
STRYKER SOUTH AFRICA PROPRIETARY LIMITED

Stryker Information Manual

Published in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000 and in terms of the Protection of Personal Information Act, 4 of 2013

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1. INTRODUCTION

- 1.1 The Promotion of Access to Information Act of 2000 (herein after referred to as "**PAIA**") was enacted with the purpose of addressing section 32 (2) of the Constitution, which provides that any person has a right to gain access to any information held by a public or private body. If the record is requested from a private body, the requester needs to prove that the record is required for the exercise or protection of a right.
- 1.2 The Protection of Personal Information Act of 2013 (herein after referred to as "**POPIA**") was enacted to give effect to:
- (a) the constitutional right to privacy, by safeguarding personal information when processed by a responsible party, subject to justifiable limitations that are aimed at : (i) balancing the right to privacy against other rights, particularly the right of access to information; and (ii) protecting important interests, including the free flow of information within the Republic and across international borders;
 - (b) regulate the manner in which personal information may be processed, by establishing conditions, in harmony with international standards, that prescribe the minimum threshold requirements for the lawful processing of personal information;
 - (c) provide persons with rights and remedies to protect their personal information from processing that is not in accordance with POPIA; and
 - (d) establish voluntary and compulsory measures, including the establishment of an Information Regulator, to ensure respect for and to promote, enforce and fulfil the rights protected by POPIA.
- 1.3 One of the main requirements specified in PAIA is the compilation of a manual that provides information on both the types and categories of records held by the public or private body. In terms of PAIA, a private body includes any former or existing juristic person.
- 1.4 Insofar as POPIA is concerned, PAIA requires the manual to detail: (i) the purpose of processing of personal information, (ii) a description of the categories of data subjects and of the information or categories of information relating thereto; (iii) the recipients or categories of recipients to whom the personal information may be supplied; (iv) any planned transborder flows of information; and (iv) a general description allowing a preliminary assessment of the suitability of the information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information which is to be processed.
- 1.5 This Information Manual ("**Manual**") provides an outline of the type of records held by and the processing of personal information performed by Stryker South Africa Proprietary Limited ("**Stryker**") in respect of the fields of medical devices and technology, and explains how one may submit requests for access to these records in terms of PAIA.
- 1.6 This document serves as the Information Manual for Stryker in terms of PAIA, to provide a reference as to the processing activities, the records held and the process that needs to be followed to request access to such records.

2. ADMINISTRATION OF PAIA - (Section 51 (1)(a) of PAIA)

The details of the contact persons who will deal with all requests made in terms of PAIA and who will act as the information officers for the purposes of POPIA relating to Stryker are as follows ("**Stryker Information Officer**"):

Stryker Information Officer	
Contact Name (1)	Dr Vitor Manuel Lamas de Almeida Ferrão
Position	General Manager
Physical Address	Stryker Building Waterfall Industrial Park Cnr of Old Main Road And Bridal Veil Gauteng 1685
Postal Address	Private Bag x4019 Ferndale Gauteng 2160
Department	Business Division Leadership
Direct line: (Tel)	+27 (0) 87 286 6950
Mobile	+27 (0) 82 303 2883
Email	vitor.ferrao@stryker.com

3. **GUIDE ON HOW TO USE PAIA - (Section 10 of PAIA)**

- 3.1 The Information Regulator is responsible for updating and making available the existing guide ("**Guide**") that has been compiled by the South African Human Rights Commission ("**SAHRC**") that will facilitate ease of use of PAIA for requesters. This Guide is available, in all 11 official languages, from the Information Regulator. Please direct any queries to:

The Information Regulator	
Physical Address:	JD House, 27 Stiemens Street, Braamfontein
Postal Address:	P.O. Box 31533, Braamfontein, Johannesburg, 2017.
General Inquiries Email Address:	inforeg@justice.gov.za
Website:	https://www.justice.gov.za/inforeg/

4. **RECORDS AUTOMATICALLY AVAILABLE - (Section 51(1)(b)(ii) of PAIA)**

- 4.1 Records that are automatically available to the public are all records of Stryker lodged in terms of regulatory/legislative requirements with various statutory/regulatory bodies and all records publicly published by Stryker on its website, as applicable from time to time: <https://www.stryker.com/za/en/international/africa/south-africa.html>.

5. **RECORDS AVAILABLE IN ACCORDANCE WITH SOUTH AFRICAN LEGISLATION - (Section 51(1)(b)(iii))**

- 5.1 Stryker has records available in terms of various laws, which may include:
- (a) Basic Conditions of Employment Act, 75 of 1997
 - (b) Companies Act, 71 of 2008

- (c) Consumer Protection Act, 68 of 2008
- (d) Copyright Act, 98 of 1978
- (e) Designs Act; 195 of 1993
- (f) Currency and Exchanges Act, 9 of 1933 (and Exchange Control Regulations)
- (g) Electronic Communication and Transactions Act, 25 of 2002
- (h) Employment Equity Act, 55 of 1998
- (i) Income Tax Act, 58 of 1962
- (j) Immigration Act, 13 of 2002
- (k) King 4 Code on Corporate Governance
- (l) Labour Relations Act, 66 of 1995
- (m) Medical and Related Substances Act, 101 of 1965
- (n) Merchandise Marks Act, 17 of 1941
- (o) Occupational Health and Safety Act, 85 of 1993
- (p) Patents Act, 57 of 1978
- (q) Pension Funds Act, 24 of 1956
- (r) Prevention of Organised Crime Act, 121 of 1998
- (s) Promotion of Access to Information Act, 2 of 2000
- (t) Promotion of Equality and Prevention of Unfair Discrimination Act, 4 of 2000
- (u) Protection of Personal Information Act, 4 of 2013
- (v) Regulation of Interception of Communications and Provision of Communication-related Information Act, 70 of 2002
- (w) Sale and Services Matters Act, 25 of 1964
- (x) Securities Transfer Tax Act, 25 of 2007
- (y) Skills Development Levies Act, 9 of 1999
- (z) Skills Development Act, 97 of 1998
- (aa) South African Revenue Services Act, 34 of 1997
- (bb) Tax on Retirement Funds Act, 38 of 1996
- (cc) Trade Practices Act, 76 of 1976
- (dd) Trademarks Act, 194 of 1993
- (ee) Unemployment Insurance Contributions Act, 4 of 2002
- (ff) Unemployment Insurance Act, 63 of 2001
- (gg) Value Added Tax Act No. 89 of 1991.

6. RECORD SUBJECTS AND THE INFORMATION OR CATEGORIES APPLICABLE TO RECORD SUBJECTS - (Section 51(1)(b)(iv) of PAIA)

6.1 Stryker holds various records under certain categories, which may include:

(a) Intellectual property

- (i) Copyright
- (ii) Designs
- (iii) Licences
- (iv) Patents
- (v) Trade Marks

(b) Insurance

- (i) Insurance investigation reports
- (ii) Insurance claim records
- (iii) Policies

(c) Taxation

- (i) Income tax returns
- (ii) PAYE returns
- (iii) I-JIF returns
- (iv) VAT returns

(d) Human resources

- (i) Accident books and records
- (ii) Disciplinary records
- (iii) Employee benefit arrangements, rules and records
- (iv) Employee information
- (v) Employee training
- (vi) Employment and termination agreements
- (vii) Forms and applications
- (viii) Grievance procedures
- (ix) IRP5s
- (x) Labour dispute records
- (xi) Leave records
- (xii) Policies, standards and procedures
- (xiii) Safety, health and environmental records

- (xiv) Standard letters and notices
- (xv) Payroll reports and wage register
- (xvi) Pay slips
- (xvii) Workplace records
- (e) Finance**
 - (i) Audited annual financial statements
 - (ii) Banking details and bank accounts
 - (iii) Debtors/creditors statements and invoices
 - (iv) General ledgers and subsidiary ledgers
 - (v) General ledger reconciliation
 - (vi) Management accounts
 - (vii) Policies and procedures
- (f) Procurement**
 - (i) Contractor, client and supplier agreements
 - (ii) Lists of suppliers, products, services and distribution
 - (iii) Policies and procedures
 - (iv) Preferential procurement policies and standards
 - (v) Requests for proposals and requests for information
 - (vi) Standard terms and conditions for supply of services and products
 - (vii) Tender documentation
- (g) Operations**
 - (i) Medical devices and technology
 - (ii) Customer and supplier lists
 - (iii) Products and services
- (h) Legal and Compliance and Regulatory Affairs/Quality Assurance**
 - (i) Agreements
 - (ii) Applications
 - (iii) Approvals
 - (iv) Authorisations
 - (v) Consumer complaints
 - (vi) Litigation claim, court documents and records
 - (vii) Permits and licences

- (viii) Registrations
- (ix) Submissions to parliament and other regulatory and statutory bodies
- (x) Policies and Procedures
- (i) Information security/information technology**
 - (i) Computer and mobile device usage policy documentation
 - (ii) Disaster recovery plans
 - (iii) Hardware asset registers
 - (iv) Information security policies, standards and procedures
 - (v) Information usage policy documentation
 - (vi) Project, disaster recovery and implementation plans
 - (vii) Software licensing
 - (viii) System documentation and manuals
- (j) Risk management and audit**
 - (i) Audit reports
 - (ii) Risk management plans
 - (iii) Risk management frameworks
- (k) Corporate records**
 - (i) Attendance registers of directors' and other meetings

7. INFORMATION REQUIRED IN TERMS OF POPIA - (Section 51(c)(i) - (v) of PAIA)

7.1 The purpose of the processing

Please refer to our Privacy Statement as available at:

<https://www.stryker.com/za/en/legal/privacy.html>

(attached as Annexure 3)

7.2 Description of the categories of data subjects and of the information or categories of the information relating thereto.

Please refer to our Privacy Statement as available at:

<https://www.stryker.com/za/en/legal/privacy.html>

(attached as Annexure 3)

7.3 The recipients or categories of recipients to whom the personal information may be supplied

Please refer to our Privacy Statement as available at:

<https://www.stryker.com/za/en/legal/privacy.html>

(attached as Annexure 3)

7.4 Planned transborder flows of personal information

Please refer to our Privacy Statement as available at:

<https://www.stryker.com/za/en/legal/privacy.html>

(attached as Annexure 3)

7.5 The information security measures implemented by Stryker to ensure the confidentiality, integrity and availability of the processed information

Please refer to our Privacy Statement as available at:

<https://www.stryker.com/za/en/legal/privacy.html>

(attached as Annexure 3)

8. PAIA ACCESS REQUEST PROCEDURE

8.1 General

- (a) The purpose of this section is to provide requesters with enough guidelines to follow to facilitate a request for access to records held.
- (b) It is important to note that an application for access to information can be refused if the application does not comply with the procedural requirements of PAIA. In addition, the successful completion and submission of an Access Request Form does not automatically allow the requester access to the requested record.
- (c) Any third party who requires data, documents, and/or information from Stryker, its service providers or its agents must provide a letter of authorization from the entity, which he/she represents. The authorisation letter should state that the requester is authorised to request the data, documents and/or information and specify the purpose for which the data, documents and/or information is requested. Any individual who requests such data, documents and/or information in their personal capacity should state that fact and specify the purpose for which the information is requested.
- (d) All data, documents and/or information requested from Stryker, its service providers or agents may only be used for the purposes for which it is provided. Such data, documents and/or information may not be retained or utilised in any format or for any other purpose. Upon completion of the project for which the data, documents and/or information was requested, the requester must certify in writing and within seven (7) days of completion of the project, that it has duly destroyed such data, documents and/or information.
- (e) Requesters are required to use reasonable means to prevent unauthorized disclosure and to protect the confidentiality of data, documents and/or information provided to them by Stryker, its service providers or agents.
- (f) Note: If it is reasonably suspected that the requester has obtained access to Stryker's records through the submission of materially false or misleading information, legal proceedings may be instituted against such requester.

8.2 Completion of Access Request Form

- (a) In order for Stryker to respond to requests in a timely manner, the Access Request Form attached as **Annexure 1** to this Manual should be completed, taking due cognisance of the following Instructions on Completion of Forms:

- (i) The Access Request Form must be completed in the English Language.
 - (ii) Type or print in BLOCK LETTERS an answer to every question.
 - (iii) If a question does not apply, state "N/A" in response to that question.
 - (iv) If there is nothing to disclose in reply to a particular question, state "nil" in response to that question.
 - (v) If there is insufficient space on a printed form in which to answer a question, additional information may be provided on an additional folio.
- (b) When the use of an additional folio is required, precede each answer thereon with the title applicable to that question.
 - (c) All additional folios must be signed by the requestor.

8.3 Submission of Access Request Form

- (a) The completed Access Request Form must be submitted either via conventional mail, e-mail or fax and must be addressed to the Stryker Information Officer.
- (b) An initial, non-refundable R 50.00 (inc. VAT) request fee is payable on submission. If the request fee is not paid in cash at the offices of Stryker, the banking details may be requested.
- (c) **Note:** This fee is not applicable to Personal Requesters, referring to any person seeking access to records that contain their personal information.

8.4 Prescribed fee

The prescribed access fee, if applicable, as provided for in paragraph, 8.3(b) above must be paid and proof of payment (e.g. copy of deposit slip or EFT) must be submitted along with your request.

8.5 Prescribed fees

- (a) PAIA provides for two types of fees, namely:
 - (i) a request fee, which will be a standard fee; and
 - (ii) an access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.
- (b) The requester, other than a personal requester, must pay the prescribed R50.00 (inc VAT) request fee, before submitting the request and provide proof of payment, which must accompany the Access Request Form.
- (c) If the search for and preparation of the record (for disclosure), including the arrangement to make it available in the Access Request Form, requires more than the hours prescribed in the regulations for this purpose, the Stryker Information Officer will request you to pay as a deposit being the prescribed portion of the access fee which would be payable if the request is granted ("**Deposit**").
- (d) The Stryker Information Officer may withhold a record until the requester has paid the prescribed fees set out in **Annexure 2**.
- (e) A requester whose request has been granted must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the

prescribed hours to search for and prepare the record for disclosure, including making arrangements to make it available in the Request Form.

- (f) You may ask for a refund of the Deposit if your request for access is refused.

8.6 Notification

- (a) Requests will be received by the Stryker Information Officer and the requester will be notified within 30 days of receipt of the completed Access Request Form.
- (b) Subsequent notifications may include:
 - (i) Notification of Extension Period (if required)
- (c) The requester may be notified whether an extension period is required for the processing of the requests, including:
 - (i) the required extension period, which will not exceed an additional 30-day period;
 - (ii) adequate reasons for the extension; and
 - (iii) notice that the requester may lodge an application with a court against the extension and the procedure, including the period, for lodging the application.

8.7 Decision on Request

- (a) If no extension period or deposit is required, the requester will be notified, within 30 days, of the decision on the request.
- (b) If the request for access to a record is successful, the requester will be notified of the following:
 - (i) the amount of the access fee payable upon gaining access to the record (if any);
 - (ii) an indication of the form in which the access will be granted; and
 - (iii) notice that the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the access fee, or the tender or payment of the deposit and the procedure, including the period, for lodging the complaint with the Information Regulator or the application.
- (c) If the request for access to a record is not successful, the requester will be notified of the following:
 - (i) adequate reasons for the refusal (refer to Third Party Information and Grounds for Refusal below); and
 - (ii) that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request and the procedure, including the period, for lodging the application.

8.8 Third Party Information

- (a) If access is requested to a record that contains information about a third party, Stryker is obligated to attempt to contact this third party to inform them of the request. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied.

- (b) In the event of the third-party furnishing reasons for the support or denial of access, our designated contact person will consider these reasons in determining whether access should be granted, or not.

8.9 Grounds for Refusal

- (a) Stryker may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which Stryker may refuse access include:
 - (i) Protecting personal information that Stryker holds about a third person (who is a natural person), including a deceased person, from unreasonable disclosure.
 - (ii) Protecting commercial information that Stryker holds about a third party or Stryker (for example trade secrets: financial, commercial, scientific or technical information that may harm the commercial or financial interests of the organization or the third party).
 - (iii) If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement.
 - (iv) If disclosure of the record would endanger the life or physical safety of an individual.
 - (v) If disclosure of the record would prejudice or impair the security of property or means of transport.
 - (vi) If disclosure of the records would prejudice or impair the protection of a person in accordance with a witness protection scheme.
 - (vii) If disclosure of the record would prejudice or impair the protection of the safety of the public.
 - (viii) The record is privileged from production in legal proceedings, unless the legal privilege has been waived.
 - (ix) Disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of Stryker.
 - (x) Disclosure of the record would put Stryker at a disadvantage in contractual or other negotiations or prejudice it in commercial competition.
 - (xi) The record is a computer programme.
 - (xii) The record contains information about research being carried out or about to be carried out on behalf of a third party or Stryker or any other Stryker entity and/or affiliate.
 - (xiii) Records that cannot be found or do not exist.
 - (xiv) If Stryker has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

8.10 Your Remedies

Stryker does not have an internal appeal procedure. As such, the decision made by Stryker's Information Officer is final. If your request is denied, you are entitled to lodge a complaint with the Information Regulator or apply to a court with appropriate jurisdiction for relief.

9. AVAILABILITY OF THE MANUAL

The Manual is available for inspection at the offices of Stryker during normal business hours. The Manual is available for download on the Stryker website: <https://www.stryker.com/za/en/international/africa/south-africa.html>.

The Information Regulator may also request a copy of the manual under the provisions of PAIA.

ANNEXURE 1

FORM C

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

([Section 53 \(1\)](#) of the Promotion of Access to Information Act, 2000
(Act [No. 2 of 2000](#)))

[[Regulation 10](#)]

A. Particulars of private body

The Head:

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below.*
- (b) The address and/or fax number in the Republic to which the information is to be sent must be given.*
- (c) Proof of the capacity in which the request is made, if applicable, must be attached.*

Full names and surname:

Identity number:

Postal address:

Fax number:

Telephone number:

E-mail address:

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname:

Identity number:

D. Particulars of record

- (a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.*

(b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

2. Reference number, if available:

3. Any further particulars of record:

E. Fees

- a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.*
- (b) You will be notified of the amount required to be paid as the request fee.*
- (c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.*
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.*

Reason for exemption from payment of fees:

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:

Form in which record is required:

Mark the appropriate box with an X

NOTES:

- (a) Compliance with your request in the specified form may depend on the form in which the record is available.*
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.*
- (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.*

1.	If the record is in written or printed form:		
	copy of record*		inspection of record
2.	If record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):		
	view the images images*	copy of the images images*	transcription of the images*
3.	If record consists of recorded words or information which can be reproduced in sound:		
	listen to the soundtrack (audio or cassette)		transcription of soundtrack*(written or printed document)
4.	If record is held on computer or in an electronic or machine-readable form:		
	printed copy of record* disc)	printed copy of information derived from the record*	copy in computer readable form* (stiffy or compact disc)
	*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?		
		YES	NO
	Postage is payable.		

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:
2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ this _____ day of _____ 20____

SIGNATURE OF
REQUESTER/PERSON ON
WHOSE BEHALF
REQUEST IS MADE

ANNEXURE 2

FEEES IN RESPECT OF PRIVATE BODIES

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) for every photocopy of an A4-size page or part thereof.	R 1.10
2. The fees for reproduction referred to in regulation 11(1) are as follows: (a) For every photocopy of an A4-size page or part thereof (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form (c) For a copy in a computer-readable form on- (i) stiffy disc (ii) compact disc (d) (i) For a transcription of an visual images, for a A4-size page or part thereof (ii) For a copy of visual images (e) (i) For a transcription of an audio record, for a A4-size page or part thereof (ii) For a copy of audio record	R 1.10 R 0.75 R 7.50 R 70.00 R 40.00 R 60.00 R 20.00 R 30.00
3. The request for fee payable by a requester, other than a personal requester, referred to in regulation 11 (2)	R 50.00
4. The access fees payable by a requester referred to in regulation 11(3) are as follows: (1) (a) For every photocopy of an A4-size page or part thereof (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form (c) For a copy in a computer-readable form on- (i) stiffy disc (ii) compact disc (d) (i) For a transcription of an visual images, for a A4-size page or part thereof (ii) For a copy of visual images (e) (i) For a transcription of an audio record, for a A4-size page or part thereof (ii) For a copy of audio record	R 1.10 R 0.75 R 7.50 R 70.00 R 40.00 R 40.00 R 60.00 R 20.00 R 30.00

(2) For purposes of section 54(2) of the Act, the following applies:

- (a) Six hours as the hours to be exceeded before a deposit is payable, and
- (b) one third of the access fee is payable as a deposit by the requester.

(3) The actual postage is payable when a copy of a record must be posted to a requester.

Annexure 3

PRIVACY STATEMENT

Introduction

Stryker recognises that the personal information it receives is held in a position of trust. Stryker seeks to fulfill that trust by adhering to general principles regarding the protection of personal information. This Privacy Statement explains how we collect, use, share and protect information in the course of operating our business.

Scope

This Privacy Statement (“Statement”) applies to the personal information of consumers that is collected or used by Stryker, its affiliates or subsidiaries (collectively, “Stryker”, “we”, “our”, “us”). This Statement applies to all the personal information that Stryker collects when consumers interact with us, such as when visiting our websites, using or purchasing our products or services, contacting customer service and when interacting with us as a business customer, supplier or business partner (collectively, the “Services”).

This includes, without limitation, all online and offline collections of all types of personal information. However, some Stryker collections involve types of data with special requirements (for example, health information) which require a different privacy notice. Whenever that is the case, Stryker will make it clear that the privacy notice concerned is different from this Statement.

For those who reside in California, please see our Privacy Notice for California Residents for additional information regarding our practices.

Information collection

Stryker may ask you to provide personal information for purposes including, but not limited to, the following:

- Buying Stryker products and services;
- Activating or registering certain products and services or enhancing functionality;
- Receiving information about Stryker products and services;
- Participating in Stryker online communities, including our social media channels/pages;
- Storing your preferences for future interactions and communications from Stryker;
- Helping us to develop products and services and create campaigns that are designed around you, optimise customer services and continuously improve our websites;
- Helping us to improve products and services, and allowing Stryker to keep you informed of, or involve you in the testing of, new products and services;
- Resolving consumer and/or product and services issues;
- Registering visitors of Stryker facilities or Stryker organised events and conferences;
- Contract or tender management; and
- Receiving personalised messages, special offers and advertisements that are relevant to your personal interests, based on the information you have shared with us and on the information we have collected through cookies or similar techniques regarding your use of the Stryker websites/social media/blogs.

Stryker maintains physical, technical, and administrative safeguards to protect your personal information and only allows disclosures as permitted by law to assist in providing products or services. We may also collect product and service information and provide these statistics to others in an aggregate form where the information has been de-identified.

Personal information collected may include:

- Contact information, such as name, address, email, telephone number, fax number, organisation name, and/or job title;
- Unique identifiers and preference information such as username, password, marketing preferences, internet protocol (IP) address, browser type, operating system, computer or mobile device, or navigation and clickstream behaviour for online interactions;
- Resume or CV, including work history, professional qualifications, publications, awards, references, completed trainings, and signature;
- Food restrictions, passport info for travel bookings or identification purposes, social security number (where required by law), bank account details, (emergency) contact persons, family information (where applicable and in accordance with local law);
- Creditworthiness, VAT number, product, purchase information history, request documentation;
- Pictures, video and audio recordings where you have provided your permission;
- Sensitive personal information, such as health information or reports of an individual end-customer (e.g., concerning product claims and investigations, patient pre- and post-operative outcomes for research & statistical purposes, or criminal records for due diligence procedures in accordance with applicable law).

[FOR ADDITIONAL INFORMATION ABOUT OUR USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES, PLEASE SEE OUR COOKIE DISCLAIMER.](#)

Stryker will retain and use the personal information collected for above mentioned processes and processing purposes in accordance with legal obligations.

Legal Bases

The legal basis Stryker uses to process personal information will be dependent on the processing purposes and the jurisdictional legal requirements. Where the personal information collected involved is of EU citizens, in general, we use the following basis:

- Consent to use the personal information, e.g. where this involves (digital) direct marketing activities and where we would like to use a photo, video or audio recording with identifiable individuals for external publishing;
- Establishment or performance of a contract, e.g. where we enter into a contract with a party and we collect contact information and signatures, as well as potential bank account details that may be linked to a representative of a company we do business with;
- Compliance with a legal obligation, e.g. where we need to disclose consumer details for compliance with (local or industry) laws such as the Physician Payments Sunshine Act or for compliance with the Medical Device Regulation;
- Legitimate interest of Stryker, e.g. where Stryker collects contact information and preferences, details for lodging and travel for attendees of Stryker organised events & trainings or third party hosted events & trainings in collaboration with Stryker;

- Public interest or for the exercise of public authority in strictly limited cases, e.g.. where we would be required to cooperate with the police or other government bodies in case of illegal conduct;
- For the establishment, exercise or defence of legal claims, e.g. for court cases;
- For scientific or research purposes, e.g. for clinical research studies with sufficient safeguards safeguarding confidentiality;
- For preventative and occupational medicine, medical diagnosis pursuant to contract with healthcare professionals;
- For public interest in the public health to ensure high standards of quality and safety of healthcare and products; and
- Where the individual chooses to disclose the personal information publicly by its own initiative.

If you choose not to provide the personal information we reasonably require, it may hinder Stryker's ability to provide the information or services you have requested.

Cross-Border Transfers

To the extent personal information is transferred out of the country where the owner of that personal information lives, such as to Stryker affiliates or business partners in other countries, including in the United States, different standards may apply to how your data is used and protected in those countries. Stryker has appropriate safeguards in place in accordance with applicable legal requirements to ensure that data is adequately protected irrespective of the country. This includes obtaining written assurances from any third party given access to your data so as to require them to adopt standards that ensure an equivalent level of protection for data as that adopted by Stryker and standardized corporate safeguards and contractual measures (based on the European Commission Model Clauses) for internal data transfers to Stryker affiliates in third countries which are deemed to provide an inadequate level of data protection.

Privacy Statement for Children

Stryker will not collect personal information from anyone we know to be under the age of 16 without the prior, verifiable consent from his or her legal representative. Such legal representative has the right, upon request, to view the information provided by the child and/or to require that it be deleted.

Retention of Information

Stryker will retain your personal information for as long as reasonably necessary to comply with legal obligations or for no longer as required for legitimate business purposes.

Disclosure of Information

Stryker may share personal information we have collected with companies or agents doing technological maintenance or working on our behalf to help fulfil business needs, including providing customer services and distributing marketing communications. Stryker may also share personal information with our subsidiaries and affiliates.

Other service providers that may be used to perform certain functions on our behalf and to whom personal information may be disclosed in order to perform their intended function include call-centre support, sending or processing postal or electronic mail or analysing or hosting information on cloud-based servers.

Stryker does not share your personal information with unaffiliated third parties for their own direct marketing purposes.

Security

The security and confidentiality of your personal information matters to us. For this reason, Stryker has physical, technical and administrative controls in place to protect your personal information from unauthorised access, use and disclosure. Stryker evaluates these safeguards on an ongoing basis to help minimise risks from new security threats as they become known.

Rights

You may request details of personal information which we hold about you. If you believe that any personal information we are holding about you is incorrect or incomplete, please contact us as soon as possible, at the address below. We will promptly correct any personal information found to be incorrect.

You may always choose to object to the collection or use of your personal information or to have your information erased. If you would like a copy of the information held about you for your own use or to transfer to another party, or if you wish to exercise any other right, please contact us at globalprivacy@stryker.com.

[IF YOU ARE A CALIFORNIA RESIDENT, PLEASE SEE OUR PRIVACY NOTICE FOR CALIFORNIA RESIDENTS FOR ADDITIONAL INFORMATION REGARDING YOUR RIGHTS AND CHOICES.](#)

Updates to Privacy Statement

This Statement may be amended at any time. If material changes are made in how personal information is collected, used, disclosed or otherwise processed, this Statement will be updated and notices will be provided when/where appropriate. Any material changes to this Statement will be effective at the time of our posting of the notice of the update. Where required to do so by law, Stryker may seek your prior consent to any material changes we make to this Privacy Statement.

The Statement was last updated on [23-04-2018]

Contact

If you have any questions, concerns or comments about this Statement, please contact us. Stryker will use reasonable efforts to respond to you as soon as possible.

Send mail to:

Stryker Corporation
Attn.: Data Privacy Director
2825 Airview Boulevard
Kalamazoo, MI 49002

Send email to:

globalprivacy@stryker.com

EU Data Protection Officer: europe.privacy@stryker.com

If we fail to respond to you within a reasonable period of receiving it in writing, or if you are dissatisfied with the response that you receive from us, you may lodge a complaint with the data protection authorities in your home country.