

## Privacy Notice for Bio-Rad's Integrity Helpline

The Integrity Helpline is a way for workforce members and external parties to report a suspected wrongdoing by or involving a Bio-Rad, its subsidiaries, or Bio-Rad workforce members that is in violation of applicable law, Bio-Rad's Code of Conduct and/or Bio-Rad policies.

This notice explains how Bio-Rad collects, uses and shares personal data for Integrity Helpline purposes. This includes any personal data relating to the person making a report, as well as personal data about those individuals against whom an allegation has been made or those who have been identified as having information about the allegation.

Bio-Rad workforce members can refer to their workforce member privacy notices for additional information about Bio-Rad's processing of personal data.

Reports to the Integrity Helpline are received on behalf of Bio-Rad by Convercent, an independent service provider and data processor of Bio-Rad. The Convercent servers are based in the United States. Bio-Rad has taken the required organizational and contractual measures to ensure that any personal data gathered by Convercent is adequately secured and processed for authorized Integrity Helpline purposes only.

### General

Bio-Rad is the data controller of personal data entered into the Integrity Helpline and handles all investigations of reported issues in the Integrity Helpline.

### Personal data

The sort of personal data our Company holds as part of the Integrity Helpline may include:

- Your name and contact details (if you decide not to report anonymously);
- The name and title of the individual(s) you may be reporting;
- A description of any questionable conduct, including all relevant details; and
- Any question you may have.

Although Bio-Rad and the entity operating Convercent do not actively seek it, sensitive personal data, as defined by privacy regulations, could be included in the Integrity Helpline investigations. Bio-Rad seeks to maintain confidentiality to the extent possible; however, accusations against another individual may require them to know the identity of a reporter to intelligently respond to the accusation. Bio-Rad may also in some exceptions be legally required to disclose your identity; where our Company is legally permitted to disclose your identity to protect or defend our rights or those of our employees, customers, suppliers or business partners, or; where our Company has determined that the allegations were malicious and were made in bad faith.

The Integrity Helpline reports may be collected by any data processing means, whether electronic or not. Please note that personal data will in all cases be processed separately from other employee information systems or employee files.

## Purpose of data processing

Bio-Rad may process your personal data;

- To administer the Integrity Helpline, assess and follow-up on submissions to the Integrity Helpline.
- To investigate alleged violations.
- To take any necessary follow-up action upon the completion of an investigation.
- To create anonymous reports for our Bio-Rad's management.

## Legal basis

Bio-Rad will only process your personal data in ways compatible with the purpose for which it was collected. To the extent necessary for such purposes, Bio-Rad will take reasonable steps to make sure that personal information is accurate, complete, and otherwise reliable with regard to its intended use.

With regard to an Integrity Helpline case, Bio-Rad shall use workforce member personal data in line with workforce member privacy notices, which allow for use of workforce member data for activities involving the protection of the interests of Bio-Rad and its employees and for protecting the interests of Bio-Rad and employee assets. Bio-Rad relies on legitimate interests as the lawful basis for the collection and use of your personal data.

Your personal data may be kept and used to manage the Integrity Helpline process whilst you are working for us, at the time when your employment ends and for some time after you have left.

## Disclosures

Personal data collected for the purposes referred to above will be shared with Convercent who administers the Integrity Helpline service on behalf of, and under the direction and control of Bio-Rad.

We may also permit selected third-party experts, such as forensic accountants, external lawyers or consultants, to access to your personal information for the purpose of conducting internal investigations in relation to (suspected) violation(s) of applicable laws, our Code of Conduct and/or Bio-Rad policies. When Bio-Rad shares personal data with these third parties, Bio-Rad requires that they only use such personal data as necessary to provide investigatory services to us and in a manner consistent with the applicable privacy notices and applicable law.

Furthermore, personal data collected for Integrity Helpline purposes will only be disclosed to any other party if Bio-Rad is under a duty to disclose or share your personal data in order to comply with any legal obligation or when necessary to report criminal offenses.

## Cross Border Transfer

Personal data is stored in the United States upon receipt. Bio-Rad puts appropriate safeguards into place based on legal requirements to ensure that your data receives protection equivalent to that provided by data protection regulations applicable in the European Economic Area.

## Data retention

Integrity Helpline reports will be removed after ten years, unless a longer statutory period is required by applicable law. Recording of any disciplinary measures against an employee resulted from a report filed under the provisions of the Integrity Helpline Up shall be done in compliance with the internal procedures that Bio-Rad maintains in relation to personnel records. 'Remove' means destruction of the personal data or adaptation of the personal data in such a way that identification of the reporter and the implicated person are no longer possible.

## Your rights

You may file a request with Bio-Rad's Data Privacy Office about whether or not a report has been filed against you. If so, you will be provided with a written overview of the personal data available about them unless this would seriously hinder the investigation. Based on your location, you may utilize your applicable individual rights related to deletion, access, or other rights. Regardless, if personal data proves to be inaccurate or incomplete, the implicated person can request rectification or completion thereof.

## Contact

If you have any other questions, if you wish to exercise any of the above rights, or if you have a complaint about our handling of your Personal Data with regard to the Integrity Helpline, please send an e-mail to [DataPrivacy@Bio-Rad.com](mailto:DataPrivacy@Bio-Rad.com).