

Position on Data Privacy

Background

With the major advances in digital technology and the criticality of data to drive innovation and discovery, it has become increasingly important that individuals have a clear understanding of how and when their personal information is being collected and used, as well as their rights regarding such collection and use under applicable laws and regulations. They need to have confidence that their personal information is being handled appropriately, securely and responsibly by means that are consistent with applicable laws. In the course of doing business, a company will gather personal information about individuals with whom it engages or wishes to learn about in order to provide better services, solutions and products. Companies that collect such personal information have a responsibility to protect every individual's right to privacy, to establish reasonable security measures—including, at a minimum, those prescribed by law—and to ensure appropriate handling and protection of personal information in their possession or control.

Relevance

As the largest, most diversified healthcare products company, Johnson & Johnson regularly receives and processes personal information from diverse groups of individuals, including healthcare professionals (HCPs), patients, consumers and current and past employees. We use this data to help us meet legal obligations, and regulatory and product safety requirements, fulfill contractual obligations and respond to requests, as well as to develop new medicines, medical technologies and consumer health products. We also use this data to respond to and stay connected with HCPs, patients and consumers regarding our products and our Company.

Patients, clinical research participants, consumers, employees and all those who engage with us trust and expect that we will protect their personal information, particularly health data, in accordance with the commitments we make. Specifically, in relation to health data, these individuals have understandably higher expectations regarding the privacy of such information. At Johnson & Johnson, we believe that safeguarding all personal information entrusted to us is essential to our business and is integral to our core way of operating. In upholding the values of [Our Credo](#), we take our responsibility for safeguarding privacy seriously. Confidential business information is stored on authorized or managed devices and only sent outside the Company in a secure manner, using approved tools and only to authorized business partners. Additionally, we have established privacy programs across Johnson & Johnson to ensure we not only comply with our obligations but evolve our systems and policies to take into account new technology developments in the fast-changing external environment.

Guiding Principles

As stated in Our Credo: “We are responsible to our employees who work with us throughout the world ... We are responsible to the communities in which we live and work and to the world community as well.” These responsibilities include respecting the rights of those we interact with, including their privacy rights.

In addition, our guidelines on upholding privacy are embedded in Johnson & Johnson’s [Code of Business Conduct](#): “Personal information should be collected only for legitimate business purposes, shared only with those who are allowed access, protected in accordance with security policies and retained only for as long as necessary.”

Our Position

Johnson & Johnson is committed to protecting the privacy of those who entrust us with their personal information. In addition to Our Credo, Code of Business Conduct, Global Privacy Compliance Framework (GPCF) and all the laws that apply to our operating companies’ handling of personal information, we also have global privacy policies to which all our businesses worldwide are expected to adhere. Our policies reflect our commitment to fair and transparent data processing practices. We do this by:

- Acting in compliance with relevant laws and regulations—as they may apply globally, regionally or locally—everywhere in the world where we operate. Each Johnson & Johnson operating company is responsible for complying with all applicable privacy obligations.
- Collecting only the personal information that is necessary and relevant for the conduct of our business, and storing it in alignment with our established retention policies and applicable laws.
- Using personal information only for the purpose for which it was collected and for which proper notice was provided at the time of disclosure of the information by the individual.
- Helping individuals who interact with Johnson & Johnson understand how personal information about them will be collected, used and disclosed. Wherever possible, we explain how personal information can be corrected, updated or deleted.
- Maintaining appropriate security systems for use and processing of personal information, reasonably supported by encryption, anonymization and/or other appropriate measures to help protect personal information.
- Training employees (and designated contractors likely to handle personal data) annually in privacy principles and appropriate ways to collect, store, use and delete personal information at the appropriate time.
- Undertaking periodic data privacy audits by our internal Global Audit & Assurance group and Bio Research Quality & Compliance team for clinical programs.
- Regularly monitoring the external environment and updating our practices in accordance with new requirements or changes in the law of the countries in which we operate.

Johnson & Johnson maintains a GPCF that establishes a consistent approach applicable to all its operating companies that process personal information. This Framework sets forth fundamental Privacy Principles, including:

- **Transparency & Choice:** Johnson & Johnson clearly and conspicuously discloses to individuals what personal information is being collected about them and how it will be used or shared, and obtains their permission for such purposes as required.
- **Right to Access & Correction:** Individuals have the right to review, correct, update, restrict or delete their personal information, in alignment with local laws.
- **Data Integrity & Security:** As responsible custodians of personal information, we are committed to protecting the accuracy of the data; ensuring they are not modified without consent; and securing the data through the application of a combination of appropriate physical, technical and organizational safeguards to protect them.

Engaging Globally

Data privacy and data protection regulations are complex, vary widely across the world, and are complicated by other barriers that stand in the way of innovation. Johnson & Johnson continues to actively engage with policymakers to help ensure a common understanding of the critical issues involved with the rapidly changing privacy and personal data protection landscape, and to inform how we participate to advance innovation while protecting the privacy of individuals and enhancing trust in new healthcare technologies. The current focus is on striking a balance across patient privacy innovation and service delivery and transparency.

Further, we actively participate in numerous forums and industry groups to address a range of issues on global privacy governance and practices, including the International Association of Privacy Professionals (IAPP), the International Pharmaceutical & Medical Device Privacy Consortium (IPMPC), the Global Privacy Alliance (GPA), the European Federation of Pharmaceutical Industries and Associations (EFPIA), the Advanced Medical Technology Association (AdvaMed), and other more regional and local privacy consortiums. We are also aligned with the approaches in the Business Roundtable's Framework for National Consumer Privacy Law.

Application

This Position is relevant for all employees and companies in the Johnson & Johnson Family of Companies, as detailed in our [governance materials](#). We provide updates relating to privacy in our annual [Health for Humanity Report](#).

Please note that we also publish a [Privacy Policy](#) for users of the Johnson & Johnson website; and all Johnson & Johnson operating company websites have relevant privacy policies.

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