

# Catalent, Inc. Privacy Policy, effective May 25, 2018

## 1. This Policy

This Privacy Policy (this “**Policy**”) is issued by Catalent, Inc. on behalf of itself and its domestic and international subsidiaries and affiliates (“Catalent”, “we” or “us”) including Catalent Pharma Solutions, Inc., and is addressed to individuals and entities outside our organization with whom we interact, including visitors to our websites. Protecting your privacy is important to us, and we want you to understand how we collect and use data about you. To ensure transparency and security, this Policy provides important information about the nature and scope of personal data processed by us and the reasons we collect and process it.

We may amend or update this Policy from time to time to reflect changes in our practices with respect to the processing of personal data or changes to applicable law. We will post such amendments and updates to our websites. We encourage you to read this Policy carefully and contact [privacy@catalent.com](mailto:privacy@catalent.com) if you have questions or concerns about this Policy or the use of your personal information.

## 2. About Catalent

We are the leading global provider of advanced delivery technologies and development solutions for pharmaceutical, biopharmaceutical, consumer health, and beauty products. Our headquarters is in Somerset, New Jersey, and we operate more than 30 facilities world-wide. We are a business-to-business provider and do not market, sell, or distribute any product or service directly to patients or consumers. Accordingly, and as described in more detail below, the personal data that we process is generally limited to what is necessary to conduct business with other businesses within the pharmaceutical, veterinary, and consumer health industries.

We have multiple subsidiaries and affiliates within our corporate group that may control and process your Personal Data, as defined below, depending upon, among other things, where you reside. To obtain a current list of Catalent entities that control Personal Data or to request additional information regarding your Personal Data within the Catalent group, please contact us at [privacy@catalent.com](mailto:privacy@catalent.com).

## 3. Defined Terms

Within this Policy, we use the following terms in accordance with the definitions below:

<b>Controller</b>	The entity that decides how and why Personal Data is Processed
<b>Data Protection Authority</b>	An independent public authority that is legally tasked with overseeing compliance with applicable data protection laws

<b>Personal Data</b>	Any information relating to an identifiable natural person who can be directly or indirectly identified by means of this information
<b>Process or Processed or Processing</b>	Anything that is done with any Personal Data, such as collection, recording, organization, structuring, storage, analysis, or alteration
<b>Processor</b>	The entity that Processes Personal Data on behalf of the Controller
<b>Sensitive Personal Data</b>	Personal Data that reveals an identifiable natural person's racial or ethnic origin; political opinions, religious, or philosophical beliefs; trade-union membership; data concerning health; sexual orientation, genetic or biometric data

#### 4. Collection of Personal Data

We may collect Personal Data about you from a variety of sources:

- We obtain your Personal Data when you provide it to us (*e.g.*, where you contact us via email or telephone or any other means).
- We may collect your Personal Data in the ordinary course of our relationship with you (*e.g.*, where necessary to manage any interaction with us and without which we may not be able to comply with our obligations or respond adequately to a request you make).
- We may receive your Personal Data from third parties who provide it to us (*e.g.*, your employer or other third parties with whom you or any affiliated organization may be connected, such as one of our customers or suppliers).
- We may obtain your Personal Data from publicly available sources.
- We collect or obtain Personal Data when you visit any of our websites or use features or resources available on or through one of our websites. When you visit our websites, your device and browser may automatically disclose certain information (IP address, dates and times of connecting to a website, and other technical communications information), some of which may be considered Personal Data.

5. **Categories of Personal Data We Process:** We may Process the following categories of your Personal Data, subject to applicable law:

- *Personal details:* Your given name(s), preferred name(s) or nickname(s), and potentially your personal image should you physically visit one of our facilities
- *Contact details:* Your address, telephone number, fax, and email address
- *Employment details:* Your industry, role, business activities, names of current and former employers, work address, work telephone number, work email address, and work-related biographical information or social media profiles
- *Electronic Identifying Data:* IP addresses, cookies, activity logs, online identifiers, unique device identifiers, and geolocation data

**Sensitive Personal Data:** In very limited circumstances and subject to applicable law, we may obtain Sensitive Personal Data about you. Specifically, if you or a third party contact us about an issue with your use of a product we manufacture or develop, we may obtain Personal Data related to your physical or mental health, including the provision of health care services, which reveal information about your health status (“*Data Concerning Health*”).

6. **Purposes of Processing and Their Legal Basis:** We may Process your Personal Data for the following purposes, and we will only Process your Personal Data on the lawful basis specified.

Processing Purpose	Legal Basis for Processing
<p>We will process Personal Data when <u>on-boarding new customers or vendors</u>. Specifically, we Process Personal Data to comply with legal requirements and our internal policies and procedures, including debarment screens and other law enforcement agency sanctions lists.</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary to comply with a legal obligation; or</li> <li>• The Processing is necessary in connection with a contract you or your employer or principal may enter into with us, or to take steps prior to entering into a contract with us; or</li> <li>• We have a legitimate interest in carrying out the Processing for the purposes of on-boarding new clients and suppliers and preventing sanctions or other legal violations (to the extent such interest is not overridden by your fundamental rights or freedoms); or</li> <li>• We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way)</li> </ul>

<p>We will Process Personal Data when <u>providing you with products and services</u>.</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary to comply with a legal obligation; or</li> <li>• The Processing is necessary in connection with a contract you or your employer or principal may enter into with us, or to take steps prior to entering into a contract with us; or</li> <li>• We have a legitimate interest in carrying out the Processing for the purpose of providing products and services to you; or</li> <li>• We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way)</li> </ul>
<p>We will Process Personal Data when <u>marketing our products and services</u>. Specifically, we may communicate with you via any means (including email, telephone, mail or in-person) subject to applicable law and maintaining and updating your contact information where appropriate.</p>	<ul style="list-style-type: none"> <li>• We have a legitimate interest in carrying out the Processing for the purpose of marketing and prospecting (to the extent such interest is not overridden by your fundamental rights or freedoms); or</li> <li>• We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way)</li> </ul>
<p>We will Process Personal Data to <u>facilitate operation of our websites</u>. Specifically, we Process Personal Data to provide content and interact with you through our websites.</p>	<ul style="list-style-type: none"> <li>• We have a legitimate interest in carrying out the Processing for the purposes of operating and managing our websites (to the extent such interest is not overridden by your fundamental rights or freedoms); or</li> <li>• We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way)</li> </ul>
<p>We may Process your Personal Data to <u>manage our IT and communications systems</u>, including for the purpose of security audits.</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary to comply with a legal obligation; or</li> <li>• The Processing is necessary in connection with a contract you or your employer or principal may enter into with us, or to take steps prior to entering into a contract with us; or</li> <li>• We have a legitimate interest in carrying out the Processing for the purposes of managing and operating our IT systems and ensuring the security of those systems (to the extent such interest is not overridden by your fundamental rights or freedoms); or</li> </ul>

	<ul style="list-style-type: none"> <li>• We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way)</li> </ul>
<p>We will Process Personal Data to <u>manage our suppliers, customers, sales, finances, operations, and legal relationships.</u></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary to comply with a legal obligation; or</li> <li>• The Processing is necessary in connection with a contract you or your employer or principal may enter into with us, or to take steps prior to entering into a contract with us; or</li> <li>• We have a legitimate interest in carrying out the Processing for the purposes of managing and operating our business (to the extent such interest is not overridden by your fundamental rights or freedoms); or</li> <li>• We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way)</li> </ul>
<p>We will Process Personal Data to <u>ensure the physical security of our premises and other assets</u> (including records of visits to our premises and CCTV recordings) and the electronic security of our operations (including log-in records and access details).</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary to comply with a legal obligation; or</li> <li>• We have a legitimate interest in carrying out the Processing for the purposes of securing the physical and electronic security of our business, premises and assets (to the extent such interest is not overridden by your fundamental rights or freedoms); or</li> <li>• We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way)</li> </ul>
<p>We will Process Personal Data if we or any local authority are <u>conducting an investigation</u> into any breach of policy, law, or contract or any criminal offense. Similarly, we may Process Personal Data for the purpose of preventing such breach.</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary to comply with a legal obligation; or</li> <li>• We have a legitimate interest in carrying out the Processing for the purposes of detecting, and protecting against, breaches of our policies and applicable laws (to the extent such interest is not overridden by your fundamental rights or freedoms); or</li> <li>• We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way)</li> </ul>

<p>We will Process Personal Data to <u>comply with our legal and regulatory obligations</u> under applicable law</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary to comply with a legal obligation</li> </ul>
<p>We will Process Personal Data in the context of any legal or regulatory proceeding to the extent necessary <u>to establish, exercise, or defend a legal right, to prevent incurring a legal obligation, or to defend ourselves against a claim.</u></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary to comply with a legal obligation; or</li> <li>• We have a legitimate interest in carrying out the Processing for the purposes of establishing, exercising our defending our legal rights (to the extent such interest is not overridden by your fundamental rights or freedoms); or</li> <li>• We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way)</li> </ul>
<p>We will Process Personal Data to <u>conduct risk assessments and management</u>, audits, and other compliance functions, or to permit regulatory authorities or customers to do so to the extent required by law or by contract.</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary to comply with a legal obligation; or</li> <li>• We have a legitimate interest in carrying out the Processing for the purposes of preventing sanctions or other legal violations and managing other risks to which our business may be exposed (to the extent such interest is not overridden by your fundamental rights or freedoms); or</li> <li>• We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way)</li> </ul>
<p>In limited circumstances, we may Process <u>Data Concerning Health</u> for the purpose of complying with applicable regulatory or statutory law.</p>	<ul style="list-style-type: none"> <li>• The Processing is necessary to comply with a legal or regulatory obligation; or</li> <li>• We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way)</li> </ul>

For additional information regarding how we balance our legitimate interest in Processing Personal Data with your privacy interest, you may contact us at [privacy@catalent.com](mailto:privacy@catalent.com).

**7. Disclosure of Personal Data to Third Parties**

We may disclose your Personal Data to other entities within the Catalent group, to comply with our legal and contractual obligations or for other legitimate business purposes (including providing services to you or your employer and operating our websites), in accordance with

applicable law. We may also share your information with you and, as discussed below, third parties.

More specifically, we may share your Personal Data internally among various Catalent entities to facilitate our ability to operate as a unified group. We may also disclose your Personal Data to:

- You, and, where appropriate, your associates and representatives;
- Your employer (to the extent that our interaction with you is based on your employment relationship with a business with which we have a relationship);
- Clients of our businesses;
- Governmental, legal, regulatory, or similar authorities or ombudsmen, upon request or where required, including for the purposes of reporting any actual or suspected breach of applicable law or regulation or when that disclosure is legally required;
- Our accountants, auditors, financial advisors, lawyers, and other professional advisors, subject to binding contractual or professional obligations of confidentiality;
- Debt-collection agencies;
- Third-party Processors (such as payment services providers, shipping companies, etc., or your employer's agents, distributors, or other service providers, to the extent that our interaction with you is based on your employment relationship with a business with which we have a relationship), subject to binding contractual obligations of confidentiality;
- Any relevant party, claimant, complainant, law enforcement agency, court, or other tribunal, to the extent necessary for the establishment, exercise, or defense of a legal right, to prevent the inappropriate establishment of a legal liability, to defend against a legal claim, or to the extent required to comply with a subpoena or other legal process; and
- Any relevant third-party acquirer(s), in the event we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution, or liquidation).

We do not provide your Personal Data to any third party for its own marketing purposes.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) Process your Personal Data only in accordance with our written instructions; and (ii) protect the confidentiality and security of the Personal Data, together with any additional requirements under applicable law.

## **8. Direct Marketing**

If you have given us your email for purposes of communication or promotion, we may use your Personal Data to contact you or send promotional emails relating to your interests.

You may at any time revoke your consent to being contacted by email for promotional purposes by clicking on an "unsubscribe" link or replying directly to the e-mail and stating your wish to

unsubscribe. You may also unsubscribe by sending an unsubscribe request to [marketing@catalent.com](mailto:marketing@catalent.com).

We may collect data to determine if you open an email from us or if you click on links in an email. This data will be used to help us improve the effectiveness of our future marketing messaging and/or to prioritize follow-ups based on perceived communications relevance.

## **9. International Transfer of Personal Data**

We are an international business and, at times, will need to transfer your Personal Data within the Catalent group, and to third parties as noted in Section 7 above, in connection with the purposes set out in this Policy. In particular, if this involves transferring your Personal Data from inside to outside the European Economic Area (the “*EEA*”), we will take steps to ensure your information remains adequately protected in accordance with this Policy and applicable law, including the European Union’s General Data Protection Regulation (“*GDPR*”).

The destination of a transfer for your Personal Data may be to the United Kingdom, the EEA, Argentina, Australia, Brazil, Canada, China, Japan, Singapore, Switzerland, the United States, Uruguay, or any future location where Catalent may operate a facility (which locations are available on <http://www.catalent.com>). These locations may have different laws and data protection compliance requirements, including data protection laws of a lower standard than those that apply in the country in which you are located. However, if we make such a transfer of your Personal Data, we will take steps to ensure that the privacy of your Personal Data is respected, by ensuring that one of the following safeguards is put in place:

- Our intercompany data transfer agreement for transfers between entities in the Catalent group;
- Appropriate contractual clauses; or
- Other valid transfer mechanisms, such as the EU-U.S. and Swiss-U.S. Privacy Shield frameworks. Click here to view our [EU/Swiss-U.S. Privacy Shield Privacy Policy](#)

If you want to receive more information about the safeguards applied to international transfers of Personal Data, please use the contact details provided in Section 17 below.

## **10. Security**

We take appropriate steps to keep your Personal Data safe.

We store all of our data, including Personal Data, in secure environments. We provide training to our employees on data protection best practices and require them to enter into confidentiality agreements with us. Even though we use all reasonable efforts to protect your Personal Data, however, we cannot guarantee the absolute security of any information that is submitted to us online or otherwise.

You are responsible for ensuring that items of Personal Data that you send to us are sent securely.

## **11. Children**

In very limited circumstances, we may Process the Personal Data of children, including Sensitive Personal Data. For example, if a child or parent contacts us about an issue with the child's use of a product we manufacture or develop, we may Process Data Concerning Health. We will seek to Process such Personal Data only with parental consent.

We do not knowingly seek or intend to Process Personal Data from children on our websites. Children are not permitted to use the Catalent websites or services, and we request that children not submit any Personal Data through our websites.

Parents or legal guardians who believe that a child has submitted personal information to us and would like to have it deleted may contact us at [privacy@catalent.com](mailto:privacy@catalent.com).

## **12. Data Retention**

Except as otherwise permitted or required by applicable law or regulation, Catalent will only retain your Personal Data for as long as necessary to fulfill the purposes for which we collected it, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve any dispute or enforce any legal right. To determine the appropriate retention period for Personal Data, we consider our statutory obligations, the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the reasons why we Process your Personal Data, and whether we can achieve those purposes through other means.

Once the retention period expires, Personal Data that is no longer needed is either irreversibly anonymised (and the anonymised information will be retained) or securely destroyed.

For additional information regarding how Catalent retains its business records, including those that may contain Personal Data, please contact us at [privacy@catalent.com](mailto:privacy@catalent.com).

## **13. Information collected through Catalent Websites**

We collect certain types of information through our websites: anonymous information, Personal Data and non-Personal Data you might provide us.

We collect certain anonymous data regarding the use of our websites. This information does not personally identify users, by itself or in combination with other information. We gather it to help us improve the effectiveness of our websites. The anonymous data we collect may include information such as the type of browser you are using and the length of your visit to our websites.

Opt-out: You can configure your browser to disable collection of certain anonymous information; doing so, however, may reduce the functionality of our websites.

On certain pages of our websites, we may also ask you to provide Personal Data. This information may be gathered when you send us feedback or an e-mail, when you register for

certain services, when we set cookies, or directly in response to inquiries on our websites. In all such cases, you choose whether to provide us with Personal Data, but certain portions of the websites may not be available to you if you do not provide the Personal Data requested.

We do not sell, trade, or rent to others your Personal Data collected through our websites.

#### **14. Cookies**

Cookies are small bits of data cached or stored on your computer based on Internet activity. We use cookies where permitted and when your browser permits this functionality to monitor individual activity in aggregate so we may improve our websites. The information we gather includes the IP address of the computer you are using, user language, the operating system of this computer, the type of browser used to search the website, the presence/absence of "flash" plug-ins, screen resolution, connection type, and information that identifies the cookie. However, no other user information is generally gathered.

#### **15. Information Regarding Third-Party Websites**

We are not responsible for the privacy policies of websites to which our websites may link. If you provide any information to such third parties, different rules regarding the collection and use of your Personal Data will apply. We strongly suggest you review such third party's privacy policies before providing any data to them. We are not responsible for the policies or practices of third parties.

Our websites may also include social media features (*e.g.*, share or like buttons). Such features are provided by third-party social media platforms such as LinkedIn, Twitter, or Facebook. Where data is collected this way, its Processing is governed by the privacy policy of the respective social media platforms.

#### **16. Your Rights Regarding Your Personal Data**

All persons with whom we interact may request additional information about how we Process Personal Data by writing us using the contact information in Section 17.

If you live in the EEA, the United Kingdom or Switzerland (the "*Designated Countries*"), you have certain rights under the GDPR regarding the Processing of your Personal Data. Should you wish to exercise those rights, please contact us using the details set out in Section 17 below. If you wish to find out more about these rights, please contact us or your applicable Data Protection Authority.

The following is a summary of certain rights available to you under the GDPR if you reside in a Designated Country, but you should always look to the GDPR itself for a complete statement of its terms and conditions:

- The right to be informed about how we Process your Personal Data.

- The right to access copies of your Personal Data that we Process or control, together with information regarding the nature, Processing, and disclosure of that Personal Data;
- The right to request rectification of any inaccuracy in your Personal Data that we Process or control;
- The right to request, on legitimate grounds:
  - erasure of your Personal Data that we Process or control (“the right to be forgotten”); or
  - restriction of Processing of your Personal Data that we Process or control;
- The right to object to Processing;
- The right to data portability, which means the right to have your Personal Data provided to you in an accessible format that allows it to be transferred to and used by another Controller;
- Where we Process your Personal Data on the basis of your consent, you have the right to withdraw that consent, although such withdrawal will not make any Processing we carried out while we had your consent unlawful; and
- The right to lodge complaints with your applicable data protection authority regarding the Processing of your Personal Data by us.

## **17. Contact details**

If you have questions, suggestions or concerns about this Policy, or about the use of your information, please contact us at [privacy@catalent.com](mailto:privacy@catalent.com).

Similarly, if you live in a Designated Country and wish to exercise any applicable right described in Section 16 of this Policy, please contact [privacy@catalent.com](mailto:privacy@catalent.com).

Last Updated: June 18, 2019