

PPTA PRIVACY SHIELD POLICY

Last updated May 17, 2018

The Plasma Protein Therapeutics Association, 147 Old Solomons Island Road, Suite 100, Annapolis, MD, 21401 (“PPTA”) complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland transferred to the United States pursuant to Privacy Shield. The Plasma Protein Therapeutics Association has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

Definitions

“Data Subject” means the individual to whom any given Personal Data covered by this Privacy Shield Policy refers.

“Personal Data” means any information relating to an individual in the European Union and Switzerland that can be used to identify that individual either on its own or in combination with other readily available data.

“Sensitive Personal Data” means Personal Data regarding an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, physical or mental health, or sexual life.

Scope and Responsibility

This Privacy Shield Policy applies to Personal Data transferred from European Union member countries and Switzerland to PPTA’s operations in the U.S. in reliance on the respective Privacy Shield framework and does not apply to Personal Data transferred under standard contractual clauses.

Some types of Personal Data may be subject to other privacy-related requirements and policies. For example:

- Some PPTA Web sites have their own privacy policies.
- Personal Data regarding and/or received from PPTA members is also subject to any specific agreement with, or notice to, the member, as well as additional applicable laws and professional standards.
- Employee Personal Data is subject to E.U. data protection authorities and internal human resource policies.

All employees of PPTA that have access in the U.S. to Personal Data covered by this Privacy Shield Policy are responsible for conducting themselves in accordance with this Privacy Shield Policy. Adherence by PPTA to this Privacy Shield Policy may be limited to the extent required

to meet legal, regulatory, governmental, or national security obligations, but Personal Data covered by this Privacy Shield Policy shall not be collected, used, or disclosed in a manner contrary to this policy.

We also may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

PPTA employees responsible for engaging third parties to which Personal Data covered by this Privacy Shield Policy will be transferred (e.g., consultants assisting with the development of voluntary industry standards, as well health-related investigations and analyses, to protect the health of plasma donors and the safety of plasma protein therapies) are responsible for obtaining appropriate assurances that such third parties have an obligation to conduct themselves in accordance with the applicable provisions of this Privacy Shield Principles, including any applicable contractual assurances required by Privacy Shield.

Data Types and Uses

PPTA collects and processes the following personal data: last name, first name, title, surname at birth if applicable, gender, date of birth, address, contact details, nationality, language, as well as health information relevant to the safety of both plasma donors and plasma protein therapies, such as age, height, weight, donation frequency, adverse reactions, and positive test results.

The personal data of PPTA's European employees is used for such purposes as payroll, benefits, and insurance coverage. The personal data of plasma donors is used for purposes of PPTA's voluntary industry standards programs, as well as for health-related investigations and analyses.

Privacy Shield Principles

PPTA commits to subject to the Privacy Shields' Principles all Personal Data received by PPTA in the U.S. from European Union member countries and Switzerland in reliance on the respective Privacy Shield framework.

1. Notice

PPTA notifies Data Subjects covered by this Privacy Shield Policy about its data practices regarding Personal Data received by PPTA in the U.S. from European Union member countries and Switzerland in reliance on the respective Privacy Shield framework, including the types of Personal Data it collects about them, the purposes for which it collects and uses such Personal Data, the types of third parties to which it discloses such Personal Data and the purposes for which it does so, the rights of Data Subjects to access their Personal Data, the choices and means that PPTA offers for limiting its use and disclosure of such Personal Data, how PPTA's obligations under the Privacy Shield are enforced, and how Data Subjects can contact PPTA with any inquiries or complaints.

2. Choice

If Personal Data covered by this Privacy Shield Policy is to be used for a new purpose that is materially different from that for which the Personal Data was originally collected or subsequently authorized, or is to be disclosed to a non-agent third party, PPTA will provide Data Subjects with an opportunity to choose whether to have their Personal Data so used or disclosed. Requests to opt out of such uses or disclosures of Personal Data should be submitted at: <https://www.pptaglobal.org/about-us/contact-us/submit-your-question>.

If Sensitive Personal Data covered by this Privacy Shield Policy is to be used for a new purpose that is different from that for which the Personal Data was originally collected or subsequently authorized, or is to be disclosed to a third party, PPTA will obtain the Data Subject's explicit consent prior to such use or disclosure.

3. Accountability and Onward Transfer

In the event we transfer Personal Data covered by this Privacy Shield Policy to a third party acting as a controller, we will do so consistent with any notice provided to Data Subjects and any consent they have given, and only if the third party has given us contractual assurances that it will (i) process the Personal Data for limited and specified purposes consistent with any consent provided by the Data Subjects, (ii) provide at least the same level of protection as is required by the Privacy Shield Principles and notify us if it makes a determination that it cannot do so; and (iii) cease processing of the Personal Data or take other reasonable and appropriate steps to remediate if it makes such a determination. If PPTA has knowledge that a third party acting as a controller is processing Personal Data covered by this Privacy Shield Policy in a way that is contrary to the Privacy Shield Principles, PPTA will take reasonable steps to prevent or stop such processing.

With respect to our agents, we will transfer only the Personal Data covered by this Privacy Shield Policy needed for an agent to deliver to PPTA the requested product or service. Furthermore, we will (i) permit the agent to process such Personal Data only for limited and specified purposes; (ii) require the agent to provide at least the same level of privacy protection as is required by the Privacy Shield Principles; (iii) take reasonable and appropriate steps to ensure that the agent effectively processes the Personal Data transferred in a manner consistent with PPTA's obligations under the Privacy Shield Principles; and (iv) require the agent to notify PPTA if it makes a determination that it can no longer meet its obligation to provide the same level of protection as is required by the Privacy Shield Principles. Upon receiving notice from an agent that it can no longer meet its obligation to provide the same level of protection as is required by the Privacy Shield Principles, we will take reasonable and appropriate steps to stop and remediate unauthorized processing.

PPTA remains liable under the Privacy Shield Principles if an agent processes Personal Data covered by this Privacy Shield Policy in a manner inconsistent with the Principles, except where PPTA is not responsible for the event giving rise to the damage.

4. Security

PPTA takes reasonable and appropriate measures to protect Personal Data covered by this

Privacy Shield Policy from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into due account the risks involved in the processing and the nature of the Personal Data.

5. Data Integrity and Purpose Limitation

PPTA limits the collection of Personal Data covered by this Privacy Shield Policy to information that is relevant for the purposes of processing. PPTA does not process such Personal Data in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by the Data Subject.

PPTA takes reasonable steps to ensure that such Personal Data is reliable for its intended use, accurate, complete, and current. PPTA takes reasonable and appropriate measures to comply with the requirement under the Privacy Shield to retain Personal Data in identifiable form only for as long as it serves a purpose of processing, which includes PPTA's obligations to comply with professional standards and PPTA's business purposes, unless a longer retention period is permitted by law, and it adheres to the Privacy Shield Principles for as long as it retains such Personal Data.

6. Access

Data Subjects whose Personal Data is covered by this Privacy Shield Policy have the right to access such Personal Data and to correct, amend, or delete such Personal Data if it is inaccurate or has been processed in violation of the Privacy Shield Principles (except when the burden or expense of providing access, correction, amendment, or deletion would be disproportionate to the risks to the Data Subject's privacy, or where the rights of persons other than the Data Subject would be violated). Requests for access, correction, amendment, or deletion should be submitted at: <https://www.pptaglobal.org/about-us/contact-us/submit-your-question>.

7. Recourse, Enforcement, and Liability

PPTA's participation in the E.U.-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework is subject to investigation and enforcement by the Federal Trade Commission.

In compliance with the Privacy Shield Principles, PPTA commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union and Swiss individuals with Privacy Shield inquiries or complaints should first contact PPTA at:

<https://www.pptaglobal.org/about-us/contact-us/submit-your-question>.

PPTA has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please

visit www.bbb.org/EU-privacy-shield/for-eu-consumers for more information and to file a complaint. This service is provided free of charge to you.

PPTA commits to cooperate with EU data protection authorities (DPAs) and/or the Swiss Federal Data Protection and Information Commissioner and comply with the advice given by the EU DPAs or the Swiss FDPIC with regard to human resources data transferred from the EU and/or Switzerland in the context of the employment relationship.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

PPTA agrees to periodically review and verify its compliance with the Privacy Shield Principles, and to remedy any issues arising out of failure to comply with the Privacy Shield Principles. PPTA acknowledges that its failure to provide an annual self-certification to the U.S. Department of Commerce will remove it from the Department's list of Privacy Shield participants.

Changes to This Privacy Shield Policy

This Privacy Shield Policy may be amended from time to time consistent with the requirements of the Privacy Shield. Appropriate notice regarding such amendments will be given.