

Otsuka Group Global Privacy Policy

I Introduction to the Policy

1 Purpose

This Policy describes the responsibilities and the processes to be followed by Otsuka Group to promote compliance with data protection laws and regulations for the processing of personal data in each country where we operate our businesses and to protect the privacy and personal data of individuals.

2 Scope

This Policy applies to each Otsuka Group which means Otsuka Holdings Co., Ltd. and any other entity or establishment that is directly or indirectly, through one or more intermediaries, being controlled by Otsuka Holdings Co., Ltd. (“we” or “us”) which processes personal data (including access logs, web beacons or pixels and cookies) in its activities. This Policy applies to us in our capacity as a data controller (a legal person or entity which determines the purposes and means of the processing of personal data) and/or a data processor (a legal person or entity which processes personal data on behalf of a controller), as applicable.

3 Policy Statement

We respect the privacy and personal data of individuals. Our business activities require us to use a variety of personal data, including that of employees, customers, consumers, patients, clinical trial subjects and healthcare professionals. We are committed to collecting, maintaining, securing, disclosing and using their personal data in accordance with applicable laws, rules and regulations, and only for legitimate business purposes.

Through this Policy, we will strive to continuously improve and develop the protection afforded to individuals and their privacy protection of personal data.

II Actions to Comply with Data Protection Laws and Regulations

1 Lawful Use with fairness and transparency

We process personal data lawfully, fairly and in a transparent manner. In particular, where required by local law, we provide data subjects with a privacy notice

detailing how we process personal data, whom personal data will be transferred to and any other information which may be required.

2 Purpose Limitation

We collect personal data for specified, explicit and legitimate purposes only (“Purpose of Processing”). In case personal data is further processed, we will ensure that it is done in a manner which is consistent with the Purpose of Processing. Where the Purpose of Processing changes, we will comply with applicable data protection laws and regulations.

3 Data Minimization

We ensure that personal data collected is adequate, relevant and limited to what is necessary in relation to the Purpose of Processing.

4 Retention of Personal Data

We retain personal data only as long as is necessary for the Purpose of Processing or as legally required. When personal data is no longer necessary or relevant for the Purpose of Processing or to fulfill a legal or business requirement, it shall be securely deleted in accordance with industry standards.

5 Accuracy of Personal Data

We keep personal data accurate and up to date for the Purposes of Processing.

6 Security of Personal Data

We are committed to preserving the integrity and confidentiality of personal data. In pursuit of this, we take necessary and appropriate technical and organizational measures to ensure that personal data is kept secure by complying with applicable Information Technology and Security policies and procedures, to protect personal data from unauthorized or unlawful processing and against accidental leakage, loss or damage, and thus to ensure business continuity.

Where third parties process personal data on our behalf, we exercise the necessary and appropriate due diligence and supervision over the relevant data processors so as to ensure the security of personal data.

7 Third Party Provision

We only transfer personal data to third parties, where it is in compliance with applicable data protection laws and regulations. When we provide personal data to a third

party in a foreign country, we take into account appropriate data transfer safeguards in accordance with applicable data protection laws and regulations.

8 Rights of Data Subjects

Where required by laws and regulations, we respect the rights of data subjects such as the right to access, right to rectification, right to erasure, right to restriction of processing, right to data portability, as may be provided by applicable data protection laws and regulations.

9 Local Standards

As we operate in many different countries, we may find local laws or regulations provide stricter requirements than set forth in this Policy, as this Policy represents the global minimum standard that applies for data protection. For the avoidance of doubt, we will adhere to stricter local requirements as necessary and these shall be reflected in country-specific privacy policies.

III Revision History

Enforced on Apr 15, 2019.