

**ASTRAZENECA**

# Binding Corporate Rules

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## 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 found in the published guidance papers on BCRs of European data protection regulators. Although We obtained approval for our BCRs in 2014, We have updated our BCRs following the entry into force of the EU General Data Protection Regulation (GDPR) on May 25, 2018, to provide for even greater protections for personal data shared among AstraZeneca's Affiliates.

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

- [Data Privacy Standard](#)
- Intra-Group Agreement (IGA) which is the agreement signed by AstraZeneca's Affiliates to give legal effect to the BCR requirements, and that bestows third-party beneficiary rights upon you, discussed below

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## KEY REQUIREMENTS

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

- Use personal data only for specified and lawful purposes;
- Collect and use only the minimum amount of personal data required in order to meet our legitimate business needs;
- 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;
- Honour data subject rights requests in regard to access, correction, deletion, restriction, objection, and porting;
- Impose suitable contractual controls whenever We engage parties to process data on our behalf;
- Report personal data breaches to competent authorities and affected individuals in appropriate cases; and

- Comply with accountability requirements that include maintaining a record of processing activities, conducting data protection impact assessments in appropriate cases, and abiding by privacy-by-design and privacy-by-default principles

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

## 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?

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, India, Poland, Mexico, Kuala Lumpur (Malaysia) and Costa Rica. 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 security policies that are intended to ensure, as far as reasonably possible, the security and integrity of all Our information, including your personal data.

Further details about AstraZeneca's approach to security are available from Our [global policies](#) found under Resources on Our Sustainability webpage

## YOUR RIGHTS

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

- **Transparency and easy access:** We will provide you with information about how We process your personal data to the extent necessary to ensure that processing is fair, and to a level that satisfies the notice requirements of the EU GDPR. 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, deletion, and restriction:** 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, deletion or restriction 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, including profiling:** 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).

Please note that under our IGA, you have rights to enforce as a third-party beneficiary the commitments made by and between the AstraZeneca Affiliates in the IGA relating to the data protection principles described above, as well as:

- Commitments to notify other AstraZeneca Affiliates in the event that applicable national laws may interfere with their compliance with the BCRs;
- Commitments to provide access to and make available a complaints procedure for prompt resolution of complaints and concerns brought by individuals in relation to their data, without prejudice to their ability to bring a complaint before a competent supervisory authority; and
- Commitments to cooperate with competent supervisory authorities, including in relation to auditing and audit reports, reporting changes to the BCRs and resolution of disputes.

## **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 or court where the relevant AstraZeneca Affiliate you believe breached the BCRs is established.

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 are an EEA resident, please contact AstraZeneca via [this form](#). If you need help with the form, please contact [privacyrequests@astrazeneca.com](mailto:privacyrequests@astrazeneca.com).

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 send your question or raise your complaint by using the “Ask a Question” route available at [www.AZethics.com](http://www.AZethics.com) which is part of AstraZeneca’s complaint management process.

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

- [privacy@astrazeneca.com](mailto:privacy@astrazeneca.com); or  
c/o the Chief Privacy Officer, AstraZeneca, Academy House, 136 Hills Road,  
Cambridge CB2 8PA

We will respond to, and rectify, any complaints you raise within 1 month (which period may be extended at maximum by two further months, in which case you will be informed accordingly).