vorwürfe zu informieren, wird sich jedoch bemühen, Ihre Identität nicht preiszugeben. Betroffene Personen haben das Recht, auf die von Ihnen gemeldeten Informationen zu reagieren. Bitte beachten Sie stets, dass die von Ihnen übermittelten Angaben zu Entscheidungen führen können, die Auswirkungen auf Personen bei Pfizer und auf involvierte Drittparteien haben. Dementsprechend bitten wir Sie, nur solche Informationen zu übermitteln, die nach Ihrem besten Wissen richtig sind. Die vorsätzliche Übermittlung von falschen oder irreführenden Informationen kann disziplinarische Maßnahmen sowie straf- und zivilrechtliche Schritte nach sich ziehen. Darüber hinaus sollten sich die Angaben auf solche Fakten beschränken, die für den jeweiligen Fall und die sich daraus ergebenden Untersuchungen relevant sind.

Benachteiligungen gegen Personen, die um Rat fragen, Bedenken äußern oder Fehlverhalten melden, oder gegen Vermittler, Einzelpersonen oder Einrichtungen, die mit meldenden Personen in Zusammenhang stehen, sind streng verboten. Wenn jemand Vergeltungsmaßnahmen gegen eine Person ergreift, die wahrheitsgemäß einen Verstoß gemeldet hat, wird Pfizer entsprechende Maßnahmen ergreifen – auch dann, wenn sich später herausstellt, dass die Person die Angelegenheit ursprünglich zu Unrecht gemeldet hat. Wenn Sie der Meinung sind, dass gegen Sie oder eine andere beteiligte Person Vergeltungsmaßnahmen ergriffen wurden, sollten Sie sich an die Compliance-Abteilung wenden (Kontaktinformationen siehe unten).

Verwendung, Aufbewahrung und Weitergabe von Informationen

Pfizer hat mit NAVEX, einem Datenverarbeiter, einen Vertrag geschlossen, der strengen Vertraulichkeitsverpflichtungen unterliegt, um die Vertraulichkeit und Sicherheit Ihrer personenbezogenen Daten zu schützen. NAVEX darf Ihre personenbezogenen Daten nur für die Bereitstellung der Helpline verwenden. Von NAVEX erhaltene Daten sowie von Ihnen übermittelte personenbezogene Daten werden in einer Pfizer-Datenbank mit Zugriffsbeschränkung gespeichert (und in der Datenbank unserer Lieferanten, wenn dies zur Unterstützung der Untersuchung notwendig ist).

Wir können Ihre personenbezogenen Daten, insofern zur Untersuchung der Meldung und zur Verwaltung der Helpline notwendig, anderen Tochtergesellschaften oder Anbietern von Pfizer zur Verfügung stellen, falls diese Ihre personenbezogenen Daten kennen müssen. Dabei können Ihre personenbezogenen Daten auch in Länder übermittelt werden, deren Datenschutzbestimmungen von den im Land Ihrer Tätigkeit geltenden Bestimmungen abweichen. Insbesondere können wir Ihre personenbezogenen Daten an die Compliance-Abteilung der Pfizer, Inc. übermitteln. Bitte beachten Sie, dass einige Länder, die nicht dem EWR angehören, einschließlich der USA, von der Europäischen Kommission nicht als Länder anerkannt werden, die ein angemessenes Schutzniveau gemäß den EWR-Standards bieten. Die Länder, die anerkanntermaßen ein angemessenes Schutzniveau bieten, finden Sie hier: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/commission/presscorner/detail/en/ip_18_111).

Wir haben angemessene Maßnahmen ergriffen, wie zum Beispiel von der Europäischen Kommission angenommene Standardvertragsklauseln, um die Übermittlung und den Schutz Ihrer personenbezogenen Daten in die Länder zu

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ermöglichen, die laut der Europäischen Kommission kein angemessenes Datenschutzniveau bieten. Wenn Sie eine Kopie dieser Maßnahmen erhalten möchten, wenden Sie sich bitte an den lokalen Datenschutzbeauftragten von Pfizer. Sie finden die Kontaktdaten unter [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Darüber hinaus kann Pfizer verpflichtet sein, Ihre personenbezogenen Daten ganz oder teilweise an die Strafverfolgungsbehörden oder an andere Behörden der betreffenden Länder weiterzuleiten.

Die mit Ihrer Meldung an die Helpline zusammenhängenden Informationen werden bei Bedarf für eine begrenzte Zeit nach folgenden Kriterien archiviert oder gelöscht: wenn die Untersuchung abgeschlossen ist und keine weiteren Maßnahmen ergriffen werden müssen, es sei denn, Pfizer ist gesetzlich dazu verpflichtet, die Daten für einen längeren Zeitraum aufzubewahren; wenn die Frist für relevante rechtliche Schritte abgelaufen ist, es sei denn, Pfizer ist gesetzlich dazu verpflichtet, die Daten für einen längeren Zeitraum aufzubewahren; und wenn die Aufbewahrungsfrist für Unterlagen im Zusammenhang mit Untersuchungen abgelaufen ist. Weitere Einzelheiten zur Datenaufbewahrung finden Sie in der Unternehmensrichtlinie zu diesem Thema. Wenn Sie Fragen haben, wenden Sie sich bitte an die Compliance-Abteilung.

Ihre Rechte

Vorbehaltlich der von der DSGVO und/oder anderen anwendbaren Gesetzen festgelegten Bestimmungen, haben Sie das Recht, auf Ihre personenbezogenen Daten zuzugreifen (Artikel 15 DSGVO), Ihre personenbezogenen Daten berichtigen zu lassen (Artikel 16 DSGVO), Ihre personenbezogenen Daten löschen zu lassen (Artikel 17 DSGVO), die Verarbeitung Ihrer personenbezogenen Daten einzuschränken (Artikel 18 DSGVO), das Recht auf Datenübertragbarkeit (Artikel 20 DSGVO) und das Recht, der Verarbeitung Ihrer personenbezogenen Daten unter bestimmten Umständen zu widersprechen (Artikel 21 DSGVO).

Wenn Sie eines Ihrer Rechte gemäß der DSGVO ausüben möchten, wenden Sie sich an den Datenschutzbeauftragten von Pfizer (siehe [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Wir werden Ihre Anfrage in Übereinstimmung mit dem geltenden Recht beantworten.

Sie sind darüber hinaus berechtigt, eine Beschwerde bei Ihrer zuständigen Datenschutzbehörde in Ihrem Land oder in Ihrer Region einzureichen.

Bei Fragen oder Bedenken zur Helpline selbst kontaktieren Sie uns bitte telefonisch unter +1 212 733 3026, per E-Mail unter corporate.compliance@pfizer.com oder auf dem Postweg unter der Adresse 66 Hudson Boulevard East, New York, NY 10001, USA.

¹In bestimmten EU-Ländern bietet Pfizer darüber hinaus lokale Berichterstattung an. Weitere Informationen zur lokalen Berichterstattung, einschließlich Datenschutzhinweise der lokalen Berichterstattung und darüber, was über den lokalen Berichtskanal gemeldet werden kann, finden Sie im lokalen Intranet von Pfizer oder bei der Compliance-Abteilung.

GREECE

Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

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The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

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- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
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- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](#)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Language: Greek
Last Updated: Dec 2022

PFIZER, INC.

COMPLIANCE HELPLINE ΣΕ ΕΕ/ΕΟΖ/ΗΒ

ΔΗΛΩΣΗ ΑΠΟΡΡΗΤΟΥ & ΚΑΘΟΔΗΓΗΣΗΣ

Η Compliance Helpline της Pfizer («η Γραμμή Βοήθειας») παρέχεται από τη Pfizer, Inc. («Pfizer», «εμείς» ή «εμάς») ως εταιρεία υπεύθυνη για τα προσωπικά σας δεδομένα. Τον ιστότοπο και την τηλεφωνική γραμμή μέσω της οποίας μπορείτε να αναφέρετε ένα συμβάν, διαχειρίζεται επί του παρόντος η NAVEX Global UK Limited, μία εταιρεία της NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Ηνωμένο Βασίλειο ("NAVEX"), που είναι ο ανεξάρτητος πάροχος της Helpline της Pfizer.

Γενικά

Ο υπεύθυνος επεξεργασίας δεδομένων της Helpline είναι: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 ΗΠΑ.

Μπορείτε να επικοινωνείτε με τον Υπεύθυνο Προστασίας Δεδομένων της Pfizer μέσω των στοιχείων επικοινωνίας που αναφέρονται παραπάνω ή στο privacy.officer@pfizer.com ή στο DPO.Pfizer.com.

Η Helpline μπορεί γενικά να χρησιμοποιηθεί για την αναφορά προβληματισμών σε εργασιακό πλαίσιο σχετικά με θέματα οικονομικής και επιχειρηματικής ακεραιότητας, όπως αυτά που σχετίζονται με τη λογιστική, εσωτερικούς λογιστικούς ελέγχους, θέματα ελέγχου, τη δωροδοκία και τη διαφθορά, το τραπεζικό και χρηματοοικονομικό έγκλημα και παραβάσεις του δικαίου της ΕΕ, όπως: δημόσιες συμβάσεις, χρηματοοικονομικές υπηρεσίες, προϊόντα και αγορές, πρόληψη νομιμοποίησης εσόδων από παράνομες δραστηριότητες και χρηματοδότηση της τρομοκρατίας, ασφάλεια προϊόντων, ασφάλεια των μεταφορών, δημόσια υγεία, προστασία του περιβάλλοντος, προστασία των καταναλωτών, παραβάσεις που επηρεάζουν το οικονομικό συμφέρον της ΕΕ ή που σχετίζεται με την εσωτερική αγορά (π.χ. κανόνες ανταγωνισμού και κρατικών ενισχύσεων), προστασία από ακτινοβολία και τη ραδιενέργεια, ασφάλεια των τροφίμων, υγεία και καλή διαβίωση των ζώων και προστασία της ιδιωτικής ζωής, προστασία δεδομένων και ασφάλεια των δεδομένων. Επιπρόσθετα με τα παραπάνω, σε μερικές χώρες μπορείτε να αναφέρετε επιπλέον ζητήματα. Δείτε το εργαλείο αναφοράς μέσω διαδικτύου στο pfizer.ethicspoint.com για περισσότερες πληροφορίες.

Η χρήση της Helpline είναι οικειοθελής¹. Σας ενθαρρύνουμε να δηλώνετε την ταυτότητά σας όταν υποβάλλετε αναφορά στη Helpline. Δεν είστε υποχρεωμένοι να τη δηλώσετε, εφόσον προβλέπεται από την ισχύουσα νομοθεσία.

Σκοπός επεξεργασίας των προσωπικών δεδομένων

Ο σκοπός της επεξεργασίας των προσωπικών δεδομένων σχετικά με τη Helpline είναι η διασφάλιση της συμμόρφωσης με την ισχύουσα διεθνή και τοπική νομοθεσία και τις εσωτερικές πολιτικές. Αν δεν διασφαλίσουμε τη συμμόρφωση, ενδέχεται να μας επιβληθούν υψηλά πρόστιμα, φυλάκιση, υποχρεώσεις και άλλες επιπλήξεις, σύμφωνα με την ισχύουσα νομοθεσία.

Συλλέγουμε και επεξεργαζόμαστε τις προσωπικές σας πληροφορίες όπως μας τις παρέχετε μέσω της Helpline για τους ακόλουθους σκοπούς:

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- Έλεγχος της αξιοπιστίας της αναφοράς σας και των στοιχείων που περιλαμβάνει, έτσι ώστε να αποφύγουμε ενδεχόμενη παραβίαση της νομοθεσίας,
- Έρευνα για εικαζόμενες παραβιάσεις της νομοθεσίας και των πολιτικών, ειδικά αυτών που αναφέρονται παραπάνω,
- Διασφάλιση της συμμόρφωσης με την ισχύουσα νομοθεσία,
- Συνεργασία με τις θυγατρικές εταιρείες της Pfizer σύμφωνα με τις υποχρεώσεις τους να ερευνούν τις παραβιάσεις,
- Υπεράσπιση αξιώσεων τρίτου μέρους και προετοιμασία των αξιώσεων κατά τρίτων μερών,
- Ανάπτυξη της Helpline και των διαδικασιών έρευνας.

Συλλογή και επεξεργασία των πληροφοριών και των προσωπικών δεδομένων

Η Pfizer δύναται να συλλέξει και να επεξεργαστεί τις εξής πληροφορίες, μέσω της Helpline: το όνομα, τον τίτλο, τη θέση και τα στοιχεία επικοινωνίας σας (εκτός αν η αναφορά είναι ανώνυμη), το όνομα και άλλα δεδομένα σχετικά με άτομα που κατονομάζονται στην αναφορά σας, το όνομα και τη θέση των προϊσταμένων σας, μια περιγραφή της συμπεριφοράς που αποτελεί το θέμα της αναφοράς σας, συμπεριλαμβανομένης της ημερομηνίας και της τοποθεσίας, καθώς και άλλων σχετικών πληροφοριών, και τυχόν ερωτήσεις που ίσως θέσετε στη Pfizer. Η Pfizer δύναται, επίσης, να συλλέξει πληροφορίες από άλλα άτομα, κατά τη διάρκεια έρευνας που ενδέχεται να προκύψει. Υπό ορισμένες συνθήκες, μπορεί επίσης να επεξεργαστούμε ευαίσθητα δεδομένα, όπως δεδομένα για θέματα υγείας, συμμετοχή σε συνδικαλιστική οργάνωση, αν μας τα παρέχετε και/ή αν είναι σχετικά με τον σκοπό της έρευνας.

Οι πληροφορίες που παρέχονται από εσάς είναι εμπιστευτικές, σύμφωνα με την ισχύουσα νομοθεσία.

Η Pfizer ενδέχεται να χρησιμοποιήσει τις πληροφορίες που αναφέρονται παραπάνω είτε επειδή πρέπει να συμμορφωθούμε με μία νομική υποχρέωση που επιβλήθηκε στη Pfizer (Άρθρο 6(1)(γ) του Γενικού Κανονισμού για την Προστασία Δεδομένων της ΕΕ ("ΓΚΠΔ") ή επειδή έχουμε έννομο συμφέρον να ερευνήσουμε την αναφορά που μας υποβάλατε (Άρθρο 6(1)(στ) ΓΚΠΔ), ή επειδή μπορεί να είστε υποχρεωμένοι στα πλαίσια της σύμβασης εργασίας σας να αναφέρετε συγκεκριμένα συμβάντα (Άρθρο 6(1)(β) ΓΚΠΔ). Όσον αφορά τα ευαίσθητα δεδομένα, όπως τα δεδομένα για θέματα υγείας, τη συμμετοχή σε συνδικαλιστική οργάνωση (για τη λίστα με τα ευαίσθητα δεδομένα, δείτε το Άρθρο 9(1) ΓΚΠΔ), η Pfizer μπορεί να χρησιμοποιήσει τις πληροφορίες για τη θεμελίωση, άσκηση ή υποστήριξη νομικών αξιώσεων (Άρθρο 9(2)(στ) ΓΚΠΔ) αν είναι απαραίτητο για λόγους ουσιώδους δημοσίου συμφέροντος, βάσει της νομοθεσίας της Ένωσης ή του δικαίου κράτους μέλους το οποίο είναι αναλογικό προς τον επιδιωκόμενο στόχο (Άρθρο 9(2)(ζ) ΓΚΠΔ), ή αν είναι απαραίτητο για λόγους δημοσίου συμφέροντος στον τομέα της δημόσιας υγείας, όπως η διασφάλιση υψηλών προτύπων ποιότητας και ασφάλειας της υγειονομικής περίθαλψης και των φαρμάκων ή των ιατροτεχνολογικών προϊόντων, βάσει της νομοθεσίας της Ένωσης ή του δικαίου κράτους μέλους (Άρθρο 9(2)(θ) ΓΚΠΔ).

Δεν θα υποβάλλουμε τα υποκείμενα δεδομένων σε αποφάσεις που λαμβάνονται με βάση αποκλειστικά την αυτοματοποιημένη επεξεργασία, συμπεριλαμβανομένης της κατάρτισης προφίλ, σε σχέση με τη Helpline (Άρθρο 22 ΓΚΠΔ).

Λειτουργία και Διαδικασίες της Helpline

Όταν καλέσετε την Helpline, θα απαντήσει ένας εκπρόσωπος της NAVEX. Η NAVEX δεν καταγράφει τον αριθμό τηλεφώνου για καμία εισερχόμενη κλήση, έτσι ώστε τα στοιχεία της κλήσης σας να παραμείνουν ανώνυμα. Η NAVEX επίσης δεν καταγράφει τις κλήσεις. Ο εκπρόσωπος ενδέχεται να σας ζητήσει αρκετές πληροφορίες εκ μέρους της Pfizer, να τεκμηριώσει τα στοιχεία που παρέχετε και να υποβάλει ερωτήσεις για λόγους διευκρίνισης των

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πληροφοριών. Έχετε υπόψη ότι ο εκπρόσωπος της NAVEX δεν είναι σε θέση να απαντήσει σε καμία ερώτηση που αφορά θέματα δεοντολογίας ή πολιτικής και δεν μπορεί να σας συμβουλευτεί για καμία ενέργεια. Η NAVEX δεν θα αποφασίσει για οποιοσδήποτε ενέργειες ή έρευνες σε σχέση με την αναφορά σας. Η NAVEX ακολουθεί τις οδηγίες που έχει εκδώσει η Pfizer. Εάν επιλέξετε να χρησιμοποιήσετε το εργαλείο υποβολής αναφορών μέσω διαδικτύου, οι ίδιες πληροφορίες καταγράφονται ηλεκτρονικά.

Μετά την υποβολή της αρχικής αναφοράς ή του αρχικού ερωτήματος, καταρτίζεται λεπτομερές αρχείο το οποίο αποστέλλεται από τη NAVEX απευθείας στη Διεύθυνση Εταιρικής Συμμόρφωσης της Pfizer. Ανάλογα με τη φύση του θέματος, και σε συμμόρφωση με τις απαιτήσεις εμπιστευτικότητας, η Διεύθυνση Εταιρικής Συμμόρφωσης μπορεί να κοινοποιήσει την αναφορά και τα σχετικά έγγραφα στο κατάλληλο προσωπικό της Pfizer το οποίο χρειάζεται ενδεχομένως να ενημερωθεί, όπως οι εκπρόσωποι της Νομικής Διεύθυνσης, της Διεύθυνσης People Experience («PX») ή Ελέγχου για περαιτέρω διερεύνηση και επίλυση του ζητήματος. Ενδέχεται να χρειαστούμε επιπλέον πληροφορίες και διευκρινίσεις από εσάς καθώς η έρευνα εξελίσσεται, οπότε θα επικοινωνήσουμε απευθείας μαζί σας. Όπου είναι απαραίτητο, η Διεύθυνση Εταιρικής Συμμόρφωσης μπορεί επίσης να χρειαστεί να ενημερώσει μέλη της Διεύθυνσης PX ή ηγετικά στελέχη της Pfizer εάν διαπιστωθεί οποιαδήποτε παραβίαση για λόγους καθορισμού τυχόν πειθαρχικών μέτρων και για σκοπούς διαφάνειας. Οι πληροφορίες ενδέχεται, επίσης, να κοινοποιηθούν σε εξωτερικούς συμβούλους της Pfizer, όπως δικηγόρους ή ελεγκτές που είναι υποχρεωμένοι να τηρούν αυστηρή εμπιστευτικότητα. Θα σας ενημερώνουμε για την πρόοδο της έρευνας και τις ενέργειες που θα πραγματοποιούνται μετά την έκβαση της έρευνας.

Ως μέρος της έρευνας, στόχος της Pfizer είναι να ενημερώσει κάθε άτομο που εμπλέκεται σε αναφορά σχετικά με τους ισχυρισμούς εναντίον του, εντός εύλογου χρονικού πλαισίου, αλλά θα προσπαθήσει να μην κοινοποιήσει την ταυτότητά σας. Τα άτομα που εμπλέκονται θα έχουν το δικαίωμα να αντιδράσουν στις πληροφορίες που έχετε καταθέσει στην αναφορά σας. Σημειώστε ότι οι πληροφορίες που παρέχετε ενδέχεται να έχουν ως αποτέλεσμα αποφάσεις οι οποίες θα επηρεάσουν κάποια άτομα στην Pfizer και άλλα τρίτα μέρη, τα οποία εμπλέκονται στο σχετικό συμβάν. Ως εκ τούτου, σας παρακαλούμε να παρέχετε μόνο πληροφορίες οι οποίες, εξ όσων γνωρίζετε, είναι ακριβείς. Η σκόπιμη παροχή ανακριβών ή παραπλανητικών πληροφοριών ενδέχεται να έχει ως αποτέλεσμα την επιβολή πειθαρχικών μέτρων, ή ακόμα και την έκθεση σε αστική ή ποινική ευθύνη. Επίσης, όπου είναι εφικτό, οι αναφορές θα πρέπει να περιορίζονται στα γεγονότα που είναι σχετικά με την αναφορά και την επακόλουθη έρευνα.

Απαγορεύονται αυστηρά τα αντίποινα εις βάρος οποιουδήποτε ατόμου που επιζητά συμβουλές, εκφράζει έναν προβληματισμό ή αναφέρει κάποιο παράπτωμα, ή εναντίον διαμεσολαβητών, ατόμων ή φορέων που συνδέονται με την αναφορά ατόμων. Εάν κάποιος προβεί σε αντίποινα εις βάρος ενός ατόμου, το οποίο με κάθε ειλικρίνεια ανέφερε κάποια παράβαση, η Pfizer θα λάβει τα απαραίτητα μέτρα, ακόμη και αν αργότερα αποδειχθεί ότι ήταν αρχικά λάθος του ατόμου να αναφέρει το ζήτημα. Αν πιστεύετε ότι εσείς ή οποιοσδήποτε άλλος εμπλεκόμενος σε ένα θέμα έχετε υποστεί αντίποινα, πρέπει να επικοινωνήσετε με τη Διεύθυνση Εταιρικής Συμμόρφωσης (πληροφορίες επικοινωνίας παρακάτω).

Χρήση, διατήρηση πληροφοριών και μεταφορά δεδομένων

Η Pfizer έχει συνάψει σύμβαση με τη NAVEX προκειμένου να προστατεύει την εμπιστευτικότητα και την ασφάλεια των προσωπικών δεδομένων σας και η NAVEX θα χρησιμοποιεί τα προσωπικά δεδομένα σας μόνο για την παροχή της Helpline. Οι πληροφορίες που λαμβάνουμε από τη NAVEX και τυχόν προσωπικά δεδομένα που μας παραχωρείτε θα αποθηκεύονται σε βάση δεδομένων της Pfizer (και σε βάση δεδομένων των προμηθευτών μας, όταν απαιτείται να μας βοηθήσουν με την έρευνα) με περιορισμένη πρόσβαση.

Ενδέχεται να μεταφέρουμε τα προσωπικά σας δεδομένα σε θυγατρικές εταιρείες εάν έχουν «ανάγκη να γνωρίζουν», μεταξύ άλλων σε χώρες με διαφορετικούς κανόνες προστασίας δεδομένων από αυτούς που ισχύουν στη χώρα όπου εργάζεστε, συμπεριλαμβανομένων άλλων θυγατρικών ή προμηθευτών της Pfizer, όπως απαιτείται για τη διερεύνηση της αναφοράς και τη διαχείριση της Helpline. Ενδέχεται, συγκεκριμένα, να μεταφέρουμε τα προσωπικά σας δεδομένα στο Τμήμα Συμμόρφωσης της Pfizer, Inc. Σημειώστε ότι ορισμένες χώρες εκτός ΕΟΖ, όπως οι ΗΠΑ, δεν αναγνωρίζονται από την Ευρωπαϊκή Επιτροπή ως χώρες που παρέχουν επαρκή επίπεδα προστασίας σύμφωνα με τα πρότυπα του ΕΟΖ. Οι χώρες οι οποίες αναγνωρίζονται ως χώρες που διαθέτουν επαρκές επίπεδο προστασίας είναι διαθέσιμες εδώ: [Adequacy decisions \(europa.eu\)](https://www.europa.eu).

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Έχουμε θέσει σε εφαρμογή κατάλληλα μέτρα, όπως τυπικές συμβατικές ρήτρες που υιοθετήθηκαν από την Ευρωπαϊκή Επιτροπή που επιτρέπουν τη μεταφορά και προστασία των προσωπικών σας δεδομένων σε χώρες που δεν αναγνωρίζονται από την Ευρωπαϊκή Επιτροπή ότι παρέχουν επαρκές επίπεδο προστασίας δεδομένων. Μπορείτε να λάβετε αντίγραφο των εν λόγω μέτρων επικοινωνώντας με τον τοπικό Υπεύθυνο Προστασίας Δεδομένων της Pfizer, τα στοιχεία επικοινωνίας του οποίου μπορείτε να βρείτε στο DPO.Pfizer.com.

Η Pfizer μπορεί επίσης να είναι υποχρεωμένη να μεταφέρει μερικά ή όλα τα προσωπικά σας δεδομένα σε υπηρεσίες ή αρχές επιβολής του νόμου ή άλλες αρχές των σχετικών χωρών.

Οι πληροφορίες που σχετίζονται με αναφορά, η οποία υποβλήθηκε μέσω της Helpline της Pfizer για Θέματα Συμμόρφωσης, θα αρχειοθετούνται για περιορισμένο χρονικό διάστημα, όταν χρειάζεται, ή θα διαγράφονται βάσει των ακόλουθων κριτηρίων: όταν η έρευνα έχει κλείσει και δεν απαιτείται περαιτέρω ενέργεια εκτός αν η Pfizer είναι υποχρεωμένη από το νόμο να διατηρήσει τα στοιχεία για μεγαλύτερο χρονικό διάστημα, όταν η χρονική περίοδος για οποιαδήποτε σχετική δικαστική διαμάχη έχει παρέλθει αν η Pfizer είναι υποχρεωμένη από το νόμο να διατηρήσει τα στοιχεία για μεγαλύτερο χρονικό διάστημα, και όταν οι υποχρεώσεις μας όσον αφορά την τήρηση αρχείων σχετικών με τις έρευνες έχουν εκπληρωθεί. Ανατρέξτε στην ισχύουσα εταιρική πολιτική σχετικά με τη διατήρηση αρχείων, για περισσότερες λεπτομέρειες. Εάν έχετε οποιοσδήποτε ερωτήσις, επικοινωνήστε με τη Διεύθυνση Εταιρικής Συμμόρφωσης.

Τα δικαιώματά σας

Με την επιφύλαξη των προϋποθέσεων που ορίζονται στον ΓΚΠΔ ή/και σε άλλους ισχύοντες νόμους, έχετε το δικαίωμα πρόσβασης στα προσωπικά σας δεδομένα (Άρθρο 15 ΓΚΠΔ), το δικαίωμα διόρθωσης των προσωπικών σας δεδομένων (Άρθρο 16 ΓΚΠΔ), το δικαίωμα διαγραφής των προσωπικών σας δεδομένων (Άρθρο 17 ΓΚΠΔ), το δικαίωμα περιορισμού της επεξεργασίας των προσωπικών σας δεδομένων (Άρθρο 18 ΓΚΠΔ), το δικαίωμα στη φορητότητα των δεδομένων (Άρθρο 20 ΓΚΠΔ), και το δικαίωμα αντίρρησης στην επεξεργασία των προσωπικών σας δεδομένων υπό ορισμένες συνθήκες (Άρθρο 21 ΓΚΠΔ).

Εάν θέλετε να ασκήσετε ένα δικαίωμα υπό τον ΓΚΠΔ, μπορείτε να επικοινωνήσετε με τον Υπεύθυνο Προστασίας Δεδομένων της Pfizer (βλ. DPO.Pfizer.com). Θα ανταποκριθούμε στο αίτημά σας σύμφωνα με την ισχύουσα νομοθεσία.

Έχετε επίσης το δικαίωμα να υποβάλετε ανά πάσα στιγμή παράπονο σε αρχή προστασίας δεδομένων της χώρας ή της περιοχής σας.

Εάν έχετε οποιοσδήποτε απορίες ή προβληματισμούς, σχετικά με τη Helpline, επικοινωνήστε μαζί μας στον αριθμό +1-212-733-3026, ηλεκτρονικά στη διεύθυνση corporate.compliance@pfizer.com, ή ταχυδρομικά 66 Hudson Boulevard East, New York, NY 10001 ΗΠΑ .

¹ Σε μερικές χώρες της ΕΕ, η Pfizer παρέχει επίσης τοπικά κανάλια αναφορών. Για περισσότερες πληροφορίες σχετικά με τη δυνατότητα αναφοράς σε τοπικό επίπεδο, καθώς και για τη δήλωση απορρήτου του τοπικού καναλιού αναφοράς και τι μπορεί να αναφερθεί μέσω του τοπικού καναλιού αναφοράς, συμβουλευτείτε το τοπικό ενδοδίκτυο (intranet) της Pfizer, ή επικοινωνήστε με τη Διεύθυνση Εταιρικής Συμμόρφωσης.

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Language: English
Last Updated: Dec 2022

PFIZER, INC. COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above;
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](https://www.eudataprotection.eu/).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region. (in Hungary that is the Hungarian Data Protection and Freedom of Information Authority, address: 1055 Budapest, Falk Miksa utca 9-11., phone number: +36-1-391-1400, telefax: +36-1-391-1410, e-mail: ugyfelszolgalat@naih.hu).

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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PFIZER, INC.

MAGYARORSZÁG – MEGFELELŐSÉGI FORRÓDRÓT ÚTMUTATÓ ÉS ADATVÉDELMI KÖZLEMÉNY

A Pfizer Megfelelőségi Forródrótot („Forródrót”) a Pfizer, Inc. („Pfizer”, „mi” vagy „minket”) mint az Ön személyes adataiért felelős vállalat biztosítja. A webhelyet és a telefonvonalat, amelyen keresztül Ön bejelentést tehet az incidensekről, jelenleg a NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Egyesült Királyság („NAVEX”), a Pfizer független szolgáltatója működteti.

Általános

A Forródrót adatkezelője: Pfizer, Inc., 66 Hudson Boulevard East, New York, NY 10001 USA.

A Pfizer adatvédelmi tisztviselőjét a fent említett elérhetőségeken vagy a következő elérhetőségeken érheti el: privacy.officer@pfizer.com vagy DPO.Pfizer.com.

A Forródrót általában a pénzügyi és üzleti integritással kapcsolatos, például a számvittel, belső számviteli ellenőrzésekkel, könyvvizsgálati ügyekkel, vesztegetéssel és korrupcióval, banki és pénzügyi bűncselekményekkel, az európai uniós jogszabályok megsértésével – beleértve a közbeszerzésre, pénzügyi szolgáltatásokra, termékekre és piacokra, a pénzmosás és a terrorizmus finanszírozásának megelőzésére, a termékbiztonságra, közlekedésbiztonságra, közegészségügyre, környezetvédelemre, fogyasztóvédelemre, az EU pénzügyi érdekeit sértő vagy a belső piacra (pl. verseny- és állami támogatási szabályok), a sugárzás elleni védelemre és nukleáris biztonságra, az élelmiszer-biztonságra, állategészségügyre és állatjólétre, valamint a magánélet védelmére, adatvédelemre és adatbiztonságra vonatkozó jogszabályokat – kapcsolatos aggályok bejelentésére használható. A fentiekben túlmenően egyes országokban további ügyeket is bejelenthet. Ellenőrizze a webes jelentési eszközünket a pfizer.ethicspoint.com webhelyen további információkért.

A Forródrót használata önkéntes¹. A bejelentés beadásakor javasoljuk, hogy azonosítsa magát; Ez azonban nem kötelező ott, ahol azt a hatályos helyi jogszabályok lehetővé teszik.

A személyes adatok feldolgozásának célja

A Forródróttal kapcsolatos személyes adatok feldolgozásának célja az alkalmazandó nemzetközi és helyi jogszabályoknak és belső szabályzatoknak való megfelelés biztosítása. Ha nem biztosítjuk a megfelelést, a vonatkozó jogszabályoktól függően magas bírságok, börtönbüntetés, felelősségre vonás és egyéb megrovás várhat ránk.

A Forródróton keresztül megadott személyes adatait a következő célokból gyűjtjük és dolgozzuk fel:

- A jelentés és az abban szereplő adatok hitelességének ellenőrzése a törvénysértések elkerülése érdekében,
- A jogszabályok és politikák állítólagos megsértésének kivizsgálása, különösen a fent említettek esetében;
- Az alkalmazandó jogszabályoknak való megfelelés biztosítása,

- Együttműködés a Pfizer leányvállalataival a jogsértések kivizsgálására vonatkozó kötelezettségeik tekintetében,
- Harmadik felek követeléseinek védelme és harmadik felekkel szembeni követelések előkészítése,
- A Forródrót és vizsgálati folyamataink fejlesztése.

Információk és személyes adatok gyűjtése és feldolgozása

A Pfizer a következő adatokat rögzítheti és dolgozhatja fel a Forródróton keresztül: név, megszólítás, beosztás és elérhetőségi adatok (kivéve, ha névtelen bejelentésről van szó); a bejelentésben megnevezett személyek neve és egyéb adatai; a felettesei neve és beosztása; a bejelentett magatartás ismertetése, ideértve azt, hogy hol és mikor fordult elő, valamint az egyéb releváns információkat; az Pfizernek feltenni kívánt esetleges kérdéseket. A Pfizer a bejelentést követő esetleges vizsgálat során másoktól is gyűjthet információkat. Bizonyos körülmények között érzékeny adatokat is feldolgozhatunk, például egészségügyi adatokat, szakszervezeti tagságot, ha Ön ezeket megadja nekünk, és/vagy ha ezek a vizsgálat célja szempontjából relevánsak.

A vállalat az Öntől kapott információkat bizalmasan, a vonatkozó jogszabályoknak megfelelően kezeli.

A Pfizer azért használhatja fel a fent említett információkat, mert vagy a Pfizerre vonatkozó jogi kötelezettségünknek kell eleget tennünk (az EU általános adatvédelmi rendeletének („GDPR”) 6. cikke (1) bekezdésének c) pontja), vagy jogos érdekünk fűződik az Ön által hozzánk benyújtott bejelentés kivizsgálásához (GDPR 6. cikke (1) bekezdésének f) pontja), vagy a munkaszerződése alapján Önt bizonyos incidensek bejelentésére kötelezheti (GDPR 6. cikke (1) bekezdésének b) pontja). Az érzékeny adatok, például egészségügyi adatok, szakszervezeti tagság (az érzékeny adatok listáját lásd a GDPR 9. cikkének (1) bekezdésében) tekintetében a Pfizer felhasználhatja az információkat jogi igények előterjesztéséhez, érvényesítéséhez vagy védelméhez (GDPR 9. cikk (2) bekezdés f) pontja), ha ez lényeges közérdekből szükséges, az uniós vagy tagállami jog alapján, amelynek arányosnak kell lennie az elérni kívánt céllal (GDPR 9. cikk (2) bekezdés g) pont), vagy ha a közegészségügy területén közérdekből, például az egészségügyi ellátás és a gyógyszerek vagy orvostechikai eszközök magas minőségi és biztonsági színvonalának biztosításához szükséges, az uniós vagy tagállami jog alapján (GDPR 9. cikk (2) bekezdés i) pont).

A Forródróttal kapcsolatban nem vetjük alá az érintetteket kizárólag automatizált feldolgozáson alapuló döntéseknek, így profilalkotásnak sem (GDPR 22. cikk).

A Forródrót működése és folyamatai

A forródrótra érkező hívásokat a NAVEX munkatársa fogadja. A NAVEX nem rögzíti, hogy a hívás milyen telefonszámról érkezik, így az ezzel kapcsolatos adatok névtelenek maradnak. A NAVEX nem rögzíti a hívásokat. A NAVEX munkatársa a Pfizer nevében kérdéseket tehet fel a telefonálónak, rögzíti a válaszokat, és szükség esetén pontosítást kér. Fontos tudnod, hogy a NAVEX munkatársa nem tud etikai vagy a szabályokkal kapcsolatos kérdésekre választ adni, és nem adhat tanácsot abban, hogy mit tegyél. A NAVEX nem dönthet az Ön bejelentésével kapcsolatos intézkedésekről és vizsgálatokról. A NAVEX a Pfizer által kiadott utasításokat követi. Ha az online bejelentő felületet használja, ott ugyanezek az adatok kerülnek rögzítésre elektronikusan.

A NAVEX a kapott bejelentésről vagy kérdésről részletes jelentést küld közvetlenül a Pfizer Vállalati Compliance részlegének. A bejelentés jellegétől függően és a titoktartási kötelezettségeket betartva a Vállalati Compliance részleg a jelentést és a kapcsolódó dokumentációt továbbíthatja a Pfizer megfelelő munkatársainak (például a Jogi, a People Experience („PX”) vagy a Belső Ellenőrzési Osztályon) kivizsgálásra és a szükséges eljárások lefolytatásához. Előfordulhat, hogy a vizsgálat előrehaladtával további információkra és pontosításokra lesz szükségünk Öntől, ebben az esetben közvetlenül Önnel vesszük fel a kapcsolatot. Szükség esetén továbbá a Vállalati Compliance részleg kötelessége, hogy értesítse a PX munkatársakat vagy a Pfizer vezetőit az előírások megszegéséről, részben az esetleges fegyelmi intézkedés meghatározásához, részben az átláthatóság biztosítása érdekében. Az információkat a Pfizer külső tanácsadói, például ügyvédek és könyvvizsgálók is megismerhetik, akikre

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szigorú titoktartási kötelezettség vonatkozik. Tájékoztatni fogjuk Önt a vizsgálat előrehaladásáról és a vizsgálat eredményét követően hozott intézkedésekről.

A kivizsgálás részeként a Pfizer a bejelentésben érintett minden személyt megfelelő időn belül tájékoztatni kíván a rá vonatkozó állításokról, de arra törekszik, hogy az Ön kilétét ne ismerjék meg. Az érintett személyeknek jogukban áll az általad bejelentettekre reagálni. Ne feledje, hogy az Ön által közölt információk olyan döntésekhez vezethetnek, amelyek hatással vannak a Pfizer és az adott eseményben szerepet játszó külső felek munkatársaira. Ezért kérjük, hogy csak olyan információt közöljön, amely a legjobb tudomása szerint igaz. A valóságnak nem megfelelő vagy félrevezető információk szándékos közlése fegyelmi intézkedéssel, sőt, polgári vagy büntetőjogi felelősségre vonással járhat. A bejelentéseknek továbbá lehetőleg a bejelentés és az azt követő vizsgálat szempontjából fontos tényekre kell szorítkozniuk.

Szigorúan tilos a tanácsot kérő, aggályokat felvető vagy a visszaélést bejelentő személyekkel szembeni megtorlás, illetve a bejelentő személyekkel kapcsolatban álló közvetítőkkel, magánszemélyekkel vagy szervezetekkel szembeni megtorlás. Ha bárki megtorlást alkalmaz azon munkatárssal szemben, aki a valóságnak megfelelően szabálysértést jelez, a Pfizer megteszi a megfelelő lépéseket – még akkor is, ha később az derül ki, hogy az adott munkatárs tévesen jelentette az aggályát. Ha úgy gondolja, hogy Önt vagy bárki mást megtorlás ért, forduljon a Compliance részleghez (elérhetőségek alább).

Az adatok felhasználása, megőrzése és továbbítása

A Pfizer a NAVEX-szel, az adatfeldolgozóval szigorú titoktartás mellett kötött szerződésben biztosítja a személyes adataid védelmét és bizalmas kezelését, azokat a NAVEX kizárólag a Forródrót nyújtásához használhatja fel. A NAVEX-től kapott információkat és az Ön által megadott személyes adatokat a Pfizer egyik adatbázisában (és szállítóink adatbázisában, amennyiben a vizsgálatban való segítségnyújtáshoz szükséges) tároljuk, korlátozott hozzáféréssel.

A személyes adatait továbbíthatjuk leányvállalataink részére, ha ezeket szükséges ismerniük, – amennyiben az a bejelentés kivizsgálásához és a Forródrót üzemeltetéséhez szükséges – többek között olyan országokba (például a Pfizer leányvállalatainak vagy szállítóinak), ahol más adatvédelmi szabályok vannak érvényben, mint abban az országban, ahol Ön dolgozik. Személyes adatait különösen a Pfizer, Inc. megfelelőségi osztályának továbbíthatjuk. Vegye figyelembe, hogy az EGT-n kívüli országok némelyikét – köztük az USA-t – az Európai Bizottság nem ismeri el az EGT-szabványok szerinti megfelelő szintű védelem biztosításának. A megfelelő szintű védelmet nyújtó országok listáját itt találja: [Adequacy decisions \(europa.eu\)](https://www.europa.eu/adequacy).

Megfelelő intézkedéseket hozunk, például az Európai Bizottság által elfogadott szabványos szerződési záradékokat alkalmazunk, amelyek lehetővé teszik az Ön személyes adatainak továbbítását és védelmét olyan országok esetén is, amelyeket az Európai Bizottság nem ismer el megfelelő szintű adatvédelmet biztosítóként. A Pfizer helyi adatvédelmi felelősétől elkérheti az ezeket az intézkedéseket tartalmazó dokumentumot. Az adatvédelmi felelős elérhetősége megtalálható a [DPO.Pfizer.com](https://www.pfizer.com/dpo) oldalon.

A Pfizer arra is kötelezhető, hogy az Ön személyes adatainak egy részét vagy egészét továbbítsa a bűnüldöző szervek vagy hatóságok, illetve az érintett országok egyéb hatóságai részére.

A Forródróton keresztül tett bejelentésekkel kapcsolatos információkat a következő szempontok alapján őrizzük meg szükség szerint korlátozott ideig, vagy töröljük: lezárult-e a vizsgálat, és szükség van-e további intézkedésekre, kivéve, ha a Pfizer törvény által előírt kötelessége az adatok hosszabb ideig való megőrzése; lejárt-e a kapcsolódó peres eljárásokra vonatkozó elévülési idő, kivéve, ha a Pfizer törvény által előírt kötelessége az adatok hosszabb ideig való megőrzése; fennáll-e a vizsgálatához kapcsolódó adatok megőrzésére vonatkozó kötelezettségünk. Az adatok megőrzéséről az erre vonatkozó vállalati szabályzatból tudhatsz meg többet. Ha kérdése van, kérjük forduljon a Compliance részleghez.

Az Ön jogai

A GDPR-ben és/vagy más alkalmazandó jogszabályokban meghatározott feltételek mellett Ön jogosult a személyes adataihoz való hozzáférésre (GDPR 15. cikk), a személyes adatai helyesbítéséhez való jogra (GDPR 16. cikk), a

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személyes adatai törléséhez való jogra (GDPR 17. cikk), a személyes adatai kezelésének korlátozásához való jogra (GDPR 18. cikk), az adathordozhatósághoz való jogra (GDPR 20. cikk), valamint arra, hogy bizonyos körülmények között tiltakozzon a személyes adatai kezelése ellen (GDPR 21. cikk).

Ha a GDPR szerinti jogát szeretné gyakorolni, kapcsolatba léphet a Pfizer adatvédelmi tisztviselőjével (lásd: DPO.Pfizer.com). Az alkalmazandó jogszabályokkal összhangban fogunk válaszolni a kérésére.

Önnek továbbá bármikor joga van panaszt tenni az országa vagy régiója szerint illetékes adatvédelmi hatóságnál (Magyarországon ez a Magyar Adatvédelmi és Információszabadság Hatóság, cím: 1055 Budapest, Falk Miksa utca 9–11., telefonszám: +36-1-391-1400, telefax: +36-1-391-1410, e-mail: ugyfelszolgalat@naih.hu).

Magával a Forródróttal kapcsolatban minden kérdéssel és aggálllyal kapcsolatban forduljon hozzánk az +1-212-733-3026 telefonszámon, a corporate.compliance@pfizer.com e-mail-címen vagy a 66 Hudson Boulevard East, New York, NY 10001, Amerikai Egyesült Államok postacímen.

¹ Egyes uniós országokban a Pfizer helyi jelentéstételi csatornákat is kínál. A helyi bejelentéssel kapcsolatos további információkért, beleértve a helyi bejelentési csatorna adatvédelmi nyilatkozatát és a helyi bejelentési csatornán keresztül jelenthető információkat, keresse fel a Pfizer helyi intranetjét, vagy forduljon a Compliance részleghez.

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The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

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- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

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The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

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¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](#)). We will respond to your request in accordance with applicable law.

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PFIZER, INC.
COMPLIANCE HELPLINE UE/SEE/UK
GUIDA E INFORMATIVA SULLA PRIVACY

La Compliance Helpline di Pfizer (“Helpline”) viene fornita da Pfizer, Inc. (“Pfizer”, o “noi”) in qualità di azienda responsabile dei tuoi dati personali. Il sito web e la linea telefonica mediante i quali puoi segnalare un incidente sono attualmente gestiti da NAVEX Global UK Limited, una società del gruppo NAVEX Global Holding, Vantage London 4° piano, Great West Road, Brentford, TW8 9AG Regno Unito (“NAVEX”), il fornitore esterno di Pfizer che eroga il servizio della Helpline.

Informazioni di carattere generale

Il responsabile del trattamento dei dati della Helpline è: Pfizer, Inc., 66 Hudson Boulevard East, New York, NY 10001 Stati Uniti.

Puoi contattare il Responsabile della protezione dei dati di Pfizer tramite i recapiti indicati sopra o l’indirizzo privacy.officer@pfizer.com o DPO.Pfizer.com.

In generale, la Helpline può essere utilizzata per segnalare preoccupazioni in ambito lavorativo su problemi di integrità di tipo finanziario e aziendale, come quelli riguardanti la contabilità; controlli contabili interni; problemi di rendicontazione; corruzione e concussione; reati bancari e finanziari e violazioni della legge dell’UE, inclusi: finanziamento pubblico, servizi finanziari, prodotti e mercati, prevenzione del riciclaggio del denaro e del finanziamento del terrorismo, sicurezza dei prodotti, sicurezza dei trasporti, salute pubblica, protezione dell’ambiente, protezione dei consumatori, violazioni riguardanti interessi finanziari dell’UE oppure del mercato interno (ad es., leggi sulla concorrenza e regole in materia di aiuti di Stato), radioprotezione e sicurezza nucleare, sicurezza degli alimenti, sicurezza e benessere degli animali, protezione e sicurezza dei dati e protezione della privacy. In aggiunta a quanto sopra, in alcuni Paesi è possibile effettuare segnalazioni su altre questioni. Per ulteriori informazioni, consultare il nostro strumento di segnalazione web alla pagina pfizer.ethicspoint.com.

L’utilizzo della Helpline è facoltativo¹. Ti invitiamo a identificarti quando effettui una segnalazione alla Helpline. Tuttavia, ove consentito dalla legge, non sussiste alcun obbligo in tal senso.

Finalità dell’elaborazione dei dati personali

Le finalità dell’elaborazione dei dati personali in relazione alla Helpline sono di garantire la conformità con le leggi internazionali e locali applicabili e con le politiche interne. Qualora non garantissimo la Compliance, saremmo soggetti a multe elevate, incarcerazione, responsabilità e altre sanzioni in base alle leggi applicabili.

Raccogliamo ed elaboriamo le informazioni personali forniteci tramite la Helpline per le seguenti finalità:

- verifica della plausibilità della segnalazione e dei dati contenuti nel presente documento, al fine di evitare eventuali violazioni delle leggi;
- indagini su presunte violazioni di leggi e policy, in particolare di quelle sopra menzionate;

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- garanzia della conformità con le leggi applicabili;
- cooperazione con le società affiliate di Pfizer nel rispetto degli obblighi di accertamento delle violazioni;
- difesa delle rivendicazioni di terze parti e preparare le indennizzi nei confronti di terze parti;
- sviluppo della nostra Helpline e le procedure di indagine.

Raccolta ed elaborazione delle informazioni e dei dati personali

Pfizer potrebbe raccogliere ed elaborare le seguenti informazioni attraverso la Helpline: nome, qualifica, posizione e recapiti (a meno che la segnalazione non sia anonima); nome e altri dati riguardanti i soggetti citati nella segnalazione; nome e qualifica dei supervisori; descrizione della condotta oggetto di segnalazione, tra cui data e sede, nonché altre informazioni pertinenti, unitamente a eventuali domande e quesiti sollevati da chi effettua la segnalazione a Pfizer. Pfizer potrebbe inoltre raccogliere informazioni da parte di altri durante eventuali indagini successive. In determinate circostanze, possiamo elaborare altresì dati sensibili, quali dati sulla salute, iscrizione ai sindacati, qualora si siano forniti e/o se sono pertinenti alle finalità dell'indagine.

Le informazioni fornite saranno trattate nel rispetto della privacy, conformemente alle leggi applicabili.

Pfizer può utilizzare le informazioni sopra indicate se è tenuta a essere conforme agli obblighi legali imposti a Pfizer (Articolo 6(1)(c) dal Regolamento generale sulla protezione dei dati (General Data Protection Regulation, GDPR) dell'UE, se ha un interesse legittimo a indagare sulla segnalazione a lei inoltrata (Articolo 6(1)(f) GDPR), o se hai un obbligo ai sensi del contratto di impiego a segnalare determinati incidenti (Articolo 6(1)(b) GDPR). In relazione ai dati sensibili, quali dati sulla salute, iscrizioni sindacali (per un elenco completo dei dati sensibili consultare l'Articolo 9(1) GDPR), Pfizer può utilizzare le informazioni per la costituzione, l'esercizio e la difesa di azioni legali (Articolo 9(2)(f) GDPR) qualora si ritenga necessario per motivi di interesse pubblico rilevante, sulla base del diritto dell'Unione o dello Stato membro che dovrà essere proporzionato all'obiettivo perseguito (Articolo 9(2)(g) GDPR), o qualora sia necessario per motivi di interesse pubblico nell'area della salute pubblica, a garanzia di elevati standard di qualità e sicurezza dell'assistenza sanitaria e di prodotti farmacologici o dispositivi medici sulla base del diritto dell'Unione o dello Stato membro (Articolo 9(2)(i) GDPR).

Non vincoleremo i soggetti interessati alle decisioni esclusivamente sulla base di elaborazioni automatizzate, tra cui profilazione, in relazione alla Helpline (Articolo 22 del GDPR).

Funzionamento e procedure della Helpline

La chiamata alla Helpline sarà presa in carico da un rappresentante NAVEX. NAVEX non rileva i recapiti telefonici delle chiamate in entrata, i cui dati rimarranno pertanto anonimi. NAVEX inoltre non registra le telefonate. Il rappresentante può chiedere una serie di informazioni per conto di Pfizer, documentare le risposte e formulare domande di approfondimento a maggiore chiarimento delle informazioni fornite. Nota: il rappresentante NAVEX non è in grado di rispondere ad alcun quesito relativo a questioni etiche o policy e, pertanto, non può fornire alcun consiglio in merito ad eventuali azioni da intraprendere. NAVEX non può decidere in merito a eventuali azioni o indagini relativamente alla tua segnalazione. NAVEX si attiene alle istruzioni fornite da Pfizer. Se si sceglie di utilizzare lo strumento di segnalazione via web, gli stessi dati vengono rilevati in formato elettronico.

Una volta effettuata la segnalazione o la richiesta di informazioni iniziale, viene redatto un verbale dettagliato che NAVEX provvede a inviare direttamente alla Divisione Compliance di Pfizer. A seconda della natura della questione e conformemente agli obblighi di riservatezza, la Divisione Compliance può decidere di comunicare la segnalazione e la documentazione correlata al personale incaricato presso Pfizer che potrebbe avere la necessità di essere al corrente dei fatti, tra cui i rappresentanti delle Divisioni Legale, People Experience ("PX") o Audit per ulteriori approfondimenti e per la risoluzione del caso. Con l'avanzamento delle indagini potremmo richiedere informazioni e chiarimenti aggiuntivi, nel qual caso provvederemo a contattarti direttamente. Ove necessario, la Divisione Compliance potrebbe avere inoltre la necessità di comunicare ai componenti della Divisione PX o ai dirigenti Pfizer

eventuali riscontri di violazione al fine di stabilire possibili azioni disciplinari e per finalità di trasparenza. Le informazioni possono essere condivise anche con consulenti esterni a Pfizer, tra cui legali o revisori, i quali sono obbligati a mantenere la massima riservatezza. Vi informeremo sul progresso dell'indagine e sulle azioni intraprese in seguito all'esito dell'indagine.

Come parte dell'indagine, Pfizer si adopera per informare ciascuna persona implicata in una segnalazione circa le presunte accuse sollevate nei loro confronti in un arco di tempo adeguato, impegnandosi al contempo a non rivelare l'identità della persona che ha effettuato la segnalazione. Le persone oggetto di segnalazione hanno il diritto di replicare alle segnalazioni fatte nei loro confronti. Nota: le informazioni fornite possono determinare decisioni che incidono su persone presenti in Pfizer e su altre terze parti coinvolte nel caso segnalato. Si richiede, pertanto, che vengano fornite esclusivamente informazioni che, per quanto a conoscenza, siano accurate. Fornire intenzionalmente informazioni inaccurate o fuorvianti può determinare l'adozione di misure disciplinari e comportare anche responsabilità in sede civile o penale. Inoltre, è auspicabile che, per quanto possibile, le segnalazioni si limitino a fatti ritenuti pertinenti alla segnalazione e alle indagini di approfondimento.

La ritorsione nei confronti di qualsiasi persona che cerchi assistenza, segnali un problema o denunci in buona fede una condotta scorretta, o contro facilitatori, soggetti o enti connessi alla segnalazione di persone, è severamente proibita. Ove qualcuno praticasse delle ritorsioni nei confronti di una persona che, in modo sincero, abbia segnalato una violazione, Pfizer prenderà opportuni provvedimenti, anche nel caso in cui successivamente dovesse emergere che la segnalazione effettuata in origine dall'individuo risultasse erronea. Se ritieni che tu, o qualsiasi altra persona coinvolta, abbiate subito ritorsioni, dovete contattare la Divisione Compliance (informazioni di contatto sotto).

Utilizzo, conservazione e trasmissione dei dati

Pfizer ha stipulato un contratto con NAVEX, soggetto preposto al trattamento dei dati tenuto a osservare la massima riservatezza, al fine di tutelare la privacy e la sicurezza dei dati personali. NAVEX è autorizzata a utilizzare i dati personali forniti dagli utenti soltanto per l'erogazione dei servizi di Helpline. Le informazioni che ci pervengono da NAVEX ed eventuali altri dati personali che ci vengono forniti dai diretti interessati sono custoditi all'interno di un database di Pfizer (e nel database dei nostri fornitori, laddove necessario per fornirci assistenza nell'indagine) con accesso limitato.

Possiamo inoltre trasmettere i dati personali alle nostre affiliate che rispondono a esigenze conoscitive, nonché a Paesi che dispongono di normative sulla protezione dei dati diverse rispetto a quelle vigenti nel Paese in cui si presta servizio, tra cui altre affiliate o fornitori di Pfizer, ove ciò risulti necessario al fine di svolgere le dovute indagini in merito alla segnalazione e gestire la Helpline. Possiamo, in particolare, trasmettere i tuoi dati personali alla Divisione Compliance di Pfizer, Inc. Si noti che alcuni dei Paesi non appartenenti al SEE, compresi gli Stati Uniti, non sono riconosciuti dalla Commissione Europea, dal momento che non forniscono un livello di protezione adeguato secondo gli standard del SEE. La lista dei Paesi che non sono riconosciuti dal SEE per via del livello di protezione offerto è disponibile qui: [Adequacy decisions \(europa.eu\)](https://eudatascr.com/).

Abbiamo attuato misure adeguate, tra cui clausole contrattuali standard adottate dalla Commissione Europea al fine di consentire la trasmissione e la protezione dei tuoi dati personali a Paesi non riconosciuti dalla Commissione Europea, garantendo un livello adeguato di protezione dei dati. È possibile ottenere una copia di queste misure contattando il Responsabile della protezione dei dati Pfizer, i cui recapiti sono disponibili all'indirizzo [DPD.Pfizer.com](mailto:DPD@Pfizer.com).

Pfizer potrebbe inoltre essere obbligata a trasmettere alcuni o tutti i tuoi dati personali alle autorità giudiziarie o di altra natura dei relativi Paesi.

Le informazioni contenute in una segnalazione effettuata tramite la Helpline vengono archiviate per un periodo di tempo limitato, laddove necessario, o eliminate in base ai seguenti criteri: dopo che le indagini si sono concluse e non sono necessarie ulteriori azioni, eccetto nel caso in cui Pfizer sia tenuta legalmente a conservare i dati per un periodo più lungo; una volta scaduti i termini previsti per eventuali ricorsi, eccetto nel caso in cui Pfizer sia tenuta legalmente a conservare i dati per un periodo più lungo, e una volta scaduti i termini che impongono la

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conservazione delle informazioni relative alle indagini. Per maggiori informazioni si faccia riferimento alla relativa policy aziendale sulla conservazione dei dati. In caso di domande, consultare la Divisione Compliance.

I tuoi diritti

Conformemente alle condizioni enunciate nel GDPR e/o ad altre leggi applicabili, in determinate circostanze, hai il diritto di accedere ai tuoi dati personali (Articolo 15 GDPR), il diritto di modificare i tuoi dati personali (Articolo 16 GDPR), il diritto alla cancellazione dei tuoi dati personali (Articolo 17 GDPR), il diritto a limitare il trattamento dei tuoi dati personali (Articolo 18 GDPR), il diritto alla portabilità dei dati (Articolo 20 GDPR) e il diritto a opporsi al trattamento dei tuoi dati personali (Articolo 21 GDPR).

Qualora desideri esercitare un diritto ai sensi del GDPR, puoi contattare il Responsabile della protezione dei dati di Pfizer (consultare la pagina [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Risponderemo alla richiesta nel rispetto della legge applicabile.

Inoltre, hai anche il diritto di presentare un reclamo in qualsiasi momento presso un'autorità di protezione dei dati competente per il Paese o la regione di appartenenza.

Per qualsiasi domanda o perplessità relative alla Helpline, è possibile contattarci ai seguenti recapiti: +1 212 733 3026, corporate.compliance@pfizer.com, oppure 66 Hudson Boulevard East, New York, NY 10001 Stati Uniti.

¹ In determinati Paesi dell'UE, Pfizer fornisce inoltre canali di segnalazione locali. Per ulteriori informazioni sulla segnalazione locale, nonché sull'informativa sulla privacy dei canali di segnalazione locali e su ciò che è possibile segnalare mediante tali canali, consultare la rete intranet locale di Pfizer o contattare la Divisione Compliance.

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We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/eu-justice/european-data-protection-board/adequacy-decisions/).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

LATVIA

Language: Latvian
Last Updated: Dec 2022

PFIZER, INC.

ES/EEZ/AK ATBILSTĪBAS UN PALĪDZĪBAS TĀLRUŅA LĪNIJA VADLĪNIJAS UN PAZIŅOJUMS PAR KONFIDENCIALITĀTI

Pfizer Atbilstības un palīdzības tālrūņa līniju ("Palīdzības līniju") nodrošina Pfizer, Inc. (turpmāk — "Pfizer", "mēs" vai "mūs") kā uzņēmums, kas atbild par Jūsu personas datiem. Tīmekļa vietni un tālrūņa līniju, pa kuru varat ziņot par incidentiem, pašlaik uztur NAVEX Global UK Limited, NAVEX Global mātesuzņēmums, ar juridisko adresi Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG, Apvienotā Karaliste ("NAVEX"), kas ir Pfizer neatkarīgais Palīdzības līnijas pakalpojuma nodrošinātājs.

Vispārīgi

Palīdzības līnijas datu pārzinis ir: Pfizer, Inc., adrese: 66 Hudson Boulevard East, New York, NY 10001, ASV.

Jūs varat sazināties ar Pfizer datu aizsardzības amatpersonu, izmantojot kontaktinformāciju, kas minēta iepriekš, vai rakstot uz e-pasta adresi privacy.officer@pfizer.com, vai arī apmeklējot vietni DPO.Pfizer.com.

Palīdzības līniju var vispārīgi izmantot bažu paušanai ar darbu saistītā kontekstā attiecībā uz finanšu vai uzņēmējdarbības integritātes jautājumiem, piemēram, saistībā ar grāmatvedību; iekšējām revīzijām; jautājumiem par revīzijām; kukuļdošanu vai korupciju; banku lietām vai finanšu noziegumiem un EU tiesību aktu pārkāpumiem, tādiem kā publiskā iepirkuma, finanšu pakalpojumu, produktu un tirgu, nelikumīgi iegūtu līdzekļu legalizācijas un teroristu finansēšanas novēršanas, produktu drošuma, transporta drošības, sabiedrības veselības, vides aizsardzības, patērētāju aizsardzības tiesību aktu pārkāpumiem, tādiem pārkāpumiem, kuri ietekmē ES finanšu intereses vai ir saistīti ar iekšējo tirgu (piemēram, konkurenci un Valsts palīdzības noteikumiem), aizsardzību pret radiāciju un kodoldrošību, pārtikas drošumu, dzīvnieku veselību un labklājību, privātuma aizsardzību, datu aizsardzību un datu drošību. Turklāt dažās valstīs varat ziņot arī par papildus jautājumiem. Lūdzu, iepazīstieties ar mūsu tīmekļa ziņošanas rīku vietnē pfizer.ethicspoint.com, lai uzzinātu vairāk.

Palīdzības līnijas lietošana ir brīvprātīga¹. Sniedzot ziņojumus Palīdzības tālrūņa līnijai, Jūs mudina sevi identificēt; Jums nav pienākuma to darīt, ja vien to neparedz piemērojamie tiesību akti.

Personas datu apstrādes mērķis

Ar Palīdzības līniju saistīto personas datu apstrādes mērķis ir nodrošināt atbilstību piemērojamajiem starptautiskajiem un vietējā līmeņa tiesību aktiem, kā arī iekšējām politikām. Ja mēs nenodrošinātu atbilstību, mums varētu piemērot lielus naudas sodus, cietumsodus, atbildību un citas sankcijas atkarībā no piemērojamajiem tiesību aktiem.

Mēs vācam un apstrādājam Jūsu personas datus, kas tiek mums sniegti, zvanot uz Palīdzības līniju, šādiem mērķiem:

- lai pārbaudītu Jūsu ziņojuma un tajā ietverto datu patiesību nolūkā izvairīties no tiesību aktu pārkāpumiem;

- lai izmeklētu norādītos tiesību aktu un politiku pārkāpumus, jo īpaši attiecībā uz iepriekš minētajiem;
- lai nodrošinātu atbilstību piemērojamajiem tiesību aktiem;
- lai sadarbotos ar Pfizer partneriem saistībā ar to saistībām izmeklēt pārkāpumus;
- lai aizstāvētu trešo personu prasības un sagatavotu prasības pret trešām personām;
- lai pilnveidotu mūsu Palīdzības līniju un izmeklēšanas procesus.

Informācijas un personas datu vākšana un apstrāde

Pfizer Palīdzības tālruņa līnijas darbības ietvaros var tikt vākta un apstrādāta šāda informācija: Jūsu vārds, uzvārds, amata nosaukums, amats un kontaktinformācija (ja vien ziņojums nav anonīms); Jūsu ziņojumā minēto personu vārdi, uzvārdi un citi dati; Jūsu vadītāju vārdi, uzvārdi un amati; ziņojumā minētās rīcības apraksts, tostarp datums un vieta, kā arī cita ar to saistītā atbilstīgā informācija; Jūsu iespējamie jautājumi Pfizer. Turpmākas izmeklēšanas ietvaros Pfizer var iegūt informāciju arī no citām personām. Dažādos apstākļos mums var būt nepieciešama apstrādāt sensitīvus datus, piemēram, saistībā ar veselību, piederību arodbiedrībai, ja šādus datus mums sniedzat un/vai tie ir saistīti ar izmeklēšanas mērķi.

Ar Jūsu sniegto informāciju rīkosies, ievērojot konfidencialitāti un piemērojamus tiesību aktus.

Pfizer var izmantot iepriekš minēto informāciju, lai nodrošinātu atbilstību Pfizer piemērojamajām juridiskajām saistībām (ES Vispārīgās datu aizsardzības regulas ("VDAR") 6. panta 1. punkta c) apakšpunkts) vai mums ir leģitīma interese izmeklēt Jūsu iesniegto ziņojumu (VDAR 6. panta 1. punkta f) apakšpunkts) vai Jums ir pienākums saskaņā ar darba līgumu ziņot par konkrētiem incidentiem (VDAR 6. panta 1. punkta b) apakšpunkts). Attiecībā uz sensitīviem datiem, piemēram, veselības datiem, dalību arodbiedrībās (sensitīvo datu kategoriju sarakstu skatiet VDAR 9. panta 1. punkta b) apakšpunktā), Pfizer var izmantot informāciju juridisko prasību iesniegšanai, īstenošanai vai aizstāvēbai (VDAR 9. panta 2. punkta f) apakšpunkts), ja tas nepieciešams būtisku sabiedrības interešu aizstāvēbai, pamatojoties uz apvienības vai dalībvalsts tiesību aktiem, kam jāatbilst konkrētajam mērķim (VDAR 9. panta 2. punkta g) apakšpunkts), vai tas nepieciešams sabiedrības interešu aizstāvēbai sabiedrības veselības interesēs, piemēram, nodrošinot veselības aprūpes un medicīnas produktu vai ierīču augstas kvalitātes standartus, pamatojoties uz apvienības vai dalībvalsts tiesību aktiem (VDAR 9. panta 2. punkta i) apakšpunkts).

Mēs uz datu subjektiem neattiecināsim lēmumus, pamatojoties tikai uz automātisku apstrādi, tostarp profilēšanu, saistībā ar Palīdzības līniju (VDAR 22. pants).

Palīdzības līnijas darbība un procesi

Uz Jūsu zvanu Palīdzības līnijai atbildēs NAVEX pārstāvis. Lai saglabātu Jūsu iezvana informācijas anonimitāti, NAVEX neregistrē ienākošo zvanu tālruņa numurus. NAVEX arī neieraksta zvanus. Pārstāvis Pfizer vārdā Jums var uzdot vairākus informatīva rakstura jautājumus, dokumentēt Jūsu ziņojumu un uzdot papildu jautājumus informācijas noskaidrošanai. Lūdzu, ņemiet vērā, ka NAVEX pārstāvis nespēj atbildēt uz jautājumiem par ētiku vai politiku un nevar Jums ieteikt, kā rīkoties. NAVEX var nepieņemt lēmumus saistībā ar jebkādam rīcībām vai izmeklēšanām attiecībā uz Jūsu ziņojumu. NAVEX ievēro Pfizer sniegtos norādījumus. Ja izvēlaties lietot tīmekļa ziņošanas rīku, tā pati informācija tiek reģistrēta elektroniski.

Pēc sākotnējā ziņojuma saņemšanas vai iztaujāšanas NAVEX sagatavo detalizētu aprakstu un nosūta to tieši Pfizer Atbilstības nodaļai. Atkarībā no jautājuma rakstura un atbilstoši konfidencialitātes saistībām Atbilstības nodaļa var nosūtīt ziņojumu un ar to saistītos dokumentus attiecīgajiem Pfizer darbiniekiem, kam vajadzētu tikt informētiem, piemēram, Juridiskās nodaļas, People Experience ("PX") vai Audita nodaļas pārstāvjiem, turpmākai izmeklēšanai un lēmumu pieņemšanai. Mums var būt nepieciešama papildu informācija un paskaidrojumi no Jums izmeklēšanas procesa laikā, un tad mēs sazināsimies ar Jums tiešā

veidā. Vajadzības gadījumā Atbilstības nodaļa var sniegt informāciju par pārkāpumu konstatēšanu arī Personāla nodaļas speciālistiem vai Pfizer vadītājiem, lai tiktu noteikti disciplināri pasākumi, kā arī caurskatāmības nolūkā. Šāda informācija var arī tikt nodota Pfizer ārējiem konsultantiem, piemēram, juristiem un revidentiem, kuriem ir pienākums ievērot stingrus konfidencialitātes principus. Mēs Jūs informēsim par izmeklēšanas gaitu un darbībām, ko veiksīm pēc izmeklēšanas noslēgšanas.

Izmeklēšanas ietvaros Pfizer mērķis ir ikvienu ar ziņojumu saistīto personu pienācīgā laika posmā informēt par apgalvojumiem saistībā ar viņa vai viņas darbību, taču uzņēmums neatklās Jūsu identitāti. Iesaistītajām personām būs tiesības paust savu viedokli par Jūsu sniegto informāciju. Ņemiet vērā, ka Jūsu norādītā informācija var sekmēt tādu lēmumu pieņemšanu, kas ietekmē Pfizer darbiniekus un citas attiecīgajā gadījumā iesaistītās trešās personas. Tāpēc lūdzam norādīt tikai tādu informāciju, par kuras pareizību esat pārliecināts. Darbiniekiem, kas apzināti sniedz nepareizu vai maldinošu informāciju, var tikt piemērotas disciplināras darbības vai pat iestāties civiltiesiskā atbildība vai kriminālatbildība. Tāpat ziņojumā pēc iespējas jāietver tikai fakti, kas attiecas uz ziņojumā aprakstīto gadījumu vai turpmāko izmeklēšanu.

Uz atbilstību vērsta rīcība pret jebkuru personu, kura jautā padomu, pauž bažas vai ziņo par neatbilstošu rīcību, vai pret ietekmējošām personām, cilvēkiem vai organizācijām, kas saistītas ar ziņojošajām personām, ir stingri aizliegta. Ja kāds izmanto represijas pret kādu, kurš ir godīgi un godprātīgi ziņojis par pārkāpumu, Pfizer veiks attiecīgus pasākumus pat tad, ja vēlāk izrādīsies, ka konkrētā persona sākotnēji maldījies, ziņojot par šo jautājumu. Ja uzskatāt, ka Jūs vai kāda cita iesaistītā persona ir cietusi no atbilstīgas rīcības, Jums jāsazinās ar Atbilstības nodaļu (sk. tālāk minēto kontaktinformāciju).

Informācijas izmantošana, saglabāšana un datu nodošana

Pfizer ir noslēdzis līgumu ar NAVEX, datu apstrādātāju, saskaņā ar stingrām konfidencialitātes saistībām attiecībā uz Jūsu personas datu konfidencialitātes un drošības aizsardzību, un NAVEX izmantos personas datus tikai Palīdzības līnijas darbības nodrošināšanai. Informācija, kuru saņemam no NAVEX, un jebkādi personas dati, kurus sniedzat mums, tiks glabāti Pfizer datubāzē (un mūsu pakalpojumu sniedzēju datubāzē, kad tas būs nepieciešams, lai palīdzētu mums izmeklēšanā) ar ierobežotu piekļuvi.

Mēs Jūsu personas datus varam nosūtīt saviem partneriem, ja tiem ir nepieciešamība tos saņemt, tostarp uz valstīm, kurās spēkā esošie tiesību akti par datu aizsardzību var atšķirties no tiem, kas ir spēkā valstī, kurā strādājat; dati var tikt nosūtīti arī Pfizer partneriem vai pakalpojumu sniedzējiem, ja tas ir nepieciešams ar ziņojumu saistītajai izmeklēšanai un Palīdzības līnijas darbam. Mēs, jo īpaši, varam nodot Jūsu personas datus Pfizer, Inc. Atbilstības nodaļai. Lūdzu, ievērojiet, ka dažas valstis ārpus EEZ, tostarp ASV, Eiropas Komisija neatzīst kā tādas, kas spēj nodrošināt piemērotu aizsardzības līmeni saskaņā ar EEZ standartiem. Valstis, kuras atzītas kā tādas, kas spēj nodrošināt piemērotu aizsardzības līmeni, ir norādītas šeit:

[Adequacy decisions \(europa.eu\)](https://eudataprivacy.europa.eu/).

Mēs īstenojam piemērotus aizsardzības līdzekļus, piemēram, standartklausulas, ko pieņēmusi Eiropas Komisija, lai varētu nodrošināt Jūsu personas datu nodošanu valstīm, kuras Eiropas Komisija nav atzinusi kā tādas, kas spēj nodrošināt piemērotu aizsardzības līmeni, kā arī Jūsu datu aizsardzību šādās valstīs. Jūs varat saņemt šo līdzekļu izklāsta kopiju, sazinoties ar Pfizer datu aizsardzības amatpersonu (kontaktinformācija ir pieejama vietnē DPO.Pfizer.com).

Pfizer arī var būt pienākums nodot daļu vai visus Jūsu personas datus tiesībaizsardzības aģentūrām vai iestādēm, vai citām institūcijām attiecīgajās valstīs.

Informācija, kura ir saistīta ar Palīdzības līnijā iesniegto ziņojumu, tiks pēc nepieciešamības arhivēta uz noteiktu laika periodu vai dzēsta šādos gadījumos: izmeklēšana būs noslēgusies un turpmāka rīcība nebūs vajadzīga, ja vien tiesību akti nenoteiks Pfizer pienākumu saglabāt datus ilgāku laiku; visu saistīto tiesas procesu periods būs beidzies, ja vien tiesību akti nenoteiks Pfizer pienākumu saglabāt datus ilgāku laiku; būs pagājis obligātais izmeklēšanas informācijas glabāšanas laika posms. Plašāku informāciju skatiet attiecīgajā uzņēmuma politikā par informācijas glabāšanu. Ja Jums ir kādi jautājumi, lūdzu, konsultējieties ar Atbilstības nodaļu.

Jūsu tiesības

Saskaņā ar VDAR un/vai citos piemērojamajos tiesību aktos izklāstītajiem nosacījumiem Jums ir tiesības piekļūt saviem personas datiem (VDAR 15. pants), tiesības labot savus personas datus (VDAR 16. pants), tiesības uz savu personas datu dzēšanu (VDAR 17. pants), tiesības ierobežot savu personas datu apstrādi (VDAR 18. pants), tiesības uz datu pārņemšanu (VDAR 20. pants) un tiesības iebilst savu personas datu apstrādei konkrētos apstākļos (VDAR 21. pants).

Ja vēlaties īstenot savas tiesības saskaņā ar VDAR, varat sazināties ar Pfizer datu aizsardzības amatpersonu (sk. informāciju DPO.Pfizer.com). Uz Jūsu pieprasījumu atbildēsim atbilstoši piemērojamā tiesību akta prasībām.

Jums arī ir tiesības jebkurā laikā iesniegt sūdzību atbilstošajai datu aizsardzības iestādei savā valstī vai reģionā.

Ja Jums ir radušies kādi jautājumi vai bažas saistībā ar Palīdzības līniju kā tādu, sazinieties ar mums pa tālruni +1-212-733-3026, sūtiet ziņojumu uz adresi corporate.compliance@pfizer.com vai apmeklējiet mūs klātienē: 66 Hudson Boulevard East, New York, NY 10001, ASV.

¹ Dažās ES valstīs Pfizer piedāvā arī vietēja līmeņa ziņošanas kanālus. Lai uzzinātu vairāk par vietējā līmeņa ziņošanu, tostarp vietējā līmeņa ziņošanas kanālu paziņojumiem par konfidencialitāti un to, par ko var ziņot vietējā līmeņa ziņošanas kanālos, lūdzu, ieskatieties Pfizer iekšīklā vai sazinieties ar Atbilstības nodaļu.

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Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out

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that the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](#)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Language: Lithuanian
Last Updated: Dec 2022

„PFIZER, INC.“

ES / EEE / JK ATITIKTIES PASITIKĖJIMO LINIJA GAIRĖS IR PRIVATUMO PRANEŠIMAS

„Pfizer“ atitikties pasitikėjimo linija (toliau – Pasitikėjimo linija) teikia „Pfizer, Inc.“ (toliau – „Pfizer, Inc.“, mes arba mus) kaip bendrovė, atsakinga už jūsų asmens duomenis. Šiuo metu interneto svetainę ir telefono liniją, kuria galite pranešti apie incidentą, administruoja „NAVEX Global UK Limited“, „NAVEX Global Holding Company“, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (toliau – NAVEX), nepriklausoma „Pfizer“ pasitikėjimo linijos paslaugų teikėja.

Bendrosios nuostatos

Pasitikėjimo linijos duomenų valdytoja yra: „Pfizer, Inc.“, esanti 66 Hudson Boulevard East, New York, NY 10 001 USA.

Su „Pfizer, Inc.“ duomenų apsaugos pareigūnu galite susisiekti pirmiau nurodytais kontaktiniais duomenimis, arba el. paštu: privacy.officer@pfizer.com arba DPO.Pfizer.com.

Pasitikėjimo linija paprastai galima naudotis pranešant apie su darbu susijusius susirūpinimą keliančius klausimus, tokius kaip finansiniai ir verslo sąžiningumo klausimai, pavyzdžiui, susiję su apskaita, vidaus apskaitos kontrole, auditu, kyšininkavimu ir korupcija, bankininkystės ir finansiniais nusikaltimais, ES teisės pažeidimais, įskaitant tokius kaip viešųjų pirkimų, finansinių paslaugų, produktų ir rinkų, pinigų plovimo ir teroristų finansavimo prevencijos, produktų saugos, transporto saugos, visuomenės sveikatos, aplinkos apsaugos, vartotojų apsaugos pažeidimai, turintys įtakos ES finansiniams interesams arba susiję su vidaus rinka (pvz., konkurencijos ir valstybės pagalbos taisyklės), radiacinės saugos ir branduolinės saugos, maisto saugos, gyvūnų sveikatos ir gerovės, privatumo apsaugos, duomenų apsaugos ir duomenų saugumo reikalavimais. Be to, kai kuriose šalyse galima pranešti ir apie kitus papildomus dalykus. Daugiau informacijos rasite mūsų žiniatinklio pranešimų teikimo priemonėje: pfizer.ethicspoint.com.

Pasitikėjimo linija naudojama savanoriškai¹. Jeigu leidžiama pagal galiojančius įstatymus, pageidautina, kad teikdami pranešimus Pasitikėjimo linija nurodytumėte savo tapatybę, nors to daryti neprivalote.

Asmens duomenų tvarkymo tikslas

Su Pasitikėjimo linija susijusių duomenų tvarkymo tikslas – užtikrinti atitiktį galiojantiems tarptautiniams ir vietos įstatymams bei vidaus taisyklėms. Jei neužtikrinsime, kad tokių reikalavimų būtų tinkamai laikomasi, mums gali būti skirtos didelės baudos, laisvės atėmimo bausmė, kilti atsakomybė, mums gali būti taikomos kitokios priemonės, atsižvelgiant į galiojančius įstatymus.

Jūsų asmens duomenis, kuriuos pateikiate naudodamiesi Pasitikėjimo linija, renkame ir tvarkome toliau nurodytais tikslais:

- tikrinti jūsų pranešimų ir juose pateiktų duomenų patikimumą, kad būtų išvengta įstatymų pažeidimų,
- tirti įtariamus įstatymų ir reikalavimų pažeidimus, ypač pirmiau minėtus;
- užtikrinti atitiktį galiojantiems įstatymams;
- bendradarbiauti su „Pfizer“ filialais dėl jų įsipareigojimų tirti pažeidimus;
- gintis nuo trečiųjų šalių ieškinių ir rengti ieškinius prieš trečiąsias šalis;

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- tobulinti mūsų Pasitikėjimo liniją ir tyrimo procesus.

Informacijos ir asmens duomenų rinkimas ir tvarkymas

Per Pasitikėjimo liniją „Pfizer“ gali rinkti ir tvarkyti tokius duomenis: jūsų vardas, pavardė, pareigos ir kontaktiniai duomenys; asmenų, kuriuos nurodėte savo pranešime, vardai, pavardės ir kiti duomenys; pranešamo elgesio apibūdinimas, įskaitant datą ir vietą bei kitą susijusią informaciją ir bet kokius jūsų turimus klausimus. Vykdydama tyrimą „Pfizer“ taip pat gali rinkti informaciją iš kitų asmenų. Tam tikromis aplinkybėmis taip pat galime tvarkyti neskelbtinus duomenis, pavyzdžiui, duomenis apie sveikatą, narystę profesinėje sąjungoje, jei juos jums pateikiate ir (arba) jei jie yra svarbūs tyrimo tikslui.

Jūsų pateikta informacija bus laikoma konfidencialia pagal taikomus įstatymus.

„Pfizer“ gali naudoti pirmiau minėtą informaciją, nes turime laikytis „Pfizer“ nustatytos teisinės prievolės (ES Bendrojo duomenų apsaugos reglamento (BDAR) 6 straipsnio 1 dalies c punktas) arba turime teisėtą interesą ištirti pranešimą, kurį jums pateikėte (BDAR 6 straipsnio 1 dalies f punktas), arba pagal darbo sutartį privalote pranešti apie tam tikrus incidentus (BDAR 6 straipsnio 1 dalies b punktas). „Pfizer“ gali tvarkyti neskelbtinus duomenis, pavyzdžiui, duomenis apie sveikatą, narystę profesinėse sąjungose (neskelbtinų duomenų sąrašą žr. BDAR 9 straipsnio 1 dalyje), „Pfizer“ gali naudoti duomenis teisiniams reikalavimams pareikšti, vykdyti ar ginti (BDAR 9 straipsnio 2 dalies f punktas), jei tai būtina dėl svarbaus viešojo intereso, remiantis Sąjungos arba valstybės narės teise, kuris turi būti proporcingas siekiamam tikslui (BDAR 9 straipsnio 2 dalies g punktas), arba jei tai būtina dėl viešojo intereso priežasčių visuomenės sveikatos srityje, pavyzdžiui, siekdama užtikrinti aukštus sveikatos priežiūros ir vaistų ar medicinos prietaisų kokybės ir saugos standartus pagal Sąjungos arba valstybės narės teisę (BDAR 9 straipsnio 2 dalies i punktas).

Duomenų subjektams netaikysime tik automatizuotų duomenų tvarkymu, įskaitant profiliavimą, pagrįstų sprendimų, susijusių su Pasitikėjimo linija (BDAR 22 straipsnis).

Pasitikėjimo linijos veikimas ir procesai

Jūsų skambučių į Pasitikėjimo liniją atsilieps NAVEX atstovas. NAVEX nefiksuoja jokių įeinančių skambučių telefono numerių, kad skambučio informacija liktų anonimiška. NAVEX nedaro skambučių įrašų. Atstovas „Pfizer“ vardu gali jūsų paprašyti pateikti keletą informacijos elementų, užfiksuoti jūsų atsakymus ir užduoti papildomus klausimus informacijai patikslinti. Atkreipkite dėmesį, kad NAVEX atstovas negali atsakyti į jokių klausimus apie etiką ar politiką, taip pat negali patarti dėl jokių veiksmų. NAVEX negali priimti sprendimų dėl jokių su jūsų pranešimu susijusių veiksmų ar tyrimų. NAVEX veikia vadovaudamasi „Pfizer“ nurodymais. Pasirinkus naudoti pranešimų žiniatinklio priemonę, ta pati informacija fiksuojama elektroniniu būdu.

Pateikus pradinį pranešimą arba užklausa, parengiamas išsamus įrašas, kurį NAVEX tiesiogiai siunčia į „Pfizer“ Atitikties skyrių. Atsižvelgdamas į klausimo pobūdį ir laikydamasis konfidencialumo įsipareigojimų, Atitikties skyrius gali perduoti pranešimą ir susijusius dokumentus atitinkamiems „Pfizer“ darbuotojams, kuriuos gali prireikti informuoti, pavyzdžiui, Teisės, „People Experience“ (toliau - **PX**) arba Audito skyrių atstovams, kad jie galėtų atlikti tolesnį tyrimą ir priimtų sprendimą. Tyrimo eigoje jums gali prireikti papildomos informacijos ir paaiškinimų; tokiu atveju su jumis susisieksime tiesiogiai. Jeigu reikia, siekiant nustatyti taikytinas drausmines priemones ir skaidrumo apie bet kokią nustatytą pažeidimą Atitikties skyriui taip pat gali prireikti informuoti PX narius ar „Pfizer“ vadovus. Informacija taip pat gali būti perduodama „Pfizer“ išorės konsultantams, pvz., teisininkams ar auditoriams, kurie privalo išlaikyti griežtą konfidencialumą. Informuosime jus apie tyrimo eigą ir veiksmus, kurių bus imtasi gavus tyrimo rezultatus.

„Pfizer“ informuos kiekvieną pranešime nurodytą asmenį apie jam (jai) metamus įtarimus per atitinkamą laikotarpį, neatskleidžiant Jūsų tapatybės. Asmenys, dėl kurių teikiamas pranešimas, turi teisę pateikti atsakymą apie jūsų praneštą informaciją. Įsidėmėkite, kad jūsų pateikta informacija gali lemti sprendimus, turinčius poveikio „Pfizer“ darbuotojams ir kitoms trečiosioms šalims, susijusioms su atitinkamu įvykiu. Todėl pateikite tik tą informaciją, kuri jūsų turimomis žiniomis, yra teisinga. Sąmoningas netikslios ar klaidinančios informacijos pateikimas gali lemti drausmines nuobaudas darbuotojams arba netgi civilinę ar baudžiamąją atsakomybę. Jeigu įmanoma, pranešimas turi apsiriboti tik faktais, kurie yra aktualūs pačiam pranešimui ir vėlesniam tyrimui.

Griežtai draudžiama keršyti bet kuriam asmeniui, kuris kreipiasi patarimo, praneša apie jam susirūpinimą sukėlusį dalyką, netinkamą elgesį, arba tarpininkams, fiziniams ar juridiniams asmenims, kurie yra susiję su pranešančiais asmenimis. Jei kas nors keršys asmeniui, sąžiningai pranešusiam apie pažeidimą, „Pfizer“ imsis atitinkamų

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veiksmų, net jei vėliau paaiškės, kad asmuo, iš pradžių pranešdamas apie pažeidimą, suklydo. Jei manote, kad prieš jus ar kitą susijusį asmenį buvo imtasi atsakomųjų veiksmų, turėtumėte kreiptis į Atitikties skyrių (kontakcinė informacija pateikiama toliau).

Informacijos naudojimas, saugojimas ir duomenų perdavimas

„Pfizer“ sudarė sutartį su NAVEX jūsų asmens duomenų konfidencialumui ir saugumui užtikrinti, todėl NAVEX naudos jūsų asmens duomenis tik Pasitikėjimo linijai administruoti. Informacija, kurią gauname iš NAVEX, ir bet kokie asmens duomenys, kuriuos mums pateikiate, bus saugomi „Pfizer“ duomenų bazėje (ir mūsų pardavėjų duomenų bazėje, kai reikia padėti mums atlikti tyrimą) su ribota prieiga.

Be NAVEX, asmens duomenys gali būti perduoti į šalis, kuriose yra kitokios duomenų apsaugos taisyklės nei toje šalyje, kurioje dirbate, įskaitant į kitus „Pfizer“ filialus ar kitiems paslaugų teikėjams, kaip reikalinga pranešimui iširti ir Pasitikėjimo linijai administruoti. Visų pirma galime perduoti jūsų asmens duomenis „Pfizer, Inc.“ atitikties departamentui. Atkreipkite dėmesį, kad Europos Komisija nepripažįsta kai kurių ne EEE šalių, įskaitant JAV, kaip užtikrinančių tinkamą apsaugos lygį pagal EEE standartus. Šalių, pripažintų užtikrinančiomis tinkamą apsaugos lygį, sąrašą rasite čia: [Adequacy decisions \(europa.eu\)](http://Adequacy%20decisions%20(europa.eu)).

Taikome tinkamas priemones, pavyzdžiui, Europos Komisijos patvirtintas standartines sutarčių sąlygas, leidžiančias perduoti ir apsaugoti jūsų asmens duomenis į šalis, kurių Europos Komisija nepripažįsta užtikrinančiomis tinkamą duomenų apsaugos lygį. Tokių priemonių kopiją galite gauti kreipęsi į savo vietinį „Pfizer“ duomenų apsaugos pareigūną, kurio kontaktinius duomenis galima rasti adresu DPO.Pfizer.com.

„Pfizer“ taip pat gali būti įpareigota perduoti tam tikrus arba visus jūsų asmens duomenis teisėsaugos institucijoms, valdžios institucijoms ar kitoms atitinkamų šalių institucijoms.

Jeigu reikia, informacija, susijusi su pranešimu, pateiktu per Pasitikėjimo liniją, bus tam tikrą ribotą laiką archyvuojama, arba ištrinama remiantis šiais kriterijais: kai tyrimas bus baigtas ir nebereikės imtis tolesnių veiksmų, išskyrus atvejus, kai „Pfizer“ pagal įstatymus turi saugoti duomenis ilgesnį laiką; kai pasibaigs bet kokio atitinkamo bylinėjimosi laikotarpis, išskyrus atvejus, kai „Pfizer“ pagal įstatymus turi saugoti duomenis ilgesnį laiką; ir kai bus įvykdyti mūsų įsipareigojimai saugoti su tyrimais susijusius įrašus. Išsamesnės informacijos rasite atitinkamuose įmonės nuostatuose dėl dokumentų saugojimo. Jei turite klausimų, kreipkitės į Atitikties skyrių.

Jūsų teisės

Laikydami BDAR ir (arba) kituose taikomuose įstatymuose nustatytų sąlygų, turite teisę susipažinti su savo asmens duomenimis (BDAR 15 straipsnis), ištaisyti savo asmens duomenis (BDAR 16 straipsnis), ištrinti savo asmens duomenis (BDAR 17 straipsnis), apriboti jūsų asmens duomenų tvarkymą (BDAR 18 straipsnis), teisę į duomenų perkeliamumą (BDAR 20 straipsnis) ir teisę tam tikromis aplinkybėmis nesutikti su jūsų asmens duomenų tvarkymu (BDAR 21 straipsnis).

Jei norite pasinaudoti BDAR numatyta teise, galite kreiptis į „Pfizer“ duomenų apsaugos pareigūną (žr. DPO.Pfizer.com). Atsakysime į jūsų prašymą laikydami galiojančių teisės aktų nuostatų.

Jūs taip pat visada turite teisę pateikti skundą kompetentingai savo šalies ar regiono duomenų apsaugos institucijai.

Jeigu turite klausimų, arba jums susirūpinimą kelia pačios Pasitikėjimo linijos veikimas, susisiekite su mumis +1 212 733 3026, corporate.compliance@pfizer.com, arba 66 Hudson Boulevard East, New York, NY 10001 USA.

¹Tam tikrose ES šalyse „Pfizer“ taip pat siūlo vietinius pranešimų kanalus. Daugiau informacijos apie pranešimų teikimą vietose, įskaitant vietos pranešimų teikimo kanalo privatumo pranešimą ir tai, ką galima pranešti per vietos pranešimų teikimo kanalą, rasite vietiniame „Pfizer“ intranete, arba kreipęsi į Atitikties skyrių.

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Language: English
Last Updated: Dec 2022

PFIZER, INC.

EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

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Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out

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that the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/eu-justice/european-data-protection-board/adequacy-decisions/).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Language: French
Last Updated: Dec 2022

PFIZER, INC.

EU/EEU/UK COMPLIANCE HELPLINE

GUIDE ET DECLARATION DE CONFIDENTIALITE

La Compliance Helpline de Pfizer, (la « Helpline ») est fournie par Pfizer, Inc. (« Pfizer », « nous » ou « notre ») en tant qu'entreprise responsable de vos données personnelles. Le site Web et la ligne téléphonique par le biais desquels vous pouvez signaler un incident sont exploités actuellement par NAVEX Global UK Limited, filiale de NAVEX Global Holding, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Royaume-Uni (« NAVEX »), prestataire indépendant de Pfizer qui fournit la Helpline.

Généralités

Le responsable du traitement des données de la Helpline est : Pfizer, Inc., 66 Hudson Boulevard East, New York, NY 10001 États-Unis.

Vous pouvez contacter le délégué à la protection des données de Pfizer à l'adresse ci-dessus, par e-mail à privacy.officer@pfizer.com ou sur DPO.Pfizer.com.

La Helpline peut généralement être utilisée pour signaler des préoccupations professionnelles concernant des problèmes d'intégrité financière et commerciale, tels que ceux liés à la comptabilité, aux contrôles comptables internes, aux audits, à la corruption, à la criminalité bancaire et financière et aux violations de la législation européenne, notamment en ce qui concerne les marchés publics, les services, produits et marchés financiers, la prévention du blanchiment d'argent et du financement du terrorisme, la sécurité des produits, la sécurité des transports, la santé publique, la protection de l'environnement, la protection des consommateurs, les violations portant atteinte aux intérêts financiers de l'UE ou relatives au marché intérieur (par ex, les règles relatives à la concurrence et aux aides d'État), la radioprotection et la sûreté nucléaire, la sécurité alimentaire, la santé et le bien-être des animaux, ainsi que la protection de la vie privée, la protection des données et la sécurité des données. Dans certains pays, vous pouvez également signaler d'autres problèmes. Pour plus d'informations, consultez notre outil de signalement en ligne sur pfizer.ethicspoint.com.

L'utilisation de la Helpline est volontaire¹. Vous êtes encouragé à vous identifier lorsque vous contactez la Helpline, mais vous n'êtes pas obligé de le faire lorsque cela est prévu par la législation en vigueur.

Finalité du traitement des données personnelles

La finalité du traitement des données personnelles en relation avec la Helpline est d'assurer le respect des lois internationales et locales applicables et des politiques internes. Si nous n'assurons pas la conformité, nous nous exposons à de lourdes amendes, à des peines d'emprisonnement, à des mises en cause et à d'autres conséquences préjudiciables, en fonction des lois applicables.

Nous collectons et traitons vos informations personnelles qui nous sont fournies via la Helpline aux fins suivantes :

- Vérifier la crédibilité de votre signalement et des données qu'il contient, afin d'éviter toute infraction aux lois,
- Enquêter sur les prétendues violations des lois et des politiques, en particulier celles mentionnées ci-dessus,

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- Assurer le respect des lois applicables,
- Coopérer avec les sociétés affiliées de Pfizer dans le cadre de leurs obligations d'enquêter sur les infractions,
- Assurer la défense contre les recours de tiers et préparer des recours contre des tiers,
- Développer notre Helpline et nos processus d'enquête.

Collecte et traitement des informations et données personnelles

Pfizer peut collecter et traiter les informations suivantes via la Helpline : vos nom, titre, poste et coordonnées (sauf si le signalement est anonyme), le nom des personnes citées dans votre signalement et d'autres données les concernant, le nom et le poste de vos supérieurs, une description du comportement douteux signalé, y compris la date et le lieu, ainsi que toute autre information pertinente, ainsi que toute question que vous pourriez poser à Pfizer. Pfizer peut aussi recueillir des informations de tiers lors d'une enquête résultant du rapport. Dans certaines circonstances, nous pourrions également traiter des données sensibles, telles que des données de santé ou l'appartenance à un syndicat, si vous nous les fournissez et/ou si elles sont utiles à l'enquête.

Les informations que vous fournissez seront traitées de manière confidentielle, conformément aux lois applicables.

Pfizer pourrait utiliser les informations susmentionnées soit pour respecter une obligation légale à laquelle Pfizer est soumis (article 6, paragraphe 1, point c) du Règlement général sur la protection des données de l'UE (« RGPD »), soit parce que nous avons un intérêt légitime à enquêter sur le signalement que vous nous avez soumis (article 6, paragraphe 1, point f) du RGPD), ou vous pourriez avoir l'obligation, en vertu de votre contrat de travail, de signaler certains incidents (article 6, paragraphe 1, point b) du RGPD). Concernant les données sensibles, telles que les données de santé, l'appartenance à un syndicat (pour une liste des données sensibles, Cf. article 9, paragraphe 1, du RGPD), Pfizer pourrait utiliser les informations pour la constatation, l'exercice ou la défense de droits en justice (article 9, paragraphe 2, point f) du RGPD) si cela est nécessaire pour des motifs d'intérêt public important, sur la base du droit de l'Union ou du droit d'un État membre qui doit être proportionné à l'objectif poursuivi (article 9, paragraphe 2, point g) du RGPD), ou si le traitement est nécessaire pour des motifs d'intérêt public dans le domaine de la santé publique, notamment aux fins de garantir des normes élevées de qualité et de sécurité des soins de santé et des médicaments ou des dispositifs médicaux, sur la base du droit de l'Union ou du droit de l'État membre (article 9, paragraphe 2, point i) du RGPD).

Nous ne soumettrons pas les personnes concernées à des décisions fondées uniquement sur un traitement automatisé, y compris au profilage, en relation avec la Helpline (article 22 du RGPD).

Fonctionnement et processus de la Helpline

Tout appel sur la Helpline sera traité par un représentant de NAVEX. NAVEX n'enregistre pas le numéro de téléphone des appels entrants afin que vos coordonnées téléphoniques restent anonymes. NAVEX n'enregistre pas non plus les appels. Le représentant pourrait vous demander plusieurs éléments d'information pour le compte de Pfizer, et il documentera votre appel et vous posera des questions afin de clarifier les informations. Notez que le représentant de NAVEX n'est pas en mesure de répondre aux questions d'éthique ou de procédure, et ne peut vous conseiller sur la ligne de conduite à adopter. NAVEX ne peut pas décider des actions ou enquêtes à entreprendre en lien avec votre signalement. NAVEX suit les instructions données par Pfizer. Si vous optez pour l'outil de signalement Web, les mêmes informations sont saisies électroniquement.

Une fois la demande ou le signalement effectués, NAVEX prépare un dossier détaillé et l'envoie directement à la Division Compliance de Pfizer. Selon la nature du problème, et conformément à ses obligations de confidentialité, la Division Compliance peut transmettre le signalement et la documentation liée au personnel compétent de Pfizer devant être informé, comme les représentants des services juridique, People Experience (« PX ») ou Audit, pour une enquête plus approfondie. Nous pourrions avoir besoin d'informations supplémentaires ou de clarifications de votre

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part au fur et à mesure que l'enquête avance, auquel cas nous vous contacterons directement. Si besoin, la Division Compliance peut également informer les membres du service PX ou les dirigeants de Pfizer de toute constatation de violation afin de déterminer d'éventuelles mesures disciplinaires et à des fins de transparence. Les informations peuvent également être partagées avec les conseillers externes de Pfizer, tels que les avocats ou les auditeurs qui sont tenus de les tenir strictement confidentielles. Nous vous informerons de l'état d'avancement de l'enquête et des mesures prises suite aux conclusions de l'enquête.

Dans le cadre de l'enquête, Pfizer a l'intention d'informer en temps voulu chaque personne impliquée dans un signalement sur les accusations la concernant, tout en évitant de dévoiler votre identité. Les personnes impliquées auront le droit de répondre aux informations que vous rapportez. Veuillez noter que les informations que vous fournissez peuvent engendrer des décisions affectant des salariés de Pfizer ou d'autres tierces parties impliquées dans l'incident en question. Ainsi, nous vous remercions de n'indiquer que les informations qui, à votre connaissance, sont exactes. Fournir sciemment des informations inexactes ou erronées peut donner lieu à des mesures disciplinaires, voire à une responsabilité civile ou pénale. De plus, dans la mesure du possible, tout rapport doit se limiter à l'exposition de faits pertinents au rapport et à l'enquête en résultant.

Les représailles contre toute personne recherchant des conseils, soulevant un problème ou signalant une faute professionnelle, ou contre tout conseiller, personne physique ou entité liés à cette personne, sont strictement interdites. Pfizer prendra les mesures nécessaires en cas de représailles à l'encontre d'une personne qui aurait signalé une infraction en toute sincérité, même s'il s'avère par la suite que cette personne s'est trompée lorsqu'elle a signalé le problème. Si vous pensez que vous-même, ou une autre personne concernée, avez fait l'objet de représailles, contactez la Division Compliance (coordonnées ci-dessous).

Conservation des informations, rétention et transfert de données

Pfizer a engagé NAVEX, un sous-traitant soumis à des obligations de confidentialité strictes, pour assurer la confidentialité et la sécurité de vos données personnelles et NAVEX est la seule entité autorisée à utiliser vos données personnelles dans le cadre de la Helpline. Les informations que nous recevons de NAVEX et toutes les données personnelles que vous nous fournissez sont stockées dans une base de données Pfizer (et dans la base de données de nos prestataires, si nécessaire pour nous aider à mener l'enquête) dont l'accès est limité.

Nous pourrions transférer vos données personnelles vers nos sociétés affiliées qui ont un besoin d'en connaître, y compris vers des pays qui ont des règles de protection des données différentes de celles du pays dans lequel vous travaillez, notamment avec les autres filiales ou fournisseurs Pfizer, pour les besoins de l'enquête et la gestion de la Helpline. Nous pourrions notamment transférer vos données personnelles au service Compliance de Pfizer, Inc. Remarque : certains des pays non membres de l'EEE, y compris les États-Unis, ne sont pas reconnus par la Commission européenne comme offrant un niveau de protection adéquat selon les normes de l'EEE. La liste des pays reconnus comme offrant un niveau de protection adéquat est disponible ici : [Adequacy decisions \(europa.eu\)](https://www.europa.eu/adequacy-decisions).

Nous avons mis en place des mesures adéquates, telles que des clauses contractuelles types adoptées par la Commission européenne pour protéger vos données personnelles et permettre leur transfert vers des pays qui ne sont pas reconnus par la Commission européenne comme offrant un niveau adéquat de protection des données. Vous pouvez obtenir une copie de ces mesures en contactant le délégué à la protection des données de Pfizer, dont les coordonnées sont disponibles sur DPO.Pfizer.com.

Pfizer pourrait également être tenu de transférer tout ou partie de vos données personnelles à la police, à la justice ou à d'autres autorités des pays concernés.

Les informations concernant un signalement effectué via la Helpline seront archivées pendant une durée limitée, si nécessaire, ou supprimées selon les critères suivants : une fois l'enquête close et si aucune autre mesure n'est nécessaire à moins que Pfizer ait l'obligation légale de conserver les données pendant plus longtemps ; à la fin du délai de prescription à moins que Pfizer ait l'obligation légale de conserver les données pendant plus longtemps ; et lorsque nos obligations de tenue de registres relatives aux enquêtes ont expiré. Pour plus de détails, veuillez consulter la Politique de l'entreprise en vigueur sur la conservation des registres. Si vous avez des questions, veuillez consulter la division Conformité.

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Vos droits

Sous réserve des conditions prévues par le RGPD et/ou d'autres lois applicables, vous avez le droit d'accéder à vos données personnelles (article 15 du RGPD), le droit de rectifier vos données personnelles (article 16 du RGPD), le droit d'obtenir l'effacement de vos données personnelles (article 17 du RGPD), le droit à la limitation du traitement de vos données personnelles (article 18 du RGPD), le droit à la portabilité des données (article 20 du RGPD) et, le droit de vous opposer au traitement de vos données personnelles dans certains cas (article 21 du RGPD).

Si vous souhaitez exercer un droit en vertu du RGPD, vous pouvez contacter le délégué à la protection des données de Pfizer (Cf. [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Nous répondrons à votre demande conformément au droit applicable.

Vous avez aussi le droit d'introduire une réclamation à tout moment auprès de l'autorité compétente en charge de la protection des données dans votre pays ou région.

Pour toute question ou remarque concernant la Helpline, veuillez nous contacter au +1 212 733 3026, à l'adresse corporate.compliance@pfizer.com, ou à 66 Hudson Boulevard East, New York, NY 10001, États-Unis.

¹Dans certains pays de l'UE, Pfizer propose également des canaux de signalement local. Pour plus d'informations sur le signalement local, y compris pour consulter la Déclaration de confidentialité du canal de signalement local et ce qui peut être signalé via le canal de signalement local, veuillez consulter l'intranet local de Pfizer ou contacter la division Compliance.

MALTA

Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/eu-justice/european-data-protection-board/adequacy-decisions).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

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Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

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Language: Dutch
Last Updated: Dec 2022

PFIZER, INC.

EU/EEA/UK COMPLIANCE HELPLINE RICHTLIJNEN EN PRIVACYVERKLARING

De Pfizer Compliance Helpline (“de Helpline”) wordt verzorgd door Pfizer, Inc. (“Pfizer”, “wij/we” of “ons/onze”) in de hoedanigheid van de voor uw persoonsgegevens verantwoordelijke onderneming. De website en telefoonverbinding waarlangs u mogelijk melding doet van een incident worden momenteel aangeboden door NAVEX Global UK Limited, een deelneming van NAVEX Global gevestigd te Vantage London, 4th Floor, Great West Road, Brentford, TW8 9AG, Verenigd Koninkrijk (“NAVEX”), de zelfstandige dienstverlener die namens Pfizer de Helpline verzorgt.

Algemeen

De gegevensverwerker van de Helpline is: Pfizer, Inc., gevestigd aan de Hudson Boulevard East 66, New York, NY 10001, Verenigde Staten.

U kunt contact opnemen met de functionaris voor gegevensbescherming van Pfizer aan de hand van de voornoemde contactgegevens of door een e-mail te sturen aan privacy.officer@pfizer.com of DPO.Pfizer.com.

De Helpline kan in het algemeen worden gebruikt voor het melden van werkgerelateerde zorgen op het gebied van financiële en zakelijke integriteit, zoals kwesties in verband met de boekhouding, interne boekhoudcontroles, auditing, omkoping en corruptie, bancaire en financiële criminaliteit en schendingen van de EU-wetgeving, waaronder op het gebied van openbare aanbestedingen, financiële diensten, producten en markten, de preventie van witwassen van geld en terrorismefinanciering, productveiligheid, transportveiligheid, volksgezondheid, milieubescherming, consumentenbescherming, schendingen die de financiële belangen van de EU schaden of verband houden met de interne markt (bijv. mededingings- en staatssteunregels), stralingsbescherming en nucleaire veiligheid, voedselveiligheid, de gezondheid en het welzijn van dieren en de bescherming van de persoonlijke levenssfeer, gegevensbescherming en gegevensbeveiliging. Daarnaast mag u in sommige landen ook van andere aangelegenheden melding doen. Ga naar pfizer.ethicspoint.com om onze online meldingstool te raadplegen voor meer informatie.

Het gebruik van de Helpline is vrijwillig¹. Medewerkers worden aangemoedigd zich te identificeren wanneer ze iets melden bij de Helpline; indien anoniem melden wettelijk is toegestaan, bent u niet verplicht om dat te doen.

Doel van de verwerking van persoonsgegevens

Het doel van de verwerking van persoonsgegevens in het kader van de activiteiten van de Helpline is om ervoor zorg te dragen dat de toepasselijke internationale en plaatselijke wetgeving en het interne beleid van Pfizer worden nageleefd. Als we geen zorg dragen voor dergelijke naleving, krijgen we mogelijk te maken met hoge boetes, gevangenisstraffen, aansprakelijkheden en andersoortige berispingen uit hoofde van de toepasselijke wetgeving.

We verzamelen en verwerken uw persoonsgegevens zoals deze aan ons via de Helpline worden verstrekt omwille van de volgende doelen:

- Het controleren van de plausibiliteit van uw melding en de daarin vervatte gegevens, teneinde schendingen van wetgeving te voorkomen,

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- Het onderzoeken van vermeende inbreuken op wetgeving en beleidsmaatregelen, met name de bovengenoemde;
- Het zorg dragen voor de naleving van de toepasselijke wetgeving,
- Het samenwerken met de aangesloten bedrijven van Pfizer in het kader van de verplichtingen waartoe zij gehouden zijn met betrekking tot het onderzoeken van inbreuken,
- Het verdedigen van vorderingen van derden en het voorbereiden van vorderingen tegen derden,
- Het ontwikkelen van onze Helpline en van onderzoeksprocessen.

Verzameling en verwerking van persoonlijke gegevens

Pfizer kan de volgende gegevens van u verzamelen en verwerken via de Helpline: uw naam, titel, positie en contactgegevens (tenzij de melding anoniem wordt gedaan); de naam en andere gegevens van personen die vermeld worden in uw melding; naam en positie van uw leidinggevendenden; een beschrijving van het gedrag in kwestie in uw melding, waaronder de datum en locatie en andere relevante informatie; en eventuele vragen aan Pfizer die u mogelijk hebt. Pfizer kan ook informatie van anderen verzamelen tijdens verder onderzoek. Onder bepaalde omstandigheden verwerken wij mogelijk ook gevoelige gegevens, zoals gezondheidsgegevens of lidmaatschap van een vakbond, indien u deze aan ons verstrekt en/of indien deze relevant zijn met het oog op het doel van het onderzoek.

De door u opgegeven informatie zal vertrouwelijk worden behandeld, in overeenstemming met de toepasselijke wetgeving.

Pfizer mag de hierboven genoemde informatie gebruiken omdat wij ofwel aan een aan Pfizer opgelegde wettelijke verplichting moeten voldoen (artikel 6, lid 1, sub c) van de Algemene verordening gegevensbescherming van de EU ("AVG"), dan wel een legitiem belang hebben bij het onderzoeken van de melding die u bij ons heeft ingediend (artikel 6, lid 1, sub f) AVG), dan wel omdat u op grond van uw arbeidsovereenkomst verplicht bent bepaalde incidenten te melden (artikel 6, lid 1, sub b) AVG). Met betrekking tot gevoelige gegevens, zoals gezondheidsgegevens of lidmaatschap van een vakbond (raadpleeg voor een lijst van gevoelige gegevens artikel 9, lid 1 AVG), is Pfizer gerechtigd de informatie gebruiken voor de vaststelling, uitoefening of verdediging van rechtsvorderingen (artikel 9, lid 2, sub f) AVG) indien zulks noodzakelijk is om redenen van zwaarwegend algemeen belang, uit hoofde van wetgeving van de Unie of van een lidstaat die in verhouding staat tot het nagestreefde doel (artikel 9, lid 2, sub g) AVG), of indien zulks noodzakelijk is om redenen van algemeen belang op het gebied van volksgezondheid, zoals het waarborgen van hoge kwaliteits- en veiligheidsnormen voor gezondheidszorg en voor geneesmiddelen of medische hulpmiddelen, uit hoofde van wetgeving van de Unie of van een lidstaat (artikel 9, lid 2, sub i) AVG).

Wij onderwerpen de betrokkenen niet aan besluiten uitsluitend op basis van geautomatiseerde verwerking, met inbegrip van profilering, in verband met de Helpline (artikel 22 AVG).

Functioneren en processen van de Helpline

Een vertegenwoordiger van NAVEX zal uw oproep aan de Helpline beantwoorden. NAVEX zal de telefoonnummers van binnenkomende oproepen niet registreren zodat uw gegevens anoniem blijven. NAVEX neemt de oproepen evenmin op. De vertegenwoordiger mag u namens Pfizer om verschillende vormen van informatie verzoeken, uw antwoorden vastleggen en vervolgvragen stellen om informatie te verduidelijken. Houd er rekening mee dat de NAVEX-vertegenwoordiger geen ethische of beleidsvragen kan beantwoorden en u geen advies kan geven over het eventuele verloop van acties. NAVEX is niet gerechtigd om over eventuele maatregelen of onderzoeken naar aanleiding van uw melding te beslissen. NAVEX volgt de door Pfizer afgegeven instructies op. Als u uw melding online doet, dan zal dezelfde informatie elektronisch worden vastgelegd.

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Nadat de aanvankelijke melding of vraag is gemaakt/ingediend, zal er een gedetailleerd rapport worden opgemaakt dat direct door NAVEX naar de Compliance Division van Pfizer zal worden doorgestuurd. Afhankelijk van de aard van de zaak, alsmede in overeenstemming met haar verplichtingen op het gebied van geheimhouding, stuurt de Compliance Division het rapport en gerelateerde documenten mogelijk door naar de passende personen binnen Pfizer die ervan op de hoogte moeten worden gebracht, zoals vertegenwoordigers van de afdelingen Legal, People Experience ("PX") of Audit, voor verder onderzoek en nadere beslechting. In de loop van het onderzoek hebben wij mogelijk aanvullende informatie en verduidelijkingen van u nodig; in dat geval nemen wij rechtstreeks contact met u op. Waar nodig zal de Compliance Division mogelijk ook leden van PX of leiders van Pfizer op de hoogte brengen van eventuele bevindingen van overtreding voor het bepalen van disciplinaire maatregelen en voor transparantiedoelenden. De informatie wordt mogelijk ook gedeeld met externe adviseurs van Pfizer, zoals advocaten of auditors die aan handhaving van strikte vertrouwelijkheid gehouden zijn. Wij stellen u op de hoogte van de voortgang van het onderzoek en de maatregelen die naar aanleiding van de uitkomsten ervan worden genomen.

In het kader van het onderzoek zal Pfizer elk individu dat genoemd wordt in een rapport binnen de gepaste termijn informeren over de beschuldigingen die tegen hen gemaakt zijn, maar tracht daarbij uw identiteit niet te onthullen. Betrokken personen hebben het recht om te reageren op de informatie die door u is gemeld. Houd er rekening mee dat de informatie die u verstrekt kan leiden tot besluiten die invloed hebben op medewerkers van Pfizer en andere derden die betrokken zijn bij het incident in kwestie. U wordt daarom verzocht om uitsluitend informatie te verstrekken die naar uw beste weten accuraat is. Welbewust onjuiste of misleidende informatie verstrekken, kan leiden tot disciplinaire maatregelen of zelfs burgerlijke of strafrechtelijke aansprakelijkheid. Daarnaast moet een rapport, waar mogelijk, beperkt worden tot de feiten die relevant zijn voor het rapport en het vervolgonderzoek.

Represailles/vormen van vergelding tegen personen die om advies vragen, een probleem aan de orde stellen of wangedrag melden, of tegen facilitators, personen of rechtspersonen die verbonden zijn met personen die een melding doen, zijn ten strengste verboden. Als iemand wraak neemt op een individu die eerlijk een schending heeft gemeld, zal Pfizer passende maatregelen nemen – zelfs indien later mocht blijken dat het individu het, bij het melden van de oorspronkelijke kwestie, niet bij het rechte eind had. Als u denkt dat er tegen u, of tegen iemand anders, represailles zijn genomen, moet u contact opnemen met de Compliance Division (contactgegevens hieronder).

Informatiegebruik, retentie en gegevensoverdracht

Pfizer werkt samen met NAVEX, een gegevensverwerker, onder strikte geheimhoudingsverplichtingen, om de vertrouwelijkheid en veiligheid van uw persoonsgegevens te beschermen en NAVEX mag uw persoonsgegevens alleen gebruiken voor het leveren van de Helpline. Informatie die wij van NAVEX ontvangen en alle persoonsgegevens die u ons verstrekt, worden opgeslagen in een database van Pfizer (en in de database van onze leveranciers, indien dat nodig is om ons te helpen bij het onderzoek) met toegangsbeperkingen.

Wij dragen uw persoonsgegevens mogelijk over aan aangesloten bedrijven indien deze daar kennis van moeten nemen in het kader van uw melding, inclusief in landen die andere regels voor gegevensbescherming hanteren dan in het land waarin u werkzaam bent, bijvoorbeeld aan andere aangesloten bedrijven of leveranciers van Pfizer, wanneer dit noodzakelijk is voor het onderzoeken van het rapport en het verzorgen van de Helpline. Wij geven uw persoonsgegevens met name mogelijk door aan de Compliance-afdeling van Pfizer, Inc. Let erop dat sommige niet-EER-landen, waaronder de Verenigde Staten, door de Europese Commissie niet worden erkend als landen die een volgens de EER-normen adequaat beschermingsniveau bieden. Landen waarvan wordt erkend dat deze een adequaat beschermingsniveau bieden, zijn hier te vinden: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/eu-justice/european-data-protection-officer/adequacy-decisions).

Wij hebben passende maatregelen getroffen, zoals gebruikmaking van door de Europese Commissie goedgekeurde modelcontractbepalingen, om de overdracht en bescherming van uw persoonsgegevens naar landen mogelijk te maken waarvan niet door de Europese Commissie wordt erkend dat ze een adequaat niveau van gegevensbescherming bieden. U kunt een exemplaar van deze maatregelen verkrijgen door contact op te nemen met uw plaatselijke functionaris voor gegevensbescherming van Pfizer. De contactgegevens van deze functionaris zijn te vinden op [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer is mogelijk ook verplicht om bepaalde, of al uw, persoonsgegevens over te dragen aan wetshandavingsinstanties of autoriteiten of aan andere autoriteiten in de desbetreffende landen.

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Informatie met betrekking tot een rapport dat is ingediend via de Helpline wordt gedurende een beperkte periode gearhiveerd, afhankelijk van wat noodzakelijk is, of verwijderd op basis van de volgende criteria: wanneer het onderzoek is afgesloten en er geen verdere actie is vereist, tenzij Pfizer wettelijk verplicht is de gegevens gedurende een langere periode te bewaren; wanneer de termijn voor enige relevante procesvoering is verlopen, tenzij Pfizer wettelijk verplicht is de gegevens gedurende een langere periode te bewaren; en wanneer onze verplichting tot het bewaren van dossiers met betrekking tot onderzoeken is verlopen. Raadpleeg het desbetreffende bedrijfsbeleid over dossierbewaring voor meer informatie. Als u vragen hebt, neem dan contact op met de Compliance Division.

Uw rechten

Behoudens de in de AVG en/of andere toepasselijke wetgeving vastgelegde voorwaarden hebt u het recht op toegang tot uw persoonsgegevens (artikel 15 AVG), het recht op rectificatie van uw persoonsgegevens (artikel 16 AVG), het recht om uw persoonsgegevens te laten wissen (artikel 17 AVG), het recht op beperking van de verwerking van uw persoonsgegevens (artikel 18 AVG), het recht op overdraagbaarheid van gegevens (artikel 20 AVG) en het recht om onder bepaalde omstandigheden bezwaar te maken tegen de verwerking van uw persoonsgegevens (artikel 21 AVG).

Als u een van uw rechten uit hoofde van de AVG wilt uitoefenen, kunt u contact opnemen met de functionaris voor gegevensbescherming van Pfizer (zie [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We zullen in overeenstemming met de toepasselijke wetgeving reageren op uw verzoek.

Ook hebt u te allen tijde het recht om een klacht in te dienen bij een gegevensbeschermingsautoriteit die in uw land of regio bevoegdheid heeft.

Als u vragen of zorgen hebt met betrekking tot de Helpline zelf, neem dan telefonisch contact met ons op via +1-212-733-3026, door te mailen naar corporate.compliance@pfizer.com of per post op het volgende adres: Hudson Boulevard East 66, New York, NY 10001, Verenigde Staten.

¹ In bepaalde EU-landen geeft Pfizer u ook de mogelijkheid om gebruik te maken van een lokaal meldingskanaal. Voor meer informatie over lokaal melding doen, inclusief de privacyverklaring van het lokale meldingskanaal en waar er via het lokale meldingskanaal melding van kan worden gedaan, raadpleeg het lokale Pfizer-intranet of neem contact op met de Compliance Division.

NORWAY

Language: English
Last Updated: Dec 2022

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The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/eu-justice/justice-portal/pages/adequacy-decisions.jsp).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

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Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We will respond to your request in accordance with applicable law.

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If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

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Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

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We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

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Language: Polish
Last Updated: Dec 2022

PFIZER, INC.

INFOLINIA DS. ZGODNOŚCI NA TERENIE UE/EEA/UK

WYTYCZNE I INFORMACJA NA TEMAT OCHRONY DANYCH OSOBOWYCH

Infolinia ds. zgodności Pfizer (Compliance Helpline) („Infolinia”) jest udostępniana przez Pfizer, Inc. („Pfizer”, „my” lub „nas”), która jest odpowiedzialna za dane osobowe. Strona internetowa i infolinia telefoniczna, przez którą można zgłaszać incydenty, jest obecnie obsługiwana przez NAVEX Global UK Limited, firmę należącą do NAVEX Global Holding Company z siedzibą przy Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG w Wielkiej Brytanii („NAVEX”), niezależnego od Pfizer usługodawcy obsługującego infolinię telefoniczną.

Ogólne informacje

Administratorem danych infolinii telefonicznej jest: Pfizer, Inc. z siedzibą przy 66 Hudson Boulevard East, Nowy Jork, NY 10001 w Stanach Zjednoczonych.

Kontakt z inspektorem ochrony danych możliwy jest poprzez dane kontaktowe dostępne powyżej lub e-mailowo na privacy.officer@pfizer.com lub na stronie internetowej DPO.Pfizer.com.

Z Infolinii można korzystać w celu zgłaszania wątpliwości dotyczących spraw zawodowych, które dotyczą uczciwości finansowej i biznesowej, na przykład kwestii związanych z księgowością, wewnętrznymi kontrolami księgowymi, sprawami audytów, przekupstwa i korupcji, przestępstwami bankowymi i finansowymi oraz naruszeniami prawa UE, w tym: zamówieniami publicznymi, usługami, produktami i rynkami finansowymi, zapobieganiem praniu pieniędzy i finansowaniu terroryzmu, bezpieczeństwem produktów, bezpieczeństwem transportu, zdrowiem publicznym, ochroną środowiska, ochroną konsumentów, naruszeniami wpływającymi na interes finansowy UE lub związanymi z rynkiem wewnętrznym (np. konkurencji i pomocy państwowej), ochroną przed promieniowaniem i bezpieczeństwem jądrowym, bezpieczeństwem żywności, zdrowiem i dobrostanem zwierząt oraz ochroną prywatności, ochroną danych i bezpieczeństwem danych. Ponadto, w niektórych krajach można zgłaszać kwestie dodatkowe. Aby uzyskać więcej informacji, prosimy o zapoznanie się z naszym narzędziem zgłaszania na stronie pod adresem pfizer.ethicspoint.com.

Korzystanie z Infolinii jest dobrowolne¹. Zachęcamy pracowników do ujawnienia swojej tożsamości podczas dokonywania zgłoszeń za pośrednictwem Infolinii; nie musisz tego robić, jeśli obowiązujące przepisy prawa dopuszczają taką możliwość.

Cel przetwarzania danych osobowych

Celem przetwarzania danych osobowych w związku z Infolinią jest zapewnienie zgodności z obowiązującymi międzynarodowymi i miejscowymi przepisami prawa, jak i wewnętrznymi politykami. W przypadku braku zapewnienia zgodności na Pfizer mogą zostać nałożone wysokie grzywny, kary więzienia, zobowiązania finansowe i inne obciążenia, zgodnie z obowiązującymi przepisami.

Zbieramy i przetwarzamy dane osobowe przekazane nam poprzez Infolinię w poniższych celach:

- Sprawdzanie wiarygodności przesłanego zgłoszenia oraz zawartych w nim danych, by uniknąć naruszenia przepisów prawa;

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- Badanie domniemanych przypadków naruszenia przepisów prawa i zasad, w szczególności tych wymienionych powyżej;
- Zapewnienie zgodności z obowiązującymi przepisami prawa;
- Współpraca z filiami Pfizer w zakresie ich zobowiązań, by zbadać naruszenia.
- Obrona przed roszczeniami stron trzecich oraz przygotowywanie roszczeń przeciwko stronom trzecim;
- Rozwój naszej Infolinii telefonicznej oraz procesów badawczych.

Zbieranie i przetwarzanie informacji i danych osobowych

Pfizer może zbierać i przetwarzać następujące informacje za pośrednictwem Infolinii: Twoje imię i nazwisko, Twoje stanowisko oraz pozycja i dane kontaktowe (chyba że zgłoszenie ma charakter anonimowy); imiona i nazwiska oraz inne informacje na temat osób wymienionych w Twoim zgłoszeniu; imiona i nazwiska oraz pozycje Twoich przełożonych, opis problemu z Twojego zgłoszenia, łącznie z datą i miejscem, jak również inne istotne informacje; ewentualne zadane przez Ciebie firmie Pfizer pytania. Pfizer może także w ramach dochodzenia zbierać informacje od innych osób. W niektórych okolicznościach możemy również przetwarzać wrażliwe dane osobowe, takie jak dane na temat stanu zdrowia, informacje o przynależności do związku zawodowego, w przypadku dostarczenia nam takich danych lub jeśli są one istotne dla celu śledztwa.

Przekazane przez Ciebie informacje będą traktowane jako poufne, zgodnie z obowiązującymi przepisami prawa.

Pfizer może wykorzystać informacje wymienione powyżej, gdyż albo musimy postępować zgodnie z prawnym zobowiązaniem nałożonym na Pfizer (Artykuł 6(1)(c) Rozporządzenia o ochronie danych osobowych UE („RODO”) albo mamy uzasadniony cel zbadania przesłanego do nas przez Ciebie zgłoszenia (Artykuł 6(1)(f) RODO), lub jesteś obowiązany(-a) swoją umową o pracę do zgłaszania niektórych incydentów (Artykuł 6(1)(b) RODO). W odniesieniu do danych wrażliwych, jak dane na temat stanu zdrowia, przynależność do związku zawodowego (lista danych wrażliwych jest zawarta w Artykule 9(1) RODO), Pfizer może wykorzystać te informacje do złożenia, skorzystania z prawa roszczenia lub obrony przed roszczeniami prawnymi (Artykuł 9(2)(f) RODO), jeśli wymaga tego znacząca korzyść publiczna, na mocy prawa unijnego lub prawa Państwa członkowskiego, która powinna być proporcjonalna do celu (Artykuł 9(2)(g) RODO), lub jeśli jest to niezbędne do celów interesu publicznego w obszarze zdrowia publicznego, jak zapewnienie wysokich standardów jakości i bezpieczeństwa opieki zdrowotnej oraz produktów leczniczych lub urządzeń medycznych, na mocy prawa unijnego lub prawa Państwa członkowskiego (Artykuł 9(2)(i) RODO).

Nie narazimy osób, których dane dotyczą, na decyzje na podstawie wyłącznie zautomatyzowanego przetwarzania, w tym profilowania w odniesieniu do Infolinii (Artykuł 22 RODO).

Funkcjonowanie i procesy Infolinii

Gdy zadzwonisz na Infolinię, telefon odbierze przedstawiciel firmy NAVEX. NAVEX nie rejestruje numerów telefonów połączeń przychodzących, więc informacje przekazane przez Ciebie telefonicznie pozostają anonimowe. NAVEX nie nagrywa też prowadzonych rozmów. Przedstawiciel może poprosić Cię w imieniu Pfizer o podanie kilku informacji, udokumentuje przekazane przez Ciebie dane i może zadać kilka pytań w celu ich objaśnienia. Pamiętaj, że przedstawiciel firmy NAVEX nie będzie w stanie odpowiedzieć na żadne pytania dotyczące zagadnień etycznych czy zasad i nie może udzielać porad związanych ze sposobem postępowania. NAVEX nie może decydować o jakichkolwiek działaniach lub śledztwach w odniesieniu do Twojego zgłoszenia. NAVEX postępuje zgodnie ze wskazówkami Pfizer. Jeśli podejmiesz decyzję o użyciu narzędzia zgłoszeniowego online, te same informacje zostaną zarejestrowane w sposób elektroniczny.

Po dokonaniu wstępnego zgłoszenia lub zapytania firma NAVEX przygotuje szczegółowy raport, który zostanie przesłany bezpośrednio do Działu Compliance Pfizer. W zależności od charakteru sprawy i zgodnie ze swoimi

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zobowiązaniami dotyczącymi poufności dział Compliance Pfizer może przekazać raport i związaną z nim dokumentację odpowiednim pracownikom Pfizer, którzy powinni otrzymać te informacje, na przykład przedstawicielom Działu Prawnego, Działu People Experience („PX”) czy Audytowi w celu przeprowadzenia dalszego dochodzenia i rozstrzygnięcia sprawy. W miarę postępów w dochodzeniu możemy potrzebować dodatkowych informacji i wyjaśnień. W takim przypadku skontaktujemy się z Tobą bezpośrednio. Jeśli będzie to konieczne, Dział Compliance być może będzie musiał powiadomić pracowników Działu PX lub kadrę kierowniczą Pfizer o wykryciu naruszenia, by możliwe było ustalenie, czy konieczne jest podjęcie działań dyscyplinarnych, oraz dla celów związanych z przejrzystością. Informacje takie mogą być także udostępniane doradcom zewnętrznym Pfizer, jak prawnicy czy audytorzy, którzy zobowiązani są do zachowania ścisłej poufności. Na bieżąco będziemy informować Cię o postępach w dochodzeniu i działaniach podjętych po jego zakończeniu.

W ramach tego dochodzenia Pfizer dokłada starań, by w odpowiednim czasie informować wszystkie osoby, których dotyczy zgłoszenie, lecz będzie dążyć do nieujawniania Twojej tożsamości. Osoby, których dotyczy sprawa, będą mieć prawo do ustosunkowania się do przekazanych przez Ciebie informacji. Pamiętaj, że przekazane przez Ciebie informacje mogą mieć wpływ na decyzje dotyczące osób z Pfizer i innych osób biorących udział w incydencie. Tym samym, prosimy o przekazywanie informacji, które według Twojej najlepszej wiedzy są dokładne. Przekazanie nieprecyzyjnych lub mylących informacji może być przyczyną wszczęcia działań dyscyplinarnych, a nawet pociągnięcia do odpowiedzialności karnej lub cywilnej. Ponadto zawsze, gdy to tylko możliwe, informacje w zgłoszeniu powinny być ograniczone do faktów związanych ze sprawą i dochodzeniem jej dotyczącym.

Działania odwetowe przeciwko osobom zasięgającym porad, zgłaszającym wątpliwości lub przypadki naruszenia zasad, lub przeciwko prowadzącym, osobom indywidualnym czy podmiotom powiązanym z osobami zgłaszającymi, są surowo zabronione. Jeśli ktoś podejmie działania odwetowe względem osoby, która w dobrej wierze dokonała zgłoszenia naruszenia przepisów, Pfizer podejmie odpowiednie czynności – nawet jeśli później okaże się, że osoba, która pierwotnie dokonała zgłoszenia, była w błędzie. Jeśli uważasz, że Ty lub ktoś inny padł ofiarą działań odwetowych, skontaktuj się z Działem Compliance (dane kontaktowe poniżej).

Wykorzystanie i przechowywanie informacji oraz przekazywanie danych

Pfizer zawarł z firmą NAVEX, podmiotem przetwarzającym dane, ze ścisłym zobowiązaniem do zachowania poufności, umowę w celu zapewnienia poufności i bezpieczeństwa Twoich danych osobowych i będzie wykorzystywać te dane wyłącznie w celach związanych z prowadzeniem Infolinii ds. zgodności (Compliance Helpline). Informacje otrzymane od firmy NAVEX oraz wszelkie przekazane przez Ciebie dane osobowe będą przechowywane w bazie danych Pfizer (a także w bazie danych Twojego dostawcy, kiedy to wymagane, by pomóc nam w dochodzeniu) o ograniczonym dostępie.

Może dochodzić do przekazywania danych naszym filiom, jeśli potrzebują je znać, w tym do krajów stosujących inne przepisy o ochronie danych niż kraj Twojego zatrudnienia, także podmiotom stowarzyszonym lub dostawcom Pfizer, w celach związanych z prowadzeniem dochodzenia oraz zarządzania Infolinią. W szczególności może dochodzić do przekazywania Twoich danych osobowych do Działu Compliance Pfizer, Inc. Należy pamiętać, że niektóre kraje spoza EOG, w tym USA, nie są uznawane przez Komisję Europejską za zapewniające odpowiedni poziom ochrony zgodnie ze standardami EOG. Wykaz krajów, które zostały uznane za zapewniające odpowiedni poziom ochrony, można znaleźć tutaj: [Adequacy decisions \(europa.eu\)](https://www.efpi.europa.eu/adequacy-decisions).

Wdrożyliśmy odpowiednie środki, jak standardowe klauzule umowne przyjęte przez Komisję Europejską, by pozwolić na przenoszenie i ochronę Twoich danych osobowych do krajów, których Komisja Europejska nie uznaje za zapewniające odpowiedni poziom ochrony danych. Możesz uzyskać egzemplarz tekstu z opisem tych środków, kontaktując się z inspektorem ochrony danych Pfizer, którego dane kontaktowe można znaleźć w witrynie DPO.Pfizer.com.

Pfizer może mieć również obowiązek przesyłania niektórych lub wszystkich Twoich danych osobowych organom ścigania, władzom czy innym władzom odpowiedniego państwa.

Informacje dotyczące zgłoszeń dokonanych za pośrednictwem Infolinii Pfizer będą archiwizowane przez ograniczony czas lub usuwane w oparciu o następujące kryteria: czy dochodzenie zostało zamknięte i żadne dalsze działania nie

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są konieczne, chyba że Pfizer jest zobowiązany przepisami prawa do przechowywania danych przez dłuższy okres; czy okres odpowiedniego procesu sądowego już się zakończył, chyba że Pfizer jest zobowiązany przepisami prawa do przechowywania danych przez dłuższy okres; oraz czy nasze zobowiązania dotyczące przechowywania zapisów odnoszących się do dochodzenia już wygasły. Więcej informacji znajdziesz w odpowiedniej polityce korporacyjnej dotyczącej przechowywania danych. W razie jakichkolwiek pytań należy skonsultować się z Działem Compliance.

Twoje prawa

Z zastrzeżeniem warunków zawartych w RODO oraz/lub innych obowiązujących przepisach prawa, masz prawo dostępu do Twoich danych osobowych (Artykuł 15 RODO), prawo do sprostowania Twoich danych osobowych (Artykuł 16 RODO), prawo do usunięcia Twoich danych osobowych (Artykuł 17 RODO), prawo do ograniczenia przetwarzania Twoich danych osobowych (Artykuł 18 RODO), prawo do przenoszenia danych (Artykuł 20 RODO), a także prawo sprzeciwu wobec przetwarzania Twoich danych osobowych w pewnych okolicznościach (Artykuł 21 RODO).

Jeśli chcesz skorzystać z prawa wynikającego z RODO, możesz skontaktować się z inspektorem ochrony danych Pfizer (zobacz [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Odpowiemy na wniosek zgodnie z obowiązującymi przepisami prawa.

Masz także prawo złożyć skargę do organu ochrony danych odpowiedzialnego za Twój kraj lub region.

W razie pytań lub wątpliwości związanych z samą Infolinią, skontaktuj się z nami: +1-212-733-3026, corporate.compliance@pfizer.com lub 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ W niektórych krajach Unii Europejskiej Pfizer posiada również miejscowe kanały zgłaszania. Więcej informacji na temat zgłaszania lokalnego, w tym polityki prywatności dla lokalnego kanału zgłaszania i tego, co można zgłosić drogą lokalnego kanału zgłaszania, można znaleźć w lokalnej sieci wewnętrznej Pfizer lub kontaktując się z Działem Compliance.

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Language: English
Last Updated: Dec 2022

PFIZER, INC.

EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/commission/presscorner/detail/en/ip_18_1911).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Language: Portuguese
Last Updated: Dec 2022

PFIZER, INC.

LINHA DE APOIO À COMPLIANCE UE/EEE/REINO UNIDO ORIENTAÇÃO E AVISO DE PRIVACIDADE

A Linha de Apoio à Compliance da Pfizer (“a Linha de Apoio”) é fornecida pela Pfizer, Inc. (“Pfizer”, “nós” ou “nos”) enquanto empresa responsável pelos seus dados pessoais. O site e a linha telefónica através dos quais pode relatar um incidente são atualmente operados pela NAVEX Global UK Limited, uma Holding Global NAVEX, sita em Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), prestador de serviços independente da Pfizer para a Linha de Apoio.

Geral

O responsável pelo tratamento dos dados da Linha de Apoio é: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

Pode entrar em contacto com o Encarregado de Proteção de Dados da Pfizer através dos dados de contacto mencionados acima ou privacy.officer@pfizer.com ou DPO.Pfizer.com.

A Linha de Apoio pode geralmente ser usada para relatar preocupações relacionadas com o contexto laboral sobre questões financeiras e de integridade comercial, como aquelas relacionadas com a contabilidade; controlos contabilísticos internos; assuntos de auditoria; suborno e corrupção; crimes bancários e financeiros e violações da legislação da UE, incluindo: concursos públicos, serviços financeiros, produtos e mercados, prevenção do branqueamento de capitais e financiamento do terrorismo, segurança dos produtos, segurança dos transportes, saúde pública, proteção do ambiente, proteção dos consumidores, infrações que afetem os interesses financeiros da UE ou relacionadas com o mercado interno (p. ex. regras da concorrência e auxílios estatais), proteção contra radiações e segurança nuclear, segurança alimentar, saúde e bem-estar animal, e proteção da privacidade, proteção de dados e segurança de dados. Para além disso, em alguns países pode ainda reportar outro tipo de assuntos. Consulte a nossa ferramenta de reporte na web em pfizer.ethicspoint.com para obter mais informações.

A utilização da Linha de Apoio é voluntária¹. Encorajamos a que se identifique quando fizer denúncias através da Linha de Apoio; sempre que a legislação em vigor o permita, não é obrigado a fazê-lo.

Objetivo do Processamento de Dados Pessoais

O objetivo do processamento de dados pessoais em relação à Linha de Apoio é garantir o cumprimento das leis internacionais e locais aplicáveis e das políticas internas. Se não garantirmos a conformidade, podemos estar sujeitos a multas elevadas, penas de prisão, responsabilidades e outras sanções, sujeitas às leis aplicáveis.

Recolhemos e processamos as suas informações pessoais conforme nos são facultadas por si através da Linha de Apoio para os seguintes fins:

- Verificar a plausibilidade da sua denúncia e os dados nela contidos, a fim de evitar qualquer violação legal,
- Investigar supostas infrações de leis e políticas, em particular as mencionadas acima,

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- Garantir o cumprimento das leis aplicáveis,
- Cooperar com as afiliadas da Pfizer em relação às suas obrigações de investigar infrações,
- Defender reclamações de terceiros e preparar reclamações contra terceiros,
- Desenvolver a nossa Linha de Apoio e processos de investigação.

Recolha e Processamento de Informações e Dados Pessoais

A Pfizer pode recolher e processar as seguintes informações através da Linha de Apoio: o seu nome, título, cargo e detalhes de contacto (a menos que a denúncia seja anónima); o nome e outros dados sobre indivíduos mencionados na sua denúncia; nome e cargo dos seus supervisores; uma descrição da conduta em questão na sua denúncia, incluindo a data e o local, bem como outras informações pertinentes; e quaisquer perguntas que possa fazer à Pfizer. A Pfizer pode igualmente recolher informações junto de outras pessoas durante qualquer investigação subsequente. Em determinadas circunstâncias, também podemos processar dados confidenciais, como dados de saúde, filiação sindical, se nos fornecer essas informações e/ou se forem relevantes para os fins da investigação.

As informações que facultar serão tratadas com confidencialidade, de acordo com as leis aplicáveis.

A Pfizer pode usar as informações acima mencionadas seja por termos que cumprir com uma obrigação legal imposta à Pfizer (Artigo 6(1)(c) do Regulamento Geral de Proteção de Dados (“RGPD”) da UE ou termos interesse legítimo em investigar a denúncia que nos enviou (Artigo 6(1)(f) do RGPD) ou, ainda, por ter uma obrigação de acordo com o seu contrato de trabalho de relatar certos incidentes (Artigo 6(1)(b) do RGPD). Em relação a dados confidenciais, como dados de saúde, filiação sindical (para uma lista de dados confidenciais, consulte o Artigo 9(1) RGPD), a Pfizer pode usar as informações para o estabelecimento, exercício ou defesa de ações judiciais (Artigo 9(2)(f) do RGPD) se for necessário por motivos de interesse público substancial, com base no direito da União ou do Estado-Membro, que deve ser proporcional ao objetivo pretendido (Artigo 9(2)(g) do RGPD), ou se for necessário por motivos de interesse público na área da saúde pública, como a garantia de elevados padrões de qualidade e segurança dos cuidados de saúde e dos medicamentos ou dispositivos médicos, com base na legislação da União ou do Estado-Membro (Artigo 9(2)(i) do RGPD).

Não sujeitaremos os titulares de dados a decisões baseadas apenas em processamento automatizado, incluindo criação de perfis, em relação à Linha de Apoio (Artigo 22 do RGPD).

Funcionamento e processos da Linha de Apoio

Um representante da NAVEX atenderá a sua chamada para a Linha de Apoio. A NAVEX não guarda o número de telefone das chamadas recebidas, pelo que as informações da sua chamada permanecem anónimas. A NAVEX também não grava as chamadas. O representante pode solicitar-lhe em nome da Pfizer várias informações, documentar aquilo que disse e pode fazer perguntas de acompanhamento para clarificar as informações. Tenha em atenção que o representante da NAVEX não está apto a responder a perguntas sobre ética ou políticas e não pode aconselhá-lo sobre o rumo que deve seguir. A NAVEX não pode decidir sobre quaisquer ações ou investigações em relação à sua denúncia. A NAVEX segue as instruções emitidas pela Pfizer. Se optar por utilizar a ferramenta de reporte na web, saiba que as mesmas informações são guardadas eletronicamente.

Depois do relatório ou inquérito inicial ser feito, é preparado um registo detalhado e enviado pela NAVEX diretamente à Divisão de Compliance da Pfizer. Dependendo da natureza do assunto e em conformidade com as suas obrigações de confidencialidade, a Divisão de Compliance pode comunicar a denúncia e a documentação relacionada com o pessoal relevante da Pfizer que poderá ter de ser informado (por exemplo, os representantes do Departamento Legal, People Experience (“PX”) ou Auditoria para proceder à respetiva investigação e resolução. Podemos precisar de mais informações e esclarecimentos seus à medida que a investigação avança, caso em que entraremos em contacto diretamente consigo. Sempre que necessário, a Divisão de Compliance poderá ter que notificar também elementos do Departamento de PX ou a liderança da Pfizer sobre situações de infração detetadas,

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para efeitos de se determinar uma eventual medida disciplinar e de transparência. As informações poderão ser também partilhadas com consultores externos da Pfizer como, por exemplo, advogados ou auditores que são obrigados a manter estrita confidencialidade. Iremos informá-lo sobre o andamento da investigação e as ações tomadas após o resultado da investigação.

Como parte da investigação, a Pfizer tem como objetivo, dentro de um período de tempo adequado, informar todas as pessoas envolvidas numa denúncia sobre as alegações de que são alvo; no entanto, tentará não divulgar a sua identidade. As pessoas envolvidas terão o direito de responder às informações que comunicou. Salientamos que as informações por si facultadas poderão resultar em decisões que afetem indivíduos da Pfizer e terceiros envolvidos no incidente em questão. Por esse motivo, pedimos que faculte apenas informações que, tanto quanto for do seu conhecimento, sejam rigorosas. A partilha consciente de informações incorretas ou enganosas poderá resultar em ações disciplinares ou mesmo responsabilidade civil ou penal. Além disso, sempre que possível, todas as comunicações devem limitar-se aos factos relevantes para a denúncia e para a subsequente investigação.

É estritamente proibida a retaliação contra qualquer indivíduo que procure aconselhamento, levante uma preocupação ou denuncie má conduta, ou contra facilitadores, indivíduos ou entidades que estejam relacionados com os denunciantes. Se alguém exercer represálias contra um indivíduo que tiver denunciado uma violação em prol da verdade, a Pfizer tomará as devidas medidas – mesmo que se venha a verificar que o indivíduo errou ao denunciar o assunto. Se achar que no seu caso, ou no de qualquer outra pessoa envolvida, houve retaliação, entre em contacto com a Divisão de Compliance (informações de contacto abaixo).

Uso de informações, retenção e transferência de dados

A Pfizer contratou a NAVEX, um processador de dados, sob estritas obrigações de confidencialidade para proteger a confidencialidade e a segurança dos seus dados pessoais e a NAVEX só tem permissão para usar os seus dados pessoais para efeitos da Linha de Apoio. As informações que recebemos da NAVEX e quaisquer dados pessoais que nos fornecer serão armazenados numa base de dados da Pfizer (e na base de dados dos nossos fornecedores, quando necessário para nos ajudar na investigação) com acesso limitado.

Podemos transferir os seus dados pessoais para as nossas afiliadas se elas precisarem de saber, inclusive para países que têm regras de proteção de dados diferentes daquelas existentes no seu país de trabalho – mesmo para outras filiais ou outros fornecedores da Pfizer – conforme necessário para investigar a comunicação e administrar a Linha de Apoio. Podemos, em particular, transferir os seus dados pessoais para o Departamento de Compliance da Pfizer, Inc. Note que alguns dos países não pertencentes ao EEE, incluindo os EUA, não são reconhecidos pela Comissão Europeia como fornecendo um nível adequado de proteção de acordo com os padrões do EEE. Os países que são reconhecidos como fornecendo um nível adequado de proteção estão disponíveis aqui: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/commission/roaming-debit-protection/adequacy-decisions).

Implementamos medidas adequadas, como cláusulas contratuais padrão adotadas pela Comissão Europeia para permitir a transferência e proteção dos seus dados pessoais para países que não são reconhecidos pela Comissão Europeia como fornecendo um nível adequado de proteção de dados. Poderá obter uma cópia destas medidas através do Encarregado de Proteção de Dados da Pfizer, cujos contactos estão disponíveis em DPO.Pfizer.com.

A Pfizer também pode ser obrigada a transferir alguns ou todos os seus dados pessoais para agências ou autoridades policiais ou outras autoridades dos países relevantes.

As informações relacionadas com uma denúncia feita através da Linha de Apoio serão arquivadas por um período limitado de tempo, conforme necessário, ou eliminadas com base nos seguintes critérios: quando a investigação for encerrada e nenhuma ação adicional for necessária, a menos que a Pfizer seja obrigada por lei a reter os dados por um período mais longo; quando o período de tempo para qualquer litígio relevante tiver expirado, a menos que a Pfizer seja obrigada por lei a reter os dados por um período mais longo; e quando as nossas obrigações de manutenção de registos relacionados com investigações expirarem. Para mais informações, consulte a política empresarial sobre a retenção de dados aplicável. Se tiver alguma dúvida, contacte a Divisão de Compliance.

Os seus direitos

Sujeito às condições estabelecidas no RGPD e/ou outras leis aplicáveis, tem o direito de aceder aos seus dados pessoais (Artigo 15 do RGPD), o direito de retificar os seus dados pessoais (Artigo 16 do RGPD), o direito de ter os seus dados pessoais dados apagados (Artigo 17 do RGPD), o direito de restringir o processamento dos seus dados pessoais (Artigo 18 do RGPD), direito à portabilidade de dados (Artigo 20 do RGPD) e o direito de se opor ao processamento dos seus dados pessoais em determinadas circunstâncias (Artigo 21 do RGPD).

Se pretender exercer um direito ao abrigo do RGPD, pode contactar o Encarregado de Proteção de Dados da Pfizer (consulte [DPO.Pfizer.com](https://www.pfizer.com/pt/privacidade)). Responderemos ao seu pedido de acordo com a lei aplicável.

A qualquer momento poderá também apresentar uma reclamação à autoridade de proteção de dados competente no seu país ou na sua região.

Se tiver dúvidas ou preocupações relacionadas com a própria Linha de Apoio, contacte-nos pelo telefone +1-212-733-3026, corporate.compliance@pfizer.com, ou 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ Em alguns países da UE, a Pfizer também oferece canais de denúncias locais. Para obter mais informações sobre denúncias a nível local, incluindo o aviso de privacidade do canal de denúncia local e o que pode ser reportado através do canal de denúncia local, consulte a intranet local da Pfizer ou entre em contacto com a Divisão de Compliance.

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Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/eu-justice/justice-portal/pages/adequacy-decisions-eeaa.htm).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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PFIZER, INC.

LINIA DE ASISTENȚĂ PENTRU CONFORMITATE UE/SEE/UK AVIZ DE ORIENTARE ȘI CONFIDENȚIALITATE

Linia de asistență pentru conformitate Pfizer („Linia de asistență”) este furnizată de Pfizer, Inc. („Pfizer”, „noi”) în calitate de companie responsabilă pentru datele dumneavoastră cu caracter personal. Site-ul web și linia telefonică prin intermediul căreia puteți raporta un incident sunt gestionate în prezent de NAVEX Global UK Limited, o companie NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Regatul Unit („NAVEX”), furnizorul independent de servicii al Liniei de asistență telefonică a Pfizer.

Informații generale

Operatorul de date al Liniei de asistență telefonică este: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 SUA.

Puteți contacta responsabilul cu protecția datelor de la Pfizer prin intermediul detaliilor de contact menționate mai sus sau la adresa privacy.officer@pfizer.com sau DPO.Pfizer.com.

Linia de asistență telefonică poate fi utilizată, în general, pentru raportarea preocupărilor legate de aspecte privind integritatea financiară și de afaceri, cum ar fi cele legate de contabilitate, controale contabile interne, probleme de audit, mită și corupție, infracțiuni bancare și financiare și încălcări ale legislației UE, inclusiv: cele privind achizițiile publice, serviciile financiare, produse și piețe, prevenirea spălării banilor și finanțării terorismului, siguranța produselor, siguranța transportului, sănătatea publică, protecția mediului, protecția consumatorului, încălcări care afectează interesul financiar al UE sau care privesc piața internă (de exemplu normele privind concurența și ajutorul de stat), protecția împotriva radiațiilor și siguranța nucleară, siguranța alimentelor, sănătatea și starea de bine a animalelor și protecția vieții private, protecția datelor și securitatea datelor. În plus față de cele de mai sus, în unele țări puteți raporta cu privire la aspecte suplimentare. Vă rugăm să consultați instrumentul nostru de raportare online la adresa pfizer.ethicspoint.com pentru mai multe informații.

Utilizarea Liniei de asistență este voluntară¹. Sunteți încurajat să vă identificați atunci când raportați către Linia de asistență; dacă legislația în vigoare permite, nu sunteți obligat să faceți acest lucru.

Scopul prelucrării datelor cu caracter personal

Scopul prelucrării datelor cu caracter personal în legătură cu Linia de asistență telefonică este de a asigura conformitatea cu legile internaționale și locale aplicabile și cu politicile interne. În cazul în care nu asigurăm conformitatea, putem face obiectul unor amenzi mari, pedepse cu închisoarea, răspunderi și alte muștrări, în conformitate cu legile aplicabile.

Colectăm și prelucrăm informațiile dvs. cu caracter personal pe care ni le furnizați prin intermediul Liniei de asistență telefonică în următoarele scopuri:

- Verificarea plauzibilității raportului dumneavoastră și a datelor conținute în acesta, pentru a evita orice încălcare a legilor,

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- Investigarea presupuselor încălcări ale legilor și politicilor, în special a celor menționate mai sus,
- Asigurarea respectării legilor aplicabile,
- Cooperarea cu afiliații Pfizer în ceea ce privește obligațiile acestora de investigare a încălcărilor,
- Apărarea reclamațiilor terților și pregătirea reclamațiilor împotriva terților,
- Dezvoltarea liniei noastre de asistență telefonică și a proceselor de investigare.

Colectarea și prelucrarea informațiilor și a datelor cu caracter personal

Pfizer poate colecta și procesa următoarele informații prin intermediul Liniei de asistență: numele, titlul, funcția și datele dvs. de contact (cu excepția cazului în care raportul este anonim); numele și alte date legate de persoane menționate în raportul dvs.; numele și funcția superiorilor dvs.; o descriere a comportamentului menționat în raportul dvs., inclusiv data și locul, precum și alte informații pertinente; și orice întrebări pe care le puteți adresa Pfizer. De asemenea, Pfizer poate colecta informații din alte surse în timpul unei investigații ulterioare. În anumite circumstanțe, putem prelucra, de asemenea, date sensibile, cum ar fi date privind sănătatea, apartenența la un sindicat, în cazul în care ne furnizați aceste date și/sau dacă acestea sunt relevante pentru scopul investigației.

Informațiile pe care le furnizați vor fi tratate în mod confidențial, în conformitate cu legile aplicabile.

Pfizer poate utiliza informațiile menționate mai sus fie pentru că trebuie să respectăm o obligație legală impusă Pfizer (articolul 6 alineatul (1) litera (c) din Regulamentul general privind protecția datelor („RGPD”) al UE), sau pentru că avem un interes legitim de a investiga raportul pe care ni l-ați transmis (articolul 6 alineatul (1) litera (f) din RGPD), sau pentru că este posibil să aveți o obligație în temeiul contractului de muncă de a raporta anumite incidente (articolul 6 alineatul (1) litera (b) din RGPD). În ceea ce privește datele sensibile, cum ar fi datele privind sănătatea, apartenența la un sindicat (pentru o listă de date sensibile, a se vedea articolul 9(1) RGPD), Pfizer poate utiliza informațiile pentru constatarea, exercitarea sau apărarea unor pretenții legale (articolul 9(2)(f) RGPD), dacă acest lucru este necesar din motive de interes public substanțial, în temeiul dreptului Uniunii sau al dreptului statelor membre, care trebuie să fie proporționale cu scopul urmărit (articolul 9 alineatul (2) litera (g) din RGPD), sau dacă este necesar din motive de interes public în domeniul sănătății publice, cum ar fi asigurarea unor standarde ridicate de calitate și siguranță a asistenței medicale și a medicamentelor sau a dispozitivelor medicale, în temeiul dreptului Uniunii sau al dreptului statelor membre (articolul 9 alineatul (2) litera (i) din RGPD).

Nu vom supune persoanele vizate la decizii bazate exclusiv pe prelucrarea automată, inclusiv crearea de profiluri, în legătură cu Linia de asistență telefonică (articolul 22 din RGPD).

Funcționarea și procesele Liniei de asistență

Un reprezentant al NAVEX va răspunde la apelul dvs. către Linia de asistență. NAVEX nu păstrează numerele de telefon de la care sunt efectuate apelurile, astfel că informațiile despre apelul dvs. rămân anonime. NAVEX, de asemenea, nu înregistrează apelurile. Este posibil ca reprezentantul să vă ceară mai multe informații în numele Pfizer, să consemneze informațiile pe care le furnizați și să vă pună întrebări suplimentare pentru a clarifica informațiile. Vă rugăm să rețineți că reprezentantul NAVEX nu poate răspunde la întrebările despre etică sau politică și nu vă poate consilia cu privire la acțiunile pe care trebuie să le întreprindeți. NAVEX nu poate decide cu privire la nicio acțiune sau investigație în legătură cu raportul dumneavoastră. NAVEX urmează instrucțiunile emise de Pfizer. Dacă optați pentru utilizarea instrumentului de raportare online, aceste informații sunt înregistrate electronic.

După efectuarea raportului sau cererii inițiale, este pregătită o înregistrare detaliată și trimisă de către NAVEX direct Diviziei Pfizer de asigurare a conformității. În funcție de natura problemei și în conformitate cu obligațiile sale de confidențialitate, Divizia de asigurare a conformității va comunica raportul și documentația aferentă personalului adecvat din cadrul Pfizer care trebuie informat, cum ar fi reprezentanții departamentelor juridic, People Experience („PX”) sau ai companiei de audit, pentru investigare și soluționare ulterioară. Este posibil să avem nevoie de informații

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și clarificări suplimentare din partea dumneavoastră pe măsură ce ancheta avansează, caz în care vă vom contacta direct. În cazul în care este necesar, Divizia de asigurare a conformității va trebui să informeze și membrii departamentului PX sau conducerea Pfizer referitor la orice constatare a unei încălcări a legii sau a politicii companiei, în scopul determinării sancțiunii disciplinare și din motive de transparență. De asemenea, informațiile pot fi transmise și consultanților externi ai grupului Pfizer, cum ar fi avocații sau auditorii, care sunt obligați să păstreze confidențialitatea strictă. Vă vom informa cu privire la evoluția investigației și la măsurile luate în urma rezultatului acesteia.

Ca parte a investigației, Pfizer își propune să informeze fiecare persoană implicată într-un raport cu privire la acuzațiile care i se aduc, într-un interval de timp adecvat, însă nu vă va dezvălui identitatea. Persoanele vizate vor avea dreptul de a reacționa la informațiile din raportul dvs. Rețineți că informațiile pe care le furnizați pot determina luarea unor decizii care afectează persoanele din cadrul grupului Pfizer și alți terți implicați în incidentul raportat. Prin urmare, vă rugăm să furnizați doar informații care, după cunoștințele dvs., sunt exacte. Furnizarea cu bună știință a unor informații inexacte sau înșelătoare poate determina măsuri disciplinare sau chiar atragerea răspunderii civile sau penale. De asemenea, dacă este posibil, orice raport trebuie să includă doar fapte relevante pentru incident și investigația ulterioară.

Sunt strict interzise represaliile împotriva oricărei persoane care solicită consiliere, își exprimă o îngrijorare sau raportează un comportament necorespunzător sau împotriva facilitatorilor, persoanelor sau entităților care au legătură cu persoanele care raportează. Dacă cineva exercită represalii împotriva unei persoane care a raportat o încălcare în mod corect, Pfizer va lua măsuri corespunzătoare, chiar dacă ulterior se dovedește că persoana respectivă a greșit în raportarea problemei inițiale. Dacă sunteți de părere că dumneavoastră sau orice altă persoană implicată ați făcut obiectul unor represalii, trebuie să contactați Divizia de asigurare a conformității (informațiile de contact de mai jos).

Utilizarea, păstrarea informațiilor și transferul de date

Pfizer a încheiat un contract cu NAVEX, un procesator de date, în baza unor obligații stricte de confidențialitate, pentru a proteja confidențialitatea și securitatea datelor dvs. cu caracter personal, iar NAVEX are permisiunea de a utiliza datele dvs. cu caracter personal numai pentru asigurarea serviciilor Liniei de asistență. Informațiile pe care le primim de la NAVEX și orice date cu caracter personal pe care ni le furnizați vor fi stocate într-o bază de date Pfizer (și în baza de date a furnizorilor noștri, atunci când este necesar pentru a ne ajuta în cadrul investigației) cu acces limitat.

Este posibil să transferăm datele dvs. cu caracter personal către afiliații noștri dacă aceștia au nevoie să știe, inclusiv în țări care au norme de protecție a datelor diferite de cele din țara în care lucrați, inclusiv către alți afiliați sau distribuitori Pfizer, după cum este necesar pentru a investiga raportul și a administra Linia de asistență telefonică. Putem, în special, să transferăm datele dvs. cu caracter personal către Departamentul de conformitate al Pfizer, Inc. Rețineți că unele dintre țările care nu fac parte din SEE, inclusiv SUA, nu sunt recunoscute de Comisia Europeană ca oferind un nivel de protecție adecvat conform standardelor SEE. Țările care sunt recunoscute ca oferind un nivel adecvat de protecție sunt disponibile aici: [Adequacy decisions \(europa.eu\)](https://www.europa.eu/adequacy).

Am implementat măsuri adecvate, cum ar fi clauzele contractuale standard adoptate de Comisia Europeană, pentru a permite transferul și protecția datelor dvs. cu caracter personal către țări care nu sunt recunoscute de Comisia Europeană ca oferind un nivel adecvat de protecție a datelor. Puteți obține o copie a acestor măsuri luând legătura cu responsabilul pentru protecția datelor Pfizer, ale cărui date de contact sunt disponibile la adresa DPO.Pfizer.com.

De asemenea, compania Pfizer poate fi obligată să transfere unele sau toate datele dumneavoastră cu caracter personal către agențiile sau autoritățile de aplicare a legii sau către alte autorități din țările respective.

Informațiile referitoare la un raport înaintat prin Linia de asistență vor fi arhivate pentru o perioadă limitată de timp, după cum este necesar, sau șterse pe bază următoarelor criterii: când investigația a fost finalizată și nu mai este necesară nicio acțiune, cu excepția cazului în care compania Pfizer este obligată prin lege să păstreze datele pentru o perioadă mai lungă; când perioada de timp pentru soluționarea eventualelor litigii a expirat, cu excepția cazului în care Pfizer este obligată prin lege să păstreze datele pentru o perioadă mai lungă; și când obligațiile noastre de

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păstrare a înregistrărilor referitoare la investigații au expirat. Pentru mai multe detalii, vă rugăm să consultați politica corporativă referitoare la păstrarea evidențelor. Dacă aveți întrebări, vă rugăm să luați legătura cu Divizia de asigurare a conformității.

Drepturile dumneavoastră

Sub rezerva condițiilor prevăzute în RGPD și/sau în alte legi aplicabile, aveți dreptul de a accesa datele dvs. cu caracter personal (articolul 15 din RGPD), dreptul de a vă rectifica datele cu caracter personal (articolul 16 din RGPD), dreptul de a vă șterge datele cu caracter personal (articolul 17 din RGPD), dreptul de a restricționa prelucrarea datelor dvs. cu caracter personal (articolul 18 din RGPD), dreptul la portabilitatea datelor (articolul 20 din RGPD) și dreptul de a vă opune prelucrării datelor dvs. cu caracter personal în anumite circumstanțe (articolul 21 din RGPD).

Dacă doriți să vă exercitați un drept în temeiul GDPR, puteți contacta responsabilul cu protecția datelor al Pfizer (a se vedea [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Vom răspunde solicitării dvs. în conformitate cu legislația în vigoare.

De asemenea, aveți dreptul de a depune în orice moment o plângere către o autoritate de protecție a datelor în a cărei competență intră țara sau regiunea dvs.

Pentru orice întrebări sau nelămuriri legate de Linia de asistență în sine, contactați-ne la +1-212-733-3026, corporate.compliance@pfizer.com, sau la adresa 66 Hudson Boulevard East, New York, NY 10001 SUA.

¹ În anumite țări din UE, Pfizer oferă, de asemenea, canale locale de raportare. Pentru mai multe informații privind raportarea la nivel local, inclusiv notificarea de confidențialitate a canalului local de raportare și ceea ce poate fi raportat prin intermediul canalului local de raportare, vă rugăm să consultați intranetul Pfizer local sau să contactați Divizia de asigurare a conformității.

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Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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PFIZER, INC.

LINKA COMPLIANCE HELPLINE EU/EEA/VB POSTUP A OCHRANA OSOBNÝCH ÚDAJOV

Linku Pfizer Compliance Helpline (ďalej len „linka pomoci“) poskytuje spoločnosť Pfizer, Inc. („Pfizer“, „my“ alebo „nás“) ako spoločnosť zodpovedná za vaše osobné údaje. Webovú stránku a telefónnu linku, prostredníctvom ktorej môžete nahlásiť incident v súčasnosti prevádzkuje spoločnosť NAVEX Global UK Limited, spoločnosť NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Spojené kráľovstvo (ďalej len „NAVEX“), nezávislý poskytovateľ služieb linky pomoci spoločnosti Pfizer.

Všeobecné

Správcom údajov asistenčnej linky je: spoločnosť Pfizer, Inc 66 Hudson Boulevard East, New York, NY 10001 USA.

Na úradníka pre ochranu údajov spoločnosti Pfizer sa môžete obrátiť prostredníctvom kontaktných údajov uvedených vyššie alebo e-mailom na adresu privacy.officer@pfizer.com alebo DPO.Pfizer.com.

Linka pomoci sa môže vo všeobecnosti použiť na nahlasovanie podnetov súvisiacich s prácou v súvislosti s otázkami finančnej a obchodnej integrity, ako sú tie, ktoré sa týkajú účtovníctva; interných účtovných kontrol; auditorských záležitostí; úplatkárstva a korupcie; bankovej a finančnej kriminality a porušenia právnych predpisov EÚ vrátane verejného obstarávania, finančných služieb, produktov a trhov, predchádzania legalizácii príjmu z trestnej činnosti a financovaniu terorizmu, bezpečnosti výrobkov, bezpečnosti dopravy, verejného zdravia, ochrany životného prostredia, ochrany spotrebiteľa, porušení, ktoré majú vplyv na finančné záujmy EÚ alebo sa týkajú vnútorného trhu (napr. pravidlá hospodárskej súťaže a štátnej pomoci), radiačnej ochrany a jadrovej bezpečnosti, bezpečnosti potravín, zdravia a dobrých životných podmienok zvierat a ochrany súkromia, ochrany údajov a bezpečnosti údajov. Okrem vyššie uvedeného môžete v niektorých krajinách nahlásiť ďalšie záležitosti. Viac informácií o našom webovom reportovacom nástroji nájdete na adrese pfizer.ethicspoint.com.

Používanie linky pomoci je dobrovoľné¹. Odporúčame, aby ste sa pri podávaní podnetov na linku pomoci identifikovali. Ak to však platné zákony povoľujú, nie ste tak povinní urobiť.

Účel spracúvania osobných údajov

Účelom spracúvania osobných údajov vo vzťahu k linke pomoci je zabezpečiť dodržiavanie platných medzinárodných a miestnych zákonov a interných zásad. Ak nezabezpečíme dodržiavanie predpisov, môžeme byť vystavení vysokým pokutám, väzeniu, zodpovednosti a iným pokarhaniam v súlade s platnými zákonmi.

Vaše osobné údaje, ktoré nám boli poskytnuté prostredníctvom linky pomoci zhromažďujeme a spracúvame na nasledujúce účely:

- kontrolu hodnovernosti vášho hlásenia a údajov v ňom obsiahnutých, aby sa predišlo akémukoľvek porušeniu zákonov;
- vyšetrovanie údajných porušení zákonov a zásad, najmä tých, ktoré sú uvedené vyššie;
- zabezpečenie dodržiavania platných zákonov;

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- spoluprácu s pridruženými spoločnosťami spoločnosti Pfizer v súvislosti s ich povinnosťami vyšetrovať porušenia;
- obhajovanie nárokov tretích strán a prípravu nárokov voči tretím stranám;
- rozvoj našej linky pomoci a procesov vyšetrovania.

Zhromažďovanie a spracovávanie informácií a osobných údajov

Spoločnosť Pfizer môže pri používaní linky pomoci zhromažďovať a spracovávať tieto údaje a informácie: vaše meno, titul, pozíciu a kontaktné údaje (pokiaľ hlásenie nie je anonymné), mená a iné údaje osôb, ktoré spomeniete vo svojom hlásení, mená a pozície vašich nadriadených, popis problematickeho konania, na ktoré upozorňujete, vrátane dátumu, miesta a iných súvisiacich informácií a tiež akékoľvek otázky, ktoré môžete položiť spoločnosti Pfizer. Spoločnosť Pfizer môže počas vyšetrovania taktiež zhromažďovať informácie od iných osôb. Za určitých okolností môžeme spracovávať aj citlivé údaje, ako sú zdravotné údaje, členstvo v odboroch, ak nám ich poskytnete a/alebo ak sú relevantné na účely vyšetrovania.

S informáciami, ktoré poskytnete, sa bude zaobchádzať ako s dôvernými, v súlade s platnými zákonmi.

Spoločnosť Pfizer môže použiť informácie uvedené vyššie, pretože buď musíme splniť zákonnú povinnosť uloženú spoločnosti Pfizer (článok 6 ods. 1 písm. c) všeobecného nariadenia EÚ o ochrane údajov („GDPR“) alebo máme oprávnený záujem prešetriť hlásenie, ktoré ste nám predložili (článok 6 ods. 1 písm. f) GDPR) alebo môžete mať podľa pracovnej zmluvy povinnosť nahlásiť určité incidenty (článok 6 ods. 1 písm. b) GDPR). Pokiaľ ide o citlivé údaje, ako sú údaje o zdravotnom stave, členstvo v odboroch (zoznam citlivých údajov nájdete v článku 9 ods. 1 GDPR), spoločnosť Pfizer môže tieto informácie použiť na určenie, výkon alebo obhajobu právnych nárokov (článok 9 ods. 2 písm. f) GDPR), ak je to potrebné z dôvodov závažného verejného záujmu, na základe právnych predpisov Európskej únie alebo členského štátu, ktoré je primerané sledovanému cieľu (článok 9 ods. 2 písm. g) GDPR), alebo ak je to potrebné z dôvodov verejného záujmu v oblasti verejného zdravia, ako je zabezpečenie vysokých štandardov kvality a bezpečnosti zdravotnej starostlivosti a zdravotníckych výrobkov alebo zdravotníckych zariadení, na základe právnych predpisov Európskej únie alebo členského štátu (článok 9 ods. 2 písm. i) GDPR).

Dotknuté osoby nebudeme v súvislosti s linkou pomoci vystavovať rozhodnutiam založeným výlučne na automatizovanom spracúvaní vrátane profilovania (článok 22 GDPR).

Fungovanie a procesy asistenčnej linky

Pri telefonáte na asistenčnú linku budete komunikovať so zástupcom spoločnosti NAVEX. Spoločnosť NAVEX nezaznamenáva telefónne čísla žiadnych prichádzajúcich hovorov, takže informácie o vašom telefonáte zostávajú anonymné. Spoločnosť NAVEX tiež nezaznamenáva hovory. Zástupca vás môže požiadať o niekoľko informácií v mene spoločnosti Pfizer, zdokumentuje vaše údaje a môže vám položiť doplňujúce otázky na objasnenie týchto informácií. Pripomíname, že zástupca spoločnosti NAVEX nedokáže odpovedať na akékoľvek otázky týkajúce sa etiky alebo zásad a nedokáže vám poradiť, ako konať ďalej. Spoločnosť NAVEX nemôže rozhodovať o žiadnych akciách alebo vyšetrovaniach v súvislosti s vašou správou. Spoločnosť NAVEX sa riadi pokynmi vydanými spoločnosťou Pfizer. Ak sa rozhodnete použiť webový nástroj na nahlasovanie, rovnaké informácie sa zaznamenajú elektronicky.

Po úvodnom nahlásení podnetu alebo zadaní dopytu sa pripraví podrobný záznam, ktorý spoločnosť NAVEX odošle priamo divízií Compliance spoločnosti Pfizer. V závislosti od charakteru tejto záležitosti a v súlade s jej povinnosťami dôvernosti môže divízia Compliance odovzdať hlásenie a príslušnú dokumentáciu na ďalšie prešetrenie a rozhodnutie zodpovedajúcej osobe v spoločnosti Pfizer, ktorá by mala byť informovaná, ako napríklad zástupcovi právneho oddelenia, oddeleniu People Experience („PX“) alebo auditu. V priebehu vyšetrovania od vás môžeme potrebovať ďalšie informácie a objasnenia. V takom prípade vás budeme priamo kontaktovať. V prípade potreby môže divízia Compliance tiež informovať členov PX alebo vedúcich pracovníkov spoločnosti Pfizer o akýchkoľvek zisteniach porušení predpisov za účelom stanovenia disciplinárnych opatrení a zachovania transparentnosti. Tieto informácie sa tiež môžu odovzdať externým poradcom spoločnosti Pfizer, ako sú napríklad právni zástupcovia alebo audítori, ktorí sú povinní zachovávať prísnu mlčanlivosť. O priebehu vyšetrovania a opatreniach prijatých na základe výsledku vyšetrovania vás budeme informovať.

Ako súčasť vyšetrovania je cieľom spoločnosti Pfizer v primeranom časovom rámci informovať všetky osoby spomenuté v hlásení o obvineniach vznesených voči nim bez odhalenia vašej identity, pokiaľ to nebude nutné. Spomenuté osoby potom majú právo vyjadriť sa k informáciám, ktoré ste o nich podali. Upozorňujeme, že na základe informácií, ktoré nám poskytnete, sa môžu prijať rozhodnutia, ktoré budú mať vplyv na jedincov v spoločnosti Pfizer a aj na ďalšie tretie strany zapojené do ohláseného incidentu. Preto vás žiadame, aby ste podľa svojho najlepšieho vedomia a svedomia uvádzali presné informácie. V prípade vedomého poskytnutia nepresných alebo zavádzajúcich informácií môže byť voči vám uplatnené disciplinárne opatrenie alebo aj občiansky či trestný postih. Taktiež prosíme, aby ste v hláseniach podľa možnosti uvádzali len skutočnosti, ktoré sú pre dané hlásenie a následné vyšetrovanie podstatné.

Odvetné opatrenia proti každému jedincovi, ktorý požiada o radu, upozorní na obavy alebo nahlási nesprávne konanie, alebo proti facilitátorom, jedincom alebo subjektom, ktoré sú spojené s nahlásujúcimi osobami sú prísne zakázané. Ak sa niekto pomstí jedincovi, ktorý pravdivo a v dobrej viere nahlásil pochybenie, spoločnosť Pfizer podnikne potrebné kroky – a to aj ak sa neskôr ukáže, že jedinec nahlásil záležitosť neoprávnene. Ak si myslíte, že voči vám alebo komukoľvek inému zainteresovanému boli podniknuté odvetné opatrenia, mali by ste sa obrátiť na divíziu Compliance (kontaktné informácie nižšie).

Používanie a uchovávanie informácií a prenos údajov

Spoločnosť Pfizer uzavrela za prísnych povinností zachovávať mlčanlivosť zmluvu so spoločnosťou NAVEX, sprostredkovateľom údajov, ktorá zodpovedá za ochranu dôvernosti a zabezpečenia vašich osobných údajov. Spoločnosť NAVEX má povolenie používať osobné údaje len na účely spojené s poskytovaním linky pomoci. Informácie, ktoré dostaneme od spoločnosti NAVEX, a akékoľvek osobné údaje, ktoré nám poskytnete, budú uložené v databáze spoločnosti Pfizer (a v databáze našich predajcov, ak to bude potrebné ako pomoc pri našom vyšetrení) s obmedzeným prístupom.

Vaše osobné údaje môžeme prenášať aj do pridružených spoločností, ak majú potrebu vedieť vrátane krajín, v ktorých platia iné pravidlá ochrany osobných údajov, než v krajine, v ktorej pracujete. Môže ísť o pridružené spoločnosti alebo zmluvných partnerov spoločnosti Pfizer, ktorí tieto údaje potrebujú v rámci vyšetrovania alebo zabezpečovania chodu linky pomoci. Vaše osobné údaje môžeme preniesť najmä do divízie Compliance spoločnosti Pfizer, Inc. Upozorňujeme, že niektoré krajiny mimo EHP vrátane USA nie sú Európskou komisiou uznané ako krajiny poskytujúce primeranú úroveň ochrany podľa štandardov EHP. Krajiny, ktoré sú uznané za krajiny poskytujúce primeranú úroveň ochrany, sú uvedené tu: [Adequacy decisions \(europa.eu\)](https://eudataprivacy.europa.eu/).

Zavedli sme primerané opatrenia, ako sú štandardné zmluvné doložky prijaté Európskou komisiou, ktoré umožňujú prenos a ochranu vašich osobných údajov do krajín, ktoré Európska komisia neuznáva ako krajiny poskytujúce primeranú úroveň ochrany údajov. Kópiu týchto opatrení vám na požiadanie poskytne úradník pre ochranu údajov spoločnosti Pfizer, ktorého kontaktné údaje sú k dispozícii na lokalite DPO.Pfizer.com.

Spoločnosť Pfizer môže byť tiež povinná preniesť niektoré alebo všetky vaše osobné údaje orgánom činným v trestnom konaní alebo orgánom alebo iným orgánom príslušných krajín.

Informácie súvisiace s hlásením podaným prostredníctvom linky pomoci sa budú archivovať na obmedzené časové obdobie podľa potreby, resp. budú odstránené na základe týchto kritérií: po uzavretí vyšetrovania, ak nie sú potrebné žiadne ďalšie kroky, pokiaľ spoločnosť Pfizer nie je povinná zo zákona uchovávať údaje počas dlhšieho obdobia, po uplynutí časovej lehoty súvisiacej s príslušným súdnym sporom, pokiaľ spoločnosť Pfizer nie je povinná zo zákona uchovávať údaje počas dlhšieho obdobia, a po uplynutí lehoty povinnej archivácie záznamov súvisiacich s vyšetrovaním. Ďalšie podrobnosti nájdete v príslušnej firemnej smernici o uchovávaní záznamov. Ak máte akékoľvek otázky, obráťte sa na divíziu Compliance.

Vaše práva

Za podmienok stanovených v GDPR a/alebo iných platných zákonoch máte právo na prístup k svojim osobným údajom (článok 15 GDPR), právo na opravu svojich osobných údajov (článok 16 GDPR), právo na vymazanie vašich osobných údajov (článok 17 GDPR), právo na obmedzenie spracúvania vašich osobných údajov (článok 18 GDPR),

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právo na prenosnosť údajov (článok 20 GDPR) a právo za určitých okolností namietať proti spracúvaniu vašich osobných údajov (článok 21 GDPR).

Ak by ste chceli uplatniť právo podľa GDPR, môžete sa obrátiť na úradníka pre ochranu údajov spoločnosti Pfizer (navštívte stránku DPO.Pfizer.com). Na vašu žiadosť odpovieme v súlade s príslušnými právnymi zákonmi.

Máte tiež právo kedykoľvek podať sťažnosť na príslušný orgán dohľadu nad ochranou údajov vo vašej krajine alebo regióne.

Ak máte akékoľvek otázky alebo obavy súvisiace s linkou pomoci, neváhajte sa na nás obrátiť na čísle +1 212 733 3026, na e-mailovej adrese corporate.compliance@pfizer.com alebo poštou na adrese 66 Hudson Boulevard East, New York, NY 10001, USA.

¹V niektorých krajinách EÚ spoločnosť Pfizer ponúka aj miestne kanály na nahlasovanie správ. Ďalšie informácie o miestnom nahlasovaní vrátane oznámenia o ochrane osobných údajov na miestnom kanáli nahlasovania a toho, čo je možné nahlásiť cez miestny kanál nahlasovania nájdete na miestnom intranete spoločnosti Pfizer alebo sa obráťte na divíziu Compliance.

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Language: English
Last Updated: Dec 2022

PFIZER, INC.

EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out

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that the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/eu-justice/european-data-protection-board/adequacy-decisions).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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PFIZER, INC.

SLUŽBA ZA POMOČ UPORABNIKOM V ZVEZI S SKLADNOSTJO V EU/EGP/VB NAVODILA IN OBVESTILO O ZASEBNOSTI

Služba za pomoč uporabnikom v zvezi s skladnostjo družbe Pfizer („služba za pomoč“) je storitev družbe Pfizer, Inc. („Pfizer“, „mi“ ali „nas“), ki je odgovorna za vaše osebne podatke. Spletno mesto in telefonsko linijo, prek katerih lahko prijavite neskladnosti, trenutno upravlja družba NAVEX Global UK Limited, NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG, Velika Britanija („NAVEX“), neodvisni ponudnik storitev službe za pomoč družbe Pfizer.

Splošno

Upravljaavec podatkov službe za pomoč je: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001, ZDA.

Na pooblaščen osebo za varstvo podatkov v družbi Pfizer se lahko obrnete prek zgoraj navedenih kontaktnih podatkov, na naslovu privacy.officer@pfizer.com ali na spletnem mestu DPO.Pfizer.com.

Služba za pomoč se lahko na splošno uporablja za poročanje o službenih pomislekih v zvezi s finančno in poslovno integriteto, npr. z računovodstvom; notranjim nadzorom računovodstva; revizijskimi zadevami; podkupovanjem in korupcijo; bančnim in finančnim kriminalom ter kršitvami zakonov EU, vključno z javno nabavo, finančnimi storitvami, izdelki in trgi, preprečevanjem pranja denarja in financiranja terorizma, varnostjo izdelkov, varnostjo prevoza, javnim zdravjem, varovanjem okolja, zaščito potrošnikov, kršitvami v zvezi s finančnimi interesi EU ali notranjim trgov (npr. zakonodajo o konkurenci in državnih pomočih), zaščito pred sevanjem in jedrsko varnostjo, varnostjo živil, zdravjem in dobrim počutjem živali, varstvom zasebnosti ter zaščito in varstvom podatkov. Poleg zgoraj navedenega lahko v nekaterih državah poročate tudi o drugih zadevah. Za več informacij preverite naše spletno orodje za poročanje na pfizer.ethicspoint.com.

Uporaba službe za pomoč je prostovoljna¹. Svetujemo vam, da se pri poročanju prek službe za pomoč predstavite. Če to dovoljuje ustrezna zakonodaja, vam tega ni treba storiti.

Namen obdelave osebnih podatkov

Namen obdelave osebnih podatkov v zvezi z službo za pomoč je zagotoviti skladnost z veljavno mednarodno in lokalno zakonodajo ter notranjimi pravilniki. Nezagotavljanje skladnosti se lahko v skladu z veljavno zakonodajo kaznuje z visokimi denarnimi kaznimi, zapornimi kaznimi, odškodninami in drugimi opomini.

V družbi vaše osebne podatke, ki nam jih posredujete prek službe za pomoč uporabnikom, zbiramo in obdelujemo za naslednje namene:

- Preverjanje verodostojnosti vašega poročila in podatkov, ki jih vsebuje, v izogib morebitnim kršitvam zakonov;
- Preiskovanje domnevnih kršitev (zlasti zgoraj omenjenih) zakonov in pravilnikov;
- Zagotavljanje skladnosti z veljavno zakonodajo;
- Sodelovanje s povezanimi družbami družbe Pfizer v zvezi z njihovimi obveznostmi preiskovanja kršitev;
- Obramba zahtevkov tretjih strank in priprava zahtevkov proti tretjim strankam;
- Razvijanje naše službe za pomoč in preiskovalnih postopkov.

Zbiranje in obdelava informacij in osebnih podatkov

Družba Pfizer lahko prek službe za pomoč zbira in obdeluje naslednje podatke: vaše ime, naziv, položaj in podatke za stik (če poročilo ni anonimno), imena ter druge podatke o posameznikih, ki so zapisani v vašem poročilu, imena in položaji vaših nadrejenih, opis vprašljivega vedenja v vašem poročilu, ki vključuje datum in kraj ter ostale potrebne informacije, prav tako pa tudi vaša preostala vprašanja za družbo Pfizer. Družba Pfizer lahko v kateri koli od naknadnih preiskav zbere informacije tudi od drugih vpletenih. V določenih okoliščinah lahko obdelujemo tudi občutljive podatke, kot so zdravstveni podatki ali članstvo v sindikatu, če nam jih posredujete in/ali če so pomembni za namen preiskave.

Informacije, ki jih boste posredovali, bomo v skladu z veljavnimi zakoni obravnavali zaupno.

V družbi Pfizer lahko uporabimo zgoraj omenjene podatke, ker moramo bodisi izpolniti zakonsko obveznost družbe Pfizer v skladu s (člen 6(1)(c) splošno uredbo EU o varstvu podatkov („GDPR“) bodisi imamo zakonit interes za preiskavo poročila, ki ste nam ga predložili (člen 6(1)(f) GDPR), ali pa imate v skladu s svojo pogodbo o zaposlitvi obveznost poročanja o določenih dogodkih (člen 6(1)(b) GDPR). V zvezi z občutljivimi podatki, kot so zdravstveni podatki ali članstvo v sindikatu (za seznam občutljivih podatkov glejte člen 9(1) GDPR), lahko družba Pfizer podatke uporabi za uveljavljanje, izvajanje ali obrambo pravnih zahtevkov (člen 9(2)(f) GDPR), če je to potrebno zaradi bistvenega javnega interesa, na podlagi prava Unije ali države članice, ki mora biti sorazmerno z zastavljenim ciljem (člen 9(2)(g) GDPR), ali če je to potrebno zaradi javnega interesa na področju javnega zdravja, kot je zagotavljanje visokih standardov kakovosti in varnosti zdravstva in zdravil ali medicinskih pripomočkov na podlagi zakonodaje Unije ali države članice (člen 9(2)(i) GDPR).

Posamezniki, na katere se nanašajo osebni podatki, se ne bodo primorani odločati na osnovi informacij v zvezi s službo za pomoč, ki temeljijo izključno na avtomatizirani obdelavi, vključno z ustvarjanjem profilov (22. člen GDPR).

Delovanje in postopki službe za pomoč

Na vaš klic se bo v službi za pomoč odzval predstavnik družbe NAVEX. Družba NAVEX ne shranjuje podatkov o telefonskih številkah pri dohodnih klicih, kar pomeni, da pri klicu ostanete anonimni. Družba NAVEX prav tako ne snema klicev. Predstavnik vas bo v imenu družbe Pfizer povprašal po različnih informacijah, zabeležil vaše odgovore, zastavil pa vam bo lahko tudi dodatna vprašanja, s katerimi bo še enkrat preveril podane informacije. Predstavnik družbe NAVEX vam ne bo mogel odgovoriti na vprašanja o etičnem ravnanju ali pravilnikih, prav tako pa vam ne bo mogel svetovati glede kakršnih koli ukrepov. Družba NAVEX ne sme odločati o kakršnih koli ukrepih ali preiskavah v zvezi z vašim poročilom. Družba NAVEX sledi navodilom družbe Pfizer. Pri uporabi spletnega orodja za poročanje po spletu se iste informacije zabeležijo elektronsko.

Po oddanem začetnem poročilu ali poizvedbi se pripravi podroben zapis, ki ga družba NAVEX pošlje neposredno službi za skladnost družbe Pfizer. Glede na naravo zadeve bo služba za skladnost v skladu s svojimi obveznostmi glede zaupnosti poročilo in pripadajočo dokumentacijo posredovala ustreznim zaposlenim v družbi Pfizer, ki jih poročilo zadeva, na primer predstavnikom pravne službe, People Experience („PX“) ali revizijske službe, ki bodo zadevo nadalje preiskali in razrešili. Če bomo med potekom preiskave od vas potrebovali dodatne informacije in pojasnila, bomo stopili v neposreden stik z vami. Če bo služba za skladnost odkrila kakršno koli kršitev, bo o tem morala obvestiti tudi zaposlene v službi za izkušnje zaposlenih ali vodstvo družbe Pfizer za določitev disciplinskih ukrepov in zaradi preglednosti. Informacije bodo morda morali deliti tudi z zunanjimi svetovalci družbe Pfizer, na primer z odvetniki ali revizorji, ki bodo morali spoštovati strogo zaupnost informacij. Obvestili vas bomo o napredovanju preiskave in ukrepih po njenem zaključku.

V sklopu preiskave je cilj družbe Pfizer v doglednem času posameznike, ki so vpleteni v poročilo, obvestiti o pritožbah proti njim, pri čemer si bomo prizadevali ohraniti zaupnost vaše identitete. Posamezniki, ki so vpleteni v poročilo, se bodo imeli pravico odzvati nanj. Zavedati se morate, da lahko vaše posredovane informacije privedejo do odločitev, ki bodo vplivale ne zaposlene družbe Pfizer in tretje stranke, vpletene v zadevni dogodek. Prosimo vas, da posredujete samo informacije, ki so po vašem mnenju resnične. Zavestno zavajanje ali podajanje neresničnih informacij lahko privede do disciplinskih ukrepov ali celo do civilne ali kazenske odgovornosti. Če je to mogoče, mora biti pritožba omejena na podatke, ki so pomembni tako za pritožbo kot za nadaljnjo preiskavo.

Maščevanje proti kateremu koli posamezniku, ki poišče nasvet, izrazi pomislek ali poroča o neprimernem ravnanju, proti posameznikom ali subjektom, povezanim s poročevalci, ali osebam, ki jim pri poročanju pomahajo, je strogo prepovedano. Če se posameznik maščuje proti osebi, ki je v dobri veri prijavila kršitev, bo družba Pfizer ustrezno

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ukrepala – tudi če bi se kasneje izkazalo, da se je oseba, ki je poročala o kršitvi, zmotila. Če menite, da ste bili oz. da je bila katera vpletena deležna maščevanja, se obrnite na službo za skladnost (kontaktni podatki so navedeni spodaj).

Uporaba informacij, hranjenje in prenos podatkov

Družba Pfizer je družbo NAVEX, upravljavca podatkov, za katerega veljajo stroge obveznosti do spoštovanja zasebnosti, pooblastila za varovanje zaupnosti in varnosti osebnih podatkov, ki jih bo lahko družba NAVEX uporabila izključno za zagotavljanje službe za pomoč. Informacije, ki jih prejmemo od družbe NAVEX, in vsi osebni podatki, ki nam jih posredujete, bodo shranjeni v zbirki podatkov družbe Pfizer (in v zbirki podatkov naših prodajalcev, ko je to potrebno za pomoč pri preiskavi) z omejenim dostopom.

Če imajo potrebo po seznanitvi, lahko vaše osebne podatke prenesemo našim podružnicam, tudi tistih v drugih državah, kjer veljajo drugačni režimi varovanja podatkov kot v državi, v kateri ste zaposleni, vključno z drugimi podružnicami ali prodajalci družbe Pfizer, ki morajo preiskati poročilo in upravljati službo za pomoč družbe Pfizer. Vaše osebne podatke lahko prenesemo zlasti na službo za skladnost družbe Pfizer, Inc. Upoštevajte, da nekatere države zunaj EGP, vključno z ZDA, po presoji Evropske komisije ne zagotavljajo ustrezno raven zaščite v skladu s standardi EGP. Seznam držav, ki potrjeno zagotavljajo ustrezno raven zaščite, je na voljo tukaj: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/commission/presscorner/detail/en/qanda_18_1117).

Za omogočanje prenosov in zaščite vaših osebnih podatkov v države, ki po presoji Evropske komisije ne zagotavljajo ustrezne ravni varstva podatkov, smo sprejeli ustrezne ukrepe, kot so standardne pogodbene klavzule, ki jih je sprejela Evropska komisija. Kopijo ukrepov lahko prejmete pri lokalni pooblaščenici osebi za varovanje podatkov družbe Pfizer, katere kontaktne podatke najdete na [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Družba Pfizer bo morda dolžna nekatere ali vse vaše osebne podatke posredovati organom pregona ali drugim organom zadevnih držav.

Podatke o poročilu, prejetem prek službe za pomoč, bomo shranili za omejeno obdobje ali po potrebi izbrisali v skladu z naslednjimi merili: po koncu preiskave, ko dodatni ukrepi niso zahtevani, če družba Pfizer po zakonu ni dolžna podatkov hraniti za daljše obdobje; po koncu obdobja vsakršnega pravnega spora, če družba Pfizer po zakonu ni dolžna podatkov hraniti za daljše obdobje; in po koncu veljavnosti naših obveznosti glede hrambe zapisov o preiskavah. Za več informacij preberite veljavni pravilnik družbe, ki zadeva čas hranjenja zapisov. Če imate kakršna koli vprašanja, se posvetujte s službo za skladnost.

Vaše pravice

V skladu s pogoji, določenimi v GDPR in/ali drugih veljavnih zakonih, imate pravico do dostopa do svojih osebnih podatkov (15. člen GDPR), pravico do popravka svojih osebnih podatkov (16. člen GDPR), pravico do izbrisa svojih osebnih podatkov (17. člen GDPR), pravico do omejitve obdelave svojih osebnih podatkov (18. člen GDPR), pravico do prenosljivosti podatkov (20. člen GDPR) in pravico do ugovora zoper obdelavo svojih osebnih podatkov v določenih okoliščinah (21. člen GDPR).

Če želite uveljaviti pravico v skladu z GDPR, se lahko obrnete na pooblaščenico osebo za varstvo podatkov družbe Pfizer (glejte [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Na vašo zahtevo bomo odgovorili v skladu z veljavno zakonodajo.

Prav tako imate pravico kadar koli vložiti pritožbo pri organu za varstvo podatkov, odgovornem za vašo državo ali regijo.

V primeru vprašanj ali pomislekov glede službe za pomoč, nas pokličite na +1-212-733-3026 ali nam pišite na corporate.compliance@pfizer.com ali 66 Hudson Boulevard East, New York, NY 10001, ZDA.

¹V nekaterih državah EU družba Pfizer ponuja tudi lokalne kanale za poročanje. Več informacij o lokalnem poročanju, vključno z obvestilom o zasebnosti lokalnega kanala za poročanje in o informacijah o pomislekih, o katerih jih je mogoče prijaviti prek lokalnega kanala za poročanje, lahko najdete na lokalnem intranetu družbe Pfizer, obrnete pa se lahko tudi na službo za skladnost.

SPAIN

Language: English
Last Updated: Dec 2022

PFIZER, INC.

EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out

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that the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

Information Use, Retention, and Data Transfer

Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](#)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Language: Spanish
Last Updated: Dec 2022

PFIZER, INC.

LÍNEA DE AYUDA AL CUMPLIMIENTO PARA UE/EEE/RU GUÍA Y AVISO DE PRIVACIDAD

Pfizer, Inc. (“Pfizer” o “**nosotros**”), como empresa responsable de sus datos personales, proporciona la Línea de ayuda al cumplimiento de Pfizer (“la Línea de ayuda”). El sitio web y la línea telefónica a través de los cuales usted puede denunciar un incidente son actualmente operados por NAVEX Global UK Limited, una compañía de NAVEX Global Holding, con domicilio social en Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Reino Unido (“NAVEX”), el proveedor de servicios independiente de Pfizer de la Línea de ayuda.

General

El responsable de los datos de la Línea de Ayuda es: Pfizer, Inc., con domicilio social en 66 Hudson Boulevard East, Nueva York, NY 10001 EE. UU.

Puede ponerse en contacto con el Responsable de Protección de Datos de Pfizer a través de los datos de contacto mencionados anteriormente, en la dirección privacy.officer@pfizer.com o en el sitio web DPO.Pfizer.com.

Por lo general, la Línea de Ayuda se puede utilizar para denunciar preocupaciones en un contexto laboral sobre cuestiones relacionadas con la integridad financiera y comercial, como las relacionadas con la contabilidad; controles contables internos; asuntos relacionados con auditorías; el soborno y la corrupción; delitos bancarios y financieros, y violaciones de la legislación de la UE, que incluyen: contratación pública, servicios financieros, productos y mercados, prevención del blanqueo de capitales y financiación del terrorismo, seguridad de los productos, seguridad del transporte, salud pública, protección del medio ambiente, protección del consumidor, infracciones que afecten a los intereses financieros de la UE o estén relacionadas con el mercado interior (por ejemplo, normas sobre la competencia y las ayudas estatales), protección contra las radiaciones y seguridad nuclear, seguridad alimentaria, salud y bienestar animal, y protección de la privacidad, y protección y seguridad de datos. Además de lo anterior, en algunos países puede denunciar otros asuntos. Para obtener más información, consulte nuestra herramienta de denuncias a través de Internet en pfizer.ethicspoint.com.

El uso de la Línea de Ayuda es voluntario¹. Se le anima a que se identifique en el momento de presentar denuncias en la Línea de Ayuda; sin embargo, no está obligado a ello cuando lo permita la legislación aplicable.

Finalidad del Tratamiento de los Datos Personales

La finalidad del tratamiento de los datos personales en relación con la Línea de Ayuda es la de asegurar el cumplimiento de las leyes locales e internacionales y las políticas internas vigentes. Si no garantizamos el cumplimiento, podemos estar sujetos a sanciones elevadas, penas de prisión, responsabilidades y otras amonestaciones, en virtud de las leyes vigentes.

Recopilamos y tratamos su información personal según se nos proporciona a través de la Línea de Ayuda para los siguientes fines:

- Comprobar la verosimilitud de su denuncia y los datos incluidos en la misma, para evitar cualquier infracción de las leyes;

- Investigar las supuestas infracciones de leyes y políticas, concretamente las mencionadas anteriormente;
- Garantizar el cumplimiento de las leyes vigentes;
- Cooperar con los socios de Pfizer con respecto a sus obligaciones de investigación de infracciones;
- Defender las reclamaciones de terceros y preparar reclamaciones contra terceros;
- Desarrollar nuestra Línea de Ayuda y nuestros procesos de investigación.

Recopilación y Tratamiento de Información y Datos Personales

Pfizer puede recopilar y tratar la información siguiente a través de la Línea de Ayuda: tu nombre, cargo, puesto y datos de contacto (salvo que la denuncia sea anónima); el nombre y otros datos sobre las personas mencionadas en tu denuncia; el nombre y el cargo de sus supervisores; una descripción de la conducta de su denuncia, incluida la fecha y el lugar, así como otros datos pertinentes y cualquier pregunta que pueda plantearle a Pfizer. Pfizer también puede recopilar información de otras personas durante cualquier investigación posterior. En algunos casos, también podemos tratar datos sensibles, como datos médicos o afiliaciones sindicales, si nos los proporciona y/o si son relevantes para el propósito de la investigación.

La información que usted facilite se tratará de forma confidencial, de conformidad con las leyes vigentes.

Pfizer puede utilizar la información mencionada anteriormente porque debemos cumplir alguna obligación legal que se haya impuesto a Pfizer [artículo 6(1)(c) del Reglamento General de Protección de Datos (“RGPD”) de la UE] o porque tengamos un interés legítimo para investigar la denuncia que usted nos haya presentado (artículo 6(1)(f) del RGPD) o porque tengamos alguna obligación en virtud de su contrato de trabajo de comunicar ciertos incidentes (artículo 6(1)(b) del RGPD). Con respecto a datos sensibles, como los datos de salud o afiliaciones sindicales (consulta la lista de datos personales sensibles en el artículo 9(1) del RGPD), Pfizer puede usar la información para el establecimiento, ejercicio o defensa de reclamaciones legales (artículo 9(2)(f) del RGPD) en caso de que sea necesario por razones de interés público sustancial, sobre la base del Derecho de la Unión o de los Estados Miembros, que deberá ser proporcional al objetivo perseguido (artículo 9(2)(g) del RGPD), o si es necesario por motivos de interés público en materia sanitaria, como la garantía de rigurosos estándares de calidad y seguridad de la atención sanitaria o de los productos o dispositivos médicos en función de la legislación de la Unión o del Estado Miembro (artículo 9(2)(i) del RGPD).

No someteremos a los interesados a decisiones basadas únicamente en tratamiento automático, incluida la creación de perfiles, con relación a la Línea de Ayuda (artículo 22 del RGPD).

Funcionamiento y Procesos de la Línea de Ayuda

Cuando llame a la Línea de Ayuda le responderá un representante de NAVEX. NAVEX no guarda el número de teléfono de las llamadas entrantes, por lo que la información de la llamada será anónima. NAVEX tampoco graba las llamadas. El representante le podrá solicitar, en nombre de Pfizer, varios datos, documentará su aportación y le podrá plantear preguntas de seguimiento para aclarar algunos datos. Tenga en cuenta que el representante de NAVEX no podrá responder a ninguna pregunta sobre ética ni políticas, y no podrá aconsejarle sobre cómo actuar. NAVEX no decidirá ningún curso de acción ni investigación en relación con tu denuncia. NAVEX seguirá las instrucciones proporcionadas por Pfizer. Si opta por utilizar la herramienta de denuncias a través de Internet, registraremos la misma información en formato electrónico.

Tras la denuncia o consulta inicial, NAVEX preparará y enviará un informe detallado directamente al Departamento de Cumplimiento de Pfizer. En función de la naturaleza del asunto y conforme a sus obligaciones de confidencialidad, la División de Cumplimiento puede hacer llegar la denuncia y la documentación pertinente al personal correspondiente de Pfizer que deba ser informado, por ejemplo, representantes de los departamentos Legal, People Experience (“PX”), o Auditoría, a fin de que continúen investigando y lleguen a una resolución. Es

posible que necesitemos información adicional y aclaraciones de tu parte a medida que avance la investigación, en cuyo caso nos pondremos en contacto contigo directamente. Cuando sea necesario, es posible que la División de Cumplimiento también tenga que informar a miembros de PX o a la dirección de Pfizer en caso de descubrir un incumplimiento al determinar las medidas disciplinarias necesarias y mantener los objetivos de transparencia. La información también se podrá compartir con asesores externos de Pfizer, como abogados o auditores, que tienen la obligación de mantener la confidencialidad. Le informaremos sobre el progreso de la investigación y las acciones tomadas después del resultado de la investigación.

En el marco de la investigación, Pfizer pretende informar a cada persona implicada en una denuncia acerca de las acusaciones en su contra en un plazo de tiempo apropiado, pero procurará no divulgar su identidad. Las personas implicadas tendrán derecho a reaccionar ante la información que haya proporcionado. Tenga en cuenta que la información que proporcione puede tener como resultado decisiones que afecten a personas de Pfizer y a terceros relacionados en dicho incidente. Por lo tanto, rogamos que proporcione únicamente la información que, a su leal saber y entender, sea precisa. Proporcionar deliberadamente información inexacta o engañosa puede tener como resultado acciones disciplinarias o incluso incurrir en responsabilidades civiles o penales. Además, siempre que sea posible, cualquier denuncia debe limitarse a hechos relevantes para dicha denuncia y para la investigación de seguimiento.

Está estrictamente prohibido tomar represalias contra cualquier persona que busque consejo, plantee una preocupación o denuncie una irregularidad y contra mediadores, individuos o entidades relacionados con los denunciados. Si alguien toma represalias contra una persona que ha informado sinceramente acerca de un incumplimiento, Pfizer adoptará las medidas correspondientes; incluso si después resulta que la persona estaba equivocada al informar del asunto en primer lugar. Si cree que se han tomado represalias contra usted o cualquier otra persona involucrada, debe ponerse en contacto con la División de Cumplimiento (información de contacto a continuación).

Uso de la información, conservación y transferencia de datos

Pfizer ha contratado a NAVEX, una empresa de tratamiento de datos, en virtud de estrictas obligaciones de confidencialidad, para proteger la confidencialidad y seguridad de sus datos personales y solo podrá utilizarlos para la gestión de la Línea de Ayuda. La información que recibamos de NAVEX y cualquier dato personal que nos proporcione se almacenará en una base de datos de Pfizer (y en la base de datos de nuestros proveedores, cuando deban ayudarnos con la investigación) con acceso limitado.

Podemos transferir sus datos personales a nuestros afiliados si estos tienen la necesidad de conocerlos, incluido a países que tengan leyes de protección de datos distintas a las del país en el que trabaja, así como a otros afiliados o proveedores de Pfizer, según sea preciso para investigar la denuncia y administrar la Línea de Ayuda. Concretamente, podemos transferir sus datos personales al Departamento de Cumplimiento de Pfizer, Inc. Tenga en cuenta que la Comisión Europea no reconoce que algunos de los países no pertenecientes al EEE, incluidos los Estados Unidos, proporcionen un nivel de protección adecuado según las normas del EEE. Los países a los que se les reconoce un nivel de protección adecuado están disponibles aquí: [Adequacy decisions \(europa.eu\)](https://eudatascene.eu/).

Hemos implementado medidas adecuadas, como las cláusulas contractuales estándar adoptadas por la Comisión Europea para permitir la transferencia y protección de sus datos personales a países que no están reconocidos por la Comisión Europea como proveedores de un nivel adecuado de protección de datos. Puede obtener una copia de estas medidas poniéndose en contacto con el responsable de protección de datos de Pfizer, cuyos datos de contacto están disponibles en [DPO.Pfizer.com](https://www.pfizer.com/privacy).

Pfizer también puede estar obligado a transferir la totalidad o parte de sus datos personales a las fuerzas del orden, las autoridades policiales u otras autoridades de los países en cuestión.

La información relacionada con una denuncia realizada a través de la Línea de ayuda se archivará durante un período limitado, según sea necesario, o se eliminará según los siguientes criterios: cuando la investigación se haya cerrado y no se vayan a realizar más acciones, salvo que Pfizer esté legalmente obligado a conservar los datos durante un período más largo; cuando haya transcurrido el plazo para cualquier litigio relevante salvo que Pfizer

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esté legalmente obligado a conservar los datos durante un período más largo y cuando hayan finalizado nuestras obligaciones de mantenimiento de registros relacionadas con las investigaciones. Para más información, consulte la política corporativa aplicable en materia de retención de registros. Si tiene alguna pregunta, póngase en contacto con la División de Cumplimiento.

Sus derechos

Sujeto a las condiciones establecidas en el RGPD u otras leyes vigentes, tiene derecho a acceder a sus datos personales (artículo 15 del RGPD), a rectificarlos (artículo 16 del RGPD), a borrarlos (artículo 17 del RGPD), a limitar su tratamiento (artículo 18 del RGPD), a su portabilidad (artículo 20 del RGPD) y a oponerle a su tratamiento en ciertos casos (artículo 21 del RGPD).

Si desea ejercer algún derecho en virtud del RGPD, puede ponerse en contacto con el Responsable de protección de datos de Pfizer (consulta [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Responderemos a su solicitud de conformidad con la legislación vigente.

También tiene derecho en todo momento a presentar una queja ante una autoridad de protección competente en su país o región.

Si tiene alguna pregunta o preocupación en relación con la propia Línea de Ayuda, póngase en contacto con nosotros a través de los siguientes datos: +1-212-733-3026, corporate.compliance@pfizer.com o 66 Hudson Boulevard East, Nueva York, NY 10001 EE. UU.

¹En algunos países de la UE, Pfizer también ofrece canales de denuncias locales. Para obtener más información sobre las denuncias locales, incluido el aviso de privacidad del canal de denuncias local y lo que se puede denunciar a través de este canal de denuncias local, consulte la intranet de Pfizer local o póngase en contacto con la División de Cumplimiento.

SWEDEN

Language: English
Last Updated: Dec 2022

PFIZER, INC. EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

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General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

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the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact the Compliance Division (contact information below).

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Pfizer has contracted with NAVEX, a data processor, under strict obligations of confidentiality to protect the confidentiality and security of your personal data, and NAVEX is only permitted to use your personal data for the provision of the Helpline. Information we receive from NAVEX and any personal data that you provide to us will be stored in a Pfizer database (and in our vendors' database, when required to assist us with the investigation) with limited access.

We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/eu-justice/justice-portal/pages/adequacy-decisions.jsp).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](https://www.pfizer.com/dpo)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Language: Swedish
Last Updated: Dec 2022

PFIZER, INC.

HJÄLPLINJEN FÖR EFTERLEVAD I EU/EEA/UK VÄGLEDNING OCH SEKRETESSMEDDELANDE

Pfizers hjälplinje för efterlevnad ("hjälpplinjens") tillhandahålls av Pfizer, Inc. ("Pfizer", "vi", eller "oss") som är ett företag med ansvar för dina personuppgifter. Webbplatsen och telefonlinjen via vilka du kan rapportera en incident drivs för tillfället av NAVEX Global UK Limited, ett globalt holdingbolag inom NAVEX, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom ("NAVEX"), Pfizer:s oberoende tjänsteleverantör för hjälplinjen.

Allmänt

Uppgiftsansvarig för hjälplinjen är: Pfizer, Inc. 66 Hudson Boulevard East., New York, NY 10001 USA

Du kan kontakta Pfizers dataskyddsombud med hjälp av kontaktuppgifter ovan eller via privacy.officer@pfizer.com eller DPO.Pfizer.com.

Hjälpplinjens kan i allmänhet användas för att rapportera problem i ett arbetsrelaterat sammanhang om ekonomiska frågor och affärsintegritet, sådana som gäller redovisning, internredovisning, revision, bekämpning av mutor och korruption, bank- och finansbrott och brott mot EU-rätt, inklusive: offentlig upphandling, finansiella tjänster, produkter och marknader, förebyggande av penningtvätt och finansiering av terrorism, produktsäkerhet, transportsäkerhet, folkhälsa, miljöskydd, konsumentskydd, överträdelser som påverkar EU:s ekonomiska intressen eller den inre marknaden (t.ex. regler om konkurrens och statligt stöd), strålskydd och kärnsäkerhet, livsmedelssäkerhet, djurs hälsa och välbefinnande samt skydd av privatliv, dataskydd och datasäkerhet. Utöver vad som anges ovan kan ytterligare ärenden rapporteras i vissa länder. Se webbrapporteringsverktyget på pfizer.ethicspoint.com för mer information.

Användningen av Hjälpplinjens är helt frivillig¹. Du uppmanas att identifiera dig när du lämnar rapporter via Hjälpplinjens i de fall du tillåts göra det enligt gällande lag.

Syfte för behandling av personuppgifter

Syftet för behandling av personuppgifter i samband med hjälplinjen är att säkerställa efterlevnad av tillämpliga internationell och nationell lag och intern policy. Om vi inte kan garantera efterlevnad kan vi bli ålagda höga straffavgifter, frihetsberövande, och andra åtgärder enligt gällande lag.

Vi samlar in och behandlar dina personuppgifter som lämnas till oss genom hjälplinjen för följande syften:

- Kontroll av rimligheten för din rapport och de uppgifter den innehåller, för att undvika överträdelse av någon lag.
- Utredning av anklagelser om överträdelse av lag eller policy, specifikt de som nämns ovan.
- Fastställande av efterlevnad av gällande lag,
- Samverkan med Pfizers samarbetsparter gällande deras skyldighet att utreda överträdelser.
- Försvaret av tredje parts anspråk och förberedelse av anspråk gentemot tredje part.
- Utveckling av vår hjälplinje och utredningsprocesser.

Insamling och behandling av uppgifter och personuppgifter

Pfizer kan samla in och behandla följande uppgifter genom Hjälpplinjens: ditt namn, titel och kontaktuppgifter, namn och andra uppgifter om personer som nämns i din rapportering, en beskrivning av gällande problem i din rapport, inklusive datum och plats, såväl som annan relevant information samt frågor du ställer till Pfizer. Pfizer kan också komma att samla in uppgifter från andra parter under utredningen som följer. Under vissa omständigheter kan vi även behandla känsliga data, till exempel hälsouppgifter, fackligt medlemskap, om du lämnar sådana till oss och/eller om de är relevanta för utredningssyfte.

Uppgifter som du lämnar behandlas konfidentiellt och enligt gällande lag.

Pfizer kan använda uppgifter som nämns ovan antingen på grund av att vi måste följa rättsliga krav på Pfizer (Artikel 6(1)(c) i EU:s allmänna dataskyddsdirektiv ("GDPR") eller på grund av vårt legitima intresse av att utreda rapporten som du har lämnat (GDPR Artikel 6(1)(f)) eller att du genom ditt anställningsavtal är skyldig att rapportera vissa incidenter (GDPR Artikel 6(1)(b)). Beträffande känsliga data, exempelvis hälsouppgifter, fackligt medlemskap (se GDPR Art. 9(1) för förteckning av känsliga uppgifter) kan Pfizer använda uppgifterna för etablering, verkställande eller försvar av rättsliga anspråk (GDPR Art. 9(2)(f)) om det krävs av orsaker som betydande allmänintresse, på grund av fackförening eller medlemsstats lag vilket skall vara proportionerligt för syftet (GDPR Art. 9(2)(g)) eller om det är nödvändigt av orsaker till allmänintresse inom området folkhälsa, såsom att säkerställa höga krav på kvalitet och säkerhet i hälso- och sjukvård och för läkemedel eller medicinteknisk utrustning enligt fackförening eller medlemsstats lag (GDPR Art. 9(2)(i)).

Vi utsätter inte registrerade personer för beslut baserade på automatisk behandling, inklusive profilering, i samband med hjälpplinjens (GDPR Art. 22)

Hjälpplinjens funktionssätt och processer

En representant från NAVEX besvarar ditt samtal till Hjälpplinjens. NAVEX registrerar inte telefonnumret för inkommande samtal och din samtalsinformation förblir anonym. NAVEX spelar inte heller in samtalen. Representanten kommer å Pfizers vägnar att efterfråga flertalet uppgifter och ställa uppföljningsfrågor för att klargöra och dokumentera ditt budskap. Observera att NAVEX-representanten inte kan svara på frågor om etik eller policy och kan inte ge dig råd om hur du ska agera. NAVEX har inte rätt att besluta om några åtgärder eller utredningar med anknytning till din rapport. NAVEX följer de instruktioner som Pfizer ger. Om du väljer att använda webbrapporteringsverktyget kommer samma uppgifter att samlas in elektroniskt.

Efter det att den första rapporten eller undersökningen gjorts kommer en detaljerad dokumentation att upprättas och skickas från NAVEX direkt till Pfizers Compliance Division. Beroende på vilken typ av ärende det gäller, och i enlighet med skyldigheter till konfidentiell hantering, kan Compliance Division förmedla rapporten och tillhörande dokument till Pfizer-personal som kan behöva informeras, till exempel företrädare för den juridiska avdelningen, People Experience ("PX") eller revisionsfunktion för vidare utredning och lösning av problemet. Vi kan behöva ytterligare information och förtydliganden från dig i den fortsatta utredningen, och kontakter dig i sådant fall direkt. Vid behov kan Compliance Division också meddela medlemmar av PX eller chefer inom Pfizer om eventuella överträdelser i syfte att fastställa disciplinära åtgärder och för transparensändamål. Informationen kan även utlämnas till Pfizers externa rådgivare, till exempel advokater eller revisorer. Vi kommer att informera dig om vad som händer med utredningen och de åtgärder som vidtagits på grund av utredningens resultat.

Som en del av utredningen är Pfizers avsikt att inom lämplig tidsram informera varje person som är inblandad i en rapport om anklagelserna mot honom eller henne och samtidigt sträva efter att inte avslöja din identitet. Inblandade personer har rätt att invända mot den information du rapporterat in. Observera att den information du tillhandahåller kan leda till beslut som påverkar personer inom Pfizer och tredje parter som är inblandade i händelsen. Därför ber vi dig att endast lämna information som, så vitt du vet, är korrekt. Att avsiktligt lämna felaktig eller vilseledande information kan resultera i disciplinära åtgärder eller civil- eller straffrättsligt ansvar. Dessutom bör en rapport, om möjligt, begränsas till fakta som är av relevans för rapporten och den efterföljande undersökningen.

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Repressalier mot någon person som ber om råd, tar upp ett problem eller tjänstefel, eller mot handledare, personer eller aktörer som har anknytning till rapporterande personer, är strängt förbjudet. Om någon utsätter en person, som sanningsenligt har rapporterat en överträdelse, för repressalier, vidtar Pfizer lämpliga åtgärder – även om det senare visar sig att personen hade misstagit sig i den fråga som ursprungligen rapporterades. Om du tror att du, eller någon annan involverad, har blivit utsatt för repressalier ska du kontakta Compliance Division (kontaktuppgifter ges nedan).

Användning, bevarande och överföring av uppgifter

Pfizer har ingått ett avtal med NAVEX, en databehandlare, om att under strikt sekretess tillvarata integriteten och säkerheten för dina personuppgifter och NAVEX har endast tillåtelse att använda dina personuppgifter i syfte att tillhandahålla Hjälpplinjén. Information som vi mottar från NAVEX samt andra personuppgifter som du lämnar lagras i en Pfizer-databas (och i vår leverantörs databas om det krävs för att bistå oss i en utredning) med begränsade åtkomsträttigheter.

Vi kan överföra dina personuppgifter till våra samarbetsparter om de har behov av dem, inklusive till länder som har andra dataskyddslagar än de som gäller i ditt land, inklusive till Pfizers dotterbolag eller leverantörer om det behövs för att utreda rapporter och administrera Hjälpplinjén. Vi kan, specifikt, överföra dina personuppgifter till efterlevnadsfunktionen inom Pfizer Inc. Lägga märke till att vissa av länderna som inte ingår i EEG, inklusive USA, inte av Europakommissionen betraktas som upprätthållande en adekvat nivå av dataskydd enligt EEG-standard. Länder som anses ge en adekvat skyddsnivå finns här: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/justice/data-protection/unitary/adequacy-decisions/).

Vi tillämpar adekvata åtgärder, exempelvis Europakommissionens standardklausuler för tillåtande av överföring och skydd av dina personuppgifter till länder som inte av Europakommissionen betraktas som länder där en adekvat dataskyddsnivå tillämpas. Du kan få en kopia av dessa åtgärder genom att kontakta ditt lokala dataskyddsombud hos Pfizer, vars kontaktuppgifter finns på [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer kan också vara skyldigt att överföra vissa av dina personuppgifter till brottsbekämpande organ eller andra myndigheter i relevanta länder.

Information som är relaterad till rapporter som görs via Hjälpplinjén kommer att arkiveras eller raderas baserat på följande omständigheter: när utredningen har avslutats och inga vidare åtgärder krävs, utom om Pfizer enligt lag är skyldigt att bevara uppgifterna under längre tid, när tidsperioden för en aktuell rättsprocess har gått ut samt när våra skyldigheter gällande lagring av uppgifter som är relaterade till utredningar har uppfyllts. För mer information, läs igenom gällande företagspolicy om bevarande av information. Kontakta Compliance Division om du har några frågor.

Dina rättigheter

I enlighet med GDPR och andra gällande lagar har du rätt att ta del av dina personuppgifter (GDPR Art. 15), att rätta dina personuppgifter (GDPR Art. 16), att få dina uppgifter raderade (GDPR Art. 17), att begränsa behandlingen av dina personuppgifter (GDPR Art. 18), till dataportabilitet (GDPR Art. 20) och att invända mot behandlingen av dina personuppgifter under vissa omständigheter (GDPR Art. 21).

Om du vill verkställa en rättighet enligt GDPR kan du kontakta Pfizer:s dataskyddsombud (se [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Vi kommer att svara på din begäran i enlighet med gällande lagstiftning.

Du har alltid rätt att lämna in klagomål till en behörig tillsynsmyndighet för ditt land eller region.

Om du har frågor eller funderingar om Hjälpplinjén, kontakta oss på +1 212 733-3026, corporate.compliance@pfizer.com eller 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ I vissa EU-länder erbjuder Pfizer även lokala rapporteringskanaler. Mer information om lokal rapportering, inklusive meddelande om sekretess för rapporteringskanal och vad som kan rapporteras via den lokala rapporteringskanalen finns på Pfizer:s lokala intranät eller kan beställas hos Compliance Division.

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Language: English
Last Updated: Dec 2022

PFIZER, INC.

EU/EEA/UK COMPLIANCE HELPLINE GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

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The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

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- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
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We may transfer your personal data to our affiliates if they have a need to know, including to countries that have different data protection rules than are found in the country where you work, including to other Pfizer affiliates or vendors, as required to investigate the report and administer the Helpline. We may, in particular, transfer your personal data to the Compliance Department of Pfizer, Inc. Note that some of the non-EEA countries, including the USA, are not recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available here: [Adequacy decisions \(europa.eu\)](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to permit transfer and protection of your personal data to countries which are not recognized by the European Commission as providing an adequate level of data protection. You may obtain a copy of these measures by contacting Pfizer's Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](#).

Pfizer may also be obliged to transfer certain or all of your personal data to law enforcement agencies or authorities or other authorities of the relevant countries.

Information relating to a report made via the Helpline will be archived for a limited period of time, as necessary, or deleted based on the following criteria: when the investigation has been closed and no further action is needed unless Pfizer is required by law to retain the data for a longer period; when the time period for any relevant litigation has lapsed unless Pfizer is required by law to retain the data for a longer period; and when our obligations for record keeping relating to investigations has lapsed. Please refer to the applicable corporate policy on record retention for more detail. If you have any questions, please contact the Compliance Division.

Your Rights

Subject to the conditions laid down in the GDPR and/or other applicable laws, you have the right to access your personal data (Article 15 GDPR), the right to rectify your personal data (Article 16 GDPR), the right to have your personal data erased (Article 17 GDPR), the right to restrict the processing of your personal data (Article 18 GDPR), right to data portability (Article 20 GDPR), and the right to object to the processing of your personal data under certain circumstances (Article 21 GDPR).

If you would like to exercise a right under the GDPR, you may contact Pfizer's Data Protection Officer (see [DPO.Pfizer.com](#)). We will respond to your request in accordance with applicable law.

You also have the right at all times to lodge a complaint with a data protection authority competent for your country or region.

If you have any questions or concerns related to the Helpline itself, please contact us at +1-212-733-3026, corporate.compliance@pfizer.com, or 66 Hudson Boulevard East, New York, NY 10001 USA.

¹ In certain EU countries, Pfizer also offers local reporting channels. For more information on local reporting, including the local reporting channel privacy notice and what can be reported via the local reporting channel, please consult the local Pfizer intranet, or contact the Compliance Division.

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Language: French
Last Updated: Dec 2022

PFIZER, INC.

EU/EEU/UK COMPLIANCE HELPLINE

GUIDE ET DECLARATION DE CONFIDENTIALITE

La Compliance Helpline de Pfizer, (la « Helpline ») est fournie par Pfizer, Inc. (« Pfizer », « nous » ou « notre ») en tant qu'entreprise responsable de vos données personnelles. Le site Web et la ligne téléphonique par le biais desquels vous pouvez signaler un incident sont exploités actuellement par NAVEX Global UK Limited, filiale de NAVEX Global Holding, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Royaume-Uni (« NAVEX »), prestataire indépendant de Pfizer qui fournit la Helpline.

Généralités

Le responsable du traitement des données de la Helpline est : Pfizer, Inc., 66 Hudson Boulevard East, New York, NY 10001 États-Unis.

Vous pouvez contacter le délégué à la protection des données de Pfizer à l'adresse ci-dessus, par e-mail à privacy.officer@pfizer.com ou sur DPO.Pfizer.com.

La Helpline peut généralement être utilisée pour signaler des préoccupations professionnelles concernant des problèmes d'intégrité financière et commerciale, tels que ceux liés à la comptabilité, aux contrôles comptables internes, aux audits, à la corruption, à la criminalité bancaire et financière et aux violations de la législation européenne, notamment en ce qui concerne les marchés publics, les services, produits et marchés financiers, la prévention du blanchiment d'argent et du financement du terrorisme, la sécurité des produits, la sécurité des transports, la santé publique, la protection de l'environnement, la protection des consommateurs, les violations portant atteinte aux intérêts financiers de l'UE ou relatives au marché intérieur (par ex, les règles relatives à la concurrence et aux aides d'État), la radioprotection et la sûreté nucléaire, la sécurité alimentaire, la santé et le bien-être des animaux, ainsi que la protection de la vie privée, la protection des données et la sécurité des données. Dans certains pays, vous pouvez également signaler d'autres problèmes. Pour plus d'informations, consultez notre outil de signalement en ligne sur pfizer.ethicspoint.com.

L'utilisation de la Helpline est volontaire¹. Vous êtes encouragé à vous identifier lorsque vous contactez la Helpline, mais vous n'êtes pas obligé de le faire lorsque cela est prévu par la législation en vigueur.

Finalité du traitement des données personnelles

La finalité du traitement des données personnelles en relation avec la Helpline est d'assurer le respect des lois internationales et locales applicables et des politiques internes. Si nous n'assurons pas la conformité, nous nous exposons à de lourdes amendes, à des peines d'emprisonnement, à des mises en cause et à d'autres conséquences préjudiciables, en fonction des lois applicables.

Nous collectons et traitons vos informations personnelles qui nous sont fournies via la Helpline aux fins suivantes :

- Vérifier la crédibilité de votre signalement et des données qu'il contient, afin d'éviter toute infraction aux lois,

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- Enquêter sur les prétendues violations des lois et des politiques, en particulier celles mentionnées ci-dessus,
- Assurer le respect des lois applicables,
- Coopérer avec les sociétés affiliées de Pfizer dans le cadre de leurs obligations d'enquêter sur les infractions,
- Assurer la défense contre les recours de tiers et préparer des recours contre des tiers,
- Développer notre Helpline et nos processus d'enquête.

Collecte et traitement des informations et données personnelles

Pfizer peut collecter et traiter les informations suivantes via la Helpline : vos nom, titre, poste et coordonnées (sauf si le signalement est anonyme), le nom des personnes citées dans votre signalement et d'autres données les concernant, le nom et le poste de vos supérieurs, une description du comportement douteux signalé, y compris la date et le lieu, ainsi que toute autre information pertinente, ainsi que toute question que vous pourriez poser à Pfizer. Pfizer peut aussi recueillir des informations de tiers lors d'une enquête résultant du rapport. Dans certaines circonstances, nous pourrions également traiter des données sensibles, telles que des données de santé ou l'appartenance à un syndicat, si vous nous les fournissez et/ou si elles sont utiles à l'enquête.

Les informations que vous fournissez seront traitées de manière confidentielle, conformément aux lois applicables.

Pfizer pourrait utiliser les informations susmentionnées soit pour respecter une obligation légale à laquelle Pfizer est soumis (article 6, paragraphe 1, point c) du Règlement général sur la protection des données de l'UE (« RGPD »), soit parce que nous avons un intérêt légitime à enquêter sur le signalement que vous nous avez soumis (article 6, paragraphe 1, point f) du RGPD), ou vous pourriez avoir l'obligation, en vertu de votre contrat de travail, de signaler certains incidents (article 6, paragraphe 1, point b) du RGPD). Concernant les données sensibles, telles que les données de santé, l'appartenance à un syndicat (pour une liste des données sensibles, Cf. article 9, paragraphe 1, du RGPD), Pfizer pourrait utiliser les informations pour la constatation, l'exercice ou la défense de droits en justice (article 9, paragraphe 2, point f) du RGPD) si cela est nécessaire pour des motifs d'intérêt public important, sur la base du droit de l'Union ou du droit d'un État membre qui doit être proportionné à l'objectif poursuivi (article 9, paragraphe 2, point g) du RGPD), ou si le traitement est nécessaire pour des motifs d'intérêt public dans le domaine de la santé publique, notamment aux fins de garantir des normes élevées de qualité et de sécurité des soins de santé et des médicaments ou des dispositifs médicaux, sur la base du droit de l'Union ou du droit de l'État membre (article 9, paragraphe 2, point i) du RGPD).

Nous ne soumettrons pas les personnes concernées à des décisions fondées uniquement sur un traitement automatisé, y compris au profilage, en relation avec la Helpline (article 22 du RGPD).

Fonctionnement et processus de la Helpline

Tout appel sur la Helpline sera traité par un représentant de NAVEX. NAVEX n'enregistre pas le numéro de téléphone des appels entrants afin que vos coordonnées téléphoniques restent anonymes. NAVEX n'enregistre pas non plus les appels. Le représentant pourrait vous demander plusieurs éléments d'information pour le compte de Pfizer, et il documentera votre appel et vous posera des questions afin de clarifier les informations. Notez que le représentant de NAVEX n'est pas en mesure de répondre aux questions d'éthique ou de procédure, et ne peut vous conseiller sur la ligne de conduite à adopter. NAVEX ne peut pas décider des actions ou enquêtes à entreprendre en lien avec votre signalement. NAVEX suit les instructions données par Pfizer. Si vous optez pour l'outil de signalement Web, les mêmes informations sont saisies électroniquement.

Une fois la demande ou le signalement effectués, NAVEX prépare un dossier détaillé et l'envoie directement à la Division Compliance de Pfizer. Selon la nature du problème, et conformément à ses obligations de confidentialité,

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la Division Compliance peut transmettre le signalement et la documentation liée au personnel compétent de Pfizer devant être informé, comme les représentants des services juridique, People Experience (« **PX** ») ou Audit, pour une enquête plus approfondie. Nous pourrions avoir besoin d'informations supplémentaires ou de clarifications de votre part au fur et à mesure que l'enquête avance, auquel cas nous vous contacterons directement. Si besoin, la Division Compliance peut également informer les membres du service PX ou les dirigeants de Pfizer de toute constatation de violation afin de déterminer d'éventuelles mesures disciplinaires et à des fins de transparence. Les informations peuvent également être partagées avec les conseillers externes de Pfizer, tels que les avocats ou les auditeurs qui sont tenus de les tenir strictement confidentielles. Nous vous informerons de l'état d'avancement de l'enquête et des mesures prises suite aux conclusions de l'enquête.

Dans le cadre de l'enquête, Pfizer a l'intention d'informer en temps voulu chaque personne impliquée dans un signalement sur les accusations la concernant, tout en évitant de dévoiler votre identité. Les personnes impliquées auront le droit de répondre aux informations que vous rapportez. Veuillez noter que les informations que vous fournissez peuvent engendrer des décisions affectant des salariés de Pfizer ou d'autres tierces parties impliquées dans l'incident en question. Ainsi, nous vous remercions de n'indiquer que les informations qui, à votre connaissance, sont exactes. Fournir sciemment des informations inexactes ou erronées peut donner lieu à des mesures disciplinaires, voire à une responsabilité civile ou pénale. De plus, dans la mesure du possible, tout rapport doit se limiter à l'exposition de faits pertinents au rapport et à l'enquête en résultant.

Les représailles contre toute personne recherchant des conseils, soulevant un problème ou signalant une faute professionnelle, ou contre tout conseiller, personne physique ou entité liés à cette personne, sont strictement interdites. Pfizer prendra les mesures nécessaires en cas de représailles à l'encontre d'une personne qui aurait signalé une infraction en toute sincérité, même s'il s'avère par la suite que cette personne s'est trompée lorsqu'elle a signalé le problème. Si vous pensez que vous-même, ou une autre personne concernée, avez fait l'objet de représailles, contactez la Division Compliance (coordonnées ci-dessous).

Conservation des informations, rétention et transfert de données

Pfizer a engagé NAVEX, un sous-traitant soumis à des obligations de confidentialité strictes, pour assurer la confidentialité et la sécurité de vos données personnelles et NAVEX est la seule entité autorisée à utiliser vos données personnelles dans le cadre de la Helpline. Les informations que nous recevons de NAVEX et toutes les données personnelles que vous nous fournissez sont stockées dans une base de données Pfizer (et dans la base de données de nos prestataires, si nécessaire pour nous aider à mener l'enquête) dont l'accès est limité.

Nous pourrions transférer vos données personnelles vers nos sociétés affiliées qui ont un besoin d'en connaître, y compris vers des pays qui ont des règles de protection des données différentes de celles du pays dans lequel vous travaillez, notamment avec les autres filiales ou fournisseurs Pfizer, pour les besoins de l'enquête et la gestion de la Helpline. Nous pourrions notamment transférer vos données personnelles au service Compliance de Pfizer, Inc. Remarque : certains des pays non membres de l'EEE, y compris les États-Unis, ne sont pas reconnus par la Commission européenne comme offrant un niveau de protection adéquat selon les normes de l'EEE. La liste des pays reconnus comme offrant un niveau de protection adéquat est disponible ici : [Adequacy decisions \(europa.eu\)](https://eudataprivacy.europa.eu/).

Nous avons mis en place des mesures adéquates, telles que des clauses contractuelles types adoptées par la Commission européenne pour protéger vos données personnelles et permettre leur transfert vers des pays qui ne sont pas reconnus par la Commission européenne comme offrant un niveau adéquat de protection des données. Vous pouvez obtenir une copie de ces mesures en contactant le délégué à la protection des données de Pfizer, dont les coordonnées sont disponibles sur [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Pfizer pourrait également être tenu de transférer tout ou partie de vos données personnelles à la police, à la justice ou à d'autres autorités des pays concernés.

Les informations concernant un signalement effectué via la Helpline seront archivées pendant une durée limitée, si nécessaire, ou supprimées selon les critères suivants : une fois l'enquête close et si aucune autre mesure n'est nécessaire à moins que Pfizer ait l'obligation légale de conserver les données pendant plus longtemps ; à la fin du

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délai de prescription à moins que Pfizer ait l'obligation légale de conserver les données pendant plus longtemps ; et lorsque nos obligations de tenue de registres relatives aux enquêtes ont expiré. Pour plus de détails, veuillez consulter la Politique de l'entreprise en vigueur sur la conservation des registres. Si vous avez des questions, veuillez consulter la division Conformité.

Vos droits

Sous réserve des conditions prévues par le RGPD et/ou d'autres lois applicables, vous avez le droit d'accéder à vos données personnelles (article 15 du RGPD), le droit de rectifier vos données personnelles (article 16 du RGPD), le droit d'obtenir l'effacement de votre données personnelles (article 17 du RGPD), le droit à la limitation du traitement de vos données personnelles (article 18 du RGPD), le droit à la portabilité des données (article 20 du RGPD) et, le droit de vous opposer au traitement de vos données personnelles dans certains cas (article 21 du RGPD).

Si vous souhaitez exercer un droit en vertu du RGPD, vous pouvez contacter le délégué à la protection des données de Pfizer (Cf. [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Nous répondrons à votre demande conformément au droit applicable.

Vous avez aussi le droit d'introduire une réclamation à tout moment auprès de l'autorité compétente en charge de la protection des données dans votre pays ou région.

Pour toute question ou remarque concernant la Helpline, veuillez nous contacter au +1 212 733 3026, à l'adresse corporate.compliance@pfizer.com, ou à 66 Hudson Boulevard East, New York, NY 10001, États-Unis.

¹Dans certains pays de l'UE, Pfizer propose également des canaux de signalement local. Pour plus d'informations sur le signalement local, y compris pour consulter la Déclaration de confidentialité du canal de signalement local et ce qui peut être signalé via le canal de signalement local, veuillez consulter l'intranet local de Pfizer ou contacter la division Compliance.

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Last Updated: Dec 2022

PFIZER, INC.

COMPLIANCE-HELPLINE FÜR EU/EWR/VEREINIGTES KÖNIGREICH ANLEITUNG UND DATENSCHUTZHINWEIS

Die Pfizer Compliance-Helpline (die Helpline) wird von Pfizer, Inc. („Pfizer“, „**wir**“ oder „**uns**“) als ein für Ihre personenbezogenen Daten verantwortliches Unternehmen zur Verfügung gestellt. Die Website und die Telefonnummer, über die Sie einen Vorfall melden können, wird derzeit von der NAVEX Global UK Limited, einer Tochtergesellschaft der NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG Vereinigtes Königreich (NAVEX), betrieben, Pfizers unabhängigem Dienstleistungsanbieter der Helpline.

Allgemein

Der Verantwortliche der Helpline ist: Pfizer, Inc., 66 Hudson Boulevard East, New York, NY 10001 USA.

Sie können den Datenschutzbeauftragten von Pfizer unter den oben genannten Kontaktdaten, unter privacy.officer@pfizer.com oder unter DPO.Pfizer.com erreichen.

Grundsätzlich kann die Helpline für die Meldung von Bedenken im Zusammenhang mit der finanziellen und geschäftlichen Integrität genutzt werden, z. B. in Bezug auf Buchhaltung, interne Rechnungsprüfung, Unternehmensrevision, Bestechung und Korruption sowie Banken- und Finanzkriminalität sowie Verstöße gegen EU-Recht, einschließlich: Vergabe öffentlicher Aufträge, Finanzdienstleistungen, Produkte und Märkte, Verhinderung von Geldwäsche und Terrorismusfinanzierung, Produktsicherheit, Verkehrssicherheit, öffentliche Gesundheit, Umweltschutz, Verbraucherschutz, Verstöße, welche die finanziellen Interessen der EU betreffen oder sich auf den Binnenmarkt beziehen (z. B. Wettbewerb und staatliche Beihilfen), Strahlenschutz und nukleare Sicherheit, Lebensmittelsicherheit, Tiergesundheit und Tierschutz sowie Schutz der Privatsphäre, Datenschutz und Datensicherheit. Zusätzlich zu den oben genannten Punkten können Sie in einigen Ländern weitere Angelegenheiten melden. Weitere Informationen finden Sie in unserem Web-Reporting-Tool unter pfizer.ethicspoint.com.

Die Nutzung der Helpline erfolgt freiwillig¹. Sie werden gebeten, sich gegenüber der Helpline zu identifizieren, wenn Sie eine Meldung machen; je nach Gesetzeslage des jeweiligen Landes sind Sie dazu eventuell nicht verpflichtet.

Zweck der Verarbeitung von personenbezogenen Daten

Der Zweck der Verarbeitung personenbezogener Daten im Zusammenhang mit der Helpline besteht darin, die Einhaltung der geltenden internationalen und lokalen Gesetze und internen Richtlinien zu gewährleisten. Mangelnde Compliance kann, je nach anwendbarem Recht, hohe Geldstrafen, Gefängnisstrafen, Haftungsfälle und andere Verwarnungen zur Folge haben.

Wir erheben und verarbeiten Ihre personenbezogenen Daten, die Sie uns über die Helpline zur Verfügung stellen, zu folgenden Zwecken:

- Prüfung der Plausibilität Ihrer Meldung und der darin enthaltenen Daten, um Rechtsverstöße zu vermeiden,

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- Untersuchung angeblicher Verstöße gegen Gesetze und Richtlinien, insbesondere gegen die oben genannten,
- Sicherstellung der Einhaltung aller anwendbaren Gesetze,
- Zusammenarbeit mit den Tochtergesellschaften von Pfizer im Hinblick auf ihre Verpflichtung zur Untersuchung von Verstößen,
- Verteidigung gegen Ansprüche Dritter sowie Vorbereitung von Ansprüchen gegen Dritte,
- Weiterentwicklung unserer Helpline und ihrer Prozesse.

Erhebung und Verarbeitung von Informationen und personenbezogenen Daten

Pfizer kann über die Helpline folgende Daten erheben und verarbeiten: Ihren Namen, Ihren Titel, Ihre Position und Ihre Kontaktdaten (es sei denn, die Meldung erfolgt anonym), Namen und andere Daten der von Ihnen in Ihrer Meldung genannten Personen, Namen und Position Ihrer Vorgesetzten, eine Beschreibung des von Ihnen in Ihrer Meldung angegebenen Verhaltens einschließlich Datum und Ort, sowie andere sachdienliche Informationen als auch alle Fragen, die Sie Pfizer unter Umständen stellen. Pfizer kann im Rahmen von Nachforschungen auch Informationen von Dritten einholen. Unter bestimmten Umständen können wir auch sensible Daten verarbeiten, wie z. B. Gesundheitsdaten oder die Mitgliedschaft in einer Gewerkschaft, wenn Sie uns diese zur Verfügung stellen und/oder wenn sie für den Zweck der Untersuchung relevant sind.

Die von Ihnen bereitgestellten Informationen werden in Übereinstimmung mit den geltenden Gesetzen vertraulich behandelt.

Pfizer kann die oben genannten Informationen verwenden, weil wir entweder einer gesetzlichen Verpflichtung nachkommen müssen (Artikel 6 Absatz 1 Buchstabe c der EU-Datenschutz-Grundverordnung [DSGVO]) oder weil wir ein berechtigtes Interesse an der Untersuchung der von Ihnen eingereichten Meldung haben (Artikel 6 Absatz 1 Buchstabe f DSGVO) oder weil Sie gemäß Ihres Arbeitsvertrags dazu verpflichtet sind, bestimmte Vorfälle zu melden (Artikel 6 Absatz 1 Buchstabe b DSGVO). Im Hinblick auf sensible Daten wie Gesundheitsdaten oder Informationen zur Gewerkschaftsmitgliedschaft (eine Liste sensibler Daten finden Sie in Artikel 9 Absatz 1 DSGVO) kann Pfizer diese Informationen zur Geltendmachung, Ausübung oder Verteidigung von Rechtsansprüchen (Artikel 9 Absatz 2 Buchstabe f DSGVO) verwenden, wenn dies aus Gründen eines wichtigen öffentlichen Interesses erforderlich ist, wenn die Verwendung auf Grundlage des Unionsrechts basiert oder des Rechts eines Mitgliedstaats beruht, das in angemessenem Verhältnis zu dem verfolgten Ziel steht (Artikel 9 Absatz 2 Buchstabe g DSGVO), oder wenn die Verarbeitung aus Gründen des öffentlichen Interesses im Bereich der öffentlichen Gesundheit erfolgt, wie zur Gewährleistung hoher Qualitäts- und Sicherheitsstandards bei der Gesundheitsversorgung, bei Arzneimitteln und Medizinprodukten, auf der Grundlage des Unionsrechts oder des Rechts eines Mitgliedstaats (Artikel 9 Absatz 2 Buchstabe i DSGVO).

Wir werden die betroffenen Personen in Bezug auf die Helpline keinen Entscheidungen unterwerfen, die ausschließlich auf einer automatisierten Verarbeitung, einschließlich Profiling, beruhen (Artikel 22 DSGVO).

Funktionsweise und Verfahren der Helpline

Ein Mitarbeiter von NAVEX nimmt Ihren Anruf bei der Helpline entgegen. NAVEX speichert keine Telefonnummern eintreffender Anrufe, sodass Ihre Anrufinformationen anonym bleiben. NAVEX zeichnet die Anrufe auch nicht auf. Der Mitarbeiter bittet Sie im Auftrag von Pfizer um eine Reihe von Informationen zu Ihrer Meldung, dokumentiert Ihre Informationen und stellt unter Umständen weitere Fragen zur Klärung. Bitte beachten Sie, dass der NAVEX-Mitarbeiter keine Fragen zu ethischen Belangen oder Richtlinien beantworten kann und Ihnen keine Ratschläge zu Handlungsempfehlungen geben kann. NAVEX darf nicht über Maßnahmen oder Untersuchungen im Zusammenhang mit Ihrer Meldung entscheiden. NAVEX befolgt die von Pfizer herausgegebenen Anweisungen.

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Wenn Sie sich für die Nutzung des Web-Reporting-Tools entscheiden, werden die gleichen Informationen elektronisch erfasst.

Nach der ersten Meldung oder der Anfrage wird ein detailliertes Protokoll erstellt und von NAVEX direkt an die Compliance-Abteilung von Pfizer gesendet. Je nach Art der Angelegenheit kann die Compliance-Abteilung die Meldung und die damit zusammenhängende Dokumentation unter Berücksichtigung ihrer Vertraulichkeitsverpflichtungen zur weiteren Untersuchung und Klärung an die zuständigen Mitarbeiter von Pfizer, die möglicherweise informiert werden müssen, weiterleiten, z. B. Vertreter der Rechtsabteilung, von People Experience (PX) oder der Audit-Abteilung. Es kann sein, dass wir im Laufe der Untersuchung weitere Informationen und Klarstellungen von Ihnen benötigen. In diesem Fall wenden wir uns direkt an Sie. Gegebenenfalls muss die Compliance-Abteilung zur Festlegung von Disziplinarmaßnahmen und aus Gründen der Transparenz auch die People Experience Vertreter oder Führungskräfte von Pfizer über festgestellte Verstöße informieren. Die Informationen können auch an externe Berater von Pfizer wie Rechtsanwälte oder Wirtschaftsprüfer weitergegeben werden, die zur strikten Vertraulichkeit verpflichtet sind. Wir werden Sie über den Fortgang der Untersuchung und die nach dem Ergebnis der Untersuchung getroffenen Maßnahmen informieren.

Im Rahmen der Untersuchung ist Pfizer bestrebt, jede Person, die in eine Meldung verwickelt ist, innerhalb eines angemessenen Zeitraums über die gegen sie erhobenen Vorwürfe zu informieren, wird sich jedoch bemühen, Ihre Identität nicht preiszugeben. Betroffene Personen haben das Recht, auf die von Ihnen gemeldeten Informationen zu reagieren. Bitte beachten Sie stets, dass die von Ihnen übermittelten Angaben zu Entscheidungen führen können, die Auswirkungen auf Personen bei Pfizer und auf involvierte Drittparteien haben. Dementsprechend bitten wir Sie, nur solche Informationen zu übermitteln, die nach Ihrem besten Wissen richtig sind. Die vorsätzliche Übermittlung von falschen oder irreführenden Informationen kann disziplinarische Maßnahmen sowie straf- und zivilrechtliche Schritte nach sich ziehen. Darüber hinaus sollten sich die Angaben auf solche Fakten beschränken, die für den jeweiligen Fall und die sich daraus ergebenden Untersuchungen relevant sind.

Benachteiligungen gegen Personen, die um Rat fragen, Bedenken äußern oder Fehlverhalten melden, oder gegen Vermittler, Einzelpersonen oder Einrichtungen, die mit meldenden Personen in Zusammenhang stehen, sind streng verboten. Wenn jemand Vergeltungsmaßnahmen gegen eine Person ergreift, die wahrheitsgemäß einen Verstoß gemeldet hat, wird Pfizer entsprechende Maßnahmen ergreifen – auch dann, wenn sich später herausstellt, dass die Person die Angelegenheit ursprünglich zu Unrecht gemeldet hat. Wenn Sie der Meinung sind, dass gegen Sie oder eine andere beteiligte Person Vergeltungsmaßnahmen ergriffen wurden, sollten Sie sich an die Compliance-Abteilung wenden (Kontaktinformationen siehe unten).

Verwendung, Aufbewahrung und Weitergabe von Informationen

Pfizer hat mit NAVEX, einem Datenverarbeiter, einen Vertrag geschlossen, der strengen Vertraulichkeitsverpflichtungen unterliegt, um die Vertraulichkeit und Sicherheit Ihrer personenbezogenen Daten zu schützen. NAVEX darf Ihre personenbezogenen Daten nur für die Bereitstellung der Helpline verwenden. Von NAVEX erhaltene Daten sowie von Ihnen übermittelte personenbezogene Daten werden in einer Pfizer-Datenbank mit Zugriffsbeschränkung gespeichert (und in der Datenbank unserer Lieferanten, wenn dies zur Unterstützung der Untersuchung notwendig ist).

Wir können Ihre personenbezogenen Daten, insofern zur Untersuchung der Meldung und zur Verwaltung der Helpline notwendig, anderen Tochtergesellschaften oder Anbietern von Pfizer zur Verfügung stellen, falls diese Ihre personenbezogenen Daten kennen müssen. Dabei können Ihre personenbezogenen Daten auch in Länder übermittelt werden, deren Datenschutzbestimmungen von den im Land Ihrer Tätigkeit geltenden Bestimmungen abweichen. Insbesondere können wir Ihre personenbezogenen Daten an die Compliance-Abteilung der Pfizer, Inc. übermitteln. Bitte beachten Sie, dass einige Länder, die nicht dem EWR angehören, einschließlich der USA, von der Europäischen Kommission nicht als Länder anerkannt werden, die ein angemessenes Schutzniveau gemäß den EWR-Standards bieten. Die Länder, die anerkanntermaßen ein angemessenes Schutzniveau bieten, finden Sie hier: [Adequacy decisions \(europa.eu\)](https://ec.europa.eu/commission/presscorner/detail/en/ip_ex_19_01).

Wir haben angemessene Maßnahmen ergriffen, wie zum Beispiel von der Europäischen Kommission angenommene Standardvertragsklauseln, um die Übermittlung und den Schutz Ihrer personenbezogenen Daten in die Länder zu

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ermöglichen, die laut der Europäischen Kommission kein angemessenes Datenschutzniveau bieten. Wenn Sie eine Kopie dieser Maßnahmen erhalten möchten, wenden Sie sich bitte an den lokalen Datenschutzbeauftragten von Pfizer. Sie finden die Kontaktdaten unter [DPO.Pfizer.com](https://www.pfizer.com/dpo).

Darüber hinaus kann Pfizer verpflichtet sein, Ihre personenbezogenen Daten ganz oder teilweise an die Strafverfolgungsbehörden oder an andere Behörden der betreffenden Länder weiterzuleiten.

Die mit Ihrer Meldung an die Helpline zusammenhängenden Informationen werden bei Bedarf für eine begrenzte Zeit nach folgenden Kriterien archiviert oder gelöscht: wenn die Untersuchung abgeschlossen ist und keine weiteren Maßnahmen ergriffen werden müssen, es sei denn, Pfizer ist gesetzlich dazu verpflichtet, die Daten für einen längeren Zeitraum aufzubewahren; wenn die Frist für relevante rechtliche Schritte abgelaufen ist, es sei denn, Pfizer ist gesetzlich dazu verpflichtet, die Daten für einen längeren Zeitraum aufzubewahren; und wenn die Aufbewahrungsfrist für Unterlagen im Zusammenhang mit Untersuchungen abgelaufen ist. Weitere Einzelheiten zur Datenaufbewahrung finden Sie in der Unternehmensrichtlinie zu diesem Thema. Wenn Sie Fragen haben, wenden Sie sich bitte an die Compliance-Abteilung.

Ihre Rechte

Vorbehaltlich der von der DSGVO und/oder anderen anwendbaren Gesetzen festgelegten Bestimmungen, haben Sie das Recht, auf Ihre personenbezogenen Daten zuzugreifen (Artikel 15 DSGVO), Ihre personenbezogenen Daten berichtigen zu lassen (Artikel 16 DSGVO), Ihre personenbezogenen Daten löschen zu lassen (Artikel 17 DSGVO), die Verarbeitung Ihrer personenbezogenen Daten einzuschränken (Artikel 18 DSGVO), das Recht auf Datenübertragbarkeit (Artikel 20 DSGVO) und das Recht, der Verarbeitung Ihrer personenbezogenen Daten unter bestimmten Umständen zu widersprechen (Artikel 21 DSGVO).

Wenn Sie eines Ihrer Rechte gemäß der DSGVO ausüben möchten, wenden Sie sich an den Datenschutzbeauftragten von Pfizer (siehe [DPO.Pfizer.com](https://www.pfizer.com/dpo)). Wir werden Ihre Anfrage in Übereinstimmung mit dem geltenden Recht beantworten.

Sie sind darüber hinaus berechtigt, eine Beschwerde bei Ihrer zuständigen Datenschutzbehörde in Ihrem Land oder in Ihrer Region einzureichen.

Bei Fragen oder Bedenken zur Helpline selbst kontaktieren Sie uns bitte telefonisch unter +1 212 733 3026, per E-Mail unter corporate.compliance@pfizer.com oder auf dem Postweg unter der Adresse 66 Hudson Boulevard East, New York, NY 10001, USA.

¹In bestimmten EU-Ländern bietet Pfizer darüber hinaus lokale Berichterstattung an. Weitere Informationen zur lokalen Berichterstattung, einschließlich Datenschutzhinweise der lokalen Berichterstattung und darüber, was über den lokalen Berichtskanal gemeldet werden kann, finden Sie im lokalen Intranet von Pfizer oder bei der Compliance-Abteilung.

UNITED KINGDOM

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PFIZER, INC.

EU/EEA/UK COMPLIANCE HELPLINE

GUIDANCE & PRIVACY NOTICE

The Pfizer Compliance Helpline (“the Helpline”) is provided by Pfizer, Inc. (“Pfizer”, “we”, or “us”) as a company responsible for your personal data. The website and telephone line through which you may report an incident is currently operated by NAVEX Global UK Limited, a NAVEX Global Holding Company, Vantage London 4th Floor, Great West Road, Brentford, TW8 9AG United Kingdom (“NAVEX”), Pfizer’s independent service provider of the Helpline.

General

The data controller of the Helpline is: Pfizer, Inc., of 66 Hudson Boulevard East, New York, NY 10001 USA.

You may reach out to Pfizer’s Data Protection Officer via contact details mentioned above or privacy.officer@pfizer.com or DPO.Pfizer.com.

The Helpline may generally be used for reporting concerns in a work-related context about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; bribery and corruption; banking and financial crime, and violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, transport safety, public health, protection of the environment, consumer protection, violations affecting the financial interest of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security. In addition to the above, in some countries you may report on additional matters. Please check our web-reporting tool at pfizer.ethicspoint.com for more information.

The use of the Helpline is voluntary¹. You are encouraged to identify yourself when making reports to the Helpline; where permitted by applicable law, you are not obligated to do so.

Purpose of Processing of Personal Data

The purpose of the processing of personal data in relation to the Helpline is to ensure compliance with applicable international and local laws and internal policies. If we do not ensure compliance, we may be subject to high fines, imprisonment, liabilities and other reprimands, subject to applicable laws.

We collect and process your personal information as provided to us through the Helpline for the following purposes:

- Checking the plausibility of your report and the data contained therein, in order to avoid any infringement of laws,
- Investigating alleged infringements of laws and policies, in particular those mentioned above,
- Ensuring compliance with applicable laws,
- Cooperating with Pfizer’s affiliates with respect to their obligations to investigate infringements,
- Defending third party claims and preparing claims against third parties,
- Developing our Helpline and investigation processes.

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Collection and Processing of Information and Personal Data

Pfizer may collect and process the following information through the Helpline: your name, title, position and contact details (unless the report is anonymous); the name and other data about individuals named in your report; name and position of your supervisors; a description of the conduct at issue in your report including the date and location, as well as other pertinent information; and any questions you may pose to Pfizer. Pfizer may also collect information from others during any subsequent investigation. Under certain circumstances, we may also process sensitive data, such as health data, trade union membership, if you provide this to us and/or if they are relevant for the purpose of the investigation.

The information provided by you will be treated confidentially, in accordance with applicable laws.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer (Article 6(1)(c) of the EU General Data Protection Regulation (“GDPR”) or we have a legitimate interest to investigate the report that you submitted to us (Article 6(1)(f) GDPR), or you may have an obligation under your employment contract to report certain incidents (Article 6(1)(b) GDPR). With respect to sensitive data, such as health data, trade union membership (for a list of sensitive data see Article 9(1) GDPR), Pfizer may use the information for the establishment, exercise or defense of legal claims (Article 9(2)(f) GDPR) if it is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued (Article 9(2)(g) GDPR), or if it is necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law (Article 9(2)(i) GDPR).

We will not subject data subjects to decisions based solely on automated processing, including profiling, in relation to the Helpline (Article 22 GDPR).

Functioning and Processes of the Helpline

A representative from NAVEX will answer your call to the Helpline. NAVEX does not capture the telephone number of any incoming calls so that your call-in information remains anonymous. NAVEX also does not record the calls. The representative may ask you on behalf of Pfizer for several items of information, document your input, and may ask follow-up questions to clarify information. Please note that the NAVEX representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. NAVEX may not decide about any actions or investigations in relation to your report. NAVEX follows the instructions issued by Pfizer. If you choose to use the web-reporting tool, the same information is captured electronically.

After the initial report or inquiry is made, a detailed record is prepared and sent by NAVEX directly to Pfizer’s Compliance Division. Depending on the nature of the matter, and in compliance with its confidentiality obligations, the Compliance Division may communicate the report and related documentation to appropriate personnel at Pfizer who may need to be informed, such as representatives of Legal, People Experience (“PX”), or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you directly. Where necessary, the Compliance Division may also need to notify members of PX or Pfizer leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Pfizer’s external advisers, such as lawyers or auditors who are obliged to maintain strict confidentiality. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation.

As part of the investigation, Pfizer aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Pfizer and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any individual who seeks advice, raises a concern, or reports misconduct, or against facilitators, individuals or entities that are connected with reporting persons, is strictly prohibited. If someone retaliates against an individual who has truthfully reported a violation, Pfizer will take appropriate action — even if it later turns out that

