

Eli Lilly Netherlands privacy notice related to processing of PI as part of the whistleblowing process (External)

Your privacy is important to us. This Notice will let you know what personal information Lilly Netherlands and/or entities or persons that work on behalf of, or in partnership with, Lilly but are not Lilly employees (“Third Parties”), may process (e.g., collect, record, organize, structure, store, adapt or alter, retrieve, consult, use, disclose by transmission, disseminate or otherwise make available, align or combine, restrict, erase, or destroy), how we protect it, and your rights and choices with respect to your personal information.

This notice applies to "persons potentially involved" (the whistleblower; the persons who are the subject of a whistleblowing; and the persons involved in the collection or processing of the alert (particularly the persons questioned in the context of verification operations)) in the whistleblowing process targeted by the law: Dutch Whistleblower protection law (“Wet bescherming klokkenluiders”). The Whistleblowing process procedure is included in the “Speaking Up No Retaliation Netherlands” process and is available at www.lilly.nl.

The processing of PI is carried out in accordance with Regulation (EU) 2016/679, as well as the legal provisions relating to the protection of natural persons regarding the processing of personal data concerning them. Any exchange or transmission of information by the Union institutions, bodies, offices, or agencies shall be carried out in accordance with Regulation (EU) 2018/1725 and the Dutch Whistleblower protection law.

Personal Information: What we Collect and How We Use It

We may collect the following personal information (“PI”) necessary for our business purposes:

- The identity - e.g., the names and contact details of the whistleblower;
- The identity of the person(s) concerned by the report; the persons to whom the irregularity is attributed; the persons who contributed to the irregularity; and their contact details and function;
- The identity of any person who may be linked to a report, because he or she may have witnessed or been the victim of a reported irregularity or because he or she could provide information in the context of the investigation conducted by the report manager; and their contact details and function;
- Any other necessary data transmitted by the whistleblower or collected in the course of the whistleblowing manager's tasks and relating to the persons listed in the points above. It is being understood that personal data that are manifestly not relevant for the processing of a specific report are not collected or, if accidentally collected, will be deleted without undue delay.

The whistleblowing manager may collect PI from:

- The different whistleblowing channels described in the procedure ‘Speaking Up No Retaliation NL’ which includes:
 - Your hierarchy;
 - Lilly local referents: Ethics and compliance, human resources;
 - Global Ethics and Compliance hotline managed by a third party.
- Whistleblowers related to persons involved in the violation;
- Persons involved in investigations.

Lilly and/or Third Parties”, may process PI for the following purposes:

- Implement whistleblowing process required by law;
- To pursue Lilly’s legitimate interest as part of the whistleblowing process with the procedure “Speaking Up: No Retaliation”;

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- Data analytics for the completion of a register of report required by Dutch Whistleblower protection law (Article 17);
- To establish, exercise or defend legal claims;
- Administration of other legal and business processes that are in Lilly's legitimate interest, including company record retention and maintaining and securing our systems and records (e.g., testing, validation, fixing software errors).

The whistleblowing manager can ONLY transmit PI to other person than employees authorized to manage and follow up whistleblowing in the 2 following cases:

- if expressly and freely consent by the person to whom the disclosure relates;
- if it appears necessary and proportionate, in the context of investigations carried out by the competent authorities in the investigation of offences or in the context of judicial proceedings, with a view to safeguarding the rights of defense of the accused persons.

When the identity of a person, or any other information from which that identity can be directly or indirectly inferred, will be disclosed (in respect of previous conditions), the whistleblowing manager shall inform the person to whom the disclosure relates in advance and provide the reasons for such disclosure, unless such prior information would jeopardize ongoing investigations or legal proceedings.

Reasons We Share PI

We may share your PI with the recipients listed above for purposes consistent with those identified in this notice. These Third Parties have agreed to protect the information and to process it as directed by us (if acting on our behalf) or as required by law.

We may also be required to disclose your information in response to lawful requests by public authorities, including to comply with national security or law enforcement requests.

We will also disclose PI, where legally required to do so or when doing so is necessary to protect the health and safety of you or other individuals or the vital interests of the company, to Third Parties such as government agencies, government officials or public authorities, including to comply with national security or law enforcement requests, when compelled by a subpoena or court order, or to your designated emergency contact in the event of an emergency.

Where We Transfer and Process PI

Your PI may be transferred and processed by and between Eli Lilly and Company, its affiliates and wholly owned subsidiaries, and Third Parties worldwide. When transferring PI across country borders, Lilly utilizes appropriate transfer mechanisms as applicable (which may include consent, Standard Contractual Clauses, existing adequacy decisions, intra-corporate data transfer agreements, etc.).

To obtain additional information regarding the mechanism for transfers that Lilly has in place for cross-border transfers of PI, please contact us at privacy@lilly.com or visit <https://privacynotice.lilly.com/>.

We may also provide your PI to a Third Party in connection with the merger, sale, assignment, or other transfer of the business to which the information relates, in which case PI may be shared with, sold, transferred, rented, licensed or otherwise in connection with the contemplated transaction to the Third Party. We will require any such Third Party to agree to treat PI in accordance with this notice.

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How Long We Keep PI

PI will be stored for a period of time needed to fulfill legitimate and lawful business purposes in accordance with Lilly's records retention policies and applicable laws and regulations.

How We Secure PI

We provide reasonable physical, electronic, and procedural safeguards to protect PI we process and maintain. We limit access to PI to authorized employees and Third Parties who need access to perform the business activities described in this notice. Although we strive to protect the PI we process and maintain, no security system can prevent all potential security breaches.

Your Rights and Choices

Upon verification of your identity, and as applicable by law, you have the right to:

- request:
 - information from us on how your PI is being processed and with whom it is being shared;
 - to see and get a copy of the PI that we have about you;
 - that we correct, restrict the processing of, and/or erase/delete your PI;
 - to have your information transmitted to another entity or person in a machine-readable format, in limited circumstances;
 - a copy of the Standard Contractual Clauses (SCCs) and Appendix for European Economic Area, Swiss, and United Kingdom data transferred pursuant to SCCs;
- change or withdraw your consent at any time;
- object to the processing of your PI.

There may be exceptions that apply to your request. To exercise your rights, you or your authorized representative may submit a request to:

- For workforce:
 - Internal – <http://lillyhr.i-sight.com/generalhr/new>
 - External - <https://lillyhr.i-sight.com/external/vendorrequest>
- For non workforce: datarights@lilly.com

You will not be discriminated against for exercising any of your rights.

How to Contact Us

If you have any questions about this Notice, you may contact us at:

Lilly Nederland BV.

Papendorpseweg 83

3528 BJ Utrecht

(0031) (0)30-60 25 800

E-mail : netherlands_nlmail-privacy@lilly.com

For more information on the privacy policy of Lilly please view the Privacy notice at <https://www.lilly.com/privacy>.

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How to Submit a Complaint

If you wish to raise a complaint on how we have handled your PI, you can contact Global Privacy Office and Data Protection Officer at privacy@lilly.com;

If you are not satisfied with our response or believe we are processing your PI out of accordance with the law, you can register a complaint with a relevant regulatory authority (e.g., Autoriteit Persoonsgegevens or Attorney General).

Changes to Our Privacy Practices

We may update this Notice from time to time. For the latest version of this Notice please contact us by using one of the methods listed in the How to Contact Us section.

Version 1 – 17 of December 2023