

## **Bioventus Employee Privacy Notice**

Last updated: July 16, 2024

### **Introduction**

At Bioventus we are committed to maintaining the accuracy, confidentiality, and security of your personal data. This Privacy Notice describes the personal data that Bioventus collects from or about you, how we use your personal data, and to whom we disclose that data. This Privacy Notice also describes your rights regarding your personal data.

### **Scope**

All references in this Privacy Notice to “Bioventus,” “we,” “us,” “our,” and like terms should be interpreted accordingly.

This Privacy Notice applies to the personal data of all individuals who are or were employed by Bioventus (collectively, “employees”). For information about job applicants, please refer to the Privacy Notice on our recruitment website: <https://www.bioventus.com/bioventus-job-applicant-privacy-notice/>.

Bioventus is the “controller” of employee data as that term is defined by the European Union (“EU”) General Data Protection Regulation (“GDPR”).

### **Policy of Compliance**

It is Bioventus's policy to comply with the privacy laws within each jurisdiction in which we operate. This Privacy Notice describes how Bioventus handles your personal data and complies with those laws.

### **What is Personal Data?**

“Personal data” is any data about an identified or reasonably identifiable individual. Personal data does not include anonymous information (i.e., information that cannot be associated with or tracked back to a specific individual).

### **What Personal Data Do We Collect?**

We collect and maintain different types of employee personal data. To carry out our activities and obligations as an employer, we may process the following types of personal data:

- Personal identifying and contact details, such as name, title, home address, phone number, personal email address, date of birth, and signature;
- Marital and dependent status where required to administer benefits;
- Beneficiary and emergency contact information;
- Government identification numbers such as Social Security number, driver’s license or state ID numbers, and similar information for your dependents and beneficiaries;
- Payroll and expense reimbursement information;

- Compensation and work performance history;
- Employment details, such as your job title, tenure, and employment contract;
- Education, training, and employment history, including information from resumes, job applications, and references;
- Videos and photographs;
- Sensitive demographic information (where required by law), such as race, ethnicity, sexual orientation, gender, and disability information; and
- Any other information you voluntarily provide.

### **How Do We Collect Personal Data?**

Most often, we collect employee personal data directly from our employees. We also collect some employee personal data automatically through our technology systems, such as our Information Technology (“IT”) and security monitoring software as well as our systems’ activity and audit logs.

In some cases, we may collect personal data about employees from third parties, such as when we perform background checks. In most circumstances, we will get your permission before we collect personal data about you from a third party.

### **Why Do We Collect Personal Data?**

The personal data collected is used and disclosed for our business purposes, including establishing, managing, or terminating your employment relationship with Bioventus. Bioventus processes your personal data for the following legitimate business purposes and/or for the purpose of performing the employment contract with you:

- Employee administration (including payroll and benefits administration);
- Business management and planning;
- Processing employee work-related claims (for example, insurance and worker’s compensation claims);
- Accounting and auditing;
- Conducting performance reviews and assessing qualifications for a particular job or task;
- Communicate with employees and their emergency contacts and plan beneficiaries;
- Education, training, and development;
- Fraud prevention;
- Network and information security, including preventing unauthorized access to our IT systems;
- Gathering evidence for disciplinary action or termination; and
- Complying with applicable law, including health and safety obligations.

If we use your personal data for lawful purposes other than those described above, we will inform you and, where required, obtain your consent prior to using your personal data for those additional purposes.

## **Monitoring**

As a reminder, everything you create at Bioventus, whether it is on paper, computer files, or any other format, belongs to the company. We can always check and monitor this work, including potential monitoring of your computer and email use.

## **When Do We Disclose Your Personal Data?**

We are careful about who gets to see your personal data. Only people who need it to do their jobs, and third parties who have a good reason for it, can access or receive it.

Bioventus will share your personal data within the company to manage your employment and to conduct necessary business operations.

Bioventus may share your personal data with third parties. For example, we share your personal data with payroll and expense reimbursement providers, and we use a third-party HR management tool to maintain your employment records. We also share your data with benefits providers. In some situations, we may be compelled by law to disclose your personal data to government and public authorities, including to meet national security or law enforcement requirements. Similarly, Bioventus may share your personal information with a law firm or auditor to comply with the law or to protect Bioventus's legal rights.

When we share data with third parties, we make sure they only use or share your personal data as we have instructed and in a way that complies with this Privacy Notice. We have contracts with third parties to ensure they keep your personal data confidential and have the right data privacy and security measures in place.

We may also disclose your personal data to a third party with your consent.

## **We Don't Sell Your Information**

We will not sell your personal data, including any sensitive personal data, we collect about our employees or share it with third parties for cross-context behavioral advertising.

## **Does Your Personal Data Leave the Country?**

We may send your personal data outside of your home jurisdiction, either to other Bioventus employees or to third parties, and as a result, your personal data may be used, processed, or stored in the United States of America or other countries that do not provide the same level of data protection as your home country. Bioventus implements additional safeguards to secure the transfer of your personal data to the United States and other jurisdictions.

## **How Is Your Personal Data Protected?**

At Bioventus, we care about keeping your personal data safe. We use appropriate technical and organizational security measures to protect your personal data. But remember, no system or security measure is perfect. While we strive to protect your personal data, we cannot promise that things like unauthorized access, hacking, data loss, or a data breach will never happen. If something like that does happen, you can be sure that we, and any

third parties involved, will take the appropriate steps to limit the damage to you and your personal data.

### **How Long Is Your Personal Data Retained?**

Bioventus will keep your personal data only as long as needed to fulfill the purposes for which it was collected, unless the law says we need to keep it longer. This is to make sure we meet our legal, accounting, and business obligations. Instead of deleting your data, we may make it anonymous by removing any details that can link it back to you.

### **What Are Your Rights?**

Generally, you have the right to access, correct, update, or request that Bioventus erase the personal data we hold about you. Where we have collected or used your personal data for a specific purpose with your express consent, you may withdraw your consent at any time.

Furthermore, if you live in the European Economic Area, you have certain additional rights in relation to your personal data, such as the right to object to the processing of your personal data, the right to not be subject to a decision based solely on automated processing, ask us to restrict the processing of your personal data, or request portability of your personal data.

In some circumstances, Bioventus may not be able to completely fulfill your request or objection. If this is the case, Bioventus will provide an explanation to you. To exercise any of these rights, please contact the Compliance team at [privacy@bioventus.com](mailto:privacy@bioventus.com).

### **Inquiries or Concerns?**

If you have any questions, complaints, or comments about this Privacy Notice or Bioventus' data protection practices or you would like to exercise your rights, please contact Bioventus' Compliance Team at [privacy@bioventus.com](mailto:privacy@bioventus.com).

Bioventus has also appointed an external, independent Data Protection Officer to oversee compliance with the Bioventus Privacy Program. You may contact the DPO at:

Amy R. Worley  
[aworley@thinkbrg.com](mailto:aworley@thinkbrg.com)  
+1 704-806-6542

If you are unsatisfied with our response, you may be entitled to file a complaint with the Data Protection Authority for your jurisdiction.

Additionally, the Dutch Data Protection Authority is our lead supervisory authority for the processing of personal data of individuals in Europe. European residents may lodge a complaint with the Dutch Data Protection Authority through their website: <https://autoriteitpersoonsgegevens.nl/en> or by mail at:

Autoriteit Persoonsgegevens  
PO Box 93374  
2509 AJ Den Haag