

UCB Employee Data Privacy Notice

1. WHO WE ARE AND HOW YOU CAN CONTACT US

“UCB” or “we” refers UCB S.A. with its registered office at Allée de la Recherche 60, B-1070 Brussels (Belgium) and the local UCB entity which employs you – including, for example, UCB, Inc. (1950 Lake Park Drive, Smyrna, Ga, 30080), UCB Biosciences, Inc. (8010 Arco Corporate Drive, Raleigh, NC, 27617) and of any other entity which is a wholly-owned subsidiary of any UCB company. For a full list of the UCB affiliates, see UCB Plaza: <https://ucbplaza.ucb.com/exploreucb/corp-secretariat/Pages/Affiliates-and-Group-Governance.aspx>.

As the **controller**, i.e. the legal entity that decides on the why and how information relating to you (**personal data**) is collected and processed by us in the context of your employment with us, we respect your right to privacy.

We will only process your personal data as described in this UCB Employee Data Privacy Notice (the **Notice**) and in accordance with the relevant data protection legislation, including (the General Data Protection Regulation or **GDPR**¹), and any other applicable law.

We have a data protection officer (**DPO**), who can be contacted by any of the following means for any privacy-related questions, including regarding how we collect, store and use your personal data:

- *E-mail:* dataprivacy@ucb.com (Global) or Ashley.Sosnoski@ucb.com (local)
- *Regular mail:* To the attention of the (global) Data Protection Officer, Allée de la recherche 60, 1070 Anderlecht or to the attention of the local UCB Data Protection Officer at the postal address of the UCB affiliate in your jurisdiction. For more information, please visit <https://www.ucb.com/worldwide> and select your country.

2. THE REASON BEHIND THIS NOTICE

As your employer, UCB collects, uses and discloses personal data relating to you and your family members. UCB does so for a variety of employment-related purposes, both during and after your employment with us, as will be further explained below in this Notice.

Please note that if you (as a UCB employee) are required to provide personal data about your family members to UCB, you must inform your family member(s) prior to sharing such information with UCB.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC

The Notice consists of five main components and informs you about:

- 1. Who we are and how you can contact us;
- 2. The reason behind this Notice;
- 3. The purposes for which we process your personal data, the related legal basis under GDPR and applicable retention periods;
- 4. What your rights are in relation to the personal data we hold about you and how you can exercise them; and
- 5. Further details on how we process (including share) your personal data.

This Notice may be updated periodically to reflect changes in our personal data processing activities. Any updates to this Notice will be notified to you via your UCB e-mail address and will be posted on the HR Answers portal accessible through UCB Plaza.

3. THE PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA AND APPLICABLE LEGAL BASIS

The table below indicates per purpose (i) the categories of personal data we collect and process concerning you, (ii) the source, (iii) how long we retain your personal data, (iv) who we share it with, and (v) the relevant legal basis under GDPR.

UCB EMPLOYEES	
1. For purposes of personnel administration as well as payroll & employee benefits administration, UCB:	
Collects the following personal data about you:	<ul style="list-style-type: none">- Your contact details:<ul style="list-style-type: none">✓ full name✓ home address✓ (private) e-mail address(es)✓ (private) fixed and/or mobile phone number- Your personal details/information:<ul style="list-style-type: none">✓ gender✓ birth date and birthplace✓ citizenship✓ military status (voluntary)✓ disability status (voluntary)✓ family information: marital status, number of children (<i>including their name, date of birth and social security number if so required under local law</i>),

	<ul style="list-style-type: none"> ✓ national identification number, passport number, social security number or local equivalent ✓ picture <i>(to be included on your UCB badge and shared on UCB Plaza)</i> - Your professional information: <ul style="list-style-type: none"> ✓ CV and qualifications (including your professional and language skills), hiring forms, career & educational background, skills & competencies ✓ any other job application information that you may have provided to us (including via online recruitment tools) ✓ information resulting from your (job interview) interactions with UCB, including – to the extent applicable – interview minutes or notes, feedback notes ✓ date of hiring/promotion/position change ✓ (past and) current position/function at UCB (including position title and reference number) - Your financial information: <ul style="list-style-type: none"> ✓ bank account details ✓ salary, bonus and benefits, long -term incentives, pension schemes and entitlements, (group) insurance and other benefits information ✓ information resulting from and within the framework of monitoring and managing your professional travels and business expenses, including reimbursements (insofar applicable to you) ✓ company assets in your possession (e.g. mobile phone, laptop, iPad, company car, etc. and all related info) ✓ information resulting from international assignment and mobility, as well as any other information required under immigration laws (insofar applicable to you) - Occupational health related information: <ul style="list-style-type: none"> ✓ work accidents, pregnancies, attendance information such as (long-term) sickness or absence, doctor certificates, etc., other health and safety related information ✓ The contact details for any emergency contacts <p><i>Failure to provide the abovementioned personal data prevents UCB from fulfilling its legitimate interests (indicated below). Failure to provide us with information that is legally required, prevents us from complying with our legal obligations and may prevent you from working for UCB. For instance if you fail to provide (changes in) your financial or other tax related information we may not/ no longer be able to process your payroll/remuneration and comply with our social security and tax law obligations as a company, etc.(*).</i></p>
Obtains this data from:	<ul style="list-style-type: none"> - You - Recruitment agency/ headhunter (if applicable)
Retains (**) your personal data for:	<ul style="list-style-type: none"> - 10 years following your last working day at UCB
Shares your personal data with:	<ul style="list-style-type: none"> - UCB affiliates and third-party processors (as detailed in section 5.A)
Relies on the following GDPR legal basis:	<ul style="list-style-type: none"> - Processing necessary for: <ul style="list-style-type: none"> ✓ the performance of the employment contract between you and UCB ✓ compliance with legal obligations to which UCB is subject, including employment laws (social security and payroll obligations) as well as other laws (e.g. tax and bookkeeping obligations) ✓ the purpose of the legitimate interests pursued by UCB, which include improving efficiency in the workplace, the proper conduct of its business, the protection of the economic, trade and financial interests of UCB and compliance with (non-EU) regulations (***)

2. In order to enable UCB to (i) manage its personnel, including (strategic) resource planning, development of staff (including training) and other productivity initiatives; (ii) organize work planning, including leave and absence management; (iii) manage the review and appraisal process for staff (including 360° assessments); and (iv) carry out analysis using artificial intelligence (AI) techniques² to gain insights and a better understanding regarding certain workforce related topics (e.g. *to identify and define competencies of the future, future staffing needs, create insights on how we can improve diversity & inclusion, improve wellbeing of our employees, close the pay-gap etc.*), UCB :

Collects the following personal data about you:

- **Your contact details:**
 - ✓ full name
 - ✓ company e-mail address
 - ✓ company postal address
 - ✓ business landline/cellphone number
- **Your professional information:**
 - ✓ organization
 - ✓ job title/position
 - ✓ date of hiring/promotion/position change
 - ✓ (past and) current position/function at UCB (including position title and reference number)
 - ✓ job description, CV
 - ✓ career & educational history
 - ✓ competencies & skills
- **Work attendance data including holidays and (other non-medical) absences**
- **Information resulting from or within the framework of training, development and education**
- **Performance monitoring and assessment and evaluation information**, including information resulting from the:
 - ✓ Objective setting and Management by Objectives (MBO) process
 - ✓ Managing Talent and Organizational Review (TOR)
 - ✓ individual performance feedback & official warning letters
 - ✓ appraisal process (including 360° assessments)
- **Occupational health related information:**
 - ✓ work accidents
 - ✓ pregnancies
 - ✓ attendance information such as (long-term) sickness or absence, doctor certificates, etc.
 - ✓ other health and safety related information

Failure to provide the abovementioned personal data prevents UCB from fulfilling its legitimate interests (indicated below) and may also prevent you from participating in development activities such as trainings. Failure to provide us with information that is legally required, prevents us from complying with our legal obligations and may prevent you from working for UCB().*

Obtains this data from:

- You
- Your line manager

² Such analyses are performed on information available in UCB's internal database and depending on the project at hand. Wherever possible, these analyses are performed on de-identified or aggregated data, i.e. without singling out individual employees. In addition, all appropriate organizational and security measures are put in place – in accordance with data protection laws – to ensure data privacy by design (including compliance with UCB internal/Talent approval processes). This includes but is not limited to stringent access controls.

	- Your colleagues (e.g. within the framework of a 360° assessment)
Retains (**) your personal data for:	- 10 years following your last working day at UCB, unless any such information must be maintained by UCB for a longer period of time in accordance with local law requirements
Shares your personal data with:	- UCB affiliates and third party processors (as detailed in section 5.A and including third-parties involved in the preparation and delivery of training sessions)
Relies on the following GDPR legal basis:	- Processing necessary for: <ul style="list-style-type: none"> ✓ compliance with legal obligations to which UCB is subject, including employment and social security law obligations ✓ the purpose of the legitimate interests pursued by UCB, which include (i) the proper conduct of its business; (ii) improving efficiency in the workplace; (iii) performance management and the development of staff (including ensuring staff has the required/appropriate skills); (iv) the protection of the economic, trade and financial interests of UCB;(v) ensuring compliance with (non-EU) regulations; and (vi) gaining a better understanding of and further insights into certain workforce related topics and as a result to improve the conduct of its business and workforce conditions (e.g. to achieve diversity in the workforce and equal pay) (***)
3. In order to enable UCB to (i) share and report on UCB internal employee activities and events (including team buildings and events, UCB anniversary events, etc.), as well as (ii) to include you within UCB's internal employee directory on Plaza to allow colleagues to search and contact you, UCB :	
Collects the following personal data about you:	<ul style="list-style-type: none"> - Your contact details: <ul style="list-style-type: none"> ✓ full name ✓ professional e-mail address(es), landline and/or mobile phone number ✓ Your employee ID number - Your personal details/information: <ul style="list-style-type: none"> ✓ gender ✓ country ✓ position/function at UCB (including position title and reference number, department within UCB etc.) ✓ picture (to be included on your UCB badge & UCB eco-system) ✓ pictures taken from you e.g. at corporate UCB functions or group activities (team buildings) etc. and/or testimonials ✓ Your signature on any related consent forms (including for the use of your pictures), date of signature and place of signature <p><i>Please note that your picture may be shared as part of publicly available materials, including UCB's Annual Reports and similar documents, UCB's internal and external websites and other media such as posters.</i></p>
Obtains this data from:	- You
Retains (**) your personal data for:	- 10 years following your last working day at UCB, unless any such information must be maintained by UCB for a longer period of time in accordance with local law requirements
Shares your personal data with:	- UCB affiliates and third party processors (as detailed in section 5.A)

Relies on the following GDPR legal basis:	<ul style="list-style-type: none"> - Processing: <ul style="list-style-type: none"> ✓ necessary for the purpose of the legitimate interests pursued by UCB, which include the proper conduct of its business and improving efficiency in the workplace (***) ✓ based on your consent insofar it relates to photographs or pictures, unless such use may be justified on the basis of UCB's legitimate interests (as indicated above), e.g. use of a photograph on a company ID-badge
4. In order to (i) combat potential fraud, misdemeanors and infringements; (ii) protect company assets and safeguard UCB's business interests; (iii) manage legal claims and disputes, including handling (alleged) reports of misconduct or fraud; (iv) monitor compliance with UCB policies; (v) ensure the safety of all UCB personnel as well as on premise security, including via the implementation of camera surveillance at the entrance of UCB sites and at adjacent UCB parking lots; and (vi) carry out analysis using artificial intelligence (AI) techniques³ to gain insights and a better understanding regarding certain workforce related topics (e.g. to identify financial loss/fraud, address tax concerns and optimize tax benefits), UCB:	
Collects the following personal data about you:	<ul style="list-style-type: none"> - Your contact details - Certain judicial data (i.e. personal data relating to criminal convictions and offences): <ul style="list-style-type: none"> ✓ Information regarding (potential) criminal offences or convictions ✓ Information regarding (potential) use of illegal substances ✓ Information regarding traffic accidents and fines involving a UCB company car - Information provided by you or about you in the context of electronic monitoring (see further below under processing activity n°7 for more information) resulting from your use of UCB IT assets and services as part of your employment contract with UCB (including but not limited to UCB desktops, cell-phones and other devices and services, servers, software and utilities, business applications⁴ and networks, etc.) - Information relating to your use of company assets: <ul style="list-style-type: none"> ✓ Vehicle identifiers (license plate, type of car and color of car) ✓ CCTV images from surveillance cameras at the entrance of UCB sites and adjacent parking lots ✓ UCB employee log-in username ✓ access right(s) ✓ badge number <p><i>Failure to provide the abovementioned personal data prevents UCB from fulfilling its legitimate interests (indicated below). It will also prevent you from accessing UCB sites (including onsite parking facilities) or using UCB assets and may prevent you from working for UCB(*).</i></p>
Obtains this data from:	<ul style="list-style-type: none"> - You - Fleet logistics (for any information related to company cars)

³ Such analyses are performed on information available in UCB's internal database and depending on the project at hand. Wherever possible, these analyses are performed on de-identified or aggregated data, i.e. without singling out individual employees. In addition, all appropriate organizational and security measures are put in place – in accordance with data protection laws – to ensure data privacy by design. This includes but is not limited to stringent access controls.

⁴ Being tools and applications that will enable or facilitate your work at UCB (e.g. Microsoft Teams with additional functionalities such as LiveCaption, LiveEvent, etc., Microsoft Outlook with additional features such as calendar sharing with designated colleagues).

	<ul style="list-style-type: none"> - Local authorities (in relation to criminal or punishable offences) - Third party consumer report and/or background check vendors (in accordance with applicable law)
Retains (**) your personal data for:	<ul style="list-style-type: none"> - See the information set out below for processing activity n°7 for data on electronic monitoring - 30 days for CCTV images - As long as required for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural or legal person, for compliance with a legal obligation which requires such further processing or where we need to prove or enforce a transaction or contract, or enforce our policies for any other data
Shares your personal data with:	<ul style="list-style-type: none"> - Competent regulatory and government agencies - UCB affiliates and third-party processors (as detailed in section 5.A).
Relies on the following GDPR legal basis:	<ul style="list-style-type: none"> - Processing: <ul style="list-style-type: none"> ✓ necessary for the purpose of the legitimate interests pursued by UCB, which include (i) ensuring the safety of its personnel, (ii) conducting its business; (iii) ensuring compliance with UCB company policies; (iv) maintaining the integrity of UCB property, assets and systems; (v) ensuring the safety and proper technical operation and the physical protection of UCB's IT network and systems; (vi) preventing and combatting criminal activities, fraud, misdemeanors and misuse of our products, services & assets; (vii) protecting its legal interests and handling legal disputes and claims; and (viii) gaining a better understanding of and further insights into certain workforce related topics and as a result improving the conduct of its business (e.g. to avoid financial losses and remediate tax concerns)(***) ✓ to the extent authorized under applicable national law insofar it relates to judicial data
5. In order to enable UCB to comply with its legal requirements regarding whistle blowing by handling concerns that are submitted through the UCB Integrity Line, UCB:	
Collects the following personal data about you:	<p><i>[Information on the UCB employee reporting (to the extent legally permitted, i.e. insofar the complainant does not wish to remain anonymous) concern(s) or an issue involving other UCB employee(s), contractors or other third parties as well as on the UCB employees regarding whom such concern(s) have been expressed]:</i></p> <ul style="list-style-type: none"> - Your contact details - Your professional information - Certain special categories of personal data - depending on the scope of the complaint⁵: <ul style="list-style-type: none"> ✓ For example, if the person reporting a concern, claims discrimination based on sexual orientation, then "data concerning a natural person's sex life or sexual orientation" would be processed as part of the investigation into that claim - Other information provided by you or about you in the context of UCB's internal whistle blowing procedure

⁵ Special categories of personal data as per the GDPR includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation. The processing of personal data relating to criminal convictions and offences is also considered a special category for which more stringent rules apply.

	<p><i>Failure to provide the abovementioned personal data prevents UCB from fulfilling its legitimate interests (indicated below). Failure to provide us with information that is legally required, prevents us from complying with our legal obligations(*)</i>.</p>
Obtains this data from:	<ul style="list-style-type: none"> - You - The person reporting a concern through the integrity hotline
Retains (**) your personal data for:	<ul style="list-style-type: none"> - If the reported fact is covered under the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, the report(s) shall be stored for no longer than is necessary and proportionate in order to comply with the requirements imposed by the Directive, or other requirements imposed by Union or national law
Shares your personal data with:	<ul style="list-style-type: none"> - UCB affiliates and third-party processors (as detailed in section 5.A) - Judicial or regulatory authorities (if applicable and depending on the nature of the complaint)
Relies on the following GDPR legal basis:	<ul style="list-style-type: none"> - Processing necessary for: <ul style="list-style-type: none"> ✓ compliance with UCB's legal obligations ✓ to the extent such processing would not be covered by compliance with the aforementioned legal obligations - processing necessary for the purpose of the legitimate interests pursued by UCB which include the proper conduct of its business, ensuring compliance with company policies, combatting potential fraud, misdemeanors and criminal activities - <u>For special categories of personal data</u>, processing necessary for: <ul style="list-style-type: none"> ✓ the purposes of carrying out the obligations and exercising specific rights of the controller in the field of employment and social security and social protection law in so far it is authorized by European Union (EU) or EU Member State law or a collective agreement pursuant to EU Member State law; or ✓ (to the extent applicable) the establishment, exercise or defense of legal claims - <u>For judicial data</u>, processing to the extent authorized under applicable national law
<p>6. In order to enable UCB to monitor the use of its IT systems and network by employees (including the Internet and e-mail/ traffic) via semi-automated systems such as Security Incidents & Events Management ("SIEM") in accordance with and within the limits permitted by applicable law, UCB:</p>	
Collects the following personal data about you:	<ul style="list-style-type: none"> - Your contact details: <ul style="list-style-type: none"> ✓ UCB employee ID number - Information on internet usage by employees: <ul style="list-style-type: none"> ✓ internal & external IP addresses ✓ visited websites (URL) ✓ timestamp ✓ location of the user (country/ geography)

	<ul style="list-style-type: none"> ✓ volume ✓ type of activity (protocol) <ul style="list-style-type: none"> - Information on e-mail usage by employees: <ul style="list-style-type: none"> ✓ Frequency ✓ number of emails ✓ sender and recipients ✓ size of message ✓ embedded links or attachments (that may be malicious) - Information on IT device usage by employees: <ul style="list-style-type: none"> ✓ process creation and related events ✓ device properties like operating systems, file creation, modification and other file events ✓ network configuration and activity, including IP addresses and URLs as well as potential breach activity. <p><u>Please note that:</u></p> <ul style="list-style-type: none"> a. even though the abovementioned information is logged (including through the SIEM system), it will only be accessed and reviewed by authorized UCB IT personnel (and our third party service providers as further detailed below) in the event of a security alert/incident, requiring UCB to follow-up and take remedial steps or actions and always subject to compliance with applicable data protection laws. b. regarding certain categories of UCB employees (e.g. IT administrators and employees with privileged access to certain UCB systems and information), additional information may be captured for audit trail/log reasons, as set out in the relevant UCB policies and underlying SOPs. <p><i>Failure to provide the abovementioned personal data will prevent you from using UCB resources (such as IT assets) and may prevent you from working for UCB(*)</i></p>
Obtains this data from:	<ul style="list-style-type: none"> - You (through your use of UCB IT tools)
Retains (**) your personal data for:	<ul style="list-style-type: none"> - For all monitoring systems that produce logs, such logs are initially kept for 180 days in a readily available format (so called 'hot storage'), after which they will be archived and maintained for an additional 18 months subject to even more stringent and additional access controls (so called 'cold storage')
Shares your personal data with:	<ul style="list-style-type: none"> - UCB affiliates and third-party processors (as detailed in section 5.A)
Relies on the following GDPR legal basis:	<ul style="list-style-type: none"> - Processing necessary for the purpose of the legitimate interests pursued by UCB, which include (i) the prevention of illegitimate or defamatory acts, (ii) the protection of the economic, trade and financial interests of UCB, (iii) the safety and proper technical operation of UCB's IT network-systems and the physical protection of UCB's installations, and (iv) monitoring compliance with UCB's policies and rules relating to the use of online technologies(***). <i>In this respect we also refer to the information that is captured in local work regulations</i>
<p>7. In order to improve the functionalities of our internal websites (e.g. "House of Knowledge"), we use trackers to better understand aggregate usage patterns relating to these internal websites/pages, including by retaining and evaluating information on recent use made of the website and how different parts of the website are accessed for analytics purposes so that we can make these websites more intuitive and relevant, as well as identify opportunities for training or improvement. In that context, UCB:</p>	

Collects the following personal data about you:	<p><i>[Dependent on the metrics of the internal website at hand:]</i></p> <ul style="list-style-type: none"> - Electronic identification data (i.e. information collected through cookies or other like trackers), e.g.: <ul style="list-style-type: none"> ✓ IP address ✓ department you belong to ✓ amount of visits to the website; ✓ sections of the website that were accessed <p><i>Please note that the abovementioned data will be aggregated into summary reports (statistics) only, for the purposes set out above, including website improvement. We will not identify you on an individual level. In that regard, please also consult the cookie policy featured on any such website.</i></p>
Obtains this data from:	- You
Retains (**) your personal data for:	- Depending on the relevant internal website (please see cookie policy for that website)
Shares your personal data with:	- UCB affiliates and third-party processors (as detailed in section 5.A)
Relies on the following GDPR legal basis:	<ul style="list-style-type: none"> - Processing necessary for the purpose of the legitimate interests pursued by UCB to conduct its business, including providing access to internal websites containing internal knowhow and continuously improving both the content and user experience of those websites(**). - For cookies, processing based on your consent except for functional cookies (see the relevant Cookie Policy for more information)
8. In order to enable UCB (i) to comply with applicable European Union (“EU”) or European Member State laws and regulations (including but not limited to tax, accounting, social security, health and safety legislation and other legal obligations); (ii) to perform regulatory audits based on European or European Member State laws; and (iii) to respond to any official request from a European public or judicial authority in compliance with European or European Member State laws, UCB:	
Collects the following personal data about you:	<ul style="list-style-type: none"> - Your information as set out under the previous data processing activities - Any other information that you provided to UCB or that UCB collects about you and that may be required under applicable EU or Member State laws. <p><i>Failure to provide the abovementioned personal data prevents UCB from complying with its obligations as an employer under our employment contract with you and with obligations under local laws and may prevent you from working for UCB(*)</i>.</p>
Obtains this data from:	<ul style="list-style-type: none"> - You - UCB company physician (subject to compliance with health and safety legislation)
Retains (**) your personal data for:	- For as long as needed to comply with our obligations under local law
Shares your personal data with:	- Competent EU or EU Member State regulatory and government agencies

	<ul style="list-style-type: none"> - UCB affiliates and third party processors (as detailed in section 5.A) - UCB company physician (subject to compliance with health and safety legislation)
Relies on the following GDPR legal basis:	<ul style="list-style-type: none"> - Processing necessary for: <ul style="list-style-type: none"> ✓ compliance with our legal obligations ✓ the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorized by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject – as it relates to the processing of health data ✓ the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of EU or EU Member State law or pursuant to a contract with a health professional and subject to the conditions and safeguards set out in GDPR – as it relates to the processing of health data
9. In order to enable UCB (i) to comply with applicable foreign (i.e. non-European Union or non-European Member State) laws and regulations and (ii) to respond to any official request from a foreign public or judicial authority, UCB:	
Collects the following personal data about you:	<ul style="list-style-type: none"> - Your information as set out under the previous data processing activities - Any other information that you provided to UCB or that UCB collects about you and that may be required under applicable EU or Member State laws. <p><i>Failure to provide the abovementioned personal data prevents UCB from complying with its obligations as an employer under our employment contract with you and with obligations under local laws and may prevent you from working for UCB(*)</i></p>
Obtains this data from:	<ul style="list-style-type: none"> - You
Retains (**) your personal data for:	<ul style="list-style-type: none"> - For as long as needed to comply with our obligations under local law
Shares your personal data with:	<ul style="list-style-type: none"> - Competent regulatory and government agencies - UCB affiliates and third party processors (as detailed in section 5.A)
Relies on the following GDPR legal basis:	<ul style="list-style-type: none"> - Processing necessary for the purpose of the legitimate interests pursued by UCB to comply with its legal obligations in jurisdictions outside of the EU where UCB conducts its business (***)
10. In order to enable UCB to manage M&A transactions involving UCB entities, UCB:	

Collects the following personal data about you:	- The personal data set out under the previous processing activities. However, only to the extent relevant for the transaction at hand and subject to compliance with applicable data protection laws.
Obtains this data from:	- You
Retains (**) your personal data for:	- The retention periods set out above as they relate to the different categories of personal data
Shares your personal data with:	<ul style="list-style-type: none"> - Third party interested in acquiring all or part of its business and/or assets - External counsel (e.g. law firms, auditors, etc.) assisting UCB and/or the third party buyer within the framework of the transaction - Competent regulatory and government agencies (to the extent applicable) - UCB affiliates and third-party processors (as detailed in section 5.A)
Relies on the following GDPR legal basis:	- Processing necessary for the purpose of the legitimate interests pursued by UCB to (i) conduct its business and (ii) allow a third party to acquire all (or part) of its business and/or assets (***)
	11. In order to manage sales customer relationships, UCB:
Collects the following personal data about you:	<p>Your Personal Details</p> <ul style="list-style-type: none"> ✓ Name <p>Your Professional Information</p> <ul style="list-style-type: none"> ✓ Address ✓ UCB email address ✓ Territory covered ✓ Employee number ✓ hire date ✓ title
Obtains this data from:	- Talent systems
Retains (**) your personal data for:	- For as long as needed to comply with our obligations under local law
Shares your personal data with:	- UCB affiliates
Relies on the following GDPR legal basis:	<ul style="list-style-type: none"> - The performance of the employment contract between you and UCB - The purpose of the legitimate interests pursued by UCB, which include improving efficiency in the workplace, the proper conduct of its business, the protection of the economic, trade and financial interests of UCB and compliance with (non-EU) regulations (**).
	12. In order to report the performance of the Sales team for their incentive payouts based on defined performance metrics, UCB:

Collects the following personal data about you:	Your Personal Details ✓ Name Your Professional Information ✓ Territory covered ✓ Employee number ✓ hire date ✓ transfer date ✓ termination date ✓ target IC bonus ✓ short term disability/leave of absence status/eligibility ✓ bonus earned ✓ National/Regional Pinnacle ranking
Obtains this data from:	- Talent systems
Retains (**) your personal data for:	- For as long as needed to comply with our obligations under local law
Shares your personal data with:	- UCB affiliates
Relies on the following GDPR legal basis:	- The performance of the employment contract between you and UCB - The purpose of the legitimate interests pursued by UCB, which include improving efficiency in the workplace, the proper conduct of its business, the protection of the economic, trade and financial interests of UCB and compliance with (non-EU) regulations (***).
UCB EMPLOYEES' FAMILY MEMBERS	
13. In order to enable UCB to offer certain benefits (e.g. health insurance) to defined family members of UCB employees, UCB:	
Collects the following personal data about you:	- Family members identification and personal details: ✓ full name ✓ birth date ✓ home address ✓ marital status ✓ number of dependents (including children and their full name) - (Financial) information on the actual benefits awarded to UCB employee family members (e.g. cost of health insurance, car insurance related to use of company car assigned to UCB employee, etc.) - Any other information that you provide to UCB or that UCB collects about you insofar this is required to provide you with the abovementioned benefits;

	<i>Failure to provide the abovementioned personal data will prevent you from receiving the benefits to which you are eligible as set out above.</i>
Obtains this data from:	<ul style="list-style-type: none"> - The UCB employee within your household; - You
Retains (**) your personal data for:	<ul style="list-style-type: none"> - For as long as needed to comply with our obligations under local law
Shares your personal data with:	<ul style="list-style-type: none"> - Insurance companies (and banks) acting as our partners to offer certain services (/benefits) to you - UCB affiliates and third party processors (as detailed in section 5.A).
Relies on the following GDPR legal basis:	<ul style="list-style-type: none"> - Processing is necessary for the purpose of the legitimate interests pursued by UCB to provide certain benefits (e.g. health insurance) to defined family members of UCB employees (**).

To the extent required by local law, UCB may also process additional personal data pertaining to you. UCB will only do so as strictly required by and per local legal obligations.

()Whenever personal information is collected (e.g. in forms), UCB will indicate whether the provision of such information is mandatory and the consequences of a refusal to provide the requested information.*

*(**) We will retain your personal data in accordance with the retention periods set out in the table above. These retention periods, included in our data retention policy, are dictated by:*

- applicable statutory/legal requirements;*
- industry guidelines; and*
- for those data categories for which no express statutory or legal requirements apply, certain other determining factors such as the need to prove or enforce a transaction or contract, enforce our policies, etc.*

We will delete your personal data once the abovementioned retention periods will have expired or if you object to or withdraw your consent in relation to our processing of your personal data (to the extent such processing is based on your consent), except where we need to hold on to such data for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural or legal person, for compliance with a legal obligation which requires such further processing or where we need to prove or enforce a transaction or contract, or enforce our policies.

*(***) To this end, UCB strives to maintain a fair balance between its need to process your personal data and the preservation of your rights and freedoms, including the protection of your privacy. For more information or if you have any questions regarding how we assess this balance, please contact us through any one of the channels set out above.*

4. YOUR RIGHTS AND HOW YOU CAN EXERCISE THEM

4.A. Your rights⁶

Right to access

You have the right to obtain confirmation from us as to whether or not we process personal data concerning you, and if so, the right (as far as this does not adversely affect the rights and freedoms of others) to obtain a copy of your personal data from us. *For more information, please check section 4.B “How to exercise your rights”.*

Right to rectification

You have the right to ask us to rectify without undue delay any inaccurate personal data concerning you. You can also ask us to complete incomplete personal data regarding you by providing us with a supplementary statement containing such additional information. *For more information, please check section 4.B “How to exercise your rights”.*

Right to erasure

You have the right to ask us to erase without undue delay personal data concerning you, where one of the following grounds applies:

- your personal data are no longer necessary in relation to the purposes for which they were processed;
- you have withdrawn your consent - for those processing activities based on your consent – and we have no other legal ground for such processing;
- you object to the processing of your personal data (*for more information on the right to object, see further below*) and there are no overriding legitimate grounds for such processing;
- your personal data have been unlawfully processed;
- your personal data must be erased for compliance with a European Union or European Union Member State legal obligation to which UCB is subject.

Please note that your right to erasure will not apply to the extent that processing is necessary for:

- exercising the right of freedom of expression and information;
- compliance with a European Union or European Union Member State Law to which UCB is subject;
- reasons of public interest in the area of public health in accordance with article 9(2)(h) and (i) GDPR as well as article 9(3) GDPR;
- archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the relevant provisions of the GDPR;

⁶ The rights set forth herein are in accordance with and subject to applicable laws and limitations.

- the establishment, exercise or defense of legal claims.

For more information, please check section 4.B “How to exercise your rights”.

Right to restriction of processing

You have the right to obtain from UCB restriction of processing by UCB of your personal data where one of the following applies:

- you contest - in good faith - the accuracy of personal data regarding you and held by us, in that case the restriction of processing will apply for a period enabling us to verify the accuracy of your personal data;
- the processing is unlawful and you oppose the erasure of your personal data and request restriction of their use instead;
- we no longer need your personal data, but you require them for the establishment, exercise or defense of legal claims;
- you have objected to the processing of your personal data by UCB in accordance with the relevant GDPR provision, in that case the restriction of processing will apply for a period enabling us to verify if our legitimate grounds override yours.

Please note that notwithstanding the above, we are still allowed to continue storing your personal data (throughout the period of restriction) or to process your personal data for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person.

If you have requested restriction of processing, we will inform you before the restriction of processing is lifted. *For more information, please check section 4.B “How to exercise your rights”.*

Right to objection to processing

You have the right to object at any time, on grounds relating to your specific situation, to the processing of your personal data by UCB which is based on UCB's pursuit of its legitimate interests as a controller. In that case UCB will no longer process your personal data, unless:

- UCB demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms; or
- for the establishment, exercise or defense of legal claims.

You have the right to object at any time to the processing of your personal data for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing. *For more information, please check section 4.B “How to exercise your rights”.*

Right to data portability

You have the right (insofar this does not adversely affect the rights and freedoms of others) to receive the personal data concerning you, that you have provided to UCB, in a structured, commonly used and machine-readable format and to transmit those data to another controller, without hindrance from UCB, where the processing is:

- based on your consent or on a contract; and
- carried out by automated means.

For more information, please check section 4.B “How to exercise your rights”.

Right to withdraw consent

Where the processing is based on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. *For more information, please check section 4.B “How to exercise your rights”.*

For California Residents:

California Consumer Privacy Act

The California Consumer Privacy Act of 2018 (CCPA) gives California consumers the right to know what personal information is collected about them, how it will be used and to whom it is disclosed. In addition, the CCPA provides You (as a California resident) with specific rights subject to certain exceptions.

Right to know

You have the right under the CCPA to request that We disclose what personal information We collect, use, disclose, and sell.

Right to deletion

You have the right under the CCPA to request deletion of any personal information about You that We have collected from You.

Right to opt-out

You have the right under the CCPA to opt-out of the sale of Your personal information.

Right to non-discrimination

You have the right under the CCPA not to be discriminated against for exercising Your rights.

Please note that some of the personal information that We collect, use, and disclose may be exempt from the CCPA because it is regulated by other federal and state laws that apply to Us.

4.B. How to exercise your rights

To exercise the abovementioned rights or if you have any (other) questions or concerns in connection with UCB's handling of your personal information, please contact:

- your local Talent Department via HR Answers (HR Answers Portal via UCB Plaza) OR

- the Head of Corporate Data Privacy (including via the e-mail address dataprivacy@ucb.com). OR
- the local Privacy Officer (list available on Plaza [here](#))

Please clearly identify the right(s) you wish to exercise and include your contact details so that we can respond to your request. Please note that you may be asked to provide proof of your identity. When you contact us to exercise any of the rights mentioned above, we will respond to your request within one month following receipt of the request. This period may be extended by two additional months where necessary, but in that case, we will inform you of any such extension within one month of receipt of your initial request together with the reasons for the delay.

4.C Right to lodge a complaint with supervisory authority

In accordance with article 77 GDPR you have the right to lodge a complaint with a supervisory authority, in particular in the European Union Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that UCB's processing of your personal data infringes the GDPR. Please visit the website of the relevant national supervisory authority for more information on how to submit such a complaint.

5. MORE DETAILS ON HOW WE PROCESS YOUR PERSONAL DATA

5.A. WHO WE SHARE YOUR PERSONAL DATA WITH

Principle

We will disclose your personal data only as described in this Policy (as further detailed above), as may be updated from time-to-time.

Affiliates and third-party processors

UCB transfers or discloses your personal data to its personnel, affiliates, and to third party service providers processing personal data on UCB's behalf for the purposes set out above.

Third party service providers include payroll processors; IT services/ consulting/ outsourcing companies (e.g. cloud service providers and database providers); companies that provide a variety of technical or administrative support, including but not limited to travel agencies and providers, banks, insurance companies and brokers, provider of meal tickets; telecom providers; providers of public transportation and car leasing companies; energy companies (relating to the delivery of electric car charging services); etc. These service providers provide their services from locations both within the European Economic Area ("EEA") and outside the EEA.

Other third parties include regulatory authorities (including tax authorities) and government agencies (see further below in this Notice), banks and insurance companies, our advisors and external legal counsel, our auditors and, potentially, third parties with whom UCB may merge or which may be acquired by UCB (see further below in this Notice).

Compliance with laws and legal proceedings

UCB will disclose your personal data where:

- we are required to do so by applicable law, by a governmental body or by a law enforcement agency;
- to establish or exercise our legal rights or defend against legal claims;
- to investigate, prevent or take actions against illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our policies or as otherwise required by law.

Other

If a third party acquires all (or substantially all) of our business and/or assets, we will disclose your personal data to that third party in connection with the acquisition. However, such disclosure will occur subject to and in accordance with applicable data protection laws, including the GDPR.

5.B. INTERNATIONAL TRANSFERS

UCB will transfer your personal data to its affiliates, including our affiliates outside of the EEA. In that case UCB relies on UCB's Binding Corporate Rules, which can be accessed through the following link: https://www.ucb.com/UCB_BCRs.pdf.

The transfer of your personal data to third party service providers (as set out above under section 5A) in countries outside of the EEA that do not ensure an adequate level of (data) protection, occurs on the basis of Standard Contractual Clauses that have been executed between UCB and the relevant third party service provider. You may - by exercising your rights set out above under section 4.B (How to exercise your rights) - obtain a copy of the relevant safeguard UCB has put in place or ask UCB to redirect you to the place where they have been made available.

In the absence of the aforementioned appropriate safeguards, UCB may – to the extent permitted under and in accordance with applicable data protection laws (including the GDPR) - rely on a derogation applicable to the specific situation at hand (e.g. the data subjects' explicit consent, the necessity for the performance of an agreement, the necessity for the establishment, exercise or defense of legal claims).