



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 Workforce Privacy Notice (the “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 Privacy 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 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](#).

B. Definitions

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, province, or state in which you are a Workforce member.

C. Overview of Personal Information Processing

This section of our Privacy Notice lists the categories of Personal Information Elanco and our service providers, contractors or processors (“Service Providers”) may collect on our behalf and explains how we and our Service Providers process that Personal Information. Additionally, Elanco may share Personal Information categories listed in this section with supplier and third party controllers.

1. Information We Collect and How We Use It

As appropriate depending on the Workforce member and to the extent permitted by applicable laws and within local law limitations, 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. For more information, please see Section 11 How to Contact Us.

- (1) Identifiers, such as name, alias, IP address;
- (2) Contact information, including work and home contact details (email, phone numbers, and postal address), languages(s) spoken, work permit, residency;
- (3) Characteristics of protected classifications under certain national, provincial, state or federal laws (only as may be required by law or as provided voluntarily by Workforce members in



accordance with the requirements of applicable data protection law), such as age, gender, race, physical or mental health conditions, disability status, marital status;

- (4) Internet or other electronic network activity information, such as browsing history and other information relating to use of Elanco websites or information systems;
- (5) Geolocation data, such as device location. (As noted above and with any collection of Personal Information, this is only to the extent permitted by local law and within local law limits);
- (6) 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;
- (7) Professional or employment-related information, such as work history, prior employer, application and resume/CV information, previous employment, education history, professional qualifications, relevant skills, certifications, background check information, drug testing results (positive or negative). (As noted above and with any collection of Personal Information, this is only to the extent permitted by local law and within local law limits);
- (8) Education information, such as degrees earned, student records and directory information;
- (9) Results from an online search of public sources or social network sites (applicable only to job applicants of certain roles);
- (10) 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
- (11) Personal Information that involves higher risk and may be considered Sensitive Personal Information under privacy laws, including:
 - a. Personal Information that reveals:
 - i. Social security or government identification number, driver's license, state or government issued identification card;
 - ii. Racial or ethnic origin, union membership (where required by law or voluntarily provided by Workforce members in accordance with the requirements of applicable privacy law);
 - b. Personal Information related to annual or pre-employment fit-for-work assessment summaries or certifications;

Additionally, for Workforce members *except* job applicants, we collect or have collected, the following categories of Personal Information:



- (1) Additional Identifiers, such as employee identification number, date of birth, physical characteristics or description (such as to provide company apparel or for Personal Protection Equipment fittings);
- (2) Workplace exposures, sick leave certifications return to work assessments, emergency contact information;
- (3) Employment-related information, such as base salary, bonus, benefits, compensation type, stock grants and other awards/incentives, currency, pay frequency, payroll and tax deductions, 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, work system account login, travel and business-related expenses, employment status and type, employment contract and terms, hire/re-hire and terminations date(s), length of service, retirement eligibility, retirement contributions, promotions, disciplinary records, performance management ratings, development programs planned and attended, e-learning programs, performance and development reviews, and data used to populate associated biographies;
- (4) Commercial information, such as transaction information and purchase history related to business expenses, employee discount programs or certain employee wellness programs; and
- (5) Personal Information that involves higher risk and may be considered Sensitive Personal Information, including:
 - a. Personal Information that reveals:
 - i. Passport number (where required by law or where provided by the Workforce member for identification verification or for business travel);
 - ii. Financial account number (for payroll and reimbursement), or company-issued credit card number and associated purchases;
 - iii. Precise geolocation (in limited circumstances and in accordance with applicable privacy law such as with fleet management or personal emergency response systems available at certain Elanco facilities);
 - iv. Religious or philosophical beliefs, church affiliation, political opinions (where required by law or where voluntarily provided by Workforce members in accordance with the requirements of applicable privacy laws); or
 - v. Contents of a Workforce member's email and text messages, unless Elanco is the intended recipient thereof. This may be done in individual cases, where permitted, to ensure compliance with legal obligations,



investigate potential misconduct, safeguard company information or assets, or to support necessary business operations.

- b. Biometric data processed for the purpose of uniquely identifying a Workforce member. (As noted above and with any collection of Personal Information, this is only to the extent permitted by local law and within local law limits);
- c. Personal Information concerning a Workforce member’s health, including ability to perform job duties, submission of workplace injury claim, disability accommodations, health insurance information, voluntary wellness programs, dependents, and vaccination status as may be needed in the event of a pandemic or public health concern to maintain a safe workplace or to comply with public health guidelines. (As noted above and with any collection of Personal Information, this is only to the extent permitted by local law and within local law limits); and
- d. Where voluntarily provided and permitted by local law, Personal Information concerning a Workforce member’s sexual orientation.

We have disclosed, with notice at the time of collection or within a reasonable time afterwards, the categories of Personal Information listed in this Section C(1) to Service Providers, Suppliers or third parties for a business purpose in the past twelve months.

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

Elanco and our Service Providers collect, process, and disclose the categories of Personal Information listed in Section C(1) for the below purposes. (Where permitted by applicable law and where a permissible legal basis (if required) is listed, Sensitive Personal Information may also be collected, processed or disclosed for the below purposes.) Please note that the references in the below chart to our legal bases for processing only apply to residents of countries or regions with privacy laws that require us to disclose our legal bases for processing.

Purpose	Description	Legal Basis
Workforce Management	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, and investigations of concerns reported through the	Legal obligation Performance of a contract Legitimate interest, including managing our business operations, preventing fraud, and protecting our and our Workforce’s legal rights



	ethics and compliance helpline, 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.	
Communications, Security, Facilities and Emergencies	Includes facilitating communication with our Workforce; ensuring business continuity, crisis management; managing and provisioning employee relief efforts; providing employment references; protecting Workforce health and safety; securing facilities and surrounding premises and maintaining access controls; and safeguarding and maintaining IT infrastructure and office equipment.	<p>Legal obligation</p> <p>Performance of a contract</p> <p>Legitimate interest, including managing our business operations, ensuring network and data security, preventing fraud, and protecting our and our Workforce’s legal rights</p>
Business Operations	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; 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.	<p>Legal obligation</p> <p>Performance of a contract</p> <p>Legitimate interest, including managing our business operations, ensuring network and data security, preventing fraud, and protecting our and our Workforce’s legal rights</p>
Compliance	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	<p>Legal obligation</p> <p>Legitimate interest, including ensuring network and data security, preventing fraud, and protecting our and our Workforce’s legal rights</p>



	concerns; and complying with internal policies and procedures.	
Monitoring	To the extent permitted by local law, includes monitoring compliance with internal policies; monitoring of Elanco facilities (including, in some countries, the use of badge swipe data for attendance policies), systems, and communications (i.e., telephone, email, instant messenger), which includes the use of Data Loss Prevention measures to monitor and protect the use and disclosure of Elanco data; monitoring of Workforce generated 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, quality assurance, and protecting our and our Workforce’s legal rights

We may also anonymize or aggregate (in a manner that prevents identification) Personal Information we collect about you and use the resulting anonymized or aggregated 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. You may revoke your consent to the processing of your voluntarily provided Personal Information at any time for future processing. 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 Privacy Notice, and certain perks and benefits may not be available to you.

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

Elanco and our Service Providers collect, process, and disclose the categories of Sensitive Personal Information listed in Section C(1) for the below purposes, as permitted by applicable privacy laws. Please note that the references in the below chart to our legal bases for processing only apply to residents of countries or regions with privacy laws that require us to disclose our legal bases for processing.

Purpose	Description	Legal Basis
Workforce Services	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; Verifying Workforce member information, processing payroll and compensation, accommodating disabilities, providing analytic	Performance of Contract Legitimate Interests, in limited circumstances where permitted by applicable privacy law Explicit Consent



	services, providing storage, or providing similar services on our behalf	
Security	Preventing, detecting, and investigating security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted Personal Information; Ensuring security and integrity to the extent the use of the Workforce member's Personal Information is reasonably necessary and proportionate for these purposes	<p>Legitimate Interests, in limited circumstances where permitted by applicable privacy law, to protect Elanco interests</p> <p>Processing necessary to comply with applicable law</p> <p>Processing necessary for the establishment, exercise, or defense of legal claims</p> <p>Processing necessary to vital interests of the data subject</p>
Compliance	Resisting malicious, deceptive, fraudulent, or illegal actions directed at the business and prosecuting those responsible for those actions	<p>Legitimate Interests, in limited circumstances where permitted by applicable privacy law, to protect Elanco interests</p> <p>Processing necessary to comply with applicable law</p> <p>Processing necessary for the establishment, exercise, or defense of legal claims</p>
Safety and Public Health	Ensuring the physical safety of natural persons, safety of the community or public health	<p>Legitimate Interests, in limited circumstances where permitted by applicable privacy law</p> <p>Processing necessary to comply with applicable law</p> <p>Processing necessary to vital interests of the data subject</p>
Benefits, Government Reporting, IDEA (Inclusion, Diversity, Equity, Accessibility) efforts	Collecting or processing Sensitive Personal Information where such collection or processing is not for the purpose of inferring characteristics about an Individual	<p>Legitimate Interests, in limited circumstances where permitted by applicable privacy law</p> <p>Explicit Consent</p>

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

We do not sell or share (as those terms are defined in applicable privacy laws) categories of Personal Information that we collect about Workforce members for employment-related purposes. We also do not have actual knowledge that we sell or share Personal Information of Workforce members who are residents of regions with privacy laws that recognize the right to opt out of the selling or sharing of personal information and who are under 16 years of age. Nonetheless, Workforce members who are afforded the right under applicable privacy laws to opt out of the sale and sharing of their Personal Information may do so by clicking [here](#), sending an email to 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 you in a Workforce-related capacity or to fulfill the objective for which the data was collected;
- 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 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 or drug testing, 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 as described in Section C(2) and C(3).
- **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 merger, acquisition, divestiture, 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 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 Privacy Notice, we limit access to Personal Information to our Workforce members and Service Providers who need access to the Personal Information to perform the activities described in this 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 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.

5. Your Rights & Choices

Elanco has processes in place to uphold the rights that may be afforded to individuals, including Workforce members, in relation to the Personal Information collected and processed about them. This may include (if outlined in the applicable privacy law) such rights as:

- **Right to Receive Information on Privacy Practices:** You may 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 Elanco 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 Elanco 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 have the right to request that we delete Personal Information about you that we collected from you, subject to certain exceptions.
- **Right to Correction:** You may have the right to request that we correct any inaccurate Personal Information we maintain about you.
- **Right to Know:** You may have the right to 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 may 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, or calling us toll free at 1-888-545-5973.
- **Right to Receive Information About Onward Disclosures:** You may have the right to 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 of Portability:** You may have the right to obtain your Personal Information in a structured, commonly-used, and machine-readable format for transmission to another data controller.
- **Right to Opt out of Automated Decision Making:** You may have the right to not be subject to a decision based solely on automated processing, including profiling, that produces legal or similarly significant effects.
- **Right to Withdraw Consent:** Where we rely on consent as our legal basis for processing, you may have the right to withdraw consent at any time. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.
- **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.
- **Right to Lodge a Complaint:** You may have the right to lodge a complaint with a relevant supervisory authority.

6. Exercising Your Rights



To exercise your data subject rights, you can submit your request [here](#), send an email to 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 authorizes an agent (where permitted) 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 or if we are unable to adequately identify you or your authorized agent. 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. Elanco relies on you for the legality, accuracy, updating and adequacy of the Personal Information you provide to us in any form or format. Where required by local law, you agree to inform your dependents whose Personal Information you provide to Elanco about the content of this Privacy 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 Privacy 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 and applicable U.S. Workforce Members

- **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 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 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 Privacy Notice on the Global Privacy Hub and on our website. You can determine when the Privacy Notice was revised by referring to the “Last Updated” legend at the bottom of this Privacy Notice.

11. How to Contact Us

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

To contact our Data Protection Officer (appointed in locations where required) responsible for your country or region, please email us at privacy@elancoah.com. In your email, please indicate your country of residence. Elanco employees and contractors can also access [Data Protection Officer contact information on theSpot](#).

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