

## Appendix 4 to Novartis BCR

### Data Privacy Training Program related to the BCR

This Data Privacy Training Program aims to ensure that Novartis Employees are properly trained in their obligations under the Novartis Ethical Use of Data & Technology Policy Framework, including these BCR, and the legal obligations associated with the Processing of Personal Information as well as the development of tools and systems for the Processing of Personal Information. It is composed of the following elements:

#### 1. GENERAL TRAINING FOR EMPLOYEES

Novartis Employees must perform a basic privacy online training program covering the key privacy principles and requirements. Novartis will require the Employees to demonstrate that they have undergone the training and understand their obligations.

This training must be repeated annually in whole or in parts depending on the need.

#### 2. SPECIFIC TRAININGS

1. Employees in specific functions including but not limited to Legal, People & Organization (HR), Data, Digital & IT, Marketing, Internal Audit, Procurement, Clinical Development, Safety and Security, who have regular access to and Process Personal Information, as well as Employees who develop tools and systems for the Processing of Personal Information, must undergo trainings with a frequency to be decided by each DPDAI Head based on specific functional or local needs on the obligations and requirements specific to their area of work, including their obligations under the BCR. This will also include procedures for managing requests for access to personal data by public authorities. Trainings can be performed face to face, online through web-based programs, and through information in newsletters, alerts, Intranet posts, etc.
2. Members of the DPDAI Team as well as functional representatives are several times per year trained on data privacy requirements and developments through privacy workshops and meetings, online trainings, alerts and newsletters, as well as postings on the privacy Intranet site.

#### 3. AWARENESS EFFORTS

Privacy awareness campaigns, including the delivery of posters, short messages and videos, specific information materials and booklets, articles and webinars/podcasts shall be periodically conducted upon the initiative of the respective DPDAI Head at country and/or global level. In addition, Employees have Intranet access to Novartis policies, handbooks, guidelines and other materials concerning the protection of Personal Information and the application of the BCR.

## 4. DEVELOPMENT OF THE TRAININGS

The global training programs are developed under the responsibility and oversight of the Director Innovation, Strategy and Engagement DPDAI.

Training programs launched at a country level are developed, reviewed and approved by the respective Country DPDAI Heads in alignment with the respective Legal and Ethics, Risk & Compliance departments and in accordance with local laws.

### Version History

Effective Date	Owner	Version	CNIL
3 July 2012	Group Data Privacy	1.0	3 July 2012
3 September 2018	Group Data Privacy	2.0	3 September 2018
20 December 2024	Head Data Privacy Digital & AI Compliance Region Europe	3.0	20 December 2024