

Data privacy statement of the Novartis Pension Funds and Novartis Insurance Services

The Novartis Pension Funds (Novartis Pension Fund 1, Novartis Pension Fund 2 and Novartis Management Pension Fund, hereinafter jointly referred to as «*Novartis Pension Funds*» or «we», «us», c/o Novartis AG, Lichtstr. 35, 4056 Basel, Switzerland), process personal data primarily within the scope of their legal, statutory and regulatory purposes. As a rule, the Novartis Pension Funds process personal data under joint responsibility. Insofar as personal data is processed for the purposes of implementing the mandatory occupational benefit scheme, this is the responsibility of the Novartis Pension Fund 1.

What personal data do we process and for what purpose?

The Novartis Pension Funds only process data that is necessary for the proper conduct of business and the proper fulfillment of the tasks assigned to them. We receive the data directly from you or your employer.

a) Occupational pension provision

For the purposes of implementing the occupational benefit scheme, the Novartis Pension Funds (the Novartis Pension Fund 1 in particular also within the framework of the mandatory occupational benefit scheme) collect and process the following categories of data of insured persons and pension recipients where applicable: Surname, first name, AHV number, languages, date of birth, gender, residential address, marital status, employer, income, degree of employment, financial situation, assets/capital, family, information on insurance benefits, assessments, debt collection, social assistance measures, account details, identity, advance withdrawal/pledge for home ownership promotion purposes, e-mail, telephone number.

b) Insurance Services

For advising on insurance matters, the Novartis Pension Funds may collect and process the following categories of insured person data: Surname, first name, date of birth, gender, residential address, marital status, names of children including gender and dates of birth, personal number/ID card ID, date of taking up residence, name of partner, health data, information on insurance benefits, e-mail, telephone number.

c) Website

For the purposes of website operation and security, responding to contact requests, registration and use of user accounts with access to extended content, the Novartis Pension Funds may collect and process the following categories of data from visitors to the website: Last name, first name, e-mail address, date of birth, personnel number, IP address, Unique ID, contact requests, MAC address, browser type and version, screen resolution, name and version of your operating system.

When and to whom do we pass on your personal data?

Within the scope of our activities and for the same purposes as listed in this privacy policy, your personal data may be viewed by or disclosed to the following categories of recipients, insofar as this is necessary to fulfill the purposes mentioned.

a) Occupational pension provision

For the purpose of implementing the occupational benefit scheme, it may be necessary to pass on personal data to the following categories of recipients or to grant the recipients access to the data: Beneficiaries, benefit recipients, benefit providers, relatives, life partners, experts, federal bodies, authorities, employers, reinsurers, insurance companies, auditing company, tax authorities, IT providers, lawyers, doctors, cantonal courts, supervisory authority, order processor, occupational benefits expert.

b) Insurance Services

For the purposes of providing advice on insurance matters, it may be necessary to disclose personal data to the following categories of recipients or to grant the recipients access to the data: Policyholder, insurer.

c) Website

For the purposes of the operation and security of the website, your data may be passed on to IT providers or viewed by them.

How do we protect your personal data?

We have taken appropriate technical and organizational measures to ensure an appropriate level of security and confidentiality for your personal data.

The purpose of these measures is to protect personal data against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access and against other unlawful forms of processing. In particular, the following security measures are taken for this purpose: Access control, access control, user control, data carrier control, storage control, transport control, availability control, system security control, input control, disclosure control.

The Novartis pension funds have a data protection management system and are constantly developing it further. Systems, procedures and organization are subject to an assessment by an independent certification body in accordance with internationally recognized technical standards in order to meet the requirements of the *GoodPriv@cy* data protection quality mark.

For further information please see the data protection regulations of the Novartis Pension Funds and Novartis Insurance Services.

How long do we store your personal data?

We will only retain your personal data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal or regulatory requirements. If pension benefits are paid, the obligation to retain data lasts for ten years after the end of the obligation to pay benefits. If no pension benefits are paid in the absence of a claim by the insured person, there is a retention obligation until the date on which the insured person reaches or would have reached the age of 100.

What rights do you have and how can you exercise them?

Whenever we process personal data, we take reasonable steps to keep your personal data accurate and up to date for the purposes for which it was collected. You have the ability to exercise the following rights under the law:

- the right to be informed about what personal data we have about you and how we process it;
 - the right to access the personal data we process and, if you believe that the data concerning you is inaccurate, out of date or incomplete, to request that it be corrected or updated;
 - the right to request the erasure of your personal data or the restriction of processing to certain categories of data;
 - the right to withdraw your consent at any time, without affecting the lawfulness of processing before such withdrawal;
 - the right to object to the processing of your personal data in whole or in part. With certain exceptions, this includes the right to object to direct marketing and the right to object to the use of your personal data for research purposes;
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- the right to request so-called data portability, i.e. that the personal data you have provided to us be returned to you or transferred to a person of your choice, in a structured, commonly used and machine-readable format, without us preventing you from doing so and subject to your confidentiality obligations;
- the right to object to automated decision-making, including "profiling", where this has significant or legal consequences, i.e. you can request that a human being intervenes in an automated decision-making process associated with the processing of your data with significant or legal consequences, unless the processing is based on your consent, is permitted by law or is necessary for the fulfillment of a legal or contractual obligation. However, we do not currently make any decisions that are based exclusively on automated processes and have significant or legal consequences for the individual.

If you have a question or wish to exercise any of the above rights, please contact us at pk.novartis@novartis.com.

If you are not satisfied with the way in which we process your personal data, you can contact our data protection advisor at pk.privacy@novartis.com, who will investigate your concerns.

How often do we update this privacy policy?

We regularly review our privacy policy and update it as necessary. This version of the Privacy Policy is dated September 1, 2023

Basel, September 2023

Novartis Pension Funds

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