

# Employee Privacy Policy

Last Updated: August 3, 2023

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This Employee Privacy Policy (“Policy”) describes how A&P Inphatec, LLC (“A&P,” “we,” “us,” or “our”) collects, uses, discloses, and retains personal information about our current and former employees, non-employee workers, and job applicants. This Policy also describes the rights that you may have regarding our processing of your personal information under applicable local law.

You may download a printable copy of this Policy (PDF): [here](#).

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## Categories of Personal Information We Collect About You

In the course of your employment or engagement with A&P, and during the recruitment process, we may collect the following categories of personal information about you and your emergency contacts, dependents, and beneficiaries, directly from you, from third parties, and automatically through your use of A&P IT systems, networks, and resources and the A&P careers page.

- **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, employee identification number or other unique personal identifier, usernames and passwords, social security number, driver’s license or state-issued identification card number, passport number, or other similar identifiers.
- **Protected Classifications**, such as your race, color, ethnicity, 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.
- **Compensation Information**, such as your salary, pay group, pay type, bank account information, and time off balances.

- **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 A&P IT systems, networks, and resources, and the A&P careers page, including access logs and other activity information, electronic communications and files, network connections, and login credentials.
- **Professional or employment-related information**, such as your employer, current position, job title, employment status and type, emergency contact and dependent information, performance, attendance, disciplinary records, experience and expertise, professional contact information, location of employment, working hours, work history, length of service, professional biography, travel and expense data, skills, interests, professional memberships, compliance/training records, references, and any other information provided in your resume or CV.
- **Education information**, such as information about where you attended school and your academic history.
- **Inferences**, such as inferences drawn to create a profile reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.
- **Sensitive personal information**, as defined under applicable local law, such as certain characteristics of protected classifications, social security number, driver's license or state-issued identification card number, passport number, financial account information, account login credentials and passwords, information regarding sex life or sexual orientation, and physical or mental health.

Information We Collect Directly From You. We collect personal information directly from you in the course of your employment, and in the online resume submission process.

Information We Collect From Other Sources. We may collect personal information about you from third parties, such as your former employer or references, background check providers or credit reference agencies, government agencies, higher education institutions, and other related sources. We may also collect information about your performance or conduct from other employees or A&P business contacts you work with who may provide feedback about you. We may also collect publicly available information such as information in social media profiles and information from public search engine results.

Information We Collect Automatically. We automatically collect personal information when you access A&P IT systems, mobile applications, networks, and resources, or the A&P careers page, such as the information described above as "Internet and other electronic network activity."

## **How We Use Your Information**

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

- To determine eligibility for hiring, including the verification of references and qualifications and, where permitted by law, administering background checks.

- To evaluate your candidacy for a job posting and make decisions about your recruitment and the terms on which you may work with us.
- To administer your salary, payroll and benefits, such as compensation, payroll, expense reimbursement, enrolling you in a pension arrangement or providing you with vendors for the purposes of administering benefits.
- To assess your performance and supporting you in career development, such as performance management, career development, training, and continued employment.
- To provide activities relating to our commercial operations in the context of your role, such as relocation, mobility and travel management, vacation, leave and other absences.
- To review work performance and where appropriate conduct disciplinary action or termination.
- To communicate with you and respond to your inquiries.
- To comply with our legal obligations or exercise or defend our rights or the rights of a third party, including complying with law enforcement or government authority requests and participating in compliance audits.
- Where we believe necessary, to investigate, prevent or take action regarding suspected or actual illegal activities, fraud, situations involving potential threats to the safety of any person or to otherwise enforce this Policy.
- For IT identification and authentication purposes.
- To comply with our equal opportunities and reporting obligations in certain jurisdictions.
- For business administration, including record keeping obligations, accounting, auditing, financial and business planning purposes, understanding employee retention and attrition rates, social activities and employee engagement (where applicable), and arranging systems and building access.
- To send periodic updates to you covering employment opportunities relevant to you, company news, and other information.
- We may also deidentify or anonymize your data 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 permitted under applicable law. To the extent we deidentify any data originally based on personal information, we will maintain and use such data in deidentified form and will not attempt to reidentify the data.

### **How We Disclose the Information We Collect**

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

- **Related Entities.** We disclose the personal information we collect about you to our parent, subsidiary, and affiliate entities as appropriate to fulfill business-related purposes, such as for payroll, administration and provision of benefits, IT infrastructure, etc.

- **Service Providers.** We disclose the personal information we collect about you to service providers, contractors, and agents who perform functions and business operations on our behalf, for the purposes set out above. For example, our service providers provide us with hiring services, payroll services, benefits and wellness services, travel services, training and development services, benchmarking services, website services, as well as other products and services, such as web hosting, data analysis, customer service, infrastructure services, technology services, email and other communication delivery services, research and analytic services, fraud and security services, legal services, and other business support services.
- **Business Transfers.** If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected about you to the other company. As part of the business transfer process, we may disclose certain of your information with lenders, auditors, and third party advisors, including attorneys and consultants.
- **In Response to Legal Process.** We disclose your personal information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena, including to law enforcement and government authorities, regulatory agencies, and courts.
- **To Protect Us and Others.** We disclose your personal information 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 Policy, or as evidence in litigation in which we are involved, including to law enforcement and government authorities, regulatory agencies, and courts.
- **Aggregate and De-Identified Information.** We may share aggregate, anonymized, or de-identified information about you for any purpose permitted under applicable local law.
- **Consent.** We may also disclose your personal information to any third party with your consent or at your direction, where permitted by applicable local law.

## **Your Privacy Choices and Rights**

You may have certain rights regarding our processing of your personal information under applicable local law. If our processing of your personal information is governed by such laws, the following provisions apply to our processing of your personal information. These provisions supplement the other sections of the Policy.

### ***Categories of Personal Information 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 information described above for our business purposes.

<b>Category of personal information</b>	<b>Categories of third parties to whom we may disclose personal information for a business purpose</b>
<b>Identifiers</b>	Benefits providers Government entities Professional advisors (such as accountants, auditors, lawyers)
<b>Protected Classifications</b>	Government entities
<b>Audio, electronic, visual, thermal, or similar information</b>	Government entities
<b>Compensation Information</b>	Government entities Professional advisors (such as accountants, auditors, lawyers)
<b>Internet and other electronic network activity</b>	Government entities Professional advisors (such as accountants, auditors, lawyers)
<b>Professional or employment-related information</b>	Government entities Service providers Benefits providers Professional advisors (such as accountants, auditors, lawyers)
<b>Education Information</b>	Government entities Reference check providers
<b>Inferences</b>	Government entities
<b>Sensitive personal information</b>	Government entities Benefits providers Reference check providers Professional advisors (such as accountants, auditors, lawyers)

***Your Privacy Choices and Rights***

You may have certain rights regarding our processing of your personal information under applicable local law. Depending on the jurisdiction in which you live, these may include the:

- Right to request access and a copy of your personal information and information relating to how it is processed;
- Right to request deletion of your personal information;
- Right to request the correction or update of the personal information we hold about you;
- Right to opt-out of “sales” of your personal information and “sharing” of your personal information for cross-context behavioral advertising purposes (as these terms are defined under applicable law)
- Right to opt-out of targeted advertising;
- Right to limit our use of your sensitive personal information;
- Right to opt-out of certain profiling activities;

- Right to not be unlawfully discriminated against for exercising your rights.

These rights may be limited or denied in some circumstances. For example, we may retain your personal information where required or permitted by applicable law. We do not “sell” or “share” your personal information as those terms are defined under applicable local law. We do not use or disclose your sensitive personal information for purposes other than permitted under applicable law.

To exercise your rights under applicable local law or if you are an authorized agent submitting a request on behalf of an individual under applicable local law, you may contact us at 888-964-0320 or submit a request through our [Webform](#). When you or your authorized agent are exercising your privacy rights, we require that you explain your relationship with us, specify your request type, and provide your name, email address, country, home address, the details of your request, and your date of birth. We use this information to identify responsive records and in certain cases to verify your identity. Authorized agents must also provide a copy of the signed permission authorizing the agent to submit requests on your behalf. We will not discriminate against you if you choose to exercise your privacy rights.

### **Data Retention**

Your personal information will be held for only so long as it is necessary for the purpose for which it was originally collected, and in accordance with applicable local law. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Policy. When assessing retention periods, we first examine whether it is necessary to retain the personal information collected and, if retention is required, work to retain the personal information for the shortest possible period permissible under applicable law.

### **Security of My Information**

We implement physical, technical, and organizational security measures designed to safeguard personal information. These measures are aimed to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee security.

### **Contact Us**

All comments, questions, concerns or complaints regarding your personal information or our privacy practices should be sent to the Otsuka America, Inc. Human Resources Department at [HR@otsuka-america.com](mailto:HR@otsuka-america.com).

### **Changes to this Policy**

This Policy is current as of the Last Updated date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. If we make any changes to this Policy 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 our A&P Inphatec, LLC Inc. careers page and internal intranet site or sending you an email.