

Policy Name:	Privacy Shield
Effective Date:	September 28, 2016
Last Review Date:	November 9, 2018
Policy Owner:	Privacy

Overview & Purpose

McKesson Corporation (McKesson) is committed to maintaining the privacy and security of Customer Personal Information and Human Resources (HR) Personal Information (collectively, "Covered Information"). The McKesson Privacy Shield Policy (Policy) establishes the principles that govern the processing of Personal Information received from the European Economic Area (EEA), which includes the European Union (EU), by McKesson entities in the United States (US).

Applies To:

McKesson Employees and Outside Service Workers (OSWs) who process Personal Information of:

- McKesson Europe EEA Workers, including Legacy McKesson EEA Workers and Legacy Celesio EEA Workers
- EEA individuals or EEA Workers associated with the Change Healthcare or its EEA Customers

Policy Requirements

Privacy Principles

McKesson adheres to the Privacy Shield Framework as agreed between the US and the EU, and publicly certifies that it complies with the Privacy Shield Principles (the Principles), including all applicable Supplemental Principles, published by the US Department of Commerce for all transfers of Personal Information from the EEA to the US. Information regarding McKesson's Privacy Shield certification is available at: <https://www.privacyshield.gov/list>.

Notice

Customer Personal Information

As a service provider of Change Healthcare, McKesson may view, hold and process Customer Personal Information about Change Healthcare EEA Customers and EEA Business Partners. McKesson may also process Sensitive Personal Information of Change Healthcare EEA Customers.

As data controllers, Change Healthcare and/or its EEA Customers are responsible for ensuring that Personal Information is processed in accordance with the rights and requirements of the individuals concerned under European data protection law. This includes notifying individuals of the purposes for which Personal Information is collected and used and the types of third parties to which it may be disclosed.

HR Personal Information

McKesson processes HR Personal Information about EEA Workers. McKesson informs EEA Workers about the purposes for which it collects and uses HR Personal Information, the types of third parties to which McKesson may disclose HR Personal Information, and the choices and means that McKesson offers EEA Workers for limiting the use and disclosure of HR Personal Information. McKesson provides notice in clear and conspicuous language when EEA Workers are first asked to provide HR Personal Information, or as soon as practicable thereafter, but in any event, before HR Personal Information is used for a purpose incompatible with the purpose(s) for which it was originally collected, used or disclosed. Depending on the specific McKesson legal entity involved, the above notice may be presented by McKesson or McKesson Europe (or one of its subsidiaries) on behalf of McKesson, McKesson Europe (or one of its subsidiaries) of Change Healthcare.

Choice

The vast majority of Covered Information that McKesson processes relies on a legal basis other than individual consent. To the extent individual consent is appropriate, as determined by local law, McKesson will provide an opportunity to opt-in or opt-out, depending on the circumstances, to the impacted individual. McKesson will only

use or disclose Sensitive Information for the purposes for which it was originally collected, or for a legal basis that does not rely on consent. Depending on the specific McKesson legal entity involved, this Principle may be performed by McKesson or McKesson Europe (or one of its subsidiaries), on behalf of McKesson, McKesson Europe (or one of its subsidiaries) and/or Change Healthcare.

Accountability for Onward Transfer

McKesson may share Covered Information with third parties to assist in providing services to EEA Workers or Change Healthcare EEA Customers. The third parties include those that provide the following types of services: data storage, customer support, employee surveys, talent management, learning management, information security services, investigative/legal services, technical/software support, and HR management (which may include pay, benefits, relocation, talent acquisition, etc).

McKesson obtains written agreements from third parties to whom it transfers Covered Information requiring them to provide at least the same level of privacy protection as is required by the Principles and to notify McKesson if it is unable to meet this obligation. If McKesson receives notice or otherwise becomes aware that a third party is using or disclosing Covered Information in a manner contrary to this Policy or the Principles, McKesson will take reasonable and appropriate steps to stop and remediate any unauthorized processing. McKesson remains responsible and liable under the Principles if third-party agents that McKesson engages to process the Personal Information on its behalf do so in a manner inconsistent with the Principles, unless McKesson proves that it is not responsible for the event giving rise to the damage.

Required Disclosures

McKesson may be required to disclose Covered Information in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

Security

McKesson takes reasonable and appropriate measures to protect Covered Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the Covered Information. McKesson has implemented an information security program that is designed to incorporate all the security requirements imbedded in the ISO 27001 standard, one of the most recognized global security standards.

Data Integrity and Purpose Limitation

Customer Personal Information

McKesson limits the use of Customer Personal Information to those uses that are required or permitted by Change Healthcare. Any steps designed for McKesson to maintain the accuracy, completeness and currency of the Customer Personal Information in its possession are provided by Change Healthcare.

HR Personal Information

McKesson limits the use of HR Personal Information to ways that are compatible and relevant for the purposes for which the HR Personal Information was collected and for which notice was provided, or for which consent was obtained. McKesson will take reasonable steps to ensure that all HR Personal Information is reliable for its intended use, accurate, complete and current. McKesson will retain HR Personal Information in a form identifying, or making identifiable, the individual for as long as it serves a compatible and relevant processing purpose and in accordance with applicable law. Depending on the specific McKesson legal entity involved, this Principle may be performed by McKesson or McKesson Europe (or one of its subsidiaries) on behalf of McKesson, McKesson Europe (or one of its subsidiaries) or Change Healthcare.

Access

Customer Personal Information

McKesson cooperates with Change Healthcare (or one of its EEA Customers) regarding access requests. McKesson, upon request and under the guidance of Change Healthcare, takes reasonable steps to provide individuals with an opportunity to verify the accuracy of their Personal Information, if requested, correct, amend, or delete Personal Information to the extent that the Personal Information is retained by McKesson.

HR Personal Information

McKesson grants EEA Workers reasonable access to HR Personal Information that it holds about them in an understandable format. McKesson will take reasonable steps to allow EEA Workers to verify the accuracy of their HR Personal Information and, if requested, to correct, amend, or delete HR Personal Information to the extent that the HR Personal Information is retained by McKesson. Depending on the specific McKesson legal entity involved, this Principle may be performed by McKesson or McKesson Europe (or one of its subsidiaries), on behalf of McKesson, McKesson Europe (or one of its subsidiaries) or Change Healthcare.

Recourse, Enforcement and Liability

McKesson conducts periodic training for those with access to Covered Information to enhance awareness of the Privacy Shield Principles. Violations of this Policy may be subject to disciplinary action up to and including termination.

McKesson conducts periodic reviews of its privacy practices to verify adherence to this Policy and its Privacy Shield certification to the US Department of Commerce. McKesson is subject to the investigatory and enforcement powers of the US Federal Trade Commission (FTC).

Complaints and Dispute Resolution

Customer Personal Information

Complaints may be directed to privacy@mckesson.com, to [McKesson’s Integrity Line](#) or, in select EEA countries, at the numbers provided below:

Local Integrity Line Phone Numbers	
France: 088-91-1665	Ireland: 1-8006155403
Luxembourg: 800-2-1157	Netherlands: 0800-0226174
UK: 0800-032-8483	U.S.: 1-877-625-4625

McKesson will work with Change Healthcare to investigate and attempt to resolve complaints in accordance with the Principles. For complaints that cannot be resolved by McKesson, McKesson participates in the TRUSTe U.S.-based dispute resolution procedures, which are available to you at no cost.

If you have any complaints regarding McKesson’s compliance with the Principles, you should first contact us as provided above. If McKesson does not resolve your complaint, you may raise your complaint with our U.S.-based third-party [dispute resolution provider](#) (free of charge) online with [TRUSTe](#).

HR Personal Information

EEA Workers may report complaints to their local HR Manager, to privacy@mckesson.com, to [McKesson’s Integrity Line](#) or, in select countries, at the numbers provided below:

Local Integrity Line Phone Numbers	
France: 088-91-1665	Ireland: 1-8006155403
Luxembourg: 800-2-1157	Netherlands: 0800-0226174
UK: 0800-032-8483	U.S.: 1-877-625-4625

McKesson, in collaboration with McKesson Europe (or one of its subsidiaries) or Change Healthcare, will investigate and attempt to resolve complaints in accordance with the Principles. For complaints that cannot be resolved by McKesson, McKesson participates in the dispute resolution procedures of the EU data protection authorities' panel and agrees cooperates with the local EEA data protection authorities. In accordance with the Privacy Shield Framework, a binding arbitration option may also be made available to you in order to address residual complaints not resolved by any other means.

Inquiries

If you have questions about this Policy or questions about the Personal Information which McKesson may collect, use or share, you may contact us at privacy@mckesson.com. If you are an EEA Worker and have questions about this Policy or questions about HR Personal Information McKesson collects, uses or shares about you, or would like to access or update that information, you may contact your manager, your local HR manager, your legal or compliance contact or privacy@mckesson.com. McKesson will respond to all inquiries, concerns or complaints within 45 days.

Changes to this Policy

This Policy may be amended from time to time. McKesson will provide appropriate notice about any material amendments before they become effective.

Key Definitions for this Policy:

Customer Personal Information means any information, other than in the HR context that is 1) transferred from the EEA to the US; and 2) identifies or can be used to identify an individual. This information may be about a Customer's employees and/or patients and may include identifiers such as name, contact information, user access activity data, support records, images, device/location identifier and individual identification numbers.

EEA Business Partners means any natural or legal person in the European Economic Area that does or proposes to do business with McKesson or Change Healthcare. EEA Business Partners may include service providers, vendors, distributors, re-sellers and/or alliance and teaming parties. This excludes an affiliate of McKesson or its workforce, an EEA Customer or its patients, or any other person that acts in the capacity of an EEA Customer or its patients.

EEA Customer means a natural or legal person in the European Economic Area that has procured or proposes to procure products and/or services from Change Healthcare.

EEA Worker refers to any person who is employed by or performs services directly for a McKesson Europe entity and from whom HR Personal Information is collected, such as employees, contractors, or temporary workers. It includes individuals who apply for positions with a McKesson Europe entity. This includes EEA Workers associated with Change Healthcare.

Human Resources (HR) Personal Information means any information, in the worker context, that is 1) transferred from the EEA to the US; and 2) identifies or can be used to identify an individual. This information may be about EEA Workers, OSWs, or candidates and may include information such as name, contact information, individual identification numbers, titles, dates, languages, family information, work status, user access activity data, internet/email/network activity data, facility security records, device/location identifiers, training records, business transactions, compensation, performance ratings, or eligibility for participation in McKesson's benefits programs.

McKesson means McKesson Corporation, its predecessors, successors, subsidiaries, affiliates, divisions and groups in the US.

McKesson Europe means McKesson Europe, its predecessors, successors, subsidiaries, affiliates, divisions and groups in the EEA.

Personal Information means any information that is 1) transferred from the EEA to the US; and 2) identifies or can be used to identify an individual. This information may include identifiers such as name, contact information, user access activity data, titles, images, device/location identifier and individual identification numbers.

Processing means any operation or set of operations performed upon Customer and HR Personal Information, whether or not by automatic means, such as collection, recording, organization storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, blocking, erasure or destruction.

Sensitive Personal Information means Personal Information, including Customer and HR Personal Information, specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships or information specifying the sex life of an individual.

Exceptions

There are no exceptions to this Policy.

Questions and contacts:

If you have questions or need more information about this Policy, contact policy@mckesson.com.