



Novartis Binding Corporate Rules Appendix 4

Date: 03 September 2018

Appendix 4 to Novartis BCR

Data Privacy Training Program related to the BCR

This Data Privacy Training Program aims to ensure that Novartis Employees are properly trained in their obligations under the Novartis Privacy Policy Framework, including these BCR, and the legal obligations associated with the Processing of Personal Information as well as the development of tools and systems for the Processing of Personal Information. It is composed of the following elements:

1. GENERAL TRAINING FOR EMPLOYEES

Novartis Employees must perform a basic privacy online training program covering the key privacy principles and requirements. Novartis will require the Employees to demonstrate that they have undergone the training and understand their obligations.

This training must be periodically repeated in whole or in parts depending on the need.

2. SPECIFIC TRAININGS

1. Employees in specific functions including but not limited to Legal, HR, IT, Marketing, Sourcing, Clinical Development, Safety and Security, who have regular access to and Process Personal Information, as well as Employees who develop tools and systems for the Processing of Personal Information, must undergo periodic trainings on the obligations and requirements specific to their area of work, including their obligations under the BCR. Trainings can be performed face to face, online through web-based programs, and through information in newsletters, alerts, Intranet posts, etc.
2. Members of the Data Privacy Team as well as Functional Representatives are regularly trained on data privacy requirements and developments through privacy workshops and meetings, online trainings, alerts and newsletters, as well as postings on the privacy Intranet site.

3. AWARENESS EFFORTS

Privacy awareness campaigns, including the delivery of posters, short messages, specific information materials and booklets, articles and lunch and learn sessions shall be periodically conducted upon the initiative of the respective Data Privacy Head at country and/or divisional level. In addition, Employees have Intranet access to Novartis policies, guidelines and other materials concerning the protection of Personal Information and the application of the BCR.

4. DEVELOPMENT OF THE TRAININGS

The global training programs are developed by the Data Privacy Leadership Team.

Training programs launched at a country level are developed, reviewed and approved by the respective Country Data Privacy Heads in alignment with the respective legal and compliance departments and in accordance with local laws.

Version History

Effective Date	Owner	Version	CNIL
3 July 2012	Group Data Privacy	1.0	3 July 2012
3 September 2018	Group Data Privacy	2.0	3 September 2018