

## Privacy Notice

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1. Depending on the type of reported breaches, the Controller of the personal data provided as part of the reports is **Takeda Pharma sp. z o.o.** with its registered office in Warsaw, Prosta 68, 00-383 Warsaw (**the "Company"**).
2. **The Company** processes personal data contained in reports in accordance with the provisions on the protection of personal data, in particular *the EU Regulation 2016/679 ("GDPR")* and the regulations on the protection of persons reporting breaches of the law – including *the Act of 14 June 2024 on the protection of whistleblowers*.
3. Contact with **the Company** is possible at the address of the registered office indicated in point 1 above.
4. In matters related to the processing of personal data and the exercise of rights under the **GDPR**, the Whistleblower may contact the following address: [privacyoffice@takeda.com](mailto:privacyoffice@takeda.com).
5. **The Company** processes the personal data contained in the report: of the Whistleblower, persons to whom the report relates and other persons for purposes related to the reported cases of breaches of law, on the basis of: a legal obligation resulting from the provisions on the protection of whistleblowers (in accordance with Article 6(c) of the GDPR or if the report contains special categories of data – in accordance with Article 9(2)(g)) or the legitimate interest of the Controller, which is receiving, verifying and clarifying reports of breaches of law (in accordance with Article 6(1)(f) of the GDPR).
6. If the Whistleblower decides to disclose his/her identity, his/her identification data will be processed on the basis of the Whistleblower's explicit consent (in accordance with Article 6(1)(a) of the GDPR).
7. In order to verify the report and take follow-up actions, the Company may collect and process personal data, including special category data, to the extent necessary to accept the report and take possible follow-up actions.
8. Personal data may be transferred by **the Company** to third parties such as:
  - External and/or legal advisors that **the Company** may turn to.
  - An external provider who manages the Ethics Line Platform dedicated to reports (for details, see the Information Clause at: [NAVEX Privacy Statement | NAVEX](#))
  - competent authorities, when such an obligation arises from the provisions of law (e.g. for the purposes of explanatory proceedings conducted by public authorities or court proceedings).
  - Other Takeda Group Companies.
  - Third-party providers of services such as website hosting, provision of web technology and related infrastructure, and other similar services.
9. Personal data that is not relevant to the processing of the report will not be collected and will be deleted immediately in the event of accidental collection. Such personal data shall be erased within 14 days of establishing that they are irrelevant.

10. Personal data is processed for a period of 3 years after the end of the calendar year in which the follow-up actions were completed or after the end of the proceedings initiated by these actions.
12. **The Company** ensures the confidentiality of data in connection with the received report. **The Company** may transfer personal data to countries where other Takeda group entities operate or where **the Company** engages service providers. In cases where the transfer takes place to Third Countries that do not provide an adequate level of protection for personal data, **the Company** undertakes to put in place appropriate safeguards and to comply with applicable laws and regulations in connection with such transfer.  
  
In some cases, **the Company** undertakes to enter into contracts (e.g., the European Union Standard Contractual Clauses) or relies on other available data transfer mechanisms that are designed to provide adequate protection.
13. For additional information regarding the safeguards we have put in place to manage the cross-border transfer of personal information, please contact: [privacyoffice@takeda.com](mailto:privacyoffice@takeda.com).
14. Personal data will not be subject to profiling or automated decision-making.
15. Providing personal data is voluntary, but necessary for the proper receipt and consideration of the report made, in accordance with the **Company's** Internal Reporting Procedure and the provisions of the Whistleblower Protection Act.
16. The person who made the report has the right to request, within the limits set by the provisions of Chapter III of the GDPR: access to their personal data, including obtaining a copy of it, as well as rectification thereof. They also have the right to request deletion or restriction of processing, as well as to data portability.
17. To the extent that the data is processed on the basis of consent, the person who made the notification has the right to withdraw it at any time, without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal.
18. To the extent that the data is processed on the basis of the legitimate interest of **the Company**, the person who made the report has the right to object to the processing of their personal data, for reasons related to their particular situation, if the legitimate grounds for the processing of data by **the Company** do not override the interests, rights and freedoms of the person who made the report or **the Company** demonstrates the existence of grounds for establishing, pursuing or defending claims.
19. The person who made the report also has the right to lodge a complaint with the supervisory authority, i.e. the President of the Office for Personal Data Protection.
20. **The Company** has appointed, in accordance with Article 37 of the GDPR, a Data Protection Officer (DPO) who can be contacted at the following addresses:
  - [privacyoffice@takeda.com](mailto:privacyoffice@takeda.com). by email, or
  - by sending a message to the following address: IOD | Legal Department, Takeda Pharmaceuticals International AG, Thurgauerstrasse 130, CH-8152 Glattpark-Opfikon (Zurich), Switzerland.

