



Document number: D0000000387 - A  
Name: Global Fair and Transparent Notice Template  
Revision: AA

## Form

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# Privacy Statement **Stryker**

## Introduction

Stryker (“**Company**”) acts as a Data Controller with respect to the collection, use, and other processing of certain individually identifiable information about any personal information you submit to Stryker (“**Personal Information**”) for the purpose of reporting compliance and ethical concerns in Stryker’s dedicated system. Company reserves the right to amend this Notice at any time.

Stryker recognizes 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 you submitted to Stryker in order to report a compliance and/or ethical concern.

## Scope

This Privacy Statement applies to Personal Information collected through the Stryker intake system for compliance and ethical concerns, such as information from you and other individuals. Please be aware that the information you supply about yourself, your colleagues, or any aspect of the Company’s operations may result in decisions that affect others. We therefore ask you to provide only information that, to the best of your knowledge, is correct. You will not be sanctioned for submitting information in good faith. However, if you knowingly provide false or misleading information, it may result in disciplinary action. The information you submit will be treated confidentially. We encourage you to identify yourself so that we can follow up with questions we might have.

Personal Information (also referred to as “Personal Data” in some jurisdictions) as used herein, is any data by which a natural person can be identified, directly or indirectly, or located. Any information that in combination with other non-Personal Information can reasonably be used to identify a natural person. Some data, such as anonymized/de-identified data for statistical evaluations/studies are not subject to this definition.

This Privacy Statement describes Stryker’s collection, use, and distribution practices with respect to Personal Information. Stryker’s privacy practices may vary amongst Stryker businesses and countries, both on and offline.

## Information collection

Stryker requires you to provide Personal Information to log your compliance and/or ethical concern and further investigate, where necessary. Stryker collects this information by a dedicated website.

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.

On the dedicated site, you may directly submit to Stryker the following information: your name and contact details, any question you may have, the name and title of all individuals you may be reporting, and a description of any questionable conduct, including all relevant details.

Stryker will retain and use the Personal Information collected in accordance with legal obligations.

## Legal basis for using Personal Information

The legal basis Stryker uses to process Personal Information will be dependent on the processing purposes and the jurisdictional legal requirements. Example of usual legal basis are as follows:

- Processing is necessary for compliance with a legal obligation to which the Controller is subject such as, but not limited to the US Foreign Corrupt Practices Act, other applicable international or local anti-bribery laws, laws regulating Healthcare Professionals interactions and transparency laws;



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- Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller;
- Processing is necessary for the establishment, exercise or defense of legal claims.

If you choose not to provide the Personal Information we reasonably require, it may hinder Stryker's ability to investigate your report.

### Cross-border Transfer

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. If you prefer not to have your Personal Information transferred, do not use this Site.

### Privacy Statement for children

Stryker will not collect any 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.

### How long we keep information

Stryker will retain your Personal Information for as long as reasonably necessary for legitimate business purposes.

### Information sharing

Stryker may share Personal Information we have collected with companies or agents doing technological maintenance or working on our behalf to help fulfill 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-center support, sending or processing postal or electronic mail or analyzing 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 unauthorized access, use and disclosure. Stryker evaluates these safeguards on an ongoing basis to help minimize risks from new security threats as they become known. Additionally, personal information is hosted on an environment independently audited for SOC2, HITRUST, NIST and ISO 27001.

### 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.



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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](mailto:globalprivacy@stryker.com).

### Updates to Privacy Statement

This Privacy 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 Privacy 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 September 14<sup>th</sup>, 2020.

### Contact

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

#### Send mail to:

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

[globalprivacy@stryker.com](mailto:globalprivacy@stryker.com)

EU Data Protection Officer: [europa.privacy@stryker.com](mailto:europa.privacy@stryker.com)

German Data Protection Officer: [email@iitr.de](mailto:email@iitr.de)

If we fail to respond to your complaint 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.

### Revision history

Revision number	Revision Date	Description
AA	September 2020	Initial release of form