

Binding Corporate Rules

OVERVIEW

Binding Corporate Rules (BCRs) are designed to allow multinational companies to transfer personal data from the European Economic Area (EEA) to their affiliates located outside the EEA, in compliance with European data protection law requirements.

In order to obtain approval for our BCRs, AstraZeneca [We, Us, Our] had to demonstrate to a number of European data privacy regulators that We have adequate safeguards in place for protecting personal data throughout Our organisation, in line with the requirements of the Article 29 Working Party papers on BCRs.

The approval process involved a review of the key elements of Our data privacy framework, including Our:

- [Global Data Privacy Policy](#)
- Intra-Group Agreement (IGA) which is the agreement signed by AstraZeneca's Affiliates to give legal effect to the BCR requirements

KEY REQUIREMENTS

In the countries where they apply, AstraZeneca's BCRs require Us to:

- Use personal data only for specified purposes;
- Take steps to ensure that the personal data that We hold is kept accurate and up-to-date;
- Take appropriate measures against the risks of unlawful use and accidental loss or destruction of, or damage to, personal data.

You can find more information about these requirements in our [Global Data Privacy Policy](#).

WHO IS COVERED?

Our BCRs cover a number of categories of personal data, including:

- Human resources
- Healthcare professionals
- Patients; and
- Suppliers

INTERNATIONAL TRANSFERS

AstraZeneca's BCRs are not limited just to transfers from the EEA, but they do not cover all transfers of personal data between AstraZeneca Affiliates.

Our BCRs will apply to:

- Transfers of personal data from any other country which regulates the processing of personal data;
- The subsequent processing or onward transfer of that personal data by an AstraZeneca Affiliate.

Our BCRs will not apply:

- Where an AstraZeneca Affiliate is simply processing personal data on behalf of a non AZ entity who controls and is legally responsible for the processing of that personal data;
- Personal data which originates from a jurisdiction where the transfer of personal data is not regulated, and which is not controlled at any stage by an AstraZeneca Affiliate in a regulated jurisdiction;
- CCTV footage (because CCTV footage is not ordinarily moved across borders); and
- Data about AstraZeneca employees of U.S entities.

WHAT PERSONAL DATA MAY BE TRANSFERRED?

The type of personal data which may be transferred could include anything which AstraZeneca has a legitimate business need to transfer as part of its business operations. The privacy notice which you are provided with at the time of collection (or shortly thereafter) will provide you with more information about what personal data is being collected by AstraZeneca and how it is going to be used.

WHERE COULD THE PERSONAL DATA BE TRANSFERRED TO?

AstraZeneca's global headquarters are based in the U.K and therefore it anticipates that most personal data transfers outside the EEA are from systems controlled from the U.K.

Whilst We may transfer personal data to any of Our Affiliates, it is likely that most transfers will be to our Affiliates in the U.S, China, India and Singapore. Further details of AstraZeneca's operations are available on our [AstraZeneca.com website](https://www.astrazeneca.com).

SECURING YOUR PERSONAL DATA

AstraZeneca takes the security of your personal data seriously and We have in place appropriate security policies which are intended to ensure, as far as reasonably possible, the security and integrity of all Our information, including your personal data.

Further details of AstraZeneca's approach to security are available on Our [global policies webpage](#).

YOUR RIGHTS

Where your personal data has been transferred under Our BCRs, you have rights to ensure We do the following:

- **Transparency:** We will provide you with information about how We process your personal data to the extent necessary to ensure that processing is fair. This information will normally be provided through a privacy notice which is provided to you at the time AstraZeneca first collects your personal data, or shortly thereafter.
- **Access:** You may ask AstraZeneca for access to the personal data that We hold about you and AstraZeneca will take steps to provide you with access to the Personal Data you have requested. However, We may not be able to provide you with all the information you ask for. Any information which is withheld will only be withheld based on applicable laws. Details of how to access your information will be made available to you on the applicable AstraZeneca privacy notice which covers the processing of your personal data.
- **Rectification and deletion:** You may ask AstraZeneca in writing to rectify, amend, delete, or suspend the use of the personal data that AstraZeneca holds about you, where that personal data is inaccurate or used in breach of the BCRs. Except in certain circumstances and subject to the applicable law, AstraZeneca will comply with that request. Details of how to request rectification, amendment or deletion will be made available to you on the applicable AstraZeneca privacy notice which covers the processing of your personal data.
- **Right of objection:** You may object to the collection, retention or use of your Personal Data by AstraZeneca if there are compelling legitimate grounds.
- **Automated processing:** In the unlikely circumstance that We process information about you on a purely automated basis that has a significant impact on you, We shall give you the opportunity to discuss the output of such processing before making those decisions (save to the extent otherwise permitted under applicable law).

ENFORCING YOUR RIGHTS

Depending on your circumstances and location, you may be able to enforce your privacy rights using the BCRs through one of the regulators who has approved the BCRs or through an English court or a court in your jurisdiction.

You are also entitled to obtain a copy of the IGA upon request, in order that you can see the mechanism by which We ensure that We protect your information and give you enforceable rights. We may redact some commercially sensitive information from the copy of the IGA we give to you.

As part of the BCRs, We have also agreed that where you can show you have a case against Us, we shall have the burden of proving that We have complied with the BCRs. Before exercising those rights we request you contact us in the manner described in the

“Ask a Question/Raise a Concern” section below so that we can try to address your concerns.

ASK A QUESTION/RAISE A CONCERN

If you want to access, rectify, amend or delete your personal data you can do this through the contact details provided to you in the applicable privacy notice. This will direct you straight to the business area in AstraZeneca which is managing your personal data.

If you would like to know more about the binding corporate rules and your rights under them, or if you have a complaint about the way in which AstraZeneca handles your personal data, you can raise a concern via www.AZethics.com which is part of AstraZeneca’s complaint management process.

Alternatively, you can also raise a question or concern by writing to:

- privacy@astrazeneca.com; or
- c/o the Chief Privacy Officer, AstraZeneca, 2 Kingdom Street, London, W2 6BD, United Kingdom

We will endeavour to respond to, and rectify, any complaints you raise within 6 months.