



Whistleblowing Privacy Notice

Last updated: November 2024

Chugai Pharma Europe Ltd and **Chugai Pharma UK** (together referred to as “we”, “us” or “our” or “**Chugai**”) respect your right to privacy and treat all your personal data in accordance with Chugai Group Privacy Policy and applicable privacy and data protection laws. This Privacy Notice explains who we are, how we collect, share and use personal information about you and how you can exercise your privacy rights.

If you have any questions or concerns about our use of your personal information, please contact us using the contact details provided at the ‘**Contact Us**’ section of this Privacy Notice.

Scope of this Privacy Notice

This Privacy Notice applies to personal data being collected and processed in relation to Chugai’s incident reporting and explains how we collect, use, and protect personal data when you make a whistleblowing report. We are committed to protecting the privacy of individuals who report concerns.

For general information about data processing at Chugai, please refer to the Privacy section in the footer of this website.

Who is the Data Controller?

In collecting and processing this personal data **Chugai Pharma Europe Ltd. together with Chugai Pharma UK Ltd, where the latter have the relationship with you**, are the controllers of your personal data. When we say “Chugai”, “we”, “us” or “our”, we are referring to the controller.

The registered company address and contract details for each company are shared in the ‘**Contact Us**’ section below.

Purpose of the Processing?

If you choose to identify yourself when making a report, your personal data will be processed to manage any concerns you raise in line with our Whistleblowing Process. Chugai will also process information about others involved in the process. Such activities include reporting, documenting, tracking, investigating and managing alleged misconduct of individuals to comply with the Whistleblowing Laws. It may also be provided to other companies within the Chugai Group and to service providers assisting us with these activities.

Any personal data provided to Chugai related to whistleblowing will be used solely for these purposes.

What type of information we have?

We collect and process the following information:

Data subjects:

The processing of personal data concerns the following persons:

- The author of the alert (the whistleblower) – *if you have chosen to identify yourself. Reporter may be an employee or external*
- The respondent(s)
- Witness(es)
- Implicated person(s)

Categories of data processed

The following categories of data are concerned by this processing:

- Identity and contact details of the reporter (*if you have chosen to identify yourself*)
- Employee number, function and company (*if you are an employee*)
- Place of residence

- Any other information that you provide in relation to your report
- Information gathered while verifying the facts reported
- Reports, content of the investigation
- Action taken on the report
- Identity, function and contact details of persons involved in collecting or processing the alert
- Identity, function and contact details of witnesses
- Identity, function and contact details of the respondent

Only adequate, relevant, and limited data in relation to the case shall be collected and processed.

How we get the information and why we have it?

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Your data may be collected directly from you, when you make a report, and we are in direct contact with you.
- Via third party sources such as the witness(es), the author(s) of the alert, the respondent(s).

Our Lawful Basis

Under the UK General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- Compliance with a legal obligation to which Chugai is subject to

Marginally and depending on the nature of the report and the associated internal investigation, we may be required, in the context of this processing, to process health or other sensitive data which constitutes a special category of personal data.

- The processing of your special category data has the following legal basis: Article 9.2.f GDPR - processing necessary for the establishment, exercise or defense of legal claims.

Similarly, data relating to offences, convictions and security measures may be processed under the conditions set out in Article 10 GDPR and relevant national laws.

Data Sharing and Transfer

Your data will be accessible to Chugai employees and to the Chugai group companies' employees authorised by virtue of their duties or functions have access to the personal data processed as part of the investigation into your concern.

Chugai may also share your data with third party suppliers who by virtue of their duties under the services contracted need to be involved in the investigation of your concerns. Your privacy and confidentiality are paramount to Chugai, therefore third parties are carefully selected by Chugai in line with Chugai's policies and procedures and are bound to contractual terms that ensure appropriate safeguards in relation to managing your personal data.

It is possible that in the exchange of data within the Chugai group, business partners and service providers, your personal data may be transferred to countries that do not provide the same level of protection as your own. In this case, contracts containing the appropriate safeguard mechanisms will be ensured in line with GDPR.

Retention Period

Your personal data will be kept for different periods depending on the outcome of the report:

	Alert is not assessed as a whistleblowing	No actions result from the Alert	Disciplinary or legal proceedings are initiated
The data is destroyed or anonymised:	Immediately	Within 2 months of the closure of the verification operations	At the end of the procedure or of the limitation period for appeals against the decision

Once the retention period has been reached, the personal data is either destroyed or made anonymous. In the latter case, this means that it will be impossible to identify you from this data.

Security

Chugai takes precautions to ensure that personal data collected under this Privacy Notice is protected and that the processing is in accordance with applicable data protection rules, consistent with generally accepted industry standards, including technical, administrative, and physical safeguards to protect the personal data submitted to us from loss, misuse and unauthorised access, disclosure, alteration and destruction.

Your data protection rights

Under the conditions and within the limits of the applicable regulations, you have the following rights:

- **Right of access:** you may ask us to access the personal data we hold about you.
- **Right of rectification:** you may ask us to correct any data that is inaccurate or incomplete.
- **Right to erasure** (right to be forgotten): under certain conditions, you may ask us to erase the personal data we hold about you. We may, however, refuse your request, in particular if we need your personal data to comply with a legal obligation.
- **Right to restriction:** particularly if you dispute the accuracy of the personal data we hold about you.
- **Right to object:** you may object, for reasons relating to your particular situation and under certain conditions, to the processing of data concerning you.

As certain rights are exercised subject to conditions, we may not respond favourably to your request. In such a case, we will explain the reasons for our refusal.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us using our contact details in the section below if you wish to make a request.

Your Right to Complain

You also have the right to make a complaint at any time to the relevant supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance.

If you are unhappy with how we have used your data, you can also complain to the ICO using the below contact points:

- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- **Helpline number:** 0303 123 1113
- **Webform:** <https://ico.org.uk/make-a-complaint/>

Contact us

Chugai Pharma Europe Ltd and Chugai Pharma UK Ltd have appointed a data protection officer (DPO) who can respond to any enquiries about our use of your personal data. If you have any questions about this policy, including any requests to exercise your legal rights, please contact the UK DPO using the details set out below:

- **Registered Office and Post Address for both companies:** Mulliner House, Flanders Road, Turnham Green, London, W4 1NN, United Kingdom
- **e-mail:** dataprotection@chugai-pharm.co.uk
- **Phone:** +44 (0)208 987 5600

Updates to this Privacy Notice

We keep this Privacy Notice under regular review, and we will place any updates on this website in response to changing legal, technical or business developments. We encourage you to periodically review this page for the latest information on our privacy practices.