



Data Subject Request Policy

Table of Contents

I. Overview	3
II. Scope	3
III. Definitions	3
IV. Receiving & Processing Requests	4
V. Types of Requests	4
VI. Request Intake and Identity Verification	4
VII. Determining Obligation to Comply with Request.....	4
VIII. Fulfilling Requests	5
IX. Non-Discrimination	5
X. Recordkeeping	5
XI. Compliance & Training.....	5
XII. External References	5
XIII. Revision History	5



I. Overview

The purpose of this Data Subject Request Policy (“Policy”) is to govern Bioventus’ compliance with laws relating to Data Subject Requests (“DSRs”) including, without limitation, the European Union General Data Protection Regulation (“GDPR”), the California Consumer Privacy Act (“CCPA”), and other applicable international and US state privacy laws.

This Policy supplements Bioventus’ Global Data Protection & Privacy Policy and incorporates all definitions, principles, and processes from the Global Data Protection & Privacy Policy, unless otherwise stated.

II. Scope

This Policy applies to all Bioventus Personnel and to all potential channels of communications from Data Subjects.

III. Definitions

“Applicable Laws” means laws governing data privacy and protection, data security, data breach notification, and deletion of Personal Data applicable wherever Bioventus does business.

“Bioventus” means Bioventus, LLC and its subsidiaries and affiliated entities.

“Controller” means the company that determines why, when, and how to Process Personal Data.

“Data Subject” means an individual whose Personal Data is Processed (whether by Bioventus or by a third party on Bioventus’ behalf). Various laws use different terms for similar concepts, such as “Consumer,” “Patient,” or “Identified Individual.” Data Subjects may include Bioventus customers, employees, and service providers.

“Data Subject Request” (“DSR”) means a request made by a Data Subject or a Data Subject’s authorized representative relating to the Data Subject’s Personal Data that Bioventus controls. DSRs have various names under local laws, including “Consumer Access Request,” “Customer Information Request,” “Individual Access Request,” or “User Information Request.” All of these and similar requests are considered DSRs under this Policy.

“Delete” means erase, anonymize, or aggregate Personal Data such that the Personal Data can no longer be associated or identified with a Data Subject through any means or in combination with any data set, key, or identifier.

“Information Hold” means a notification from the Bioventus Legal Department or its outside counsel to Personnel instructing them not to Delete information.

“Personal Data” means any information related to an identified, or reasonably identifiable, living person. Specific legal definitions of “Personal Data,” “Personally Identifiable Information,” “Personal Information,” “Protected Health Information,” and “Nonpublic Personal Data” are all Personal Data under this Policy.

“Personnel” means any Bioventus employee, agent, contractor, or other third party subject to Bioventus policies.

“Privacy & Data Protection Committee” means the sub-committee of the Bioventus Compliance Committee established by the Bioventus Privacy Committee Charter.

“Privacy Officer” means the chairperson of the Privacy & Data Protection Committee or their designee.

“**Processor**” means a person or entity that Processes Personal Data on behalf of the Controller, where the Controller dictates why and how the Personal Data is Processed. Processors are sometimes referred to as service providers or vendors.

IV. Receiving & Processing Requests

Bioventus will provide readily accessible means of submitting DSRs, consistent with Applicable Laws. However, a Data Subject may submit a DSR through any communications channel, and all requests must be processed regardless of the manner of transmission. All Bioventus Personnel who receive a DSR must immediately notify the Privacy Officer.

The Privacy Officer will respond to the requesting individuals within the timelines set forth in Applicable Laws. This includes acknowledging receipt of the DSR, requesting additional verification, notifying the Data Subject of time extensions and exceptions, and completion of the DSR.

V. Types of Requests

Consistent with Bioventus’ principles-based approach to data protection, Bioventus provides all Data Subjects the following rights with respect to their Personal Data, subject to legal limitations and exceptions set forth in Applicable Laws.

- *Access*: Data Subjects have the right to request that Bioventus provide them information about the categories of Personal Data Bioventus processes about them, the purpose for such processing, and with whom Bioventus shares their Personal Data. Data Subjects may further request that Bioventus provide them with a copy of their Personal Data.
- *Correction*: Data Subjects have the right to ask Bioventus to correct or complete their Personal Data if, given the purposes for which Bioventus is processing that Personal Data, accuracy is necessary to protect the Data Subject’s interests.
- *Deletion*: Data Subjects have the right to request Bioventus Delete their Personal Data.
- *Limitation*: Data Subjects may request that Bioventus only process Personal Data for specific, lawful purposes. Additionally, Data Subjects may object to or “opt-out” of certain data processing, such as the transfer or sale of their Personal Data to third parties.

VI. Request Intake and Identity Verification

The Privacy Officer must verify the identity of Data Subjects who make a DSR. If required, the information requested from the Data Subject to verify their identity must be reasonably proportional to the nature of the DSR and must not impinge upon the rights and freedoms of the Data Subject. For example, requesting a copy of the Data Subject’s photo ID may be required for verification in limited circumstances, but in most instances a photo ID would be disproportionate to the nature of the DSR.

VII. Determining Obligation to Comply with Request

Once the DSR is received and the Data Subject’s identity is verified, the Privacy Officer, in consultation with the Bioventus Chief Compliance Officer and Bioventus Legal Team, must determine whether an exception to the DSR applies. Bioventus may elect to not fulfill or only partially fulfill a DSR if:

- A Data Subject has requested correction or rectification and the Personal Data Bioventus maintains about the Data Subject is correct;
- The DSR would require Bioventus to disclose Personal Data of other Data Subjects or third parties;
- The DSR relates to intellectual property or trade secrets;



- The DSR relates to a clinical trial and fulfilling the DSR would compromise the integrity, confidentiality, or availability of the clinical trial data and results;
- The Personal Data is required to complete a transaction or fulfill a contract with the Data Subject, comply with an Information Hold, establish a legal claim or maintain a legal defense, or comply with a law requiring that Bioventus retain the Personal Data; or
- Applicable Laws provide additional exceptions that apply.

VIII. Fulfilling Requests

After completing any required verification and establishing whether Bioventus will comply with the DSR, the Privacy Officer shall perform a system search to identify all responsive data. All Bioventus Personnel will respond promptly to requests from the Privacy Officer to search systems for Personal Data to respond to a DSR.

If no responsive data is found, the Privacy Officer shall inform the Data Subject that it holds no responsive data. If responsive data is found, the Privacy Officer, with the support of any necessary Bioventus Personnel, shall process the DSR according to the type of request the Data Subject submitted and the terms of this Policy.

If information subject to a DSR is maintained by a Bioventus Processor, the Privacy Officer, with the support of any necessary Bioventus Personnel, must coordinate with that Processor to comply with the DSR.

Where the Privacy Officer determines Bioventus cannot completely fulfill the DSR, the Privacy Officer may partially fulfill the request, if possible.

IX. Non-Discrimination

Bioventus will not discriminate against any Data Subject for making a DSR.

X. Recordkeeping

The Privacy Officer shall maintain records of all DSRs and Bioventus’ responses to DSRs for at least three years.

XI. Compliance & Training

All Bioventus Personnel must comply with this Policy. Failure to do so may result in disciplinary action, up to and including termination of employment, subject to applicable law.

The Privacy Officer will provide training to all Personnel on the contents and requirements of this Policy.

XII. External References

- Bioventus Privacy & Data Protection Policy
- Bioventus Data Processing Policy
- Bioventus Records Management Policy

XIII. Revision History

Date of Change	Summary of Change	Sponsor(s)
XX/XX/2023	Initial publication	Katrina Church, Chief Compliance Officer

