

# WYETH GLOBAL PRIVACY PRINCIPLES

## **Last Modified**

These Principles were last modified on August 14, 2008.

## **Introduction**

In recognition of the importance of privacy to Wyeth and to its customers, employees, patients and the public, Wyeth has adopted Global Privacy Principles. These principles establish common and corporate-wide standards for the protection of personal information worldwide.

In some instances, local law may contain stricter requirements. In addition to adhering to these principles and relevant Wyeth privacy policies, Wyeth divisions and affiliates must always ensure that their treatment of personal information is in accordance with local laws.

## **Scope**

The Global Privacy Principles set out general principles to be applied to the collection, use, retention, and disclosure of personal information collected, used or processed by Wyeth worldwide.

## **Commitment Of Wyeth**

All Wyeth divisions and affiliates will govern themselves in accordance with these principles. In addition to complying with these principles and local law, Wyeth will process personal information in accordance with Wyeth privacy policies. Adherence to these principles may be limited to the extent necessary to comply with an applicable legal or ethical obligation.

## **Collection And Processing**

Wyeth will only obtain and process personal information by lawful and fair means. To the extent possible, Wyeth will use non-identifiable information and limit the collection of personal information to that necessary to accomplish a legitimate business purpose.

## **Notice**

Wyeth will provide individuals with privacy notices as required by applicable law or Wyeth privacy policies. In many countries, individuals must be notified about the purposes for processing personal information, categories of information collected and the identity of the company processing personal information. Individuals should be provided with any additional information required by local law.

## **Choice And Consent**

If required by law or our privacy policies, Wyeth will request the consent of the individual prior to the collection, use, or disclosure of certain information and will abide by the limitations of the consent. Under many privacy laws, individuals also have the right to object to the processing of personal information on compelling legitimate grounds. Wyeth will endeavor to satisfy requests that arise out of such objections. Compelling legitimate grounds will vary under local law but may

include instances where the individual's life or health is at risk due to the processing of personal information.

### **Use And Retention**

Wyeth will collect, process, store, and disclose personal information only for legitimate business purposes. Wyeth will retain personal information only as long as reasonably required for legitimate business purposes and consistent with applicable law and Wyeth's record retention policy.

### **Security**

Wyeth will establish safeguards to reasonably and appropriately protect personal information from unauthorized use, disclosure, destruction, and alteration.

### **Sensitive Information**

In addition to the protection afforded personal information under these principles, Wyeth will adopt additional measures as required under local law or Wyeth privacy policies for personal information defined as sensitive information. Wyeth divisions and affiliates may also adopt additional measures to address local custom or social expectation about sensitive information.

### **Data Integrity**

Wyeth will seek to ensure that personal information that is retained is accurate, complete, current and otherwise reliable in relation to the purposes for which the information is collected and used. Personal information will be adequate, relevant and not excessive for the purposes for which it is collected or used.

### **Access**

If an individual makes a request to access personal information relating to him or her or requests to modify or amend his or her personal information, Wyeth will comply where required to do so by law or Wyeth privacy policies. Where local law provides for a fee for complying with such a request, such fee may be charged.

### **Disclosures To Third Parties**

Wyeth will not disclose personal information to third parties unless necessary for legitimate business purposes and reasonably assured that the information will be legitimately processed and appropriately protected. Disclosure to third parties may occur when required by applicable law or authorized by the individual.

### **International Transfers Of Personal Information**

Wyeth will not transfer personal information to or allow access by entities in other countries unless necessary for legitimate business purposes and reasonably assured that the information will be legitimately processed and appropriately protected. Wyeth divisions and affiliates will review their requirements under local law and Wyeth privacy policies to determine that their obligations and the obligations of the recipients in the other countries are met.

### **Monitoring And Enforcement**

Wyeth divisions and affiliates will make their employees who process personal information aware of these principles. Wyeth will continue to take reasonable steps to ensure these principles are followed.

## **DEFINITIONS**

### **Personal Information**

Personal Information is defined as any information relating to an identified, or in some countries an identifiable, natural person. An identifiable person is a person who can be identified, directly or indirectly, by reference to an identification number or factors specific to his or her physical, physiological, mental, economic, financial, cultural, or social identity.

### **Processing**

Processing of Personal Information refers to any operation or set of operations that are performed upon Personal Information, whether done by automatic means or otherwise. This includes the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, disclosure by transmission, dissemination or making available in any other form, linking, alignment or combination, blocking, erasure or destruction of Personal Information.

### **Sensitive Information**

Sensitive Information is a special designation of Personal Information that warrants additional protection. Although the definition can vary by country, Sensitive Information is often described as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, data concerning health or sex life, and data relating to offenses, criminal convictions or security measures.

### **Contact Us**

If you have any questions, you may contact us at (484) 865-7771, by e-mail at [Privacy\\_Office@wyeth.com](mailto:Privacy_Office@wyeth.com), or by mail at P.O. Box 8648, Philadelphia, PA 19101.