Policy on Global Data Privacy

Background

Astellas operates in many different countries and is committed to conducting its business throughout the world in accordance with applicable laws and high ethical standards. Personal information is central to our business. We work to obtain and use personal information both fairly and transparently. This policy is implemented to ensure that the personal information we keep is held securely.

Policy

This policy is a global minimum standard for data privacy. Astellas shall comply with the relevant local standard and applicable privacy laws.

Astellas will take reasonable steps to:

- Process personal information fairly and lawfully;
- Obtain personal information only for specified and lawful purposes, and shall not further process data in any manner incompatible with those purposes;
- Ensure personal information is adequate, relevant and not excessive in relation to the purposes for which they are processed;
- Ensure personal information is accurate and, where necessary, kept up to date;
- Not keep personal information for longer than is necessary for the purposes it was collected;
- Safeguard the rights of data subjects under the applicable privacy laws;
- Take appropriate technical and organizational measures against unauthorized or unlawful processing of personal information and against its accidental loss, destruction and/or damage;
- Transfer personal information in compliance with the applicable privacy laws. Where appropriate, Astellas will carry out due diligence as well as put in place adequate contractual arrangements and use restrictions; and
- Send marketing communications in compliance with the applicable privacy laws and obtain data subject’s consent where legally required.

Astellas will endeavor to gain agreement on the principles set forth in this policy in arrangements with third parties and ensure that the service providers which process personal information on our behalf strictly protect such personal information according to the applicable agreement.