

Privacy Statement Stryker

Introduction

NV Stryker SA (“**Company**”) acts as a data controller with respect to the collection, use, and other processing of certain individually identifiable information about Healthcare Professionals (“**Personal Information**”) in connection with the organization of scientific events and the Belgian Transparency disclosure Sunshine Act. Company reserves the right to amend this Notice at any time.

Stryker recognizes that the Personal Information it receives is held in a position of trust. Stryker seeks to fulfill that trust by adhering to general principles regarding the protection of Personal Information. This Privacy Statement explains how we collect, use, share, and protect information captured through our interactions related to (educational) events.

Scope

This Privacy Statement applies to Personal Information collected online and offline paper-based Event registration methods and via publicly available sources. The Personal Information relates to attendees, such as Healthcare Professionals (“**HCPs**”), Employees, Speakers, Vendors or other third parties or partners.

Personal Information (also referred to as “Personal Data” in some jurisdictions) as used herein, is any data by which a natural person can be identified, directly or indirectly, or located. Any information that in combination with other non-Personal Information can reasonably be used to identify a natural person. Data that is anonymized or de-identified for statistical evaluations or studies are not subject to this definition.

This Privacy Statement describes Stryker’s collection, use, and distribution practices with respect to Personal Information. Stryker’s privacy practices may vary amongst Stryker businesses and countries, both on and offline.

Information collection

During the invitation process of Healthcare Professionals interested to attend Stryker organized or Stryker sponsored events, certain personal data is collected directly from the data subject through registration forms, registration websites or through direct contact with the Stryker sales representatives.

Stryker requires you to provide Personal Information to enable your registration to such events and to book necessary travel and accommodation. Some additional Personal Information is required to comply with the Belgian Sunshine Act. Stryker collects this information by requesting submission of the information on a dedicated website or by providing the information directly to the sales, events or medical education team per email.

Stryker maintains physical, technical, and administrative safeguards to protect your Personal Information and only allows disclosures as permitted by law to assist in providing products or services. We may also collect product and service information and provide these statistics to others in an aggregate form where the information has been de-identified.

Personal Information collected may include:

- Last name, first name
- Email address
- Date of birth
- Dietary requirements
- Profession
- RIZIV / INAMI medical license number
- Pictures, video and audio recordings;
- **National Registration number (Rijksregisternummer – Numéro de Registre National)**

Stryker will retain and use the Personal Information collected for event logistics and Sunshine transparency disclosure.

Legal basis for using Personal Information

The processing of Personal Information as explained in this Privacy Statement is performed on the basis of:

1. Processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party – where Company process the Personal Information for legitimate business purposes such as: event registration and tracking; documenting our events via various media recordings for internal sharing, where this involves employees;

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2. Processing is necessary for compliance with a legal obligation to which the Controller is subject, in particular with the Belgian Sunshine Act, as published on December 27, 2016 and the Royal Decree of June 14, 2017 implementing the Sunshine Act, as published on June 23, 2017.

If you choose not to provide the Personal Information we reasonably require, it may hinder Stryker's ability to provide the information or services you have requested.

Cross-border Transfer

To the extent personal information is transferred out of the country where the owner of that Personal Information lives, such as to Stryker affiliates or business partners in other countries, including in the United States, different standards may apply to how your data is used and protected in those countries. Stryker has appropriate safeguards in place in accordance with applicable legal requirements to ensure that data is adequately protected irrespective of the country. This includes obtaining written assurances from any third party given access to your data so as to require them to adopt standards that ensure an equivalent level of protection for data as that adopted by Stryker. If you prefer not to have your Personal Information transferred, do not use this Site.

Privacy Statement for children

Stryker will not collect any Personal Information from anyone we know to be under the age of 16 without the prior, verifiable consent from his or her legal representative. Such legal representative has the right, upon request, to view the information provided by the child and/or to require that it be deleted.

How long we keep information

Stryker will retain your Personal Information for as long as reasonably necessary for legitimate business purposes.

Information sharing

Stryker may share Personal Information we have collected with companies or agents doing technological maintenance or working on our behalf to help fulfill business needs, including providing customer services and distributing marketing communications. Stryker may also share Personal Information with our subsidiaries and affiliates.

Other service providers that may be used to perform certain functions on our behalf and to whom Personal Information may be disclosed in order to perform their intended function include call-center support, sending or processing postal or electronic mail or analyzing or hosting information on cloud-based servers.

Stryker does not share your Personal Information with unaffiliated third parties for their own direct marketing purposes.

Security

The security and confidentiality of your personal information matters to us. For this reason, Stryker has physical, technical and administrative controls in place to protect your Personal Information from unauthorized access, use and disclosure. Stryker evaluates these safeguards on an ongoing basis to help minimize risks from new security threats as they become known.

Rights

You can contact us directly any time at the address below to update your Personal Information. Certain Personal Information may still be retained in accordance with our internal record retention procedures and processes or to the extent necessary to comply with applicable law.

You, as a Data Subject with Personal Information held by Stryker as the Controller, have the right to request from Stryker:

- (1) Access to your Personal Information
- (2) Rectification or Erasure of your Personal information;
- (3) Restriction of Processing;
- (4) Halting of Processing based on an objection;
- (5) Data portability – The ability to move Personal Information to another Controller; and,
- (6) To withdraw your consent from Processing. Withdrawal does not invalidate the consent-based processing that occurred prior to withdrawal

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Updates to Privacy Statement

This Privacy Statement may be amended at any time. If material changes are made in how Personal Information is collected, used, disclosed, or otherwise processed, this Statement will be updated and notices will be provided when/where appropriate. Any material changes to this Privacy Statement will be effective at the time of our posting of the notice of the update. Where required to do so by law, Stryker may seek your prior consent to any material changes we make to this Privacy Statement.

The Statement was last updated on March 14, 2018

Contact

If you have any questions, complaints, or comments about this Privacy Statement, please contact us. Stryker will use reasonable efforts to respond to you as soon as possible.

Send mail to:

Stryker Corporation
Attn.: Global Privacy Director
2825 Airview Boulevard

Kalamazoo, MI 49002

europa.privacy@stryker.com and globalprivacy@stryker.com

If we fail to respond to your complaint within a reasonable period of receiving it in writing, or if you are dissatisfied with the response that you receive from us, you may lodge a complaint with the data protection authorities in your home country.