

Catalent's Business Conduct Helpline Privacy Notice

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Introduction

This notice provides information on Catalent Pharma Solutions, Inc. and its domestic and international affiliates and subsidiaries, including Catalent, Inc. (collectively, "Catalent", "we" or "us") processing of personal data it collects and receives from reports submitted to its Business Conduct Helpline (the "Helpline"). If you submit a report to Catalent's Helpline that contains personal data, Catalent will process it in a manner explained herein. Catalent is committed to being transparent about how it collects and uses that personal data and to meeting its data protection obligations under all applicable data privacy laws and regulations.

What information do we collect?

If Catalent receives a Helpline report, Catalent may collect the following personal data:

- Your name and contact information;
- Your job title and position with Catalent;
- The name and other personal data of individuals identified in the report; and
- A description of the alleged misconduct, as well as a description of the circumstances of the incident.

From where does Catalent get your personal data?

Catalent may collect this personal data from the reporting party, interviewees, or Catalent.

Why does Catalent process personal data?

Catalent may process your personal data based upon the following legal grounds:

- Legal obligation – Catalent may process your personal data if it is necessary to comply with a legal obligation.
- Legitimate interest – Catalent may process your personal data in furtherance of Catalent's legitimate interest in conducting internal investigations into allegations of violations of the law or Catalent policies and to protect Catalent's employees, property, and data.

More specifically, Catalent may process your personal data for the purpose of managing and investigating reports of misconduct submitted through the Helpline. Catalent may need to disclose your personal data in order to comply with its legal obligations. In such instances, Catalent will take steps to protect your personal data to the extent possible.

Who has access to the personal data and where is it accessed?

Your personal data may be processed by relevant Catalent employees, including members of Catalent's Human Resources, Finance, Quality, IT, and Legal & Compliance departments and external advisors. Catalent is an international organization with offices throughout the world. As such, your personal data may be transferred within the Catalent organization. Any transfer of personal data is governed by an intercompany agreement based on EU and UK approved Standard Contractual Clauses.

Catalent also engages vendors to support the management and administration of Catalent's Helpline. As such, it may be necessary for these vendors to process your personal data in order to provide Helpline services to Catalent. Catalent will not authorize its Helpline vendor(s) to use your personal data for any reason other than to provide the Helpline management services. Appropriate contractual provisions will be included in all agreements with Helpline vendors to ensure the adequate protection of your personal data. If your personal data is to be transferred out of the country in which it was collected, Catalent will ensure that such transfers comply with the applicable data privacy laws and regulations governing such cross-border transfers, including where applicable, ensure that appropriate contractual provisions are in place.

How does Catalent protect data?

Catalent takes the security of your personal data seriously. It has technical and organizational measures in

place to ensure that your personal data is not lost, accidentally destroyed, misused or inadvertently disclosed.

For how long does Catalent keep your personal data?

Catalent will not keep personal data for longer than necessary to investigate the report provided to the Helpline, or otherwise as necessary to address Catalent's legitimate compliance concerns, including complying with legal or disciplinary proceedings.

What rights do you have regarding your personal data?

Depending on where in the world you reside, you may have certain rights regarding your personal data. These rights may include the right to access, correct, or delete the personal data that Catalent possesses. To exercise any rights that you may possess, please submit your inquiry via the form found [here](#). Catalent will respond to all reasonable requests in a timely manner and in accordance with applicable law.

Under applicable data protection law, you may be entitled to request access to and/or rectify, block, or delete your personal data, transmission to another controller or object to any use of personal data. When Catalent's legal basis is to ensure compliance with applicable law and its internal policies, you don't have the right to object to any use of personal data. If Catalent will not be able to provide the requested information or make the change you request, you will be provided with reasons for such decision. Depending on where in the world you reside, you may be entitled to lodge a complaint with your local data protection authority.

If you have any comments or questions about this notice or about the processing of your personal data as described herein, please contact us at privacy@catalent.com.

Also, if you would like to learn more, please review Catalent's [Privacy Policy](#).