

**PRIVACY NOTICE
PURSUANT TO EUROPEAN REGULATION NO. 2016/679 ("GDPR")**

The **companies of the Zimmer Group** (hereinafter, individually, also the "**Company**" or the "**Data Controller**") have activated the channels according to the whistleblowing procedure adopted by each Company to enable the submission of reports of violations pursuant to the applicable whistleblowing legislation (hereinafter, the "**Reports**"), including the Directive (EU) 2019/1937, the applicable laws and regulations transposing the (EU) Directive 2019/1937 and any other applicable local laws concerning whistleblowing (hereinafter, the "**Applicable Legislation on Whistleblowing**") by various subjects, identified from time to time by the Applicable Legislation (hereinafter the "**Whistleblowers**").

These channels allow the submission of Reports by Whistleblowers also in anonymous form. However, if the Whistleblower chooses to submit the Report in a non-anonymous format, if the Report contains personal data referable to the Whistleblower and/or third parties, the Company, for the management of such Reports, will process the personal data contained therein.

Therefore, the Company, in its capacity as data controller, informs you pursuant to Articles 13 and 14 of the GDPR that your personal data will be processed in the manner and for the purposes indicated below. In this regard, the Data Controller invites you to carefully read this information (hereinafter, the "**Notice**"), as it contains important information on the protection of personal data and the security measures adopted in order to ensure its protection in full compliance with the GDPR and with any other local applicable data protection laws and regulations (hereinafter the "**Data Protection Laws**").

1. DATA CONTROLLER AND DPO

The Data Controller is the Company to which the Report refers. The Zimmer Group Companies that act as independent data controllers and their contact details, together with the details of the Data Protection officer (DPO), where appointed, are set out in Annex 1 to this Notice.

2. PERSONAL DATA PROCESSED

The Data Controller processes the personal data of the Whistleblower and those subjects that may be contained in the Reports received and/or in the documentation attached to them and/or collected in the performance of the management and verification of the Reports themselves, including, for example, personal data, contact data, data relating to work activity, or even, in some cases, data relating to criminal convictions or offences, data belonging to special categories of data (e.g., data relating to health, political opinions, trade union membership, etc.).

3. PURPOSE OF THE PROCESSING

Personal data is processed for the following purposes:

- 3.1.** the correct and complete management of the Reports in accordance with the Applicable Legislation on Whistleblowing, carry out the necessary investigative activities aimed at verifying the validity of the facts contained in the Report and the adoption of the consequent measures, as well as follow up on any requests from the Competent Authorities;
- 3.2.** ascertain, exercise or defend in court and/or out of court the rights or interests of the Data Controller or third parties.

4. LEGAL BASIS OF THE PROCESSING AND NATURE OF THE PROVISION OF DATA

With regard to the purpose referred to in point **3.1.**, the legal basis for the processing is Article 6(1)(c) of the GDPR – "*compliance with a legal obligation to which the controller is subject*".

With reference to the purpose referred to in point **3.2.**, the legal basis for the processing is Article 6(1)(f) of the GDPR – "*pursuit of the legitimate interest of the controller or third parties*". With particular reference to the purposes based on the legitimate interest of the Data Controller or third parties, pursuant to art. 6(1)(f) of the GDPR, it is specified that the legitimate interest of the Data Controller to process the data is equally balanced with your interests, fundamental rights and freedoms.

With regard to personal data belonging to special categories processed for the purposes indicated above, the legal bases for the processing are Article 9(2)(b) of the GDPR, according to which "*the processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject*" and Art. 9(2)(f) of the GDPR, according to which "*processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity*".

The processing of judicial data is based on Article 10 of the GDPR and on the further conditions of lawfulness laid down by the applicable provisions of Data Protection Laws.

Furthermore, as requested by the Applicable Legislation on Whistleblowing, the identity of the Whistleblower and any other information from which such identity can be inferred, directly or indirectly, may only be revealed upon the express consent of the Whistleblower himself, to persons other than those responsible to receive or following up the Reports, expressly authorized to process such data.

It should be noted that, in the case of an oral Report, the Report, subject to the Whistleblower's consent, as requested by the Applicable Legislation on Whistleblowing, may be documented by the personnel in charge by recording it on a device suitable for storage and listening or by means of a report that will be submitted to the Whistleblower for any corrections.

5. RETENTION PERIOD

Personal data are retained for the time necessary to manage the Report and in any case within the time frame prescribed by the Applicable Legislation on Whistleblowing and in compliance with any other applicable laws. It should be noted that the retention of data will therefore take place in compliance with the obligations referred to in the Applicable Legislation on Whistleblowing and with the principle referred to in Article 5, paragraph 1, letter e) of the GDPR.

In any case, the Data Controller reserves the right to retain personal data for a different or additional period for the sole purpose of allowing the latter to pursue specific purposes indicated in the Notice.

6. AUTOMATED DECISIONS

Under no circumstances the personal data collected for the above purposes will be subject to automated processing, including profiling pursuant to art. 22 of the GDPR.

7. RECIPIENTS OF DATA PROCESSING AND TRANSFER

Your personal data may be shared with:

- Local investigation teams and, where applicable, Supervisory Body and/or other competent function in the cases provided for by the whistleblowing procedure adopted by the Company;
- The Group and the Global Compliance Investigation team;
- the provider of the web platform dedicated to Whistleblowing;
- internal functions involved in the investigation/ascertainment of the facts contained in the Report;
- external consultants, such as, for example, law firms, who may be involved in the investigation and management of the Report;
- subjects, bodies, agencies or authorities to whom communication is mandatory by virtue of legal or regulatory provisions.

The subjects belonging to the categories indicated above, where necessary, will be duly appointed, depending on the situation, as external data processors pursuant to Article 28 of the GDPR or authorized to process pursuant to Article 29 of the GDPR. A list of the subjects appointed as data processors is available from the Data Controller.

Your personal data may be transferred outside the European Economic Area. The transfer of your personal data outside the EEA will take place in full compliance with the applicable data protection legislation, guidelines and recommendations issued by the relevant Supervisory Authorities.

8. EXERCISE OF THE RIGHTS OF THE DATA SUBJECT

In accordance with the provisions of the GDPR, in the presence of the legal requirements, you have the right to ask the Data Controller, at any time, for access to your personal data, the correction or deletion of the same or to object to their processing in the cases provided for in Article 21 of the GDPR. You also have the right to request the restriction of the processing of your data in the cases provided for in Art. 18 of the GDPR, as well as to obtain in a structured, commonly used and machine-readable format the data concerning you in the cases provided for by art. 20 of the GDPR. These rights may be exercised in compliance with and within the limits of the Data Protection Laws and Applicable Legislation on Whistleblowing.

Requests can be submitted using the [Privacy Request Form](#) or by sending an e-mail to privacy.global@zimmerbiomet.com.

In any case, the interested party always has the right to lodge a complaint with the competent supervisory authority, pursuant to art. 77 of the GDPR, if you believe that the processing of your personal data is contrary to the regulations in force.

9. CONTACT US

In case of questions on this privacy notice, please email us at privacy.global@zimmerbiomet.com or write to us at Zimmer Biomet, Attn: Global Privacy Officer, 345 East Main Street, Warsaw, IN 46580, United States. You may contact the data protection officer directly at dataprotectionofficer@zimmerbiomet.com. For questions or information on the Zimmer Biomet compliance speak up hotline, please email us at Compliance.Hotline@zimmerbiomet.com.

Annex 1 – List of Zimmer Group Companies acting as independent data controllers

For additional contact details please check Section 9 – “Contact Us”

Country	Name	Address
Austria	Zimmer Biomet Austria GmbH	Euro Plaza, Lehrbachgasse 13, 1120 Wien, Austria
Belgium	Zimmer Biomet BV	Park Lane A, Culliganlaan 2A, 1831 Diegem, Belgium
Czech Republic	Zimmer Czech, s.r.o.	Na strži 2097/63, 140 00 Praha 4, Czech Republic
Denmark	Zimmer Biomet Denmark ApS	Arne Jacobsens Allé 15, 2300 København S, Denmark
Finland	Zimmer Biomet Finland Oy	Bertel Jungin aukio 1, Espoo, 02600, Finland
France	Biomet France Sàrl	Plateau de Lautagne, 26000 Valence, France
France	MedTech SA	432 rue du Rajol, 34130 Mauguio, France
France	Orthogrid Systems SAS	Biocluster des Haras 23 Rue des Glacières, 67000 Strasbourg, France
France	Vidéo Interventionnelle Médicale Scientifique SA	10 avenue de Fontréal, ZA Eurocentre, 31620 Villeneuve-lès-Bouloc, France
France	Zimmer Biomet France SAS	70, rue du Chanoît, 25600 Brognard, France
Germany	Biomet Deutschland GmbH	Gustav-Krone-Strasse 2, 14167 Berlin, Germany
Germany	Zimmer Biomet Deutschland GmbH	Max-Immelmann-Allee 12, 79427 Eschbach, Germany
Germany	Zimmer International Logistics GmbH	Max-Immelmann-Allee 12, 79427 Eschbach, Germany
Greece	ZIMMER BIOMET HELLAS TRADING AND INDUSTRIAL SINGLE MEMBER SOCIETE ANONYME OF MEDICAL AND PHARMACEUTICAL GOODS	Parnithos 44, 14452 Metamorphosi, Greece
Ireland	Zimmer Orthopedics Manufacturing Ltd.	Arthur Cox Building, 10 Earlsfort Terrace, Dublin 2, Ireland
Italy	Zimmer Biomet Italia S.r.l.	Via San Bovio 3, 20090 Segrate (MI), Italy
Netherlands	Biomet Global Supply Chain Center B.V.	Heerbaan 14, -40, 4817NL Breda, Netherlands

Netherlands	Zimmer Biomet Nederland B.V.	Hazeldonk 6530 4836LD Breda, Netherlands
Norway	Zimmer Biomet Norway AS	Luhrtoppen 2, 1470 LØRENSKOG, Norway
Poland	Zimmer Biomet Polska sp. z o.o.	Ul. Domaniewska 50 (Tulipan House), 02-672 Warszawa, Poland
Portugal	Zimmer Biomet Portugal Unipessoal, Lda	Edificio Amoreiras Square; Rua Carlos Alberto Mota Pinto, 17 - 3ºA, 1070-313 Lisboa, Portugal
Romania	Zimmer Biomet Romania S.R.L.	Bucharest, District 6, 319L Splaiul Independenței, Paris Office Building (building A1), ground floor, Romania
Slovakia	Zimmer Slovakia s.r.o.	Mostová 2, 811 02 Bratislava, Slovak Republic
Spain	Zimmer Biomet Spain SLU	Metalurgia 32-34, 08038 Barcelona, Spain
Spain	Biomet Spain Orthopaedics, S.L.	C/ Islas Baleares, 52, Parcela 169 - Polígono Industrial "Fuente Del Jarro" - 46988 Paterna (Valencia) Spain
Sweden	Zimmer Biomet Sweden AB	Hyllie Boulevard 34, 215 32 MALMÖ, Sweden
Switzerland	Zimmer GmbH	Zaehlerweg 4, 6300 Zug, Switzerland
Switzerland	Zimmer Surgical SA	chemin du Pré-Fleuri 3, 1228 Plan-les-Ouates, Switzerland
Switzerland	Zimmer Switzerland Manufacturing GmbH	Sulzerallee 8, 8404 Winterthur, Switzerland
United Kingdom	Biomet UK Healthcare Ltd	Waterton Industrial Estate, Bridgend, Mid Glamorgan, CF31 3XA, United Kingdom
United Kingdom	Biomet UK Ltd	Waterton Industrial Estate, Bridgend, Mid Glamorgan, CF31 3XA, United Kingdom
United Kingdom	Zimmer Biomet UK Ltd.	Part Second Floor, Stella, Windmill Hill Business Park, Swindon, SN5 6NX, United Kingdom
United Kingdom	Zimmer Trustees Limited	Part Second Floor, Stella, Windmill Hill Business Park, Swindon, SN5 6NX, United Kingdom
United States	Zimmer, Inc.	345 East Main Street, Warsaw, IN 46580, United States
United States	Zimmer US, Inc.	345 East Main Street, Warsaw, IN 46580, United States