

# Privacy Notice

Roche ("Roche" or "we") is committed to protecting your personal data. This privacy notice applies to the processing of personal data within the scope of your employment with a Roche company in Switzerland. Our websites may also contain links to third party websites. We do not support and are not responsible for the content of any third party website or resource.

"personal data" in the context of this privacy notice means any information that can be used to identify you directly or indirectly as an individual, for example your contact details such as your name, address, email address or telephone number.

## 1. Data controller and contact details

Roche Human Resources Department People & Culture ("P&C") is the data protection competent body for processing personal data in the context of your employment as described in this privacy notice.

If you have questions about data protection, you can also contact the central contact point for personnel questions in the People Portal ([https://roche.service-now.com/people\\_and\\_culture](https://roche.service-now.com/people_and_culture)) or contact the following address: [people.schweiz@roche.com](mailto:people.schweiz@roche.com)

It may be that you provide us with data that also relates to other individuals (your authorised representative or emergency contact). In this case, we assume that this data is correct and that you are allowed to transmit this data to us. Since we often do not have direct contact with these individuals and cannot inform them directly about our processing of personal data, we ask you to inform them of our processing of personal data (e.g. by referring them to this privacy notice).

## 2. Processing of your personal data

We collect and process various types of professional and personal data including the following:

- Contract master data: Names, titles, addresses and private contact data (telephone numbers, email addresses), possibly also of specified emergency contacts;
- Identification data: birthday and place of birth, nationality, personnel number, legitimisation data, identity card, work and residence permit, tax ID;
- Organisational data: Details of department, office location and official contact data (employee profile), attendance and vacation times, data on work equipment, tools and ID badges, exit and entry times at entry and exit barriers, doors and as part of time recording, information on your activity and business trips, badge payments in our staff restaurants and cafeterias;
- Salary and tax-relevant data: salary statement, wage increases, bank details, long-term account, data on benefits, etc.;

- Event data/certificates: special leave, marriage and birth certificate;
- Development/assessment data: curriculum vitae, certificates, information on training, qualifications, performance, training and training;
- Data relating to restructuring;
- Authorization/usage and record data: information on IT roles and authorizations, information on the use of IT programs and systems (in particular UserID, name and device identification data), information in records, access made and audit trails; and
- Sensitive data categories: in particular health data and information on religious affiliation (insofar as required by labor or social law, for accounting purposes, verification of health suitability, salary continuation and check of employability, implementation of company integration management, prosecution of criminal offenses), where applicable biometric data (for access to specially secured areas).

We collect and process personal data in accordance with the provisions of applicable data protection laws for a number of legitimate reasons, including human resources, business and security purposes. In particular, these are:

- Fulfillment of our employment contractual obligations including planning and organization of work;
- Management of personnel records;
- Payroll and financial management in connection with employment;
- To exercise rights and fulfill legal obligations under labor law, social security law and social protection laws;
- Ensuring your health and safety at work;
- Management of training activities;
- Control of access to facilities and information systems;
- Monitoring compliance with internal policies on the use of information systems and related resources based on our supervisory powers; and
- Announcement of anniversaries.

The specific purposes for which we process your personal data may differ depending on your position and area of work.

Personal data we process from you comes from different sources:

- Transferred data: Personal data that you voluntarily provide to us when you transmit data to us or communicate with us (e.g. contract, communication, preference data);
- Collected data: Personal data that we collect about you either through direct interactions (e.g. physical or virtual meetings) or automatically through your use of our websites; and

- Received data: Personal data obtained from third parties or publicly available sources, including websites, social networks, journals and third-party platforms.

### **3. Transfer of your personal data**

We may share your personal data with Roche affiliates worldwide to be used for the same purposes. The current financial report, which you can find in the Investors section of our website [www.roche.com](http://www.roche.com), contains a list of Roche affiliates.

In addition, we may also disclose your personal data to third parties outside Roche group eg. service providers, for the following purposes:

- to facilitate improvements in employment related matters (e.g. reconciliation of data with the Roche Pension Fund, for Roche Connect with Equatex AG);
- to conduct technical maintenance of our websites and other web platforms;
- to facilitate mergers, consolidations, transfers of control or other corporate restructuring;
- to respond to legitimate requests from authorities or as required by applicable law, court orders or official regulation;
- where needed for corporate audits or to investigate or respond to a complaint or security threat; and
- in connection with our recognition program and REKA checks.

Any personal data that we collect, collate and process can be transferred to and stored in geographical regions where different data protection rules apply that may be less strict than the laws in Switzerland. We compensate for the potentially lower level of protection by using the standard contractual clauses of the European Commission and the Swiss supervisory authority of June 4, 2021 (EU 2021/914). In certain cases, we may also transfer personal data in accordance with data protection law requirements without the need for such contracts, e.g. if you have consented to disclosure or if it is necessary for performance of the contract, for establishment, exercise or enforcement of legal claims or in the public interest.

### **4. Storage / retention of your personal data**

We store your personal data,

- as long as it is necessary for the purpose of processing,
- as long as we have a legitimate interest in storing it, and
- as long as personal data is subject to a legal retention obligation.

At the end of the last to expire of these periods we delete or anonymize your personal data.

## **5. Security of personal data**

We have internal technical and organizational measures in place to secure and protect personal data. Such measures may take the form of encryption, anonymization and access restrictions, as well as physical security measures. We require our employees and all third parties who perform work for us to maintain appropriate compliance standards, including the obligation to protect any information and to take reasonable precautions when handling or disclosing employees' personal data.

## **6. Your rights in relation to your personal data**

You have the following rights in relation to your personal data, subject to the conditions and within the limits of applicable data protection law:

- the right to obtain information about your personal data stored at P&C;
- the right to correct inaccurate or incomplete personal data or to add a statement of disagreement;
- the right to receive a copy of certain personal data held in a structured, commonly used and machine-readable format, provided processing is permitted by consent on or on another legal basis;
- the right to object to processing of your personal data;
- the right to request deletion or anonymization of your personal data;
- the right to restrict further processing of your personal data;
- the right to withdraw consent, where we process personal data on the basis of your consent. The revocation is only valid for the future and we reserve the right to continue to process personal data in the event of a revocation, if legally permitted on a different basis.

If you wish to exercise any of the above rights, please contact us (section 1). As a rule, we will need to verify your identity (e.g. by means of an ID copy). You are also free to submit a complaint to the competent supervisory authority regarding our processing of your data, in Switzerland to the Federal Data Protection and Information Commissioner (FDPIC).

## **7. Updates to this privacy notice**

P&C may revise this privacy notice from time to time. Any changes to this privacy notice will be announced on this pages:

[Contract enclosures EAV](#)

[Contract enclosures Temporary Employees](#)

[Contract enclosures Interns](#)

Last modified: 14 August 2023