

## RWS Life Sciences Inc EU-U.S. Data Privacy Framework Notice

Notice version: 1.0

Effective Date: 4 October 2023

### Data Privacy Framework

The EU-U.S. and Swiss-U.S. Data Privacy Frameworks were designed by the U.S. Department of Commerce and the European Commission and Swiss Administration to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements, including the GDPR, when transferring personal data from the European Union and Switzerland to the United States in support of transatlantic commerce.

RWS Life Sciences, Inc. complies with the EU-U.S. Data Privacy Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. RWS Life Sciences has certified to the US Department of Commerce that it adheres to the Data Privacy Framework Principles.

To learn more about the Data Privacy Framework program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

### Scope

This Data Privacy Framework Policy Statement applies to all personal information received by the Organization in the United States from the EU, in any format, including electronic, paper, or verbal.

### Privacy Principles

The privacy principles in this Policy have been developed based on the Data Privacy Framework Principles, and alignment with RWS Group Privacy Policy (<https://www.rws.com/legal/privacy>). If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the Principles shall govern.

### Notice:

Where the Organization collects personal information directly from individuals in the EU, it will inform them about the purposes for which it collects and uses personal information about them, the types of non-agent third parties to which the Organization discloses that information, the choices and means, if any, the Organization offers individuals for limiting the use and disclosure of personal information about them, and how to contact the Organization. Notice will be provided in clear and conspicuous language when individuals are first asked to provide personal information to the Organization, or as soon as

practicable thereafter, and in any event before the Organization uses or discloses the information for a purpose other than that for which it was originally collected.

Where the Organization receives personal information from its parent, affiliates or other entities in the EU, and EEA, it will use and disclose such information in accordance with the notices provided by such entities and the choices made by the individuals to whom such personal information relates.

Further detail on this is available at <https://www.rws.com/legal/privacy>.

**Choice:**

The Organization will offer individuals the opportunity to choose (opt-out) whether their personal information is (a) to be disclosed to a non-agent third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual or client.

For sensitive personal information, the Organization will give individuals the opportunity to affirmatively and explicitly (opt-in) consent to the disclosure of the information to a non-agent third party or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual or client.

The Organization will provide individuals with reasonable mechanisms to exercise their choices, as further described below.

**Accountability for Onward Transfer:**

The Organization will obtain assurances from its agents that they will safeguard personal information consistently with this Policy. Where the Organization has knowledge that an agent is using or disclosing personal information in a manner contrary to this Policy, the Organization will take reasonable steps to remediate.

**Security:**

The Organization will take reasonable and appropriate measures to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration, and destruction.

**Data Integrity and Purpose Limitation:**

The Organization will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual or client. The Organization will not process personal information in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by the individual or client. The Organization will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current.

**Access:**

Upon request, the Organization will grant individuals reasonable access to personal information that it holds about them. In addition, the Organization will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete.

**Recourse, Enforcement, and Liability:**

Any questions or concerns regarding the use or disclosure of personal information should be directed to the address given below. The Organization will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information by reference to the principles contained in this Policy. For complaints that cannot be resolved between the Organization and the complainant, the Organization has agreed to participate in dispute resolution procedures in the investigation and resolution of complaints to resolve disputes pursuant to the Data Privacy Framework Principles. For disputes involving personal information received by the Organization from its clients, the Organization will employ a licensed moderator to mitigate and resolve.

In reference to Data Privacy, the Organization is subject to the investigatory and enforcement powers of the FTC and any other U.S. authorized statutory body.

The Organization commits to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIIC) and comply with the advice given by such authorities with regard to human resources data transferred from the EU, in the context of the employment relationship.

In the context of an onward transfer, the Organization has responsibility for the processing of personal information it receives and transfers on its behalf. The Organization shall remain liable under the Data Privacy Framework Principles if its agent processes such personal information in a manner inconsistent with the Data Privacy Framework Principles, unless the Organization proves that it is not responsible for the event giving rise to the damage.

In compliance with the Data Privacy Framework Principles, the Organization commits to resolve complaints about our collection or use of your personal information.

Consumers, Employees and Representatives may file a complaint concerning the Organization's processing of their Personal Data at [privacy@rws.com](mailto:privacy@rws.com). RWS, acting either in the role of data controller and/or data processor, will respond promptly, and in any event in no more than 45 days, to complaints and endeavor to investigate and resolve complaints expeditiously, at no cost to the complainant, by reference to the Data Privacy Framework Principles and provide compensation by way of damages where the applicable law provides. RWS will take reasonable and appropriate steps to remedy any issues arising out of a failure to comply with the Data Privacy Framework principles.

### **How to Contact RWS:**

The following methods can be used to contact RWS with questions or concerns about this Data Privacy Framework Privacy Policy or the Organization's practices concerning Personal Data or Customers' Personal Data:

In the USA write to:

Attn: Group Privacy Officer  
RWS Life Sciences  
101 East River Drive, 2nd Floor  
East Hartford, CT 06108  
Email: [privacy@rws.com](mailto:privacy@rws.com)

In the EEA write to:

RWS  
Attn: Group Privacy Officer  
New Globe House, Vanwall Business Park  
Vanwall Road, Berkshire, Maidenhead  
SL6 4UB  
United Kingdom  
Email: [privacy@rws.com](mailto:privacy@rws.com)

Further information is available at [www.rws.com/legal/privacy/privacy-notice](http://www.rws.com/legal/privacy/privacy-notice), Section "11. Your Rights".

### **Independent Dispute Resolution ICDR/AAA**

The Organization has further committed to refer unresolved Data Privacy Framework complaints to International Centre for Dispute Resolution American Arbitration Association (ICDR/AAA), an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit ICDR/AAA at the location listed below for more information or to file a complaint. The services of International Centre for Dispute Resolution Case Filing Services are provided at no cost to you.

For claims and disputes arising under or relating to this Policy, individuals may invoke binding arbitration in a location mutually agreeable to the parties. An award of arbitration may be confirmed in a court of competent jurisdiction.

### **ICDR/AAA Contact**

International Centre for Dispute Resolution American Arbitration Association  
1101 Laurel Oak Road, Suite 100  
Voorhees, NJ, 08043  
United States  
Website: [https://go.adr.org/dpf\\_irm.html](https://go.adr.org/dpf_irm.html)  
Email: [casefiling@adr.org](mailto:casefiling@adr.org)  
Phone: +1.856.435.6401  
Fax: +1.212.484.4178

**Limitation on Application of Data Privacy Framework Principles**

Adherence by the Organization to these Data Privacy Framework Principles may be limited (a) to the extent required to respond to a legal or ethical obligation; (b) to the extent necessary to meet national security, public interest or law enforcement obligations; and (c) to the extent expressly permitted by an applicable law, rule or regulation.