



# Novartis Binding Corporate Rules Appendix 6

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**Date:** 05 September 2019

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## Appendix 6 to Novartis BCR

### Privacy Organization at Novartis

#### 1. GLOBAL PRIVACY ORGANIZATION

Novartis has established a Privacy Program to ensure compliance with data protection laws, to enable future business models, to safeguard the business, to strengthen capabilities and to operate effectively and efficiently. The Privacy Program consists of the **Global Privacy Organization**, Novartis privacy policies and processes including the Novartis BCR. The Global Privacy Organization is organized around three pillars, corresponding to the business priorities, i.e. Policies, Technology and Risk Management, as well as three layers, corresponding to the main business geographies, i.e. United States of America, Europe, and International.

The Global Privacy Organization is led by the **Data Privacy Leadership Team (DPLT)**, which is chaired by the Global Head Data Privacy, Group Data Protection Officer. The DPLT includes the Head of Data Privacy Policies, the Head of Data Privacy Technology, the Head of Data Privacy Risk Management, the Head of Data Privacy USA, the Head of Data Privacy Europe, and the Head of Data Privacy International. The Data Privacy Leadership Team establishes and implements strategic directions for Data Privacy, sets priorities and supervises the implementation of effective controls.

The **Global Head Data Privacy** oversees the maintenance and adherence to the Group Privacy Program. He/she reports to the Group General Counsel, who is a member of the Executive Committee of Novartis (ECN). The Global Head Data Privacy assumes the function of Group Data Protection Officer (GDPO) for the Novartis organization.

The **Head Group Data Privacy Policies** defines group wide legal standards and works with all business functions to ensure responsible use of personal data with a view to Fairness, Transparency, Legal Bases (e.g., balancing of rights).

The **Head of Group Data Privacy, Technology** supports global infrastructure/functions to identify privacy risk and implement privacy controls into new or existing technology across Novartis.

The **Head Group Data Privacy, Risk Management** enables provision of risk assurance to Novartis management and to answer regulatory authorities by designing, implementing, and monitoring key global data privacy processes to document and demonstrate compliance with all relevant data privacy laws worldwide.

The **Heads of Data Privacy USA, Europe and International**, within the geographies they are responsible for, assess business strategy, business processes, systems and projects with respect to existing and arising data privacy challenges and for providing associated legal counseling, risk/ controls assessments and privacy impact assessments. They are also responsible for building strong business relationships with key functions in the respective geographies, for understanding and fostering business needs in line with data

privacy and for providing all relevant support and training to them. Their role is to provide adequate leadership, support and coaching to the other members of the Data Privacy team including the Country Data Privacy Heads, and to the legal community in their respective Regions.

In addition to France, Germany, Switzerland, United States, many countries in Europe, in the Americas, Asia and Africa as well as Australia have appointed full time **Country Data Privacy Heads** (CDPH) to provide business partnering to and coordinate compliance activities with local privacy and data protection laws in the local organization (all legal entities in the respective country(-ies)). In addition, the CDPH ensure adherence to Novartis internal data privacy policies and guidelines and establish a network of Data Privacy Coordinators. **Country Data Privacy Heads** report operationally to the Legal Head of the country where they actually sit, and functionally to the Head Data Privacy responsible for their respective Regions.

Units that process Personal Information can appoint a **Data Privacy Coordinator**. The main responsibility of **Data Privacy Coordinators** is to function as a first point of contact for data privacy matters in the business, to assist the CDPOs in awareness building and in conducting risk assessments. The Data Privacy Coordinators report to the CDPHs.

The **Business Coordinator Global Data Privacy** supports the DPLT and manages associated administrative tasks. The Privacy Business Coordinator is responsible for providing professional support to the Head Global Data Privacy, executing complex administrative tasks, and managing the operational budget of the department.

## 2. NOVARTIS GROUP GENERAL COUNSEL

The **Novartis** Group General Counsel (GGC), a member of the Novartis Executive Committee, supervises the Global Head Data Privacy and Group Data Protection Officer. The GGC receives regular updates on the status of the Privacy Program.

## 3. COMMUNICATION AND COORDINATION

The communication, coordination and collaboration within the Global Privacy Organization is supported by the Novartis Group Privacy Intranet site that contains relevant information, news, tools and templates, as well as through regular internal global and local conferences and meetings. Privacy Heads regularly report major privacy and implementation issues to the Global Head Data Privacy who regularly reports to the oversight committee of the Board of Novartis AG, the ultimate parent company, established in Switzerland.

**Version History for Annex 6**

<b>Effective Date</b>	<b>Owner</b>	<b>Version</b>	<b>CNIL</b>
3 July 2012	Group Data Privacy	1.0	3 July 2012
19 April 2017	Group Data Privacy	2.0	19 April 2017
3 September 2018	Group Data Privacy	3.0	3 September 2018
5 September 2019	Group Data Privacy	4.0	5 September 2019