

Privacy Statement for Eisai Grievance Mechanism

Eisai Co., Ltd. (“Eisai” or “we”) is a company that focuses not only on developing pharmaceuticals but also on the potential of corporate activities that go beyond the provision of medicines. We believe that our mission is not limited to simply delivering pharmaceutical products to patients.

We are committed to fulfilling our social responsibility and promoting the protection of human rights. For this purpose, we have implemented a grievance mechanism to establish a system that allows us to receive reports and concerns from a wide range of individuals. Under this grievance mechanism, you may submit a report to the Japan Center for Engagement and Remedy on Business and Human Rights (“JaCER”). We aim to leverage this system to further enhance our initiatives and ensure accountability. Please refer to this Privacy Statement for Eisai Grievance Mechanism for information on how we handle personal data obtained through the grievance mechanism. This statement applies to data subjects residing outside of Japan. If you are a resident of Japan, please refer to our privacy policy [here](#).

1. When do we collect personal data about you?

We collect your personal data if:

- you submit a grievance report via JaCER’s platform; or
- we receive a grievance report about you.

2. What personal data do we collect about you?

We only collect personal data that is relevant to the purposes given in “3. How do we use your personal data?” and this may include:

- Your name, nationality, occupation, and affiliated companies/organizations;
- Your contact information, such as your address, email or telephone number;
- Details of the content of your grievance;
- Circumstances and history pertaining to processing of the grievance; and
- Other information collected through the operation of our grievance program.

3. How do we use your personal data?

The information we collect from you will only be used to:

- Appropriately investigate and address the contents of the grievance;
- Detect any violation of human rights;
- Resolve detected issues and take necessary actions, including disciplinary measures if applicable;

- Perform other activities necessary for the operation of the grievance mechanism; and
- Comply with applicable laws.

The legal bases which we rely upon to process your personal data are, as applicable: (i) your consent to participate in the grievance program; (ii) Eisai's legitimate business interests; and (iii) compliance with legal obligations.

4. How long do we keep your personal data?

Your personal data will be retained for the period necessary to achieve the purposes stated in "3. How do we use your personal data?" above.

5. What are your rights?

In respect of the personal data that we have collected about you, you have the right (in certain circumstances) to:

- Request access to your personal data;
- Request the correction of your personal data;
- Request the erasure of your personal data;
- Request that we restrict how we process your personal data;
- Object to how we process your personal data;
- Request a copy of the personal data you have provided to Eisai in an electronic format; and
- Request that Eisai transfer the data that we have collected about you to another organization, under certain conditions.

We will consider any such request made in accordance with applicable data protection laws. However, please note that there may be a legal or other valid reason why Eisai may not be able to process your request in whole or in part.

Where you have requested that we delete your personal data, we will either delete or anonymize such personal data. In cases where it is not possible for us to delete or anonymize your personal data, we will take steps to put the personal data beyond use where it will be securely stored until such time as we are able to delete or anonymize it.

You can also withdraw your consent to the processing of your personal data at any time, but please note that this will not affect the lawfulness of the processing conducted before that time. If you would like to make a request to access, correct or delete the personal data we have collected about you, please send an email in accordance with "9. How to contact us".

6. Who do we share your personal data with?

We may share your data with:

- Authorized teams and individuals within Eisai;
- Other entities in the Eisai group;
- Third-party suppliers or potential suppliers who provide related services or business systems used by Eisai to securely process your data;
- Regulators and/or any other competent authorities who have powers to request disclosure of the personal data we hold;
- Professional advisors; and
- Third parties, where required by law.

7. Sharing your personal data outside your country

The personal data which we collect from you may be transferred outside your country to other countries where Eisai has operations. As an international organization, Eisai operates in a number of countries, including those in the European Economic Area (EEA), Japan and the USA. The list of countries where the various Eisai Group entities are located is available [here](#).

Some countries outside your country may not have a data protection supervisory authority and/or data processing principles, and/or data subject rights may not be provided for in that country, so you may not be able to enforce your rights in the same way, and recipient organizations may not be legally required to secure your data in accordance with your country's standards. Eisai shall take all necessary steps to ensure that your personal data is protected in such circumstances.

We maintain processes to ensure that any third party we are using and who will process your personal data, including other Eisai entities, will comply with same standards to protect your data as those in your country. This includes carrying out necessary due diligence on such third parties (such as by confirming the security measures they have in place for protecting personal data), and entering into contracts which contain adequate contractual measures to protect data, which can include contracting on standard contractual clauses which have been approved by your country's authorities as providing adequate protection for your personal data.

8. Changes to this privacy statement

This privacy statement may be updated by Eisai from time to time. Please visit our website at any time to view the latest version.

9. How to contact us

You can contact Eisai's Data Protection Team with a contact form, please refer to Contact for Inquiries in Overview of the Utilization of Personal Information [here](#).