

**GLOBAL DATA PRIVACY POLICY**

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## 1. About Henry Schein

Henry Schein, Inc. (Nasdaq: HSIC) is the world's largest provider of health care products and services to office-based dental, animal health and medical practitioners. The company also serves dental laboratories, government and institutional health care clinics, and other alternate care sites. Headquartered in Melville, N.Y., Henry Schein has operations or affiliates in 34 countries.

Henry Schein operates through a centralized and automated distribution network, with a large selection of branded products and Henry Schein private-brand products. The company also offers its customers innovative technology solutions, including practice management software and e-commerce solutions, as well as a broad range of financial services.

You can find our contact details at the last section of this policy.

## 2. Overview

At Henry Schein, Inc., your privacy is important to us. We process personal data in different contexts and we do so by fully respecting your privacy and your other rights and freedoms, as part of our unwavering commitment to ethical and responsible practices.

This Global Data Privacy Policy ("Policy") sets forth the principles that govern our treatment of personal data across Henry Schein, Inc. and their subsidiaries and affiliates worldwide (hereafter, Henry Schein). All employees and those with whom we share personal data must adhere to this Policy.

Henry Schein is committed to protecting the information that our employees, clients, prospects, suppliers, and vendors have entrusted to us. We collect and use personal data in order to perform our business functions and provide quality health care products and services to our customers.

Consistent with our values, we treat any personal data that we obtain in accordance with the data privacy principles of transparency, purpose limitation, data minimization, data quality, integrity and confidentiality, accountability, and privacy by design.

This Policy applies to all personal data in any format or medium, relating to all employees, clients, vendors and others who do business with Henry Schein.

## 3. Types of personal data we collect and use

We recognize personal data as any information related to an identified or identifiable individual. Depending on the context of your interactions with Henry Schein, we collect and use different types of personal data from employees, contractors, candidates, clients, prospect clients and vendors.

### Types of personal data we collect from:

- **Employees, contractors and candidates:** including contact information, employment details and history, benefits, compensation, performance, use of company resources for employees, contractors, and applicants all in connection with their role or potential role within Henry Schein.
- **Clients:** including name, tax and financial information, contact information for key personnel, language, signature, communications and login information, segmentation and marketing attributes.
- **Prospect clients:** including name and contact information.

- **Customers of our clients:** we access personal data from customers of our clients, which may include sensitive information, only when it is necessary to provide the service. In this context, we act on behalf of our clients, and the service is governed by a data processing agreement.
- **Vendors and suppliers:** including name, tax and financial information, contact information for key personnel, language, communications and segmentation.
- **Visitors of an office building:** including name and contact information and video images from security cameras in some of our office buildings.
- **Website and social media users:** In addition to the information visitors volunteer, we automatically collect the domain name, Internet Protocol (IP) address, browser type and version, operating system and platform, average time spent on our website, pages viewed, information searched for, access times and other relevant statistics. Our website also uses cookies.

#### 4. Our Policy Towards Children

Our services are not directed to children. We do not knowingly collect personal data from children. If a parent or guardian becomes aware that his or her child has provided us with personal data without their consent, please contact us. If we become aware that a child has registered for a service and has provided us with personal data, we will delete such information from our files.

#### 5. Sources of personal data

Henry Schein receives and uses various types of personal data in order to conduct our day to day business activities. We apply the data minimization principle in the collection and use of personal data ensuring that we only collect information that is necessary and by fair means, and providing notice and requiring consent when necessary.

Some of this data is collected directly from you in the following situations when:

- You apply for a position with our company
- We establish a contractual employment or commercial relationship,
- You provide us with any type of service, as a provider or vendor
- When we provide you with any type of service, product or support.
- When you browse, or use our website, e-commerce services, or social media pages

Sometimes we also obtain data from third parties, in the following situations:

- We can share data between our subsidiaries and affiliates worldwide in a Customer Relationship Management-system
- We can buy data from external companies for marketing objectives

#### 6. Uses and purposes of Personal Data

The purposes for which we collect and use your personal data may vary depending on the type of relationship you have with us, such as if you are one of our employees, clients, or a website user. Henry Schein always collect and use personal data according to the purpose limitation principle. The use of personal data for new purposes should always guarantee consistency and your privacy expectations, otherwise we will request your authorization.

- **Employees and candidates:** if you apply for a job via our career center, we use your personal data to consider you for employment and to administer your account. If you have an employment or commercial relationship with Henry Schein, we use your personal data to develop our contractual relationship, to conduct performance evaluations and to comply with legal obligations, including tax and labor regulations.
- **Clients:** we use our clients' information to maintain our commercial relationship, to ensure the proper operation of the day-to-day business, to comply with tax and other regulations, and to administering sales, and marketing activities.
- **Customers of our clients:** we provide support services to our clients that use our health care products and services, when required.
- **Prospect clients:** information from prospects clients is used to respond to their requests for information, products or services, and for marketing activities.
- **Vendors and suppliers:** if you have a business or professional relationship with Henry Schein, we will use your information to develop our business relationship with you, and to comply with tax and other regulations.
- **Visitors of an office building:** some of our buildings have physical access controls and video surveillance systems for security purposes.
- **Website and social media users:** we collect personal data from visitors and users of our website and social media pages. We use the information to manage your account registration, to store your preferences and settings, to provide interest-based advertising, to conduct statistics and to analyze how you use our website and online services.
- We also may use personal data of our employees, clients, prospects, vendors or suppliers for other purposes based on our legitimate interests, such as to conduct analytics of order history, for product development, to create statistics about market development, to generate profiles for marketing research.

## 7. Legal basis for data collection and use

Henry Schein only collects and uses personal data when there is a fair and legal basis for its collection and use, for instance, when the collection of personal data is necessary to enter into a contract, to meet our legitimate interests, to comply with legal obligations or when we have your authorization.

The information we collect when we enter into a contract or business relationship with you, except if we indicate otherwise, is mandatory to develop our contractual relationship and to comply with legal obligations. For instance, some tax laws, labor, anti-fraud or compliance laws require organizations to collect certain information that may vary depending on the local regulations. Without the required mandatory information, we would not be able to work with you.

Marketing activities are usually based on your consent or to an existing business relationship with us. However, you can opt-out of these communications anytime and free of charge.

When we use your personal data for our legitimate interests, we always conduct a balancing test in order to ensure that data subject rights are not overridden.

Finally, when we have access to personal data on behalf of our clients, in our role as data processors, there is always a written contract regulating the service, including specific instructions for the data processing and safeguards.

## 8. Retention periods

Henry Schein applies the storage limitation principle in order to retain personal data in our records only for the length of time required to fulfill the purpose for which the data was collected. We do not keep personal data for longer than is necessary, and what is necessary depends on specific circumstances such as regulations requiring to retain information for a certain period of time and limitation periods of legal claims.

## 9. Disclosures to Third Parties and processing activities

At times, Henry Schein engages third party contractors, service providers, and other vendors to help us accomplish our business objectives. There are other circumstances where we are required by law to disclose personal data to third parties such as public bodies or judicial **authorities**.

We engage with third party contractors, service providers and other vendors for the following services: technical support, direct shipments, leasing and marketing. If the engagement involves the transmission of personal data, Henry Schein requires the service provider to treat that data consistent with this Policy. A contract to protect the personal data should be executed before any data is disclosed.

In certain circumstances, Henry Schein may be required to disclose personal information when required by law, when required to protect our legal rights, or in an emergency situation where the health or security of an individual is endangered.

We may also disclose personal data in the context of any sale or transaction involving all or a portion of the business.

## 10. Security

Henry Schein is committed to the security, confidentiality and integrity principle. We take commercially reasonable precautions to keep all information obtained from our online visitors secure against unauthorized access and use and we periodically review our security measures. We are committed to processing your data in a secure manner and have put in place specific technical and organizational measures to prevent the personal data we hold from being accidentally or deliberately compromised.

Henry Schein uses VeriSign for its sites security certificates. Please be aware that these protection tools do not protect information that is not collected through our Web site, such as information provided to us by e-mail.

We also conduct information risk assessments, we ensure that our staff understands the importance of protecting personal data, and we are responsibly managing access rights within the company. We include both physical security and IT security in our overall data security approach. We are diligent in selecting vendors that process personal data on our behalf so that they also ensure appropriate technical and organizational measures to protect the data.

Henry Schein makes reasonable efforts to notify individuals and regulatory authorities, as required by law, if we reasonably believe that personal information has been stolen, disclosed, altered or infringed by an unauthorized person. We create and maintain a breach notification and reporting protocol.

We also endorse the concept of privacy by design which is an approach to projects that promotes privacy and data protection compliance from the outset. This means considering the privacy and security implications for any new project or process throughout its lifecycle.

## 11. Your data protection rights and choices

If you reside or otherwise find yourself in the territory of Europe, Henry Schein is committed to facilitate the exercise of your rights granted by the European data protection law. Otherwise you can contact us at any time to discuss your privacy concerns.

### Privacy rights under the European regulation:

**Transparency and the right to information:** we provide notice to our employees, customers, suppliers, vendors and others of how we use personal data in our day-to-day operations at the time of collecting personal data, or as soon thereafter as possible. We also publish this privacy notice for a greater transparency.

**Right to access, rectification, restriction of processing, and erasure:** we provide data subjects with access to their own personal data where required by applicable law. In addition, we will rectify their personal data when it is incorrect and inaccurate, and we will ensure the right to erasure and to restriction of processing when these rights are not compatible with local regulations.

**Right to object and withdraw consent at any time:** for all marketing materials, you can opt-out anytime, and free of charge. The right to object for other processing activities will be balanced in order to ensure that it is not incompatible with local regulations or the legitimate interests of Henry Schein.

**Right to data portability:** based on your specific situation, we provide data subjects with the right to obtain and reuse your data across different services and includes transferring of your data to you, another controller or a trusted third party.

### **Right to lodge a complaint with a supervisory authority**

These requests should be submitted as follows:

- Opt-out of marketing communications: you can opt-out anytime by following the opt-out instructions in our commercial e-mails.
- To exercise the rest of your rights: you should send a communication in writing to your office of Henry Schein (Alphadent NV, Mannebeekstraat 33, 8790 Waregem, Belgium) and providing the following information in order to verify your identity: customer number + copy of the identity card of the customer. Henry Schein will attend to your request in a timely manner within 30 days after receiving your request. If for any reason we need to extend this period of time, we will contact you.
- Right to lodge a complaint with a supervisory authority: you can have the right to lodge a complaint with the supervisory authority of your habitual residence, place of work or place of the alleged infringement.

## 12. International Transfers of Personal Data

If you are located outside the United States and you interact with our website or provide us personal data, then your personal data may be transferred to the United States. If you are based in the European Economic Area or Switzerland, please be informed that the United States is not in the list of countries that the European Commission considers adequate to the protection of personal data. However, we provide appropriate safeguards for your data in the US, as we elected to self-certify under the EU-US Privacy Shield and under the Swiss-US Privacy Shield.

### 13. Changes to this notice

We reserve the right to modify this Privacy Statement and related business practices at any time. We will duly inform you of any changes.

Changes in this privacy policy will be notified to you via the website and email communication. We will give you the opportunity to express your consent for processing your data for different and new purposes, or we will in any case inform you about the legal basis of such processing other than consent. The time stamp you see on the policy will indicate the last date it was revised.

### 14. Contact information

At Henry Schein we are committed to apply this privacy policy and the accountability principle. For this reason, if you have any privacy concern or questions about how your personal data is used, please feel free to contact us.

If you have any concerns or questions about how your personal data is used, please contact us at:

Alphadent NV  
Mannebeekstraat 33  
8790 Waregem  
Attn: Customer Service

Or call us at +32 56 629 530.

You can also contact our local customer service or your sales representative. We will promptly respond and make everything possible to address your concern.