



ASP Safe Harbor Privacy Policy

Purpose	The purpose of this document is to describe the Advanced Sterilization Products (ASP) Safe Harbor Privacy policy.
Scope	This Safe Harbor Privacy Policy sets forth how ASP handles personal data transferred from countries in the European Economic Area (EEA) to the United States that is collected or received in managing our workforce (human resources). Adherence by ASP to these privacy principles may be limited to the extent required to meet a legal, governmental, national security or public interest obligation.

Definitions

Term	Definition
Agent	A third party that processes personal data solely on behalf of and under the instructions of ASP.
Personal Data	Any information or set of information that identifies or can reasonably be used to identify an individual. Personal data do not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public personal information.
Sensitive Personal Data	Personal information that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or that concerns health or sex life. Information will be treated as sensitive personal data where it is received from a third party that treats and identifies it as sensitive.

Responsibilities

Position	Responsibility
Privacy Officer	Has overall responsibility for the Privacy Program for ASP.
Regulatory/Board Attorney	Provide legal counsel with respect to privacy matters.
Human Resources Representative	Human Resources contact with respect to privacy matters.
Information Security	Responsible for ensuring security and access control for all information systems containing personal information utilized at ASP.



References

External References:

- J&J Corporate Safe Harbor Privacy Policy Template document
- European Commission's Directive on Data Protection
- Safe Harbor overview: http://www.export.gov/safeharbor/SH_Overview.asp
- Office of Health Care Compliance & Privacy <http://Privacy.jnj.com>

Internal Documents: N/A

Subordinate Documents: N/A

Policy

ASP, a member of the Johnson & Johnson Family of Companies, is strongly committed to protecting the privacy of those who entrust us with their personal information. Our employees, and all those who do business with us, trust and expect that we will protect their personal information in accordance with the promises we make. In furtherance of our commitment, ASP has certified to the Safe Harbor Agreement between the United States and the European Union, with respect to personal data processed as part of our human resources activities. Accordingly, ASP adheres to the Safe Harbor privacy principles and Frequently Asked Questions, as agreed to by the U.S. Department of Commerce and the European Commission.

The following privacy principles apply to the collection, use and disclosure of personal data by ASP in conducting human resources activities.

Notice

ASP will inform individuals about the purposes for which we collect and use personal data about them, how to contact us, the types of non-agent third parties with whom we may share personal data, and any ways that individuals may limit the use and sharing of such data. This notice will be provided when individuals are first asked to provide personal data or as soon thereafter as is practicable.

Choice

ASP will offer an individual the opportunity to choose (opt out) whether personal data are (a) shared with a non-agent third party or (b) used for a purpose other than that for which the data were originally collected or subsequently authorized by the individual.

For sensitive personal data, ASP will give an individual an affirmative or explicit (opt in) choice if the information is to be disclosed to a third party or used for a purpose other than those for which it was originally collected or subsequently authorized by the individual.

Policy continued ***Access***

ASP will provide individuals with reasonable access to personal data about them, and they may request the correction or amendment of personal data that they demonstrate to be incorrect or incomplete.

Transfers to Agents

ASP will only transfer personal data to an agent where the agent has provided assurances that the agent provides at least the same level of privacy protection as is required by these privacy principles. Where we have knowledge that an agent is using or sharing personal data in a way that is contrary to these principles, ASP will take reasonable steps to prevent or stop such processing.

Onward Transfer

ASP will only transfer personal data to a non-agent third party where consistent with the notice provided to the individuals who are the subject of the data and any consent that those individuals have given.

Information Integrity

ASP will only use and share personal data about individuals in a way that is consistent with the purposes for which the data were collected or subsequently authorized by those individuals. To the extent necessary for those purposes, ASP will take reasonable steps to ensure that the data are accurate, complete, and current.

Information Security

ASP will take reasonable precautions to protect personal data from loss, misuse and unauthorized access, disclosure, alteration and destruction.

Enforcement

ASP has put in place mechanisms to verify our ongoing adherence to these privacy principles. We encourage individuals covered by this Policy to raise any concerns that they have about the way that we process their personal data by contacting us via email at lallison@inj.com and we will do our best to resolve them. We have also agreed to participate in the dispute resolution program provided by the European Data Protection Authorities Panel.

END OF DOCUMENT

ADVANCED STERILIZATION PRODUCTS

Division of Ethicon, Inc.

a **Johnson & Johnson** company