

Enterprise Privacy Principles



Introduction

At McKesson, we value the trust that our customers, patients, business partners, and employees place in us to appropriately use and protect Personal Information¹. To preserve that trust, McKesson has adopted the following Privacy Principles. These Privacy Principles serve as a guide for the handling of Personal Information throughout the company and as a resource for developing an effective privacy program. They apply to all employees regardless of position or tenure.



Notice – No Surprises

Where appropriate or required by law, McKesson will provide clear, conspicuous, and timely notice to individuals about our privacy practices. That includes how we collect, use, disclose, and protect Personal Information.



Consent – Real Choices

Where appropriate or required by law, McKesson will provide individuals with actionable choices about how we collect, use, retain, and disclose Personal Information. We will strive to make the choice mechanism easy to understand and use.



Collection and Use – Reasonable and Thoughtful

McKesson will limit the collection of Personal Information to that which is relevant and reasonably necessary to accomplish the intended business purpose. We will use Personal Information in accordance with relevant laws and regulations, to meet our privacy promises and consents, and to fulfill contractual obligations.



Disclosures – “Need to Know” Internally and to Trusted Third Parties

McKesson will limit disclosure of Personal Information, internally and externally, to those with a business “need to know.” McKesson seeks business partners who share our values and commitment to privacy. We may disclose Personal Information to our third parties who provide products and services to McKesson. We will take steps to help ensure appropriate protections are in place before we share or disclose Personal Information with any third party service provider.



Integrity – Data Accuracy and Consistency

McKesson will take reasonable steps to keep Personal Information accurate, complete, and up-to-date for its intended use.



Access – User Empowerment

Where appropriate or required by law, McKesson will provide individuals with reasonable access to and the ability to correct their Personal Information.



Security – Appropriate Safeguards

McKesson will apply reasonable and appropriate physical, technical, and administrative safeguards to protect Personal Information.



Accountability – It Begins With You

At McKesson, we hold our employees accountable for the appropriate use and protection of Personal Information in accordance with our ICARE shared principles of Integrity, Customer First, Accountability, Respect & Excellence. Privacy at McKesson is everyone’s responsibility and it begins with you.

¹ “**Personal Information**” means any information accessed, collected, or used by McKesson that identifies an individual, or can reasonably be used to identify an individual, whether directly or indirectly. Personal information includes, but is not limited to, name, address, telephone, fax, e-mail address, SSN, date and place of birth, medical, educational, financial, or employment information, user name or password, geolocation information, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sexual preferences or practice, and information related to offenses or criminal convictions.