



1 Purpose

This Global Privacy Policy sets forth the Privacy Principles (see below) that govern the collection, use, storage, disclosure, and other processing of personal information by or on behalf of Elanco Animal Health Incorporated and its affiliates (collectively, “Elanco” or the “Company”).

2 Scope

This Global Privacy Policy applies to all Elanco employees, officers, directors, and contractors as well as suppliers who have access to the Company’s personal information or processing systems.

3 Terms and Definitions

Personal information (also known as **personal data** or **personally identifiable information**) Any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural, or social identity. A further explanation and examples of personal information are available for employees through the Global Privacy Hub on our internal intranet.

Privacy policies and procedures Elanco policies, standards, procedures, guidelines, playbooks, and other privacy-related compliance resources approved or issued by the Global Privacy Office, as well as information security policies relevant to the protection of personal information.

All privacy policies and procedures issued or approved by the Global Privacy Office are available for employees through the Global Privacy Hub on our internal intranet.

4 Elanco’s Privacy Mission: Respecting Personal Information and Privacy

Elanco is committed to the ethical management of all personal information it holds, collects, transfers and processes - whether it is that of a customer, consumer, business partner, employee, or any other individual.

We’re open and honest about how we collect, manage, use, and disclose personal information, and we’re intentional about

protecting it. We strive to only share it with those who are authorized – and have a legitimate business need – to see it.

We keep our promises and are respectful of an individual's privacy, and we demonstrate, in every business operation, in every location around the world, that people can trust us with their personal information.

5 Policy (Privacy Principles)

Elanco adheres to the 10 Privacy Principles set forth below. These Privacy Principles are derived from the privacy laws, regulations, and industry best practices around the world applicable to Elanco and apply in all jurisdictions where we operate. The principles are used by Elanco as an operational framework to assist the Company in creating an effective privacy program that addresses privacy obligations and risks, while facilitating current and future business opportunities. The Elanco Global Privacy Program, including the Elanco privacy policies and procedures, operationalizes the Privacy Principles and drives the principles into the Company.

5.1 Management and Accountability

Elanco defines, formally documents, communicates, and assigns responsibility and accountability for its privacy policies and procedures.

5.2 Notice

Elanco provides notice to individuals about its privacy policies and procedures and identifies the purposes for which personal information is collected, used, retained, disclosed, and otherwise processed.

5.3 Choice and Consent

Elanco describes and communicates the choices available to individuals with respect to the collection, use, and disclosure of personal information and obtains implicit or explicit consent with respect to the processing of personal information when legally required or appropriate. Elanco recognizes that, when legally required or appropriate, individuals may update their choice and consent preferences.

5.4 Collection and Creation

Elanco collects and creates personal information only for the purposes identified in its privacy notice to individuals, and in ongoing communications with and notices provided to individuals.

5.5 Use, Retention, and Disposal

Elanco uses personal information for the purposes identified in its privacy notice to individuals.

Elanco retains personal information for the time necessary to fulfill the stated purposes identified in its privacy notice to individuals or as required by applicable laws or regulations. Elanco securely disposes of personal information.

5.6 Access

Elanco provides individuals with access to their personal information when requested or when asked to update and correct errors or make changes.

5.7 Disclosure of Personal Information

Elanco discloses personal information to suppliers and other third parties only for the purposes identified in Elanco's privacy notice unless an applicable law or regulation requires or allows otherwise. Elanco holds its suppliers and partners to the same privacy standards as Elanco follows when they handle personal information of employees, customers, or other individuals.

Elanco maintains policies, procedures, and contractual arrangements designed to comply with applicable laws and regulations regarding cross-border transfers of personal information.

5.8 Security for Privacy

Elanco protects personal information against unauthorized access, removal, alteration, destruction, and disclosure (both physical and logical).

5.9 Data Integrity and Quality

Elanco maintains accurate, complete, and relevant personal information for the purposes identified in its privacy notice and protects the integrity of personal information in its ongoing interactions with individuals.

5.10 Monitoring and Enforcement

Elanco monitors compliance with its privacy policies and procedures and has procedures to address privacy-related complaints and disputes.



6 Related Policies and Procedures

If employees have any questions regarding this Policy or the practices described above, they may refer to the guidance available through the Global Privacy Hub on our internal intranet website.

7 Compliance

Elanco Personnel may report any known or suspected violation of this Global Privacy Policy and supporting policies and procedures to a member of management, Human Resources, or a member of the Ethics & Compliance (“E&C”) team.

Any Elanco employee or any person, including suppliers and third parties, can raise a concern through Elanco’s established reporting channel, IntegrityLine, which is available 24 hours a day, seven (7) days a week by telephone or online. It is a convenient, confidential, and anonymous way to report issues, concerns, or behaviors that could harm Elanco or those we serve. No Elanco policy or procedure prohibits Elanco Personnel from reporting potential violations of any federal law or regulation to any government agency.

Subject to local laws and regulations, violations of this Global Privacy Policy and supporting policies and procedures may result in disciplinary action or other sanctions. Disciplinary action and sanctions may include suspension, access restrictions, work assignment limitations, or more severe penalties up to and including employment termination, in accordance with applicable law and applicable policies.

8 Approvals

Approver	Chief Ethics & Compliance Officer	Owner	Global Privacy Manager
Last Approved	5/22/2023	Policy Area	Privacy
Effective	5/22/2023	Applicability	Global
Last Revised	5/22/2023	Next Review	