

**Eli Lilly and Company**  
**US HR Privacy Notice**  
**Version 2.1 – 3/30/06**

Eli Lilly and Company collects and uses personal information about individuals for a variety of business purposes. This notice is specifically designed to explain our privacy practices to those individuals about whom Lilly collects and uses personal information due to a human resources (HR) connection to the company. Lilly is committed to processing the personal information of these individuals in accordance with our Global Policy on Information Privacy and Security.

### **Scope**

This notice applies to members of the Lilly “workforce” which refers to job applicants, active and inactive Lilly employees, former employees, retirees, dependents, beneficiaries, and other individuals about whom Lilly collects personal information for HR-related purposes. This notice also covers employees of Lilly’s third-party vendors and partners, such as contractors on assignment at Lilly and collaborators. The scope of this notice does not apply to “protected health information” as defined by the Health Insurance Portability and Accountability Act (“HIPAA”) obtained by Lilly’s Employee Health Services or The Eli Lilly and Company Health Plan. Those entities maintain separate policies and procedures relating to the collection, use and disclosure of such health information.

### **How We Obtain Personal Information**

We collect only the information we need for business purposes. In most cases, we obtain personal information directly from you, such as on job applications, on-line forms, and through interaction with you regarding your benefits, employment, etc. or from your employer for purposes of your work with Lilly.

We also collect some personal information about you from others, such as in connection with background checks, performance evaluations, investigations of possible misconduct, or where we need to locate a former employee or beneficiary to administer our benefits plans. In each case, we collect information only from sources that we believe to be reputable, and we comply with all applicable laws.

Some information about you is collected via our systems. For example, information about which buildings you access is generally collected through our security badge system and/or video surveillance systems. Information about your computer systems activity is collected through our IT systems. HR and/or financial systems may collect information about training you have taken, benefits used, time worked, pay amounts issued, expenses charged, etc. Lilly procedures govern the appropriate use of systems data for routine business purposes and trouble-shooting. In addition, we have procedures governing any necessary approvals before accessing information from the electronic or physical workspace associated with an individual for investigative purposes or review of a person’s assignment at Lilly.

## **How We Use Your Information**

Lilly uses your personal information for relevant, appropriate, and customary HR-related purposes, such as: (1) recruiting and job placement; (2) administration of compensation and benefit programs; (3) performance management and training; (4) succession management; (5) workforce and risk management, (6) routine supervision and corporate communications and (7) other legal and expected business-related purposes including cooperation with internal and government-initiated legal, policy or regulatory compliance investigations as well as government reporting. For Lilly third party vendors and partners, your personal information is used for relevant, appropriate, and customary HR-related purposes, such as (1) your assignment at Lilly; (2) administration of payments to your employer; (3) training requirements for a particular assignment; (4) risk management, etc. and other legal and expected business-related purposes as described above.

Lilly uses *sensitive* personal information (such as social security numbers and bank account numbers) where needed to comply with laws, Lilly's corporate policies and/or processes, or to offer benefits (such as direct deposit). Any other uses of sensitive personal information will occur only with your approval or "consent." Additionally, the collection and use of sensitive personal information is governed by specific procedures such as the Global Use of U.S. SSN Procedure.

## **Information Security**

Lilly takes reasonable and significant steps to protect your personal information from misuse as well as unauthorized access. We have created a global privacy program, we have named a Chief Privacy Officer, we have implemented a global privacy policy, and we have adopted physical, technical and administrative security measures to help ensure that all personal information is protected according to the sensitivity of that information. We also take reasonable steps to protect your information when it is being transferred within Lilly and to our benefits providers and other vendors, including those employers of contractors on assignment at Lilly.

## **When We Share Your Information with Others**

Within Lilly, your information will be shared only with those who have a Lilly business need to access the information.

Beyond Lilly, we will share your personal information as appropriate to other entities that process information on Lilly's behalf, such as benefits providers. Where your information is shared with a third party vendor, Lilly takes various steps to assure that the vendor has appropriate safeguards in place to protect the data, including contractual provisions, privacy certification, and/or periodic audits. We will disclose personal information about you where we are legally required to do so or when doing so is necessary to protect the health and safety of you or other individuals or the vital interests of the company, such as to government agencies or when compelled by a subpoena or court order or to your designated emergency contact in the event of an emergency.

Where your information is shared with a third party, Lilly takes reasonable steps to assure that the transfer is done in a secure manner.

## **How You Can Access and Update Your Information**

Lilly makes much of the personal information that we hold about you available to you via the Lilly intranet, HR Direct, your recruiting contact, or your employer (in the case of third party contractors and partners). We rely upon you to keep your information up-to-date, complete, and accurate. Should you have a question about your personal information beyond that which you can access directly, please contact an HR Privacy Champion (full list available on the Virtual Privacy Office on the Lilly intranet), your recruiting contact, or your employer (in the case of third party contractors and partners).

## **How We Dispose of Information**

Eli Lilly and Company has a records management policy that covers the appropriate retention and eventual destruction of corporate records, including those containing your personal information, according to a corporate-approved schedule.

## **If You Have Questions or Concerns**

The HR Privacy Office manages the privacy program that applies to the HR-related personal information and welcomes questions about how we use and protect your personal information. We will also work with you or through your employer to try to address any reasonable concerns that you may have. A significant number of privacy resources are available internally at Lilly via the company intranet under the listing "Virtual Privacy Office" or VPO, including the complete Global Policy on Information Privacy and Security. Concerns may be sent to the HR Privacy Office in the following ways:

- 1) via the VPO (Report a Concern)
- 2) via an HR Privacy Steward
- 3) by calling HR Direct (877-676-4745)
- 4) by contacting your recruiting contact
- 5) Via your employer (third party contractors and partners)
- 6) Via US Mail:

HR Privacy Office  
Drop Code 1725  
Lilly Corporate Center  
Indianapolis, IN 46285