



## **PFIZER, INC.**

### **EU/ EEA ONLINE NOTICE FOR THE HELPLINE**

The Pfizer Compliance Helpline (“**the Helpline**”) is provided by Pfizer, Inc. (“**Pfizer**”). The website through which you may report an incident is operated by GCS Compliance Services Europe Ltd., a NAVEX Global Holding Company, Boston House, Littlegreen, Richmond Upon Thames, Surrey, United Kingdom TW9 1QE (“**NAVEX**”), Pfizer’s independent service provider of the Helpline.

The Helpline may generally be used for reporting concerns about financial and business integrity issues, such as those relating to accounting; internal accounting controls; auditing matters; the fight against bribery and corruption; and banking and financial crime<sup>1</sup>. The use of the Helpline is voluntary. Colleagues are encouraged to identify themselves when making reports to the Helpline; where provided by applicable law, they are not obligated to do so.

#### **Collection of Information**

Pfizer may collect the following information through the Helpline: your name, title and contact details; the name and other data about individuals named in your report; 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 have. Pfizer may also collect information from others during any subsequent investigation.

The information provided by you will be treated confidentially.

Pfizer may use the information mentioned above because either we have to comply with a legal obligation imposed on Pfizer or we have a legitimate interest to investigate the report that you submitted to us.

#### **Processing Information and Access to Information**

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 can remain anonymous. The representative will ask you for several items of information, document your input, and 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

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<sup>1</sup> Please note the subjects that may be reported through the Helpline vary by jurisdiction. Please refer to the Raising Compliance Concerns brochure for your country available on Pfizer’s intranet at [raisingcomplianceconcerns.pfizer.com](http://raisingcomplianceconcerns.pfizer.com) or by emailing [corporate.compliance@pfizer.com](mailto:corporate.compliance@pfizer.com)

on any course of action. 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, 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, Human Resources ("HR"), or Audit for further investigation and resolution. Where necessary, the Compliance Division may also need to notify members of HR 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.

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 colleagues of 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 Pfizer colleague who seeks advice, raises a concern, or reports misconduct in good faith is strictly prohibited. If an individual retaliates against a colleague who has truthfully and in good faith reported a violation, Pfizer will take appropriate action — even if it later turns out that the colleague was mistaken in reporting the matter originally. If you think that you, or another colleague, have been retaliated against for raising a concern, you should contact the Compliance Division (contact information below) or call the Helpline immediately.

### **Information Use, Retention, and Data Transfer**

Pfizer has contracted with NAVEX 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 information that you provide to us will be stored in a Pfizer database with limited access.

Beyond NAVEX, other transfers of personal data may take place 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. Note in this regard that some of the non-EEA countries are recognized by the

European Commission as providing an adequate level of protection according to EEA standards (the full list of these countries is available here: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm).)

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission, to protect your data at all times. If you are based in the EEA, you may obtain a copy of these measures by contacting your local Pfizer Data Protection Officer, whose contact details are available at [DPO.Pfizer.com](http://DPO.Pfizer.com).

Information relating to a report made via the Helpline will be archived or deleted based on the following criteria: when the investigation has been closed and no further action is needed; when the time period for any relevant litigation has lapsed; 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 would like to request to review, correct, update, suppress, restrict or delete personal data, or if you would like to request to receive an electronic copy of such personal data for purposes of transmitting it to another company, you may contact us at [corporate.compliance@pfizer.com](mailto:corporate.compliance@pfizer.com). We will respond to your request consistent with applicable law. If you have any questions or concerns, please contact us at +1-212-733-3026, [corporate.compliance@pfizer.com](mailto:corporate.compliance@pfizer.com), or 235 East 42nd Street, New York, NY 10017 USA.

If you are based in the EEA and you would like to contact the Data Protection Officer, you can do so using the following link [DPO.Pfizer.com](http://DPO.Pfizer.com).

If you are based in the EEA, you also have the right at all times to lodge a complaint with a supervisory authority competent for your country or region.

Questions about the Helpline also may be directed to the above address.