

United States/Puerto Rico Pfizer Contingent Worker Privacy Notice

Effective Date: 5/23/2023

This Privacy Notice (“Notice”) describes how Pfizer, Inc. and its subsidiaries and affiliated entities, including the entity to which you are providing services (“Pfizer,” “we,” “us,” or “our”) collects, uses, and discloses personal data about its non-employee workers (“Contingent Workers”).

California Residents: This Notice describes how we collect, use, disclose, sell, share, and retain your personal data. For additional information relating to your rights and our processing of your personal data, please navigate to the [Additional State Disclosures](#) Section below.

DATA WE COLLECT AND USE

In the course of your relationship with Pfizer as a Contingent Worker, we may collect the following categories of personal data about you, directly from you, from third parties, and automatically through your use of Pfizer IT systems, networks, and resources.

- **Identifiers**, such as your name, maiden name and surname, work and home contact details (e.g., telephone numbers, email address, physical address), date of birth, usernames and passwords, or other similar identifiers.
- **Protected Classifications**, such as your race, color, sex, gender, age, national origin, disability, or citizenship status.
- **Audio, electronic, visual, thermal, or similar information**, such as professional photographs, photographs taken in the workplace, or CCTV footage.
- **Geolocation Data**, such as the precise physical location of your device.
- **Compensation Information**, such as your hourly rate, bonus, insurance, tax withholdings, location code, currency, pay frequency, effective date of current pay, monetary reviews, termination date, pay data, and transaction details and all information relating to credit cards that are guaranteed for payment by Pfizer for business-related purposes.
- **Internet and other electronic network activity**, Internet or other electronic network activity information, such as your browser type and operating system; IP address, browsing history, clickstream data, search history, and information regarding your interaction with Pfizer IT systems, mobile applications, networks, and resources, including access logs and other activity information, electronic communications and files, network connections, and login credentials.
- **Professional or employment-related information**, such as a description of your current position, job title, the Pfizer employee responsible for your oversight and management (“Pfizer Sponsor”), Pfizer Sponsor’s delegates, your employer (name, location), unit/department, home country/host country, terms of any applicable Contingent Worker contract, work history with Pfizer, start and termination date(s) and reasons, and length of service.
- **Education information**, such as information about where you attended school and your academic history.
- **Biometric information**, such as fingerprints and iris, retinal, or facial scans for purposes of facilitating access to facilities, devices, or applications.

- **Inferences**, such as inferences drawn to create a profile reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.
- **Sensitive Information**, as defined under applicable local law, such as certain characteristics of protected classifications, religious or philosophical beliefs, trade union membership, account login credentials and passwords, genetic or biometric data, information regarding sex life or sexual orientation, physical or mental health, and precise geolocation data.

Information We Collect Directly From You. We collect personal data directly from you in the course of your relationship with Pfizer as a Contingent Worker.

Information We Collect From Other Sources. We may collect personal data about you from sources such as your Pfizer Sponsor, Pfizer colleagues, your employer, reference checks, clients and background check providers.

Information We Collect Automatically. We automatically collect personal data when you access Pfizer IT systems, mobile applications, networks, and resources, such as the information described above as “Internet and other electronic network activity.”

HOW WE USE PERSONAL DATA

We use the categories of personal data described above for the following business purposes:

- **On-boarding/Off-boarding Administration:** Collation of relevant documentation from new and departing Contingent Workers.
- **Managing Workforce:** Maintaining a relationship with your employer and with you, managing and monitoring compliance with the any applicable contingent worker agreement, managing work activities and personnel generally, including changes, corrections and updates to data for purposes of recruitment, appraisals, performance management, paying compensation, hourly rate reviews/changes, managing and administering training, honoring other contractual benefits, performing background checks, managing and coaching on disciplinary matters and terminations, making business travel arrangements, soliciting opinions, assessing customer satisfaction, and creating and maintaining one or more internal directories.
- **Workforce Analytics:** We use workforce analytics for talent planning, workforce management and development, and data security. For example, we use workforce analytics to ensure business continuity, to design diversity initiatives, to offer training opportunities and to identify patterns in the use of Pfizer technology systems and information entrusted to us, and to protect Pfizer’s people and property.
- **Communications and Emergencies:** Facilitating communication with you, ensuring business continuity, providing references, protecting the health and safety of Pfizer employees, Contingent Workers and others, safeguarding IT infrastructure, office equipment and other property, and facilitating communication in an emergency.

- **Business Operations:** Operating, managing and monitoring the IT and communications systems and policies, including provision and support of network, data, telecom and other IT infrastructure, application hosting, data storage, backup and restore, messaging and collaboration applications, middleware applications, end user services (e.g., desktop and mobile computing and remote access), IT security operations, and related development, support and maintenance services; marketing Pfizer's or business partners' products and services; managing product and service development; improving products and services; planning and hosting business meetings/conferences; travel preparation and coordination; managing Pfizer assets; allocating Pfizer assets and human resources; strategic planning; project management; business continuity and disaster recovery; risk management (e.g., prevention and investigation of fraud and other financial crime); compilation of audit trails and other reporting tools; security management; maintaining records relating to manufacturing and other business activities; budgeting, financial management and reporting; credit card management and payment; communications, including internal promotion of events or programs; and managing mergers, acquisitions and re-organizations or disposals.
- **Compliance:** (i) Complying with contractual, legal and other requirements applicable to our businesses in all countries in which Pfizer operates, recordkeeping and reporting obligations, conducting audits, compliance monitoring and risk assessments, compliance with government inspections and other requests from government or other public authorities, responding to legal process such as subpoenas, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims, training, conducting internal investigations, managing and collecting information from helplines and complying with internal policies and procedures; (ii) Protecting, enforcing or defending the legal rights, privacy, safety, or property of Pfizer or its employees, agents and Contingent Workers (including enforcement of relevant agreements and terms of use); (iii) Protecting the safety, privacy, and security of users of Pfizer products or services or members of the public; or (iv) Protecting against fraud or for risk management purposes.
- **Monitoring and Investigations:** Monitoring compliance with any Pfizer policies and/or laws, codes, and regulations, including the policies, laws, codes, and regulations governing interactions with healthcare professionals and other third parties. This may include monitoring a Contingent Worker's use of telephone, email, Internet and other Pfizer resources or networks, and other monitoring activities as permitted by local law; conducting internal investigations in response to allegations of potential misconduct and to ensure compliance with Pfizer legal and contractual commitments, applicable laws, and any Pfizer policies.

We may also deidentify or anonymize your information in such a way that you may not reasonably be re-identified by us or another party, and we may use this deidentified data for any purpose. To the extent we deidentify any data originally based on personal data, we will maintain and use such information in deidentified form and will not attempt to reidentify the data.

HOW WE DISCLOSE PERSONAL DATA

We may disclose each of the categories of personal data described above in order to fulfill our employment obligations and for the business purposes described above as follows:

- **Affiliates:** We may disclose the personal data we collect about you to our subsidiaries and affiliated entities as appropriate to fulfill business-related purposes.
- **Professional Advisors:** Accountants, auditors, lawyers, insurers, bankers, and other outside professional advisors in all of the countries in which Pfizer operates.

- **Service Providers:** Companies that provide products and services to Pfizer such as payroll, pension scheme, benefits providers; human resources services, performance management, training, expense management, IT systems suppliers and support; third parties assisting with equity compensation programs, credit card companies, medical or health practitioners, trade bodies and associations, and other service providers.
- **Customers and Other Business Partners:** Customers and other business partners who have a legitimate need to know a Contingent Worker's corporate contact details, information about the Contingent Worker's function at Pfizer or similar personal data in order to do business with Pfizer.
- **Public and Governmental Authorities:** Entities that regulate or have jurisdiction over Pfizer such as regulatory authorities, law enforcement, public bodies, and judicial bodies.
- **To Protect Us and Others:** We disclose personal data where we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Notice, or as evidence in litigation in which we are involved.
- **Corporate Transactions:** A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, corporate partnership, co-promotion, assignment, transfer or other disposition of all or any portion of Pfizer business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- **Aggregate and De-Identified Information:** We may share aggregate, anonymized, or de-identified information about you for any purpose permitted under applicable local law.

ADDITIONAL STATE DISCLOSURES

You may have certain rights regarding our processing of your personal data under applicable local state law, including, for example, if you are a consumer in California. If our processing of your personal data is governed by such laws, the following provisions apply to our processing of your personal data. These provisions supplement the other sections of the Notice.

We do not “sell” or “share” for cross-contextual behavioral advertising (as those terms are defined under applicable local law) the categories of personal data described above. We do not use or disclose sensitive personal data for purposes other than permitted under applicable local law.

Categories of Personal data That We Collect and Disclose

As may be required under applicable local law, the chart below describes the categories of third parties to whom we disclose the categories of personal data described above for our business purposes.

Categories of Personal data	Disclosed to Which Categories of Third Parties
Identifiers	Pfizer Group entities; professional advisors; service providers; and public and governmental authorities; customer and other business partners
Protected Classifications	Pfizer Group entities; professional advisors; service providers; and public and governmental authorities
Audio, electronic, visual, thermal, or similar information	Pfizer Group entities; professional advisors; service providers; and public and governmental authorities
Geolocation Data	Pfizer Group entities; professional advisors; service providers; and public and governmental authorities
Compensation Information	Pfizer Group entities; professional advisors; service providers; and public and governmental authorities
Internet or other electronic network activity	Pfizer Group entities; professional advisors; service providers; and public and governmental authorities
Professional or employment-related information	Pfizer Group entities; professional advisors; service providers; and public and governmental authorities
Education Information	Pfizer Group entities; professional advisors; service providers; and public and governmental authorities
Biometric Information	Pfizer Group entities; professional advisors; service providers; and public and governmental authorities
Inferences	Pfizer Group entities; professional advisors; service providers; and public and governmental authorities
Sensitive Information	Pfizer Group entities; professional advisors; service providers; and public and governmental authorities

Retention

Pfizer will retain personal data for the period necessary to fulfill the purposes outlined in this Notice unless a longer retention period is required or permitted by law. The criteria typically used to determine our retention periods include: (i) the length of our relationship with you; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations).

Individual Rights

Subject to certain exceptions, you may have the right to make the following requests under applicable local law, at no charge:

- **Copy:** You may request, up to twice every 12 months, a copy of the specific pieces of personal data that we have collected, used or disclosed about you in the prior 12 months and to have this delivered, free of charge, either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows you to transmit this information to another entity without hindrance.
- **Correct:** You may request correction of your personal data that we have collected about you if it is inaccurate or incomplete.
- **Delete:** You may request deletion of your personal data that we have collected about you.
- **Know:** You may request that we provide you certain information about how we have handled your personal data, including the:
 - categories of personal data collected;
 - categories of sources of personal data;
 - business and/or commercial purposes for collecting your personal data;
 - categories of third parties with whom we have disclosed or shared your personal data; and
 - categories of personal data that we have disclosed or shared with a third party for a business purpose.

You have the right to be free from unlawful discrimination for exercising your rights under applicable state law.

Submitting Requests

You may submit requests to delete, correct, access a copy and/or know personal data we have collected about you by accessing our webform at www.pfizer.com/individualrights or by contacting us at 833-991-1933 (toll free). You will be asked to provide certain personal data when submitting your request including your relationship with Pfizer, first and last name, email address, telephone number and postal address in order for us to determine if your information is in our systems.

We will further verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the personal data subject to the request. We may need to request additional personal data from you, such as your date of birth or government identifier, in order to protect against fraudulent or spoofed requests. If you want to make a request as an authorized agent on behalf of an individual under applicable local law, you may use the submission methods noted above. As part of our verification process, we may request that you provide us with proof that you have been authorized by the individual on whose behalf you are making the request under applicable local law, which may include signed permission provided by such individual.

Please contact us according to the “Contact Us” section of the Notice below, if you have any questions regarding our processing of your personal data.

SECURITY

We use technical, administrative and procedural measures designed to safeguard your personal data from unauthorized access or use. No such measure is ever 100% effective though, so we do not guarantee that your personal data will be secure from theft, loss, or unauthorized access or use, and we make no representation as to the reasonableness, efficacy, or appropriateness of the measures we use to safeguard such data.

CONTACT US

If you have any questions, complaints, or requests about how Pfizer processes your personal data, please contact us at include privacy.officer@pfizer.com or by mail by using the details provided below.

Pfizer, Inc.
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CHANGES TO THIS NOTICE

This Notice is current as of the Effective Date set forth above. We may change this Notice from time to time, so please be sure to check back periodically. If we make any changes to this Notice that materially affect our practices with regard to the information we have previously collected about you, we will endeavor to provide you with notice in advance of such change by highlighting the change on the Pfizer website or by sending you an email.