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## PRIVACY POLICY REGARDING HUMAN RESOURCES INFORMATION FROM EUROPE

**This Policy outlines Bio-Rad’s practices with regard to personal information that Bio-Rad collects from people in the European Union, Norway and Switzerland (for this policy, all of these are referred to as “EU”) in the employment context (“HR-related personal information”) and that is transferred to Bio-Rad offices in the United States.**

Each Bio-Rad group, subsidiary and local office that transfers data to the US pursuant to the Safe Harbor must ensure that its operations are in compliance with this policy. Each Bio-Rad group, subsidiary and local office in the United States that receives HR-related personal information pursuant to the Safe Harbor must ensure that its operations are in compliance with this policy.

Bio-Rad will address and resolve in a timely manner all individual questions, concerns and complaints regarding our privacy practices. HR group and subsidiary managers should make certain that employees notify them promptly if an individual raises a question, concern or complaint (up-the-chain reporting).

**Notice**—Before an employee, consultant or intern (or anyone else, including potential employees) **in the EU** provides to Bio-Rad, including its subsidiaries and offices in the EU, HR-related personal information which will be transferred to the U.S., the Bio-Rad office collecting such information will provide him or her with a clear and conspicuous notice/statement to this effect:

“Bio-Rad, including this office and our parent company in the United States, will collect from you, and may continue to collect from you, certain personal information about you to be used in connection with legitimate employment purposes only. Bio-Rad will not disclose the personal information that you provide to any third party except (i) as necessary to assist law enforcement or as required by law or in connection with an investigation of illegal or criminal activity or other exigent circumstances; (ii) to governmental agencies that have a statutory right to receive the information, such as taxing authorities, (iii) to independent accountants, auditors and consultants in connection with its accounting, auditing and payroll activities; (iv) in certain individual circumstances with your knowledge and consent (for instance, in connection with work-related travel plans and in the preparation of immigration paperwork on your behalf); and (v) to certain benefits or service providers or in order to better administer certain Bio-Rad benefits or services. Bio-Rad enlists the services of these third parties in order to improve our services to you and to comply with applicable law. **If you do not wish for your information to be disclosed to third parties, you may have the right to opt-out.** Please promptly contact Bio-Rad’s privacy officer at the following email address [privacyofficer@bio-rad.com](mailto:privacyofficer@bio-rad.com) or if you do not have access to email, by calling (510) 741-6644 and unless we have a legal right or obligation to disclose, we will work with you to determine an alternative. Bio-Rad takes reasonable precautions to protect your personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

Please ensure that the information that you provide is complete, accurate and current, and if any of the provided information changes, please notify your local human resources department of such changes so that such changes can be communicated to the appropriate Bio-Rad personnel. You may contact your local human resources department if you would like to review your personal information, and you may correct, amend or delete such information where inaccurate. Reasonable access to such information will be provided in a timely manner.

If you have any questions or concerns regarding Bio-Rad's privacy practices, or if you would like to obtain more information about our HR-related information privacy practices, please contact Bio-Rad at [privacyofficer@bio-rad.com](mailto:privacyofficer@bio-rad.com) (or, if you do not have access to email, by calling (510) 741-6644) so that we may address the issue in a timely manner. If you find that you cannot obtain a satisfactory resolution to an issue about Bio-Rad's privacy practices, you may contact your local Data Protection Agency; we are committed to cooperating with the local Data Protection Agencies."

If any new information is collected from existing employees, those employees will also be given this Notice. Bio-Rad will consistently apply the principles herein.

**Choice**—Bio-Rad provides individuals the opportunity to choose (opt-out) whether their personal information is (a) to be disclosed to any third party or (b) to be used for a purpose that is incompatible with the purpose(s) for which it was originally collected (or subsequently authorized). Bio-Rad will not provide to any third party any HR-related personal information transferred from the EU to the U.S. except (i) as necessary to assist law enforcement or as required by law or in connection with an investigation of illegal or criminal activity or other exigent circumstances; (ii) to governmental agencies that have a statutory right to receive the information, such as taxing authorities, (iii) to independent accountants, auditors and consultants in connection with its accounting, auditing and payroll activities; (iv) in certain individual circumstances with your knowledge and consent (for instance, in connection with work-related travel plans and in the preparation of immigration paperwork on your behalf); and (v) to certain benefits or service providers or in order to better administer certain Bio-Rad benefits or services. If an employee objects to such disclosure, Bio-Rad will work with the employee to address his or her concerns and find an alternative, if possible.

Bio-Rad will not use HR-related personal information except for legitimate employment purposes, and no other purpose whatsoever.

If Bio-Rad wishes to transfer any *sensitive* information to a third party, or if Bio-Rad intends to use any sensitive information for a purpose that is incompatible with the purpose(s) for which it was originally collected (or subsequently authorized), Bio-Rad will first provide the subject individual affirmative or explicit (opt-in) choice. Any such opt-ins should be either signed by the individual expressly opting-in or otherwise clearly evidenced in writing. Sensitive information includes but is not limited to personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life of the individual. Bio-Rad will treat as sensitive information any information received from a third party where the third party treats and identifies it as sensitive.

Bio-Rad will ensure continued compliance with these policies. If in the future, Bio-Rad needs to disclose HR-related personal information to any additional third party(ies), or if Bio-Rad needs to use personal information for a purpose that is different from the purpose(s) for which it was originally collected (or subsequently authorized), for instance, non-employment related purposes or in the context of the sale of one of our business units, Bio-Rad will do so in compliance with the "Notice" and "Choice" principles above and allow an opportunity to opt-out or opt-in as applicable. The legal department can help ensure compliance with this provision.

To the limited extent and for only the period necessary to avoid prejudicing the legitimate interests of Bio-Rad in making promotions, appointments, or other similar employment decisions, Bio-Rad does not need to offer notice and choice.

**Onward Transfer**—To disclose information to a third party, Bio-Rad will first apply the "Notice" and "Choice" principles above. In addition, prior to transfer, Bio-Rad will also make sure that the third party subscribes to the safe harbor principles or another adequacy finding. As an alternative, Bio-Rad can enter into a written agreement with such third party requiring that the third party provide at least the same level of privacy protection as is required by the relevant principles. Bio-Rad will ensure continued compliance with this policy.

**Access**—Individuals will have access to their respective personal information and will be able to correct, amend or delete where inaccurate. Access will be provided upon individual request within a reasonable amount of time. Please be advised however that the obligation to provide access is not absolute, and factors such as expense and burden on the employer can be considered.

**Security**—Bio-Rad will take reasonable precautions to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Bio-Rad will use appropriate security technologies and use anonymous information whenever reasonably possible.

**Data Integrity**— The personal information that Bio-Rad collects must be relevant for the purposes for which it is to be used and we must take reasonable steps to ensure that data is reliable for its intended use, accurate, complete, and current. Further, Bio-Rad will only use the information that is collected for the specific purpose(s) for which it was originally collected (or subsequently authorized).

**Enforcement**—there are three components to this requirement:

a. **Dispute Resolution**—Bio-Rad cooperates with and complies with the dispute resolution procedures of the Data Protection Agencies of the relevant countries. However, individuals may also raise any complaints or issues with Bio-Rad first, and HR group and subsidiary managers will make certain that employees taking such complaints notify managers promptly of any such individual complaints or issues.

b. **Verification**—Bio-Rad has in place procedures for verifying that the attestations and assertions we make about our privacy practices are true and that privacy practices have been implemented as represented.

Bio-Rad has employee training with regard to its policy and data protection procedures. The trainees include those individuals affected by this policy. If employees fail to follow the appropriate procedures, such behavior should be reported to the appropriate managers immediately to be addressed according to the company's internal employment policies.

c. **Remedies**—Bio-Rad will remedy problems arising out of failure to comply with the safe harbor principles promptly.

**Posting**—This Policy will be made publicly available; there may be an appropriate web site page for such posting.

**Commitment**—Bio-Rad complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Bio-Rad has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Bio-Rad's certification, please visit <http://www.export.gov/safeharbor/>.

**Conclusion**--These requirements apply specifically to HR-related personal information that is transmitted from an EU member state to the U.S. If you have any questions, please contact the Bio-Rad legal department generally.