



## ELANCO WORKFORCE PRIVACY NOTICE

Elanco, which includes Elanco Animal Health Incorporated and its affiliates (collectively, “Elanco,” “we,” “us,” “our”), is committed to protecting Personal Information we collect from and about our workforce. Elanco collects and uses this personal information in business planning, talent searches, supporting human resources, and operational processes. This notice (the “Workforce Privacy Notice”) provides information about the personal information Elanco collects (“Personal Information”) and explains how we collect, process, disclose, and safeguard Personal Information, as well as your rights and choices with respect to your Personal Information.

Elanco operates in many different countries and regions. Some of these countries or regions have laws related to the processing of Personal Information. Elanco takes these obligations seriously and is committed to protecting the privacy of our workforce.

### A. Scope

This Notice applies to Elanco job applicants; active and inactive Elanco employees; former employees; retirees; dependents; beneficiaries; contractors and other individuals about whom Elanco collects Personal Information in an employment-related context (collectively, our “Workforce”).

Please note that this Workforce Privacy Notice does not apply to individuals with whom we interact in a non-Workforce-related capacity. Other individuals may access our Global Privacy Notice by clicking [here](#).

Some portions of this Privacy Notice apply only to Workforce members of particular regions, countries, or U.S. states. In those instances, we have indicated that such language applies only to certain Workforce members.

### B. Definitions

- “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information includes “personal data” (or equivalent term) as that term is defined by applicable privacy laws. Personal Information also includes “Sensitive Personal Information,” as defined below, except where otherwise noted. References to Personal Information in this Workforce Privacy Notice relate only to Personal Information we collect, process, and disclose about our Workforce.
- “Sensitive Personal Information” means Personal Information that reveals a consumer’s social security, driver’s license, state identification card, or passport number; account log-in, financial account number, debit card number, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious beliefs, or union membership; contents of email or text messages; and genetic data. Sensitive Personal Information also includes processing of biometric information for the purpose of uniquely identifying a consumer and Personal Information collected and analyzed concerning a consumer’s health, sex life, or sexual orientation. Sensitive Personal Information also includes “sensitive data” (or equivalent term) as that term is defined by applicable privacy laws. References to Sensitive Personal Information in this Workforce Privacy Notice relate only to Sensitive Personal Information we collect, process, and disclose about our Workforce.
- “Supplier” means a service provider, contractor, or processor as those terms are defined by



applicable privacy laws.

- “Third Party” means any entity that is not a Supplier.
- “CCPA” means the California Consumer Privacy Act of 2018 and California Privacy Rights Act of 2020, and their implementing regulations, collectively.

Other terms used herein that are defined terms under applicable privacy laws shall have the meanings afforded to them by applicable privacy laws, whether or not capitalized, unless the context indicates otherwise. As there are some variations between such definitions across global privacy laws, the definitions applicable to you are those provided in the statute for the region, country, or U.S. state in which you are a Workforce member. For example, if you are a Workforce member who is a resident of California, terms used in this Workforce Privacy Notice that are defined terms in the CCPA shall have the meanings afforded to them in the CCPA as this Privacy Notice applies to you.

### C. Overview of Personal Information Processing & California Notice at Collection

This section of our Privacy Notice lists the categories of Personal Information Elanco and our Suppliers collect and explains how we and our Suppliers process that Personal Information. This section also provides our notice at collection for Workforce members who are residents of California.

#### 1. Information We Collect and How We Use It

As appropriate depending on the Workforce member and to the extent permitted by applicable laws, we collect the following categories of Personal Information from Workforce members, and we have collected the following categories of Personal Information from Workforce members in the past twelve months:

- (1) Identifiers, such as name, alias, gender, IP address, employee identification number, date of birth, physical characteristics or description;
- (2) Contact and financial information, including work and home contact details (email, phone numbers, and postal address), languages(s) spoken, emergency contact information, dependents, work permit, residency, financial information, medical information, health insurance information;
- (3) Characteristics of protected classifications under state or federal law, such as age, gender, race, physical or mental health conditions, disability status, marital status;
- (4) Commercial information, such as transaction information and purchase history;
- (5) Biometric information;
- (6) Internet or other electronic network activity information, such as browsing history and other information relating to use of Elanco information systems;
- (7) Geolocation data, such as device location;
- (8) Audio, electronic, visual and similar information, such as photographs, call and video recordings, CCTV recordings, and information required to access Elanco facilities, systems, and applications, such as keycard access records, credentials for systems, email accounts, instant messaging accounts, and other resources provided by Elanco, mainframe ID, and electronic content produced using Elanco systems;



- (9) Professional or employment-related information, such as work history, prior employer, base salary, bonus, benefits, compensation type, stock grants and other awards/incentives, currency, pay frequency, salary reviews, working time records (including vacation and other absence records, leave status, hours worked, and department standard hours), other compensation-related data, description of position, job title, corporate status, management level, job profile, salary plan, pay grade, job family, unit/department, location, employment status and type, employment contract and terms, hire/re-hire and terminations date(s), length of service, retirement eligibility, promotions, disciplinary records, application and resume/CV information, previous employment, education history, professional qualifications, relevant skills, certifications, background check information, performance management ratings, development programs planned and attended, e-learning programs, performance and development reviews, and data used to populate associated biographies;
- (10) Education information, as defined in the federal Family Educational Rights and Privacy Act, such as student records and directory information;
- (11) Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics; and
- (12) Sensitive personal information, including:
- a. Personal Information that reveals:
    - i. Social security, driver's license, state identification card, or passport number;
    - ii. Account log-in, financial account number, debit card number, or credit card number in combination with any required security or access code, password, or credentials for allowing access to an account;
    - iii. Precise geolocation;
    - iv. Racial or ethnic origin, religious or philosophical beliefs, or union membership; or
    - v. Contents of a Workforce member's email and text messages, unless Elanco is the intended recipient thereof.
  - b. Biometric data processed for the purpose of uniquely identifying a Workforce member;
  - c. Personal Information collected and analyzed concerning a Workforce member's health; and
  - d. Personal Information collected and analyzed concerning a Workforce member's sex life or sexual orientation.

We have disclosed the categories of Personal Information listed in this Section C(1) to Third Parties for a business purpose in the past twelve months.

## **2. Purposes & Legal Bases for Collection, Processing, & Disclosure**



Elanco and our Suppliers collect, process, and disclose the categories of Personal Information listed in Section C(1) (except for Sensitive Personal Information) for the below purposes. Please note that the references in the below chart to our legal bases for processing only apply to residents of the European Economic Area, United Kingdom, and other regions with privacy laws that require us to disclose our legal bases for processing. The references to our legal bases for processing do not apply to residents of the U.S.

Purpose	Description	Legal Basis
<b>Workforce Management</b>	Includes managing work activities and personnel, including recruitment; job placement; hiring; benefits program administration; payroll and compensation; training; performance management; advancement planning; succession management; reviews; wages and other awards/incentives, such as stock grants and bonuses; leaves of absence; promotions; transfers; providing employment references; performing workforce analysis and planning; performing background checks; conducting drug testing; managing disciplinary matters, grievances, and terminations; reviewing employment decisions; making business travel arrangements; managing business expenses and reimbursements; planning and monitoring training requirements, career development activities, and skills; workforce reporting, data analytics, and trend analysis; and creating and maintaining internal employee directories.	Legal obligation Performance of a contract Legitimate interest, including managing our business operations, preventing fraud, and protecting our and our Workforce's legal rights
<b>Communications, Security, Facilities and Emergencies</b>	Includes facilitating communication with our Workforce; ensuring business continuity and crisis management; providing employment references; protecting Workforce health and safety; securing facilities and maintaining access controls; and safeguarding and maintaining IT infrastructure and office equipment.	Legal obligation Performance of a contract Legitimate interest, including managing our business operations, ensuring network and data security, preventing fraud, and protecting our and our Workforce's legal rights
<b>Business Operations</b>	Includes operating and managing IT, communications systems, and facilities; managing product and service development; improving products and services; managing Elanco assets; allocating Elanco assets and human resources; strategic planning, project management, and business continuity;	Legal obligation Performance of a contract Legitimate interest, including managing our business operations, ensuring network and data security, preventing



	compilation of audit trails and other reporting tools; maintaining records related to business activities; budgeting, financial management, and reporting; communications; and managing mergers, acquisitions, sales, or reorganizations.	fraud, and protecting our and our Workforce's legal rights
<b>Compliance</b>	Includes complying with legal and other requirements applicable to Elanco's business in all countries or regions in which Elanco operates, such as income tax and national insurance deductions; recordkeeping and reporting obligations; conducting audits; compliance with government inspections and other requests from government or other public authorities; responding to legal processes, such as subpoenas; pursuing legal rights and remedies; defending litigation and managing any internal complaints or claims; conducting investigations of alleged wrongdoing, policy violations, fraud, and financial reporting concerns; and complying with internal policies and procedures.	Legal obligation Legitimate interest, including ensuring network and data security, preventing fraud, and protecting our and our Workforce's legal rights
<b>Monitoring</b>	To the extent permitted by local law, includes monitoring compliance with internal policies; monitoring of Elanco facilities, systems, and communications (i.e., telephone, email, instant messenger); monitoring of Workforce records, documents, sales personnel call notes, internet log files, keycard access data, and similar data residing on Elanco-owned networks, computers, and other electronic devices.	Legal obligation Legitimate interest, including managing our business operations, ensuring network and data security, preventing fraud, and protecting our and our Workforce's legal rights

We may also anonymize and aggregate any Personal Information we collect about you and use the resulting aggregated and/or anonymized data for any purposes permitted by applicable law.

With the exception of certain information that is required by law, necessary for the performance of an employment contract, necessary or important to the performance of our business, your decision to provide Personal Information to Elanco is voluntary. Please note, however, that if you do not provide certain Personal Information, Elanco may not be able to accomplish some of the purposes outlined in this Notice and may not be able to interact with you in an employment-related context.

### **3. Purposes for Processing & Legal Bases for Collection, Processing, & Disclosure of Sensitive Personal Information**

Elanco and our Suppliers collect, process, and disclose the categories of Sensitive Personal Information listed in Section C(1) for the below purposes, as permitted by the CCPA. Please note that the references in the below chart to our legal bases for processing only apply to residents of the European Economic Area,



United Kingdom, and other regions with privacy laws that require us to disclose our legal bases for processing. The references to our legal bases for processing do not apply to residents of the U.S.

Purpose	Legal Basis
Performing the services or providing the goods reasonably expected by an average Workforce member who requests those goods or services, including providing benefits and complying with employment-related legal requirements	Performance of Contract Legitimate Interests, including to manage our business operations Explicit Consent
Ensuring security and integrity to the extent the use of the Workforce member's Personal Information is reasonably necessary and proportionate for these purposes	Legitimate Interests, including to comply with applicable law and protect Elanco interests Processing necessary for the establishment, exercise, or defense of legal claims Processing necessary to vital interests of the data subject
Preventing, detecting, and investigating security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted Personal Information	Legitimate Interests, including to comply with applicable law and protect Elanco interests Processing necessary for the establishment, exercise, or defense of legal claims Processing necessary to vital interests of the data subject
Resisting malicious, deceptive, fraudulent, or illegal actions directed at the business and prosecuting those responsible for those actions	Legitimate Interests, including to comply with applicable law and protect Elanco interests Processing necessary for the establishment, exercise, or defense of legal claims
Ensuring the physical safety of natural persons	Legitimate Interests, including to manage our business operations and comply with applicable law Processing necessary to vital interests of the data subject
Performing services on our behalf, including verifying Workforce member information, processing payroll and compensation,	Performance of Contract Legitimate Interests, including to manage our business operations



accommodating disabilities, providing analytic services, providing storage, or providing similar services on our behalf	Explicit Consent
Collecting or processing Sensitive Personal Information where such collection or processing is not for the purpose of inferring characteristics about an Individual	Legitimate Interests, including to manage our business operations Explicit Consent

Where permitted by applicable privacy laws, we may also collect and process Sensitive Personal Information for the purposes listed in Section C(2). This statement does not apply to Sensitive Personal Information collected about Workforce members who are residents of California.

We do not use automated decision-making, including profiling, to make decisions that have legal or similarly significant effects with respect to Workforce members.

#### 4. Sale & Sharing of Personal Information

**Disclosure for California Workforce Members:** We sell and share each of the categories of Personal Information listed in Section C(1) that we collect about Workforce members, and we have sold and shared each of the categories of Personal Information listed in Section C(1) in the past twelve months. We sell and share each category of Personal Information listed in Section C(1) with the categories of Third Parties listed in Section D(1), for the purposes listed in Sections C(2) and (3). We do not have actual knowledge that we sell or share Personal Information of Workforce members who are residents of California and who are under 16 years of age. For purposes of the CCPA, a “sale” is the disclosure of Personal Information to a Third Party for monetary or other valuable consideration, and a “share” is the disclosure of Personal Information to a Third Party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration. Workforce members who are residents of California have the right to opt out of the sale and sharing of their Personal Information, and can do so by clicking [here](#), sending an email to [privacy@elancoah.com](mailto:privacy@elancoah.com), or calling us toll free at 1-888-545-5973.

#### 5. Retention of Personal Information

We will retain each category of Personal Information listed in Section C(1) for the time needed to fulfil our legitimate and lawful business purposes in accordance with our records retention policy and applicable laws and regulations.

The criteria used to determine our retention periods include:

- The duration of our relationship with you and the time needed to interact with you in a Workforce-related capacity;
- Whether there is a legal obligation to which we are subject; and
- Whether retention is advisable for other legal and regulatory purposes.

#### D. Additional Processing Information

##### 1. How We Disclose Your Personal Information

For each of the categories of Personal Information listed in Section C(1), we disclose and have disclosed such Personal Information to our affiliates and Suppliers, and to Third Parties in the past twelve months:

- **Elanco Affiliates:** We disclose Personal Information to Elanco affiliates for the purposes described in this Workforce Privacy Notice, such as managing and monitoring our Workforce, conducting our business operations, and complying with applicable law.



- **Suppliers:** We disclose Personal Information to our Suppliers to provide services such as recruitment and hiring, benefits, human resources services, corporate responsibility programs, performance management, Workforce training, expense management, equity compensation, Workforce credit cards, medical or health services, accountants, auditors, lawyers, insurers, bankers, other professional advisors, IT systems and support, email management, managing data, hosting our databases, providing data processing services, conducting background checks, and similar purposes. Our Suppliers are restricted from using this data other than to provide services to us.
- **Third Party Partners:** We disclose Personal Information to other companies for benefits management and other business management purposes.
- **Other Third Parties:** We may disclose Personal Information to respond to subpoenas or other lawful information requests from governmental authorities, contact your emergency contacts in the event of an emergency, or to comply with applicable law, including to report adverse events, respond to law enforcement requests, or manage security, emergencies, and incident response. We may also provide your Personal Information to a Third Party in connection with any sale, assignment, or other asset transfer, in which case we will seek assurances that the Third Party will treat the Personal Information in accordance with this Workforce Privacy Notice.

## 2. Sources of Personal Information

We collect Personal Information directly from our Workforce, as well as from other sources, such as colleagues, managers, references, clients, background check providers, public databases, Suppliers, and Third Parties, as permitted by local law.

## 3. How We Secure Your Information

We provide reasonable physical, electronic, and procedural safeguards to protect Personal Information collected about our Workforce. For example, except as otherwise indicated in this Workforce Privacy Notice, we limit access to Personal Information to our Workforce members and Suppliers who need access to the Personal Information to perform the activities described in this Workforce Privacy Notice. This may include Workforce members' managers and their designees, and personnel in Elanco's human resources; health, safety, and environment; information technology; information security; ethics and compliance; legal; finance; quality; fleet management; risk management/insurance; and internal audit functions. Further, all Elanco personnel will generally have access to other Workforce members' business contact data, such as name, position, business telephone numbers, business postal address, and business email address. Although we strive to provide reasonable security for Personal Information we process, no security system can prevent all potential security breaches. Accordingly, we cannot fully guarantee the security of the Personal Information we collect about you.

## 4. International Transfers of Personal Information

Personal Information we collect from and about you may be transferred outside of your country of residence, including to the U.S. and other countries that may not provide the same level of data protection as your country of residence. Nonetheless, Elanco will process your Personal Information in accordance with this Workforce Privacy Notice and applicable privacy laws. Further, when we receive or transfer Personal Information from or to our affiliates, Suppliers, and Third Parties, we implement appropriate safeguards to facilitate such transfers where required by applicable privacy laws.



To obtain additional information regarding and/or a copy of the safeguards Elanco has implemented to facilitate cross-border transfers of Personal Information, please contact us at [privacy@elancoah.com](mailto:privacy@elancoah.com).

## 5. Your Rights & Choices

**European Economic Area & the United Kingdom:** Workforce members who reside in the European Economic Area or the United Kingdom have rights to access, correct, delete, restrict the processing of, and object to the processing of their Personal Information. They also have rights to obtain their Personal Information in a structured, commonly-used, and machine-readable format for transmission to another data controller, to not be subject to a decision based solely on automated processing, including profiling, that produces legal or similarly significant effects, and to lodge a complaint with a supervisory authority. Further, where we rely on consent as our legal basis for processing, Workforce members who reside in the European Economic Area or the United Kingdom may withdraw their consent at any time. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

**California:** Workforce members who are residents of California have the following rights regarding our collection and use of their Personal Information, subject to certain exceptions.

- **Right to Receive Information on Privacy Practices:** You have the right to receive the following information at or before the point of collection: (1) the categories of Personal Information to be collected; (2) the purposes for which the categories of Personal Information are collected or used; (3) whether or not that Personal Information is sold or shared; (4) if the business collects Sensitive Personal Information, the categories of Sensitive Personal Information to be collected, the purposes for which it is collected or used, and whether that information is sold or shared; and (5) the length of time the business intends to retain each category of Personal Information, or if that is not possible, the criteria used to determine that period. We have provided such information in this Privacy Notice, and you may request further information about our privacy practices by contacting us as at the contact information provided below.
- **Right to Deletion:** You may request that we delete any Personal Information about you we that we collected from you, subject to certain exceptions.
- **Right to Correction:** You may request that we correct any inaccurate Personal Information we maintain about you.
- **Right to Know:** You may request that we provide you with the following information about how we have handled your Personal Information: (1) the categories of Personal Information we collected about you; (2) the categories of sources from which we collected such Personal Information; (3) the business or commercial purpose for collecting, selling, or sharing Personal Information about you; (4) the categories of Third Parties to whom we disclosed such Personal Information; and (5) the specific pieces of Personal Information we have collected about you.
- **Right to Opt-Out of the Sale and Sharing of Personal Information:** You have the right, at any time, to direct us not to sell or share your Personal Information. To exercise that right, please contact us by clicking [here](#), sending an email to [privacy@elancoah.com](mailto:privacy@elancoah.com), or calling us toll free at 1-888-545-5973.
- **Right to Receive Information About Onward Disclosures:** You may request that we disclose to you: (1) the categories of Personal Information that we have collected about you; (2) the categories of Personal Information that we have sold or shared about you and the categories of Third Parties to whom the Personal Information was sold or shared; and (3) the categories of



Personal Information we have disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

- **Right to Non-Discrimination:** You have the right not to be discriminated against for exercising your data subject rights. We will not discriminate against you for exercising your data subject rights.

## 6. Exercising Your Rights

To exercise your data subject rights, you can submit your request [here](#), send an email to [privacy@elancoah.com](mailto:privacy@elancoah.com), or call us toll free at 1-888-545-5973. Authorized agents may also submit requests via these methods, where permitted by applicable privacy laws.

We will not discriminate against you for exercising your data subject rights. For example, we will not make hiring, firing, or disciplinary decisions as a result of you exercising your data subject rights.

There may be limitations to our ability to comply with your request. Certain Personal Information may be exempt from the scope of data subject requests under applicable privacy laws. Further, much of your Personal Information can be accessed via the Elanco intranet. We rely upon you to keep that information up-to-date, complete, and accurate.

## 7. Verification of Data Subject Requests & Appeals

As permitted or required by applicable privacy laws, we may ask you to provide information that will enable us to verify your identity in order to comply with your data subject request. In particular, when a Workforce member who is a resident of California authorizes an agent to make a request on their behalf, we may require the agent to provide proof of signed permission from the Workforce member to submit the request, or we may require the Workforce member to verify their own identity to us or confirm with us that they provided the agent with permission to submit the request. In some instances, we may decline to honor your request if an exception applies under applicable privacy laws. We will respond to your request consistent with applicable privacy laws.

## 8. Elanco Employee Obligations

To help Elanco keep your Personal Information current, please inform us of any significant changes to your Personal Information. Where required by local law, you agree to inform your dependents whose Personal Information you provide to Elanco about the content of this Notice, and to obtain their consent (provided they are legally competent to give consent and such consent is legally required) for the collection, processing, and disclosure of their Personal Information by Elanco as set out in this Notice. You also agree to follow applicable law and Elanco's policies, standards, and procedures that are brought to your attention when you are handling any Personal Information to which you have access in the course of your relationship with Elanco. You will not access or use any Personal Information for any purpose other than in connection with and to the extent necessary for your work with Elanco. You understand that these obligations will continue to exist after termination of your relationship with Elanco.

## 9. Other Disclosures for California Customers and Consumers

- **Disclosure About Direct Marketing for California Residents.** California Civil Code § 1798.83 permits California residents to annually request certain information regarding our disclosure of Personal Information to other entities for their direct marketing purposes in the preceding calendar year. To make such a request, please send an email to [privacy@elancoah.com](mailto:privacy@elancoah.com) with the subject "Shine the Light Request."
- **Financial Incentives for California Workforce Members.** Under California law, we do not provide



financial incentives to Workforce members who are residents of California and who allow us to collect, retain, sell, or share their Personal Information. We will describe such programs to you if and when we offer them to you.

- **Do Not Track & Opt-Out Preference Signals.** We recognize opt-out preference signals that we are required to recognize for compliance with applicable law. Where required by applicable privacy laws, we treat such opt-out preference signals as a valid request to opt-out of sale and, as applicable, sharing for the browser or device through which the signal is sent and any Workforce member profile we have associated with that browser or device, including pseudonymous profiles. If we know the identity of the Workforce member from the opt-out preference signal, we will also treat such opt-out preference signal as a valid request to opt out of sale and sharing for such Workforce member. Workforce members who are residents of California may use opt-out preference signals by downloading or otherwise activating them for use on supported browsers and setting them to send opt-out preference signals to websites they visit.

#### **10. Changes to Our Privacy Practices**

We may update this Workforce Privacy Notice from time to time. Elanco will post the revised Notice on the Global Privacy Hub and on our website. You can determine when the Notice was revised by referring to the “Last Updated” legend at the bottom of this Notice.

#### **11. How to Contact Us**

To contact us with questions or more information, you can email us at [privacy@elancoah.com](mailto:privacy@elancoah.com) or call us toll-free at 1-888-545-5973.

To contact our Data Protection Officer responsible for your country or region, please email us at [privacy@elancoah.com](mailto:privacy@elancoah.com). In your email, please indicate your country of residence.

Last Updated: [to be filled in upon publication]

## Document Approvals

Approved Date: 16 Jun 2023

Approval Task Verdict: Approve	Julie Warren, (julie.warren@elanco.com) Qualified Person (QP) Approval 16-Jun-2023 23:08:39 GMT+0000
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