



# Hospira Safe Harbor Policy

**Date: 14-NOV-2007**

**Policy Title: Safe Harbor Privacy Policy**

## Purpose

The purpose of this Safe Harbor Privacy Policy is to provide guidance and clear direction regarding the privacy principles that Hospira follows with respect to Personal Data transferred from the European Union (“EU”) to the United States.

## Scope

This Policy applies to all Personal Data received from the EU and processed by or on behalf of Hospira, Inc. or its affiliates and subsidiaries (“Hospira”) in the United States in any form, whether paper, electronic or verbal.

## Definitions

“Agent” means a third party that processes Personal Data solely on behalf of and under the instructions of Hospira.

“Personal Data” means information that identifies or is used to identify an individual, including, but not limited to, name, address, telephone number, email address, date of birth, social security number, and initials. Personal Data does not include information that is made anonymous such that the individual is no longer identifiable, or publicly available information that has not been combined with non-public personal information.

“Sensitive Personal Data” means Personal Data that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, or international work council membership, or concerns health or sex life. Information will be treated as Sensitive Personal Data where it is received from a third party that treats and identifies it as sensitive.

When used in this Policy, “individual” means the person whose Personal Data is collected and maintained by or on behalf of Hospira.

## Policy

In connection with its employment and business related activities, Hospira collects and uses Personal Data pertaining to customers, employees, suppliers, clinical trial participants, business partners, and others. Consistent with Hospira’s commitment to protect the privacy of Personal Data, Hospira adheres to the Safe Harbor privacy principles and frequently asked questions, as agreed to by the U.S. Department of Commerce and the European Commission. This Policy sets

forth the standards that Hospira applies in order to protect the privacy of those about whom it collects and uses Personal Data.

### Standards

In collecting and handling Personal Data from the EU, Hospira adheres to the following principles:

#### A. Uses of Personal Data

Hospira will use Personal Data only for legitimate business purposes. Hospira will use Personal Data only in ways that are compatible with the purposes for which the information was collected or later authorized by the individual. To the extent necessary for this purpose, Hospira will take reasonable steps to ensure that Personal Data is relevant to its intended use, accurate, complete, and current. To the extent practicable, non-identifiable information will be used.

#### B. Sharing and Transfer of Personal Data

Personal Data may be transferred to agents without providing notice of or giving individuals a choice regarding the transfer. However, before providing Personal Data to agents, Hospira will obtain contractual assurances from the agents that they will collect, use, maintain, secure and disclose personal information pursuant to Hospira's instructions and in accordance with this Policy. Where Hospira has reason to believe that an agent is using or disclosing Personal Data in a manner contrary to Hospira's instructions or this Policy, reasonable steps will be taken promptly to prevent or stop such use or disclosure.

Hospira may disclose Personal Data to non-agent third parties where consistent with the notice provided to the individuals who are the subject of the data and any consent that those individuals have given. In addition, Hospira may disclose Personal Data to non-agent third parties in other limited circumstances, such as when Hospira is required by law to do so or when Hospira determines, in good faith, that such disclosure is reasonably necessary to protect the rights, property or safety of another person.

#### C. Notice

Where Hospira collects Personal Data directly from individuals, Hospira will inform them of the purposes for which it collects and uses such Personal Data, how to contact Hospira, the types of non-agent third parties with whom Hospira may share Personal Data, and any ways that individuals may limit the use and sharing of such data. This notice will be provided when individuals are first asked to provide Personal Data or as soon thereafter as is practicable. If Hospira finds that it will use or disclose Personal Data for a purpose other than that for which it was originally collected, Hospira will use reasonable effort to notify the individual before such use or disclosure. The notice will provide the choices outlined in paragraph D below. Hospira will not provide such notice

if Hospira is precluded under certain circumstances, such as under a court order, from notifying an individual that his or her Personal Data is being provided by Hospira.

D. Choice

Hospira offers individuals the opportunity to choose whether their Personal Data is to be disclosed to a non-agent third party or to be used for a purpose other than the purpose for which it was originally collected or later authorized by the individual. Where Hospira collects Sensitive Personal Data, Hospira will give individuals the opportunity to affirmatively and explicitly consent to the disclosure of the information to a non-agent third party or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. Hospira will provide individuals with a reasonable mechanism for exercising their choices.

E. Access and Corrections

Hospira will grant an individual reasonable access to Personal Data that Hospira holds about that individual including electronic access, if practicable. Upon written request, Hospira will take reasonable steps to permit an individual to correct, amend, or delete information about the individual that he or she demonstrates to be inaccurate or incomplete, unless otherwise required by law. Hospira may deny access where the burden or expense of providing the access would be disproportionate to the risks to the individual's privacy, or where the rights of other persons would be violated.

F. Data Security

Hospira will take reasonable technical, physical, and organizational precautions to protect Personal Data in Hospira's possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

G. Enforcement

Hospira conducts compliance audits of its relevant privacy practices to verify adherence to this Policy, and will take reasonable action to correct violations of which it becomes aware, including disciplinary actions against those who fail to comply. Where Hospira becomes aware that a third party agent is using or disclosing Personal Data in a manner contrary to this Policy, Hospira will take reasonable steps to prevent or stop the use or disclosure.

H. Dispute Resolution

Any questions, complaints or concerns regarding the use or disclosure of Personal Data should be directed to Hospira at the address provided below. Hospira will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Data in accordance with the principles contained in this Policy. For complaints that cannot be resolved between Hospira and the complainant, Hospira has agreed to participate in the

dispute resolution procedures of the panel established by the European data protection authorities to resolve disputes pursuant to the Safe Harbor Agreement between the United States Department of Commerce and the European Commission regarding protection of personal information transferred from the European Union to the United States.

#### I. Contact Information

Questions or comments regarding this Policy should be submitted to the following persons or functions, by email or phone, as follows:

Director of Global Security and Privacy Officer, 275 N. Field Drive, Dept. NSEC, Bldg. H-1, Lake Forest, IL 60045; email: [www.global.security@hospira.com](mailto:www.global.security@hospira.com) telephone +1-224-212-2900.

Reporting of violations of this policy should be addressed to the OEC at oec.com or +1-224-212-2669 or the Global Ethics & Compliance (OEC) Helpline: +1-866-311-4OEC (4632).

#### J. Changes to this Policy

This Policy may be amended from time to time. When Hospira does, Hospira will also revise the “last updated” date at the bottom of this Policy. For material changes to this Policy, we will notify individuals by placing a notice on the Hospira Web site at [www.ourHospira.corp](http://www.ourHospira.corp) for 60 days.