

Position on Data Privacy

Background

In the course of doing business, a company may gather personal information about individuals with whom it engages. With the major advances in digital technology and the importance of using data to drive innovation, stay connected with patients and consumers, and maintain compliance with global regulatory and safety standards, it has become increasingly important for individuals to have a clear understanding of how and when their personal information is being used. They need also to have confidence that their information is being handled appropriately and in a manner consistent with their rights and with applicable legal requirements. We believe companies have a responsibility to protect every individual's right to privacy, and to establish reasonable measures, including those prescribed by law, to ensure appropriate handling and protection of patient and consumer information in their possession.

Relevance

As the world's largest and most diversified healthcare company, employing more than 130,000 individuals and reaching billions of patients and consumers with our medicines, consumer care products and medical devices, Johnson & Johnson and its operating companies regularly receive and utilize personal information from patients and consumers to help us meet regulatory and product safety requirements, develop new medicines and medical and consumer health products, and respond to and stay connected with healthcare professionals, consumers and patients regarding our products and our Company. Our customers, consumers, website visitors, employees, clinical research participants 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. Particularly in the area of sensitive personal information such as personal health, individuals are rightly concerned that the privacy promises we make are honored. At Johnson & Johnson, we believe that safeguarding all personal information entrusted to us is essential to our business. In upholding the values of [Our Credo](#), we take our responsibility for privacy protection seriously.

Guiding Principles

As stated in [Our Credo](#): "We are responsible to our employees who work with us throughout the world... We are responsible to the communities in which we live and work and to the world community as well." These responsibilities include respecting the rights of those we touch, including their privacy rights.

Our guidelines on upholding privacy are embedded in Johnson & Johnson's [Code of Business Conduct](#): "Personal information should be collected only for legitimate business purposes, shared only with those who are allowed access, protected in accordance with security policies and retained only for as long as necessary."

Our Position

Johnson & Johnson is strongly committed to protecting the privacy of those who entrust us with their personal information. In addition to our Code of Business Conduct and all the laws that apply to our operating companies' handling of personal information, we also have global privacy policies to which all our businesses worldwide must adhere. Our policies reflect our commitment to fair and transparent information practices. We do this by:

- Acting in compliance with all applicable laws—as they apply globally, regionally or locally—everywhere in the world. Each Johnson & Johnson operating company is responsible for complying with all applicable privacy obligations. Obligations may derive from:
 - Country, regional or local laws and regulations;
 - Johnson & Johnson Corporate Policies applicable to the processing of Personal Information, such as Privacy Policies and guidance issued by the Privacy organization;
 - Policies specific to a Johnson & Johnson operating company; and
 - Contractual or other agreements by which a Johnson & Johnson operating company is bound, including privacy statements and consents.
- Collecting only the personal information that is necessary for the conduct of our business, and storing it for the minimum period of time possible.
- Using personal information only for the purpose for which it was collected, and for which permission was granted during disclosure of the information by the individual.
- Maintaining appropriate security systems for use and processing of personal information, supported by encryption, anonymization or other appropriate measures to help ensure that personal information cannot be accessed by unauthorized persons nor be improperly disclosed.
- Training our staff on privacy principles and appropriate ways to gather, store, use and then delete personal information.
- Regularly monitoring the external environment and updating our practices in accordance with new requirements or changes in the law of the countries in which we operate.
- Helping individuals who interact with our operating companies understand how personal information about them will be collected, used and disclosed. Whenever possible, we explain how personal information can be corrected, updated or deleted.

Application

This position is relevant for all employees and Companies in the Johnson & Johnson Family of Companies, as detailed in our [governance materials](#). We provide updates relating to privacy in our annual [Health for Humanity Report](#).

Please note that we also publish a Privacy Policy for users of the Johnson & Johnson website, which can be found [on this page](#); and all Johnson & Johnson operating company websites have relevant privacy policies.

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