

## DATA PROTECTION AND DATAPRIVACY NOTICE

The data privacy regulations of some countries require that a person making a report containing personal data must be notified of certain collection and retention practices regarding the information submitted by that person and must accept the terms and conditions for the use of this helpline service.

You are being asked to read and accept the terms and conditions contained in this Data Protection and Data Privacy Notice (the "Notice"). If you do not wish to accept the terms below, we are unable to accept any information through this helpline system and suggest you report this matter directly to your supervisor or manager or to a representative of Human Resources, Legal, or Ethics & Compliance depending on the nature of the possible violation.

### 1. General

Alnylam Compliance Helpline ("Helpline") is a web and phone-based intake system provided by Alnylam Pharmaceuticals, Inc., 300 Third Street, Cambridge MA 02142 ("Alnylam") to its employees, vendors, suppliers and business partners, and those of its subsidiaries ("Reporters") for reporting suspected violations of laws or regulations, or company policies related to financial, accounting, auditing and bribery matters.

Alnylam will be responsible as data controller for the processing of any personal data collected or otherwise processed via the Helpline.

The Helpline system is provided by Convercent, a software provider, which will also be responsible for the maintenance and support of the Helpline and thus, acting as a data processor for and on behalf of Alnylam. Convercent's Terms and Conditions and Privacy Notice are also applicable to the Helpline and can be found at <https://www.convercent.com/>.

In certain countries, such as the United States, the Helpline may also be used to report suspected violations of other matters. The Helpline and the database in which the personal data and information that you may report is stored, are operated in the United States by Convercent.

You may contact Alnylam's Privacy Office with any questions relating to this Notice or this Helpline service as follows:

In the US: [privacy@alnylam.com](mailto:privacy@alnylam.com)

In the EU/EEA/UK/CH: [EUdataprivacy@alnylam.com](mailto:EUdataprivacy@alnylam.com)

In Brazil: [brasilprivacidade@alnylam.com](mailto:brasilprivacidade@alnylam.com)

Please note that we are able to receive and process reports through the Helpline if you confirm that you have read and taken note of this Data Protection and Data Privacy Notice by agreeing to the processing of the reports and your personal information as described below by clicking the I AGREE box. You will then be able to submit a report or question using the Helpline or otherwise, report this matter directly to the above mentioned stakeholders.

### 2. Use of the Alnylam Helpline

Use of the Alnylam Helpline is entirely voluntary. You are encouraged to report possible violations directly to your manager, or to a representative of Human Resources, Legal, or

Ethics & Compliance, depending on the nature of the possible violation. If you feel that you are unable to do so, you may use the Helpline to make your report.

The Helpline is a confidential online reporting system that allows you to report suspected violations of law or company policies, as well as other concerns you may have, to Alnylam. In certain countries, Alnylam may only accept reports through the Helpline that relate to some or all of the following: financial, accounting, auditing, bribery, competition law, discrimination and harassment and environment, health, hygiene, and safety matters. If your concern pertains to a matter that, under local law, may not be accepted by Alnylam through the Helpline, you will need to contact your manager or local management or a representative of Human Resources, Legal, or Ethics & Compliance to report the matter.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the Alnylam's operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation from Alnylam for any report of a suspected violation that is made in good faith, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated. The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or to conduct an investigation, in which case the information will be handled sensitively. We encourage you to identify yourself in order for us to follow up with questions we may have.

### **3. What personal data and information is collected and processed?**

The Helpline captures the following personal data and information that you provide when you make a report in accordance with applicable laws and regulations:

- (i) your name and contact details, unless you report anonymously where applicable and your employee ID number, if you are employed by Alnylam;
- (ii) the name and other personal data of the persons you name in your report if you provide such information (i.e.: description of functions and contact details); and
- (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident.

Note that depending upon the laws of the country in which you are residing, the report may not be made anonymously; however, your personal data will be treated confidentially and will only be disclosed as set out below.

### **4. How will the personal data and information be processed after your report and who may access personal data and information?**

The personal data and information you provide will be stored in a database which is located on servers hosted and operated in the United States by Convercent. Convercent has entered into contractual commitments with Alnylam Pharmaceuticals to secure the information you provide in accordance with applicable laws. Convercent is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.

For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide may be accessed, processed and used by the relevant personnel of Alnylam, including Human Resources, Finance, Internal Audit, Legal, Ethics & Compliance, management, Board members, external advisors (e.g.,

legal advisors), or, in limited circumstances, by technical staff at Convercent. Those individuals may be located in the United States, the United Kingdom or elsewhere.

Personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities subject to local requirements. The relevant bodies that receive and process personal data can be located in the US or in another country that may not provide the level of data protection available in the EU.

## **5. Accessing information concerning the report**

Alnylam will promptly notify any person who is the subject of a report to the Helpline except where notice needs to be delayed ensuring the integrity of the investigation and preservation of relevant information.

With some exceptions, as required by local law, the subject of the report may access information concerning the report (except for the identity of the reporter) and request correction of personal data that is inaccurate or incomplete in accordance with applicable law. Similarly, with some exceptions, reporters may also access information about the report and request corrections of their personal data in accordance with applicable law. To make any such corrections, please contact the General Counsel or the Global Head, Ethics & Compliance. Alternatively, you can always contact the Privacy Office as indicated above.

## **6. Legal Basis for Processing**

Alnylam will collect and process all your personal data collected for ethical reporting purposes to the extent strictly needed for Alnylam to comply with its legal and regulatory obligations as per the applicable law and regulations in the territory in which you are making the report, including those on whistleblowing, and data protection and data privacy.

In the absence of an established national legal or regulatory obligation, Alnylam shall rely on its legitimate interests to collect and process personal data relating to the reporters and the report for the purpose of maintaining an ethical and compliant workplace and to comply with its internal Code of Ethics and supporting compliance policies.

## **7. Retention of the Report and of Your Personal Data**

Your report and your personal data will only be retained for as long as they are needed for the investigation of your allegations and for any legitimate follow-up to the investigation in accordance with the applicable data protection laws and regulations; such records will be fully and securely destroyed or erased when and as soon as they are no longer needed for the investigation of the report, or for the purposes of any legitimate follow-up to the report (including legal action) or for compliance and auditing purposes, in compliance with local legal or regulatory retention requirements. In the absence of a legal or regulatory requirement, such records shall be retained on the basis of Alnylam's overriding legitimate interests for as long as needed, to maintain an ethical working environment.

## **8. Your Rights**

Alnylam will fully support you in the exercise of any rights you may have as a data subject under applicable law, i.e., your:

- right of access to your data;
- right to rectification of incorrect data;
- right to erasure of data (“right to be forgotten”);
- right to ask for restriction (“blocking”) of contested data;
- right to have third parties who received incorrect, incomplete or contested data informed of any rectifications or blocking of your data;
- right to data portability;
- right to object to processing;
- right not to be subject to automated decision-making including profiling (in fact we will not use your data or any information in your report for such decision-making).

We will only restrict any of the above rights if and to the extent that that is necessary and proportionate in order to safeguard any of the major public interests recognized in applicable law such as the protection of criminal investigations or public security, or to protect the fundamental rights and freedoms of others, including any person(s) incriminated in your report, in accordance with applicable law.

You may contact Alnylam’s Privacy Office to exercise any of your privacy rights as follows:

In the US: [privacy@alnylam.com](mailto:privacy@alnylam.com)

In the EU: [EUdataprivacy@alnylam.com](mailto:EUdataprivacy@alnylam.com)

In Brazil: [brasilprivacidade@alnylam.com](mailto:brasilprivacidade@alnylam.com)

In addition to the rights listed above, you may also have the right to lodge a complaint about our processing of your personal data with the authority competent for supervising the processing of personal data (often referred to as the data protection authority) in the country of your residence or place of work (if that is inside the EU/EEA/UK/CH) or in one of the countries in which Alnylam is physically present (if you live or work outside the EU/EEA/UK/CH).

## **9. Special Country Regulations**

Throughout much of the European Union and surrounding areas, reports may be limited in topics, generally to concerns about accounting, auditing, bribery, competition law, discrimination and harassment and environment, health, hygiene, and safety matters. Further, some countries restrict reports such that only employees in key or management functions may be the subject of a report.

Any issues or concerns relating to topics not permitted by law to be reported via the Helpline should be reported directly to your manager or a representative of Human Resources, Legal, or Ethics & Compliance as appropriate for the subject matter of the possible violation. In some countries, anonymous reports may not be permitted under the law except under extremely restrictive circumstances.

I AGREE

By choosing to continue with your report, you acknowledge that you have fully read and understood the Helpline terms and conditions described above and the related processing of your personal information which is strictly necessary to allow for the most complete investigation of any claim as set out in this Data Protection and Privacy Notice.