

# **OLYMPUS Global Privacy Policy**

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## **Chapter 1 General Provisions**

### **Article1: Purpose**

This Global Privacy Policy further outlines our commitment to protecting individuals' privacy and their personal data set down in the Global Code of Conduct. It is designed to provide clear and concise actions that everyone at Olympus must follow.

We are committed to upholding the privacy of individuals and protecting their personal data, and we expect all employees to play an active role in safeguarding such information.

With this Global Privacy Policy, we establish the Olympus Privacy Rules in Chapter 2. These are specific rules everyone in the company must follow to uphold the policy and protect individuals' privacy.

### **Article2: Living our Core Values**

At Olympus, we are dedicated to living our core values through everything we do, including how we handle personal data.

Our Olympus Privacy Rules are a vital part of our commitment to these values:

#### **Patient Focus**

We handle patients' personal data with utmost care, applying the highest privacy standards and thereby earning the trust of our customers and their patients.

#### **Integrity**

Implementing privacy and securing personal data is non-negotiable for us. We go beyond merely adequate compliance but aspire to apply the highest privacy standards as expected by customers and patients.

#### **Innovation**

Personal data fuels our innovation. We collect and use data to improve our products and services, while respecting the privacy of all stakeholders. Privacy is our competitive advantage.

#### **Impact**

We take accountability for the personal data we handle. We strive for efficiency, embedding privacy in all our processes.

#### **Empathy**

The Olympus Privacy Rules help us to ingrain our stakeholders' right to privacy into our business practices, products, and services early on.

## **Chapter 2 Olympus Privacy Rules**

### **Article3: Introduction to Personal Data**

Personal data is any piece of information that can identify an individual or further describe them by their inner or outer characteristics.

Protecting personal data is our critical responsibility, as it involves safeguarding the privacy rights

of individuals.

Here are examples of data types that constitute personal data:

**Customer Data**

Customer data can include, for example, name, address, contact information, and payment information collected during purchases or warranty registration.

**Employee Data**

Employee data can include, for example, HR and payroll records, as well as information related to performance and job responsibilities.

**Partner Data**

Partner data can include, for example, information related to financial and legal agreements with our business partners.

**Patient Data**

Patient data can include, for example, medical records and information related to diagnosis and treatment.

**Financial Data**

Financial data can include, for example, information used to process payments and manage accounts.

**Article4: Understanding the Olympus Privacy Rules**

The Olympus Privacy Rules are a set of fundamental rules that define a minimum level for safeguarding personal data at Olympus.

This Global Privacy Policy presents all these rules through the data lifecycle model that includes the following seven stages:

**1) Planning**

In this stage, you decide what personal data you need and for what purpose. You plan how to collect, use, store, and delete the data.

**2) Data Collection**

This is the stage where you initially gather the needed personal data, using various methods such as surveys, forms, or sensors.

**3) Business Use**

Once you have collected the data, you use it for the specific purposes you have identified in the planning stage.

**4) Data Storage**

This stage involves storing the data in a secure and organized manner to ensure its confidentiality, integrity, and availability.

**5) Repurposing**

If the data is still useful, it can be repurposed, but only for a use consistent with its original purpose.

**6) Data Sharing**

If the data is shared with third parties, it should be done in a legal and responsible way that protects individual privacy and enables accountability.

## **7) End of Life**

When the data is no longer needed, it should be securely and completely deleted to ensure it is not accessible or usable in the future.

## **Article5: Engaging with the Olympus Privacy Rules**

Here are four best practices to help implement the Olympus Privacy Rules in your daily work and safeguard personal data with integrity, empathy, and unity:

### **Familiarize yourself with the Olympus Privacy Rules**

Understand the importance of safeguarding personal data by familiarizing yourself with the must-follow Olympus Privacy Rules. Read the document and keep it at hand for easy reference on effectively implementing the rules at each data lifecycle stage.

### **Know Your Position – Take Action**

Consider how the Olympus Privacy Rules apply to your specific role and tasks and look for opportunities to implement them. For example, consider how to obtain consent, limit access to personal data, and ensure that the data is securely deleted when no longer needed.

### **If In Doubt, Ask the Experts**

Getting support is easier than ever. If you are unsure how to apply the Olympus Privacy Rules to your work or have questions about specific rules, use the contact form, send an email or use other channels to engage with the Privacy Function. You can ask questions, suggest updates, report data violations, or give general feedback.

### **Teamwork Makes the Dream Work**

We are united in privacy. By working together, we can ensure that we are always processing personal data in a way that respects the privacy rights of individuals. Attending privacy training is also crucial to ensure that everyone in the company has a mutually clear understanding of the Olympus Privacy Rules and how to apply them in their daily work.

## **Article6: Consequences of Non-Compliance**

Failure to follow the Olympus Privacy Rules can have serious consequences, not only for the individuals whose personal data is in question, but also for Olympus and our stakeholders.

Here are some potential outcomes:

### **Loss of Trust**

A violation of the Olympus Privacy Rules can lead to losing a customer and public trust. This can damage our reputation and make it more difficult to maintain relationships with stakeholders.

### **Personal Data Breaches**

If privacy violations result in unauthorized access to personal data, it can lead to personal data breaches and harm the individuals whose data was compromised. This can also result in notification obligations and other legal and financial consequences for Olympus.

### **Legal Penalties**

If a violation of the Olympus Privacy Rules also violates the law, it may lead to fines and claims for damages. This can result in significant financial losses for the company.

### **Termination**

If a violation of the Olympus Privacy Rules is identified, we may have to take corrective action, ranging from further education to termination.

## **Chapter 3 Applying the Olympus Privacy Rules**

### **Article7: Planning**

Planning is the foundation for any privacy-aware data handling and usage. It is essential to establish key privacy-related aspects of your project or process from the outset.

To establish a minimum data strategy for your business use case, consider the following Olympus Privacy Rules:

#### **Collaboration**

Collaborate with the Privacy Team when planning the use of personal data to ensure the data is processed in an appropriate manner. The Privacy Team will support you with putting all the Olympus Privacy Rules into practice.

#### **Responsibility**

Identify and assign responsibilities for handling personal data to ensure accountability and transparency. Coordinate with other teams and departments, if necessary. Document the assignment of responsibilities.

#### **Lawfulness**

Ensure that your intended processing of personal data is permissible under all applicable laws.

#### **Minimum Data**

Determine the minimum necessary personal data that is required to fulfill a specific purpose and plan to collect only this.

#### **Assess & Mitigate**

Assess potential privacy risks to individuals associated with processing personal data. Define measures to mitigate these privacy risks to ensure the protection of privacy rights.

#### **Access Control**

Determine and implement role-based access controls. Only grant access to personal data on a need-to-know basis.

#### **Safeguards for International Transfers**

Establish necessary safeguards and agreements for transferring data to parties in other countries and regions.

### **Article8: Data Collection**

Collecting personal data is a critical step in the data lifecycle, and it must be done in a way that respects individuals' privacy and rights.

To ensure proper initiation of the data lifecycle, follow the respective Olympus Privacy Rules:

#### **Purpose**

Collect only personal data that is necessary for the intended purpose. Make sure the data can only be used for that specific purpose and compatible purposes later.

#### **Transparency**

Clearly communicate the details of the intended data processing to the individuals, including the types of data being processed, the purposes, and the individual's rights.

#### **Data Quality**

Measure and ensure data quality during data collection to ensure the accuracy and integrity of the

collected data.

## **Article9: Business Use of Data**

Using personal data connects privacy with the underlying business context, which requires careful consideration to ensure that individuals' rights are protected.

To ensure responsible use of personal data, follow the respective Olympus Privacy Rules:

### **Purpose**

Use personal data only for the purposes for which it was originally collected or other compatible purposes. When your tasks involve using personal data, stay within your job description and responsibility, existing SOPs, and/or dedicated Working Instructions.

### **Security**

Adhere to applicable classification and security policies for personal data protection against unauthorized access, use, or disclosure. Implement measures to mitigate privacy risks, including maintaining a clean workspace and safeguarding your work environment from inspection by others.

### **Access Control**

Allow data access to eligible users only, logging usage by user, role, and timestamp level for accountability. Follow data classification and related handling obligations and practices.

### **Non-altered Data**

Preserve data accuracy, integrity, and quality by using it as collected, without manipulation or alteration.

### **Encryption**

Implement appropriate measures, like encryption, to reduce the impact on individuals' privacy.

## **Article10: Data Storage**

Storing personal data is a key aspect of many business operations and must be done securely and responsibly.

To safeguard personal data at rest, follow the respective Olympus Privacy Rules:

### **Security**

Store personal data in accordance with applicable security policies to protect the data from unauthorized access, use, or disclosure.

### **Data Deletion Requests by Individuals**

Store data in a way that allows the discovery of data relating to a specific individual and enables deletion of their personal data at the data residency level.

### **Advanced Techniques**

Favor advanced storing techniques where appropriate for especially sensitive personal data, like applying a more sophisticated encryption or storage method, to ensure optimal data security.

### **Time Limits & Data Deletion**

Store personal information only for as long as necessary for the intended purpose.

## **Article11: Repurposing of Data**

Repurposing personal data is an important part of many business operations, and it is crucial to ensure that the privacy of individuals is not compromised in the process.

To enable secondary business use cases, follow the respective Olympus Privacy Rules:

**Original Purpose**

Verify secondary use of data is compatible with original collection purposes or customer contracts. Confirm usage is permissible under applicable laws and document your considerations.

**Transparency**

Assess whether you must inform the individuals about the new ways you intend to utilize their personal data for them to understand it. If so, plan and carry out necessary actions.

**Non-altered Data**

Confirm repurposed personal data is accurate and correct.

**Necessity**

Consider whether repurposing is necessary and appropriate to the intended use.

**Article12: Data Sharing**

Sharing personal data is a sensitive issue that requires careful consideration to protect individuals' privacy rights.

To ensure responsible data sharing, follow the respective Olympus Privacy Rules:

**Data Quality**

Ensure the accuracy and quality of personal data throughout the data lifecycle, including during usage by third parties.

**Transparency**

Disclose the third-party recipients of personal data in the privacy notice, to promote transparency and accountability.

**Processors**

Identify, document, contract, review, and monitor data processors.

**Purpose and Lawfulness**

Verify that sharing personal data with a recipient aligns with the data's collection purpose and is allowed under relevant laws, particularly if the recipient uses it for their own objectives.

**Safeguards**

Considering the data classification, identify required safeguards and measures to secure personal data during and post-transfer to third parties or different countries/regions.

**International Data Transfer Mechanisms**

Comply with legal requirements for international data transfers when sharing personal data with third parties. Check in-country data retention obligations and follow them accordingly.

**Article13: End of Life**

Once personal data is no longer necessary for the original purpose for which it was collected or compatible purposes, it must be deleted.

To govern the personal data when no longer needed, follow the respective Olympus Privacy Rules:

**Time limits and Deletion**

Implement the Data Deletion Schedule. Follow timelines for personal data deletion, considering retention obligations, and take deletion steps. Remember high requirements exist for data anonymity!

**Processing Limitation**

If personal data is only retained to comply with retention periods, ensure that this data will not be used for anything else.

**Industry Standards**

Comply with relevant industry standards for physical destruction of personal data.

**Efficacy Evidence**

Apply the deletion concept when deleting personal data and document its effectiveness.

**Physical Data Storage Media**

Where personal data is stored on portable devices, including on paper, ensure disposal through eligible and secure technology (office shredders, security bins, etc.).