

Corporate Policy 11

Global Privacy and Data Protection

Purpose

The purpose of this Policy is to set forth Stryker's commitment to protect the privacy of personal information. Stryker will collect and use personal information received from employees, suppliers, patients, health care professionals, customers and others for legitimate business purposes. It is Stryker's policy to keep this information confidential and secure in accordance with applicable laws.

Scope

This Policy applies to all employees and contractors working on behalf of Stryker regardless of location. If any provision of this Policy does not comply with local or regional law applicable to a specific Stryker business unit, that business unit shall, to the extent necessary, implement an appendix to this Policy to comply with local or regional law. Where a local or regional appendix has not been implemented, all provisions of this Policy will remain in effect.

This Policy applies to all personal information. Personal information is any information that can be used on its own or with other information to identify an individual.

Basic policies

Stryker will protect and comply with all laws regulating the use of personal information. In addition to all the laws that apply to the protection and use of personal information, Stryker is committed to the standards set forth below.

1. **Legitimate purpose of collection and processing:** Stryker will collect and use personal information for legitimate business purposes only and in compliance with applicable laws.
2. **Notice of collection of use:** Individuals who interact with Stryker and who disclose personal information are entitled to understand how Stryker will use their personal information.
3. **Access:** Stryker will, where possible or feasible, provide individuals access to their personal information and provide the ability to review and update or correct their information.
4. **Complete, accurate and up-to-date:** Stryker makes reasonable efforts to ensure that personal information is complete, accurate and up-to-date.
5. **Security and confidentiality:** Stryker is committed to protecting personal information against unauthorized use or disclosure. Stryker will share personal information within the organization only with those who have a legitimate business need for the information. Stryker will make efforts to ensure that appropriate administrative, technical and physical safeguards are used to protect the confidentiality and security of personal information.
6. **Processing by third parties:** Stryker may work with third parties and/or use third party systems to support Stryker's businesses and provide services on Stryker's behalf. Stryker requires all third parties who use or process personal information on behalf of Stryker to protect the confidentiality and security of personal information. Third parties are required to process personal information as directed by Stryker's instruction and for no other purposes.
7. **Cross-border sharing:** Stryker may share personal information between our company's subsidiaries and affiliates with legitimate business need for the information. When personal information is shared across borders, Stryker will comply with applicable laws and standards regarding cross-border sharing.

Responsibilities

It is the responsibility of all Stryker employees and contractors to protect the privacy of personal information. The Global Privacy Program, in partnership with Stryker divisions and functions, will draft any additional standards necessary to ensure compliance with this Policy.

Compliance

Stryker requires all employees and contractors to comply with this Policy. If you have a question about this Policy or related procedures or if you have a concern regarding the privacy and protection of personal information, please contact Stryker's local Human Resources representative, a compliance officer, legal counsel or the Ethics Hotline. Stryker will keep these reports confidential, to the extent allowed by law.