

## **Privacy Statement**

**Effective Date: May 25, 2018**

Baxter Healthcare Ltd (“Baxter”) is committed to protecting and respecting your privacy. This Website Privacy Statement (“Privacy Statement”) is intended to let you know what information we may collect about you and how we use that information, and includes details regarding appropriate cross-border data transfer mechanisms, including the EU-U.S. and Swiss-U.S. Privacy Shield. Please read the following carefully to understand our practices regarding your Personal Information and how it will be handled.

### **Scope of this Website Privacy Statement**

This Privacy Statement applies to the websites of Baxter or Baxter affiliates that link to this Privacy Statement when you click on the "Privacy at Baxter" link at the bottom of a page, as well as mobile applications or other digital services that link to or post this Privacy Statement (“Baxter Sites”). Baxter or its affiliates may operate websites that handle your Personal Information in a manner that is different from the terms of this Privacy Statement. Those websites will post a Privacy Notice tailored to the data privacy practices of that particular website. Whenever you use a Baxter website, we encourage you to review the terms of the Privacy Notice that is posted on that site.

### **What is Personal Information?**

Personal Information means any information relating to an identified or identifiable person. Examples of Personal Information include your name, an identification number, location data, an online identifier or one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

### **What Personal Information We Collect**

We may collect your Personal Information on Baxter Sites as follows:

- Contact information. This may include your name, home or other physical address, email, telephone number, fax number, organization name, and/or job title when you submit a contact form, feedback forms or an online job application.
- Information collected through your usage of Baxter Sites. This may include unique identifiers and preference information such as your username, password, marketing preferences, internet protocol (“IP”) address or cookie, which may contain may information that may be considered Personal Information, as well as information that does not directly identify you, but which corresponds to your device, browser type, operating system, computer or mobile device, your navigation and clickstream behavior from actions that you take on our website. (See Section on [“Tracking Technologies We Use”](#))

## How We Use Your Personal Information

Depending on how you choose to interact with us on a Baxter Site, we may use your Personal Information for the following purposes:

- We use the contact information that you choose to provide to us so that we can communicate with you to respond to your queries, which includes providing you with our product and service updates. We may also use your contact information or the information you provide us on feedback forms to provide you information about Baxter products, services and programs or other marketing or advertising communications as permitted by applicable law, or to enable you to participate in surveys or questionnaires. Some of this information we collect and use with your consent and some of this information we collect and use for our legitimate business purposes of communicating with you and providing you with information about our business. Providing us your Personal Information is voluntary. You may always refuse to provide your Personal Information to us. If you choose not to provide us with your Personal Information then we will not be able to communicate with you and provide you with certain information, products, or services. If we have collected your information with your consent, you can always withdraw your consent by following the instructions provided for doing so when you provide consent or by contacting us using the contact information provided at the end of this Privacy Statement.

We use the information we collect through your use of the Baxter Sites for our legitimate interests to manage, operate, maintain and secure our websites, network systems, and other assets, and to provide you with the features and various functionalities of Baxter Sites. We may also aggregate the Personal Information we collected through your use of Baxter Sites to help us to understand our visitors' interests and improve the content and performance of our Baxter Sites.

- We may also use your Personal Information for treatment, to ensure high standards of quality and safety of health care, our medical products or medical devices. We may also use Personal Information to comply with our legal or regulatory obligations, including to comply with applicable retention obligations and as follows:
  - for purposes of adverse event reporting, materiovigilance, pharmacovigilance, product safety and other reporting obligations;
  - to respond to lawful requests by public authorities, including meeting national security or law enforcement requirements, e.g. to investigate fraud or respond to a government request;
  - to investigate potential breaches, or to protect the rights, property or safety of us, the users of our Baxter Sites or others.
- Where permitted by law, we may also enhance or combine information about you, including your Personal Information, with information about you that we obtain from third parties for the same purposes described above. Your Personal Information may also be used for profiling for the same purposes described above as permitted by law. You may object to profiling via automated-decision making by contacting us at

[privacy@baxter.com](mailto:privacy@baxter.com) or using the contract details provided at the end of this Privacy Statement.

We will indicate if the provision of certain information is voluntary and you will be able to withdraw your consent or exercise your rights in relation to this information at any time as permitted or required by applicable law.

In the event that we use your Personal Information for other purposes, not specified above, we will inform you about the specific purposes for processing your Personal Information and, when required, our basis for doing so at the time we collect the Personal Information from you to the extent required by law.

## **How We Share Personal Information We Collect**

### **Sharing with Baxter Affiliates and Subsidiaries**

Baxter is a global company and it shares Personal Information with its affiliates and subsidiaries for the purposes described in this Privacy Statement. For more information about Baxter's affiliates and subsidiaries, please contact us at [uk\\_shs\\_data\\_privacy@baxter.com](mailto:uk_shs_data_privacy@baxter.com).

### **Sharing with Third Parties Who Provide Services to Us**

We share your Personal Information with third parties that provide services to help us with our business activities and functionalities related to the Baxter Sites, such as hosting our Baxter Sites, providing IT system administration and user support services, or offering customer service. These third parties are restricted from using your Personal Information in any way other than to provide services for us and we require them to provide an adequate level of protection for your Personal Information.

### **Sharing For other Purposes**

We may also share your Personal Information for treatment purposes and to ensure high standards of quality and safety of health care, our medical products or medical devices. We may also share Personal Information to comply with our legal or regulatory obligations including, but not limited to, our obligations related to adverse event reporting, materiovigilance, pharmacovigilance, product safety and other reporting obligations or to respond to lawful requests by public authorities, including meeting national security or law enforcement requirements, (e.g. to investigate fraud or respond to a government request). We may also disclose your Personal Information to third parties as necessary to investigate potential data incidents, or to protect the rights, property or safety of us, the users of our Sites or others.

Baxter might be involved in a merger, acquisition or sale of a portion of or all of its assets (Transaction) that includes your Personal information. If Baxter is involved in a Transaction, you will be notified via email and/or a notice on our Baxter Sites of any change in ownership, uses of your Personal Information, and choices you may have regarding your Personal Information. Baxter does not sell your Personal Information to third parties.

## **Social Media Features**

The Baxter Sites may include links that will take you to Baxter’s social media pages located on social media sites like Facebook and LinkedIn. Our pages on social media sites are governed by the privacy policy of the company providing it.

## **Forum/Blog**

Some of our Baxter Sites offer publicly accessible blogs or community forums. You should be aware that such blogs or community forums are not operated by Baxter. Any information you provide in these areas may be read, collected, and used by others who access them. You should consult the other sites' privacy notices as we have no control over information that is submitted to, or collected by, these third parties, and our Privacy Statement does not cover activities occurring at other websites.

## **Links**

Our Baxter Sites may contain links to other websites whose information practices may be different from ours. You should consult the other sites' privacy notices as we have no control over information that is submitted to, or collected by, these third parties, and our Privacy Statement does not cover activities occurring at other websites.

## **International Transfers of Your Personal Information**

Baxter is a global company and therefore uses global vendors and subcontractors as well as global IT systems and applications. As a result, the Personal Information that we collect about you may be transferred to, and stored at, a destination outside of your country which may have less strict, or no data protection laws, when compared to those in your country.

Your Personal Information may be transferred to our global affiliates and to our employees and contractors who work for us and are located outside the EU/EEA for the purposes described in this Privacy Statement. If this is the case, we will take legally required steps under the General Data Protection Regulation (“GDPR”) to ensure that adequate safeguards are in place (e.g., standard contractual clauses or Privacy Shield certification) to protect your Personal Information in accordance with this Privacy Statement. You may contact us at [uk\\_shs\\_data\\_privacy@baxter.com](mailto:uk_shs_data_privacy@baxter.com) or the other contact details below, for a copy of the safeguards which we have put in place to protect your Personal Information and privacy rights when your Personal Information is transferred outside the EU/EEA.

## **EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield**

Baxter International, Inc. (“Baxter International”) and its subsidiary Baxter Healthcare Corporation, participate in and have certified their compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework (collectively “the Privacy Shield Frameworks” or the “Frameworks”). Baxter International and Baxter Healthcare Corporation are committed to processing all Personal Information they receive in the United States from EU member countries and Switzerland in reliance on the Privacy Shield Frameworks, in

accordance with the Frameworks' applicable Principles. To learn more about the Privacy Shield Frameworks, and to view Baxter International's and Baxter Healthcare Corporation's certifications, visit the U.S. Department of Commerce's Privacy Shield List.

Baxter International and Baxter Healthcare Corporation are each responsible for the processing of Personal Information they receive under the Privacy Shield Frameworks, and for any such Personal Information that they subsequently transfer to third parties, including third parties located outside the United States. Baxter International and Baxter Healthcare Corporation each complies with the Privacy Shield Frameworks' Principles for onward transfers of Personal Information obtained from the EU and Switzerland, including the onward transfer liability provisions.

With respect to Personal Information received or transferred pursuant to the Privacy Shield Frameworks, Baxter International and Baxter Healthcare Corporation are each subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Baxter International and Baxter Healthcare Corporation may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Individuals who have an unresolved privacy or data use concern that they believe Baxter International or Baxter Healthcare Corporation has not addressed in a satisfactory manner should contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the Privacy Shield website, individuals may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

In compliance with the Privacy Shield Frameworks' Principles, Baxter International and Baxter Healthcare Corporation commit to resolve complaints about the collection or use of Personal Information under the Privacy Shield Frameworks. EU and Swiss individuals with inquiries or complaints regarding Baxter International's or Baxter Healthcare Corporation's compliance with the Privacy Shield Frameworks should first contact Baxter International at [privacy@baxter.com](mailto:privacy@baxter.com), Ethics and Compliance Hotline at +1-844-294-5418 or Baxter International Inc., ATTN: Chief Privacy Officer/Data Protection Officer, Global Privacy Office 1 Baxter Parkway, Deerfield, IL USA 60015,

Baxter has further committed to cooperate with the panel established by the EU data protection authorities and the Swiss Federal Data Protection and Information Commissioner with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU and Switzerland in the context of the employment relationship.

## **Your rights**

You have rights with respect to your Personal Information. These rights include:

- If we are using or sharing your Personal Information based on your consent, you may withdraw your consent at any time. Note that withdrawal of your consent will not affect the lawfulness of our uses or sharing of that information before you withdrew your consent.
- You can request access to or copies of your Personal Information, including knowing whether we hold Personal Information about you, and, if so, what kind and for what purposes. You can also request information about who has received your Personal Information.
- You can request that we correct your Personal Information if you think it is inaccurate or incomplete or request that we erase or delete your Personal Information, unless we have a legal obligation to hold it or are otherwise permitted by applicable law to retain it.
- You can request us to restrict the processing of your Personal Information and not delete it.
- You can request that we provide you with your Personal Information that we obtained from you based on your consent or a contract so that you can store and re-use it for your personal use, and you can ask us to provide it to another entity.

You can exercise your rights by accessing your account profile for a specific Baxter Site, by sending an e-mail to, [uk\\_shs\\_data\\_privacy@baxter.com](mailto:uk_shs_data_privacy@baxter.com) by using or the other contact details below.

You also have the right to object to our using and disclosing your Personal Information for certain purposes, including our legitimate interests and for purposes of direct marketing. You can object at any time to the processing of your Personal Information for direct marketing purposes and you can do so by "opting-out" of marketing or promotional communications in accordance with the unsubscribe instructions included in the specific communication. If you are unable to object by opting-out in this manner, please send an e-mail to, [uk\\_shs\\_data\\_privacy@baxter.com](mailto:uk_shs_data_privacy@baxter.com) or contact us using the contact details provided below to exercise your right to object. If you have questions about how we determine processing is for our legitimate interests or if you want to object to our processing on that basis, please contact us at, [uk\\_shs\\_data\\_privacy@baxter.com](mailto:uk_shs_data_privacy@baxter.com) or using the other contact details below. If you believe we are using, disclosing or otherwise processing your Personal Information in a way that is not in accordance with the law you can lodge a complaint with the data protection authority in your country.

We will handle any request to exercise your rights in accordance with applicable law.

## **Data Retention**

Your Personal Information will only be kept for as long as we reasonably consider necessary for achieving the purposes set out above or for as long as we are legally required to keep it. Please contact us at [uk\\_shs\\_data\\_privacy@baxter.com](mailto:uk_shs_data_privacy@baxter.com) or using the other contact details below for further details of applicable retention periods.

## **Minors**

Baxter Websites are not directed to children under the age of 13, and we do not knowingly collect Personal Information from children under the age of 13. If you think that we have collected Personal Information from a child under the age of 13, please contact us at [privacy@baxter.com](mailto:privacy@baxter.com). If we collect Personal Information from a minor age 13 or older on the basis of consent, we require parental consent.

## Tracking Technologies We Use

The Baxter Sites utilise various technologies in order to provide you with certain services and functionalities as follows.

### Cookies

Like many websites, Baxter Sites may use "cookies." A cookie is a small file that is transferred to your computer's hard drive to help us improve content (e.g., it helps us determine which parts of the site are popular and which are less popular, so we may improve these areas in the future) and customize website content for our visitors. We will not combine cookie information with any Personal Information you have submitted to us. You may set your browser to reject cookies and to let you know when a cookie is being placed on your computer.

As is true of most websites, we gather certain information automatically. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the site. IP addresses and other data we gather automatically may be considered to be Personal Information in certain countries.

Use of cookies may vary with the unique features of Baxter websites. Therefore, please review the individual cookies policy for the specific Baxter website you are visiting for any additional information on the use of cookies by the particular Baxter website.

Generally, we use cookies (and the other technologies identified below) for the following purposes:

- **To provide a service:** A cookie may be used to provide you with a specific service. For instance, if you are logging into an access-controlled section of our site, we set a temporary session cookie to establish that you have been authenticated. The information contained in these cookies consists of random data that is used by the server to authenticate the browser requests to the server for that particular session. If you choose not to accept a temporary cookie, you will not be able to navigate in these online applications. We also use a cookie when you visit our website and request documentation or a response from us. When you are filling out a form, you may be given the option of having our website deliver a cookie to your local hard drive. You might choose to receive this type of cookie in order to save time in filling out forms and/or revisiting our website. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

- To facilitate website use: If a cookie is used, our website will be able to remember information about your preferences and movement, either until you exit your current browser window (if the cookie is temporary) or until you disable or delete the cookie. Many users prefer to use cookies in order to help them navigate a website as seamlessly as possible. You should be aware that cookies are not able to "invade" your hard drive and return to the sender Personal Information from your computer.
- To understand our visitors: When you visit our site, our computers may automatically collect statistics in aggregate about visitor behavior. We may monitor statistics and other data such as how many people visit our site, the user's IP address, which pages people visit, from which domains our visitors come, which browsers people use and how they move about our website. We use this data about your visit for aggregation purposes only. These statistics are used to help us to understand our visitors' interests and improve the content and performance of our website.

## **Do Not Track**

Baxter does not track the users of this web site over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you.

## **Web Beacons**

Some of our websites may contain electronic images (called a "single-pixel gif" or "web beacon") that allow us to count page views or to access our cookies. In general, any electronic image viewed as part of a web page, including an ad banner, can act as a web beacon. Web beacons are typically very small, 1 by 1 pixel size, banner-like files, but their presence can be easily seen within Internet Explorer by clicking on "View" and then on "Source." Web beacons are so small in order not to use valuable space on the computer screen that is better used to display helpful content. We also may include web beacons in HTML-formatted newsletters containing graphics that we send to opt-in subscribers in order to count how many newsletters have been read. In addition, some advertising networks that serve ads on our websites may use web beacons within their clearly visible banner advertisements. Our web beacons do not collect, gather, monitor, or share any Personal Information about our website visitors. They are just the technique we use to compile our anonymous, aggregated statistics about website usage.

## **Internet Protocol (IP) Addresses**

Internet protocol (IP) addresses are unique identifiers automatically assigned to each computer when logging onto the Internet. We collect IP address information from any visitor to our Websites and log them for system administrative purposes only. IP addresses are not used for identification. This information helps us prepare aggregate demographic information and other information regarding the use of this site, and improve its functions. We do not link IP addresses to any information that is personally identifiable.

## **Google Analytics**

Google Analytics is an element of the Baxter Sites. By using cookies, Google Analytics collects and stores data such as time of visit, pages visited, time spent on each page of the Baxter Sites, the IP address, and the type of operating system used in the devices used to access the Baxter Site. By downloading and using a browser plugin provided by Google (available here: <https://tools.google.com/dlpage/gaoptout>), you can choose to opt out of Google Analytics.

## Security

We have reasonable and appropriate security measures in place to protect against the loss, misuse, and alteration of any Personal Information we receive about you through the Baxter Sites. We maintain reasonable security standards to protect the Personal Information that we maintain. If you have any questions about the security of your Personal Information, you can contact us at, [uk\\_shs\\_data\\_privacy@baxter.com](mailto:uk_shs_data_privacy@baxter.com) or by using the other contact details below.

## How to Submit a Complaint

Baxter is committed to ensuring that complaints and disputes concerning Baxter's privacy practices are investigated and resolved. For this reason, we have developed a privacy complaint handling procedure. It is our intention to resolve all complaints through this procedure.

Baxter respects your privacy and if you have submitted a concern to Baxter, we have placed your issue into our Complaint Handling Process that is intended to investigate and take steps to resolve your concerns.

Privacy questions or complaints may be submitted to Baxter by email, telephone or post office mail using the contact details provided at the end of this Privacy Statement.

We recognise, however, that there may be instances where resolution through our internal procedures is not achievable, or where complainants may wish to avail themselves of alternative dispute resolution mechanisms. You may submit your concern:

1. Online by clicking on this link - [Online](#)
2. Please [click here](#) for fax and postal mail information. The dispute resolution process shall be conducted in English.

## Contact Information

If you have questions or concerns about this Privacy Statement, our information handling practices, or any other aspect of privacy and security of your Personal Information, please contact us at [uk\\_shs\\_data\\_privacy@baxter.com](mailto:uk_shs_data_privacy@baxter.com). You can also contact our Data Protection Officer at [privacy@baxter.com](mailto:privacy@baxter.com), or by fax at +1-224-948-2876, through our Ethics and Compliance Hotline at +1-844-294-5418 or by mail at Baxter International Inc., ATTN: Chief Privacy Officer/Data Protection Officer, Global Privacy Office, 1 Baxter Parkway, Deerfield, IL USA 60015.

You may also contact us at:

Baxter Healthcare Ltd, Wallingford Road, Compton, Newbury, Berkshire, RG20 7QW

+44 (0)1635 206000

[uk\\_shs\\_data\\_privacy@baxter.com](mailto:uk_shs_data_privacy@baxter.com)

## **Changes to this Privacy Statement**

We may periodically update this Privacy Statement to describe new Site features, products or services we offer and how it may affect our use of information about you. If we make material changes to this this Privacy Statement, we will post a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. We will not make any materially different use or new disclosure of your Personal Information to another entity using your Personal Information for that entity's own purposes unless we notify you and give you an opportunity to object.