

Corporate Policy 11

Employee Privacy Principles

Purpose

To establish the principles that will guide how we will protect the privacy of personal information collected in the employment relationship.

Scope

This Policy applies to all Stryker employees at all Stryker locations to the extent permitted by applicable law. If any provision of this policy does not comply with local law applicable to a particular Stryker business unit, that business unit will revise this Policy to comply with applicable local law and/or implement a separate policy to comply with local law, provided that the revised policy will, to the greatest extent possible, conform with the principles contained within this Policy. All provisions of this Policy that comply with local law will remain in effect.

At Stryker we strongly believe in the privacy of personal data and particularly protecting the information collected in the employment relationship. We also value the trust our employees place in Stryker to responsibly manage information about them. That is why we have adopted these privacy principles to guide our collection, use, release and retention practices and the accuracy and security of the personal information we hold about prospective, current and former employees.

Our employees play an important role in the protection of that information by adhering to these principles. We also expect our employees' assistance to ensure that the personal information that we hold about them is accurate and up-to-date.

By following these principles, we are committed to complying with the applicable laws and regulations protecting the privacy of personal information in the countries in which we operate. In addition, our businesses worldwide may establish and maintain a separate policy to conform to local law. However, these local policies are consistent with the Fair Information Practices, the widely-accepted standards of practice worldwide, which served as the basis for these principles.

Basic policies

- 1. We only collect, use and keep information that is relevant and necessary:** We limit the collection, use and retention of personal information about employees to that which is relevant and necessary to administer employee benefit plans, employment activities and services, to achieve legitimate business goals and to satisfy any legal requirements. We only keep this information for as long as we need it, or as may be required by law or regulation.
- 2. We tell our employees about the types of personal information we collect about them and for what purposes we use the information:** We tell applicants and new employees about the general types of personal information we collect about them, where the information comes from, to whom the information may be given and the employment-related and legitimate business purposes for which we collect, use and retain the information.
- 3. We obtain the employee's consent for the collection, use or disclosure of personal information when the employee has the legal right to refuse to provide that personal information:** In many cases, personal information is necessary for the employment relationship or for compliance with the law, and consent is not required to collect and use that information. However, when the employee's consent is required, such as to collect or transfer personal information in order to provide certain benefits to the employee, we will obtain the employee's consent.
- 4. We keep employee information complete, accurate and up-to-date:** We make reasonable efforts to ensure that the personal information we collect and use about employees is complete, accurate and up-to-date. We take reasonable steps to ensure that third parties that provide us with personal information adhere to high standards of quality. All employees have a responsibility to assist us in keeping certain types of information we have about them complete, accurate and current.
- 5. We tell employees how they can access the personal information we have about them:** Employees can access certain personal information we hold about them through their local human resources representative.
- 6. We safeguard the security and confidentiality of personal information:** We take reasonable steps to limit access to employee personal information to those individuals who have a legitimate business need for the information in the performance of their job responsibilities. We make substantial effort to ensure that appropriate administrative, technical and physical safeguards are used to protect the confidentiality and security of personal information.

- 7. We only disclose employees' personal information outside of Stryker for legitimate business purposes:** We only disclose personal information about employees to companies outside of Stryker for legitimate business purposes, as required by law or legal process or to protect the interests of Stryker employees.
- 8. Organizations retained to provide services are required to keep Stryker employees' personal information confidential and secure:** We often engage other companies to provide services on our behalf such as to administer health insurance claims or process payroll. We require that these companies do not use personal information provided to them by Stryker in any way other than that for which they were engaged, and that they protect the security of personal information.
- 9. We hold ourselves responsible for complying with these Privacy Principles and applicable law that protects the privacy of employees' personal information:** All employees who handle personal information about other employees are required to comply with these Principles and any applicable law that protects the privacy of employees' personal information. Employees who violate these Principles, or applicable laws, are subject to disciplinary action, up to and including termination. We provide awareness programs and training designed to educate employees about the meaning and requirements of these privacy principles and applicable laws. Employees are expected to report violations they know about to their manager, to a Human Resources representative, to a compliance officer, or through the Ethics Hotline. To the extent possible, we will keep these reports confidential. We also will conduct internal assessments of our privacy practices and periodically commission outside expert review of our compliance with these privacy principles, and any applicable laws, and the specific policies and practices that support these principles.
- 10. Questions:** If you have a question about these privacy principles or procedures relating to these principles, or if you have a complaint regarding the privacy of personal information, please contact your local Human Resources representative, a compliance officer, or the Legal department.