# NOTICE REGARDING PROCESSING OF INTERNATIONAL PERSONAL DATA BY DJO'S COMPLIANCE HOTLINE

To Our Valued Employees, Customers, Independent Agents and Vendors:

DJO is firmly committed to conducting its business in a legal and ethical manner in all countries in which we do business. Towards that end, DJO has launched its International Compliance Hotline. The Compliance Hotline provides an avenue for our employees, customers, independent agents and vendors to bring reports of certain types of misconduct to the attention of DJO's management.

DJO has contracted with NAVEX Global, a third-party service provider located in the U.S. that specializes in providing compliance hotline services and takes reports submitted to the Compliance Hotline. NAVEX Global provides call center representatives who are fluent in the language of the country where the caller is located to respond to calls. NAVEX Global's representatives are available 24 hours a day/7 days per week. To contact NAVEX Global, please use the telephone number listed by country here <a href="https://www.djoglobal.com/corporate-info/compliance/hotline-contact-numbers">https://www.djoglobal.com/corporate-info/compliance/hotline-contact-numbers</a>.

## Here's what happens when you call:

- You are greeted by a friendly interviewer who will ask you for your name and contact information, city and county of residence and will document your report. Your call will not be recorded. Your personal data, such as name and contact information, will be processed for purposes of responding to your report.
- 2. For E.U.-based callers, the Compliance Hotline is permitted to handle only certain types of complaints, such as those alleging bribery or corruption, accounting or auditing fraud, or insider trading. E.U.-based callers with reports falling outside the permissible scope of the hotline will be directed to DJO's usual reporting channels, such as a local Human Resources representative for employees or DJO's Legal Department for customers, independent agents, and vendors. The documentation of reports not handled by the hotline will be archived by NAVEX Global and will not be sent to DJO.
- 3. If the report can be handled through the Compliance Hotline, the interviewer will assign a report number to you and ask you to make one call back.
- 4. The report is then relayed to appropriate management for investigation. Senior executives located at DJO's corporate headquarters in the U.S. typically will be involved in the investigation.
- 5. Using the report number and scheduled call back date given to you by the interviewer, you may call for the follow-up interview. You may be asked additional questions or asked to provide additional information.

## Confidentiality

DJO's Compliance Hotline is confidential. Your identity will not be disclosed, without your prior consent, to any person who is the subject of your report. Anonymous reports, when permitted

by E.U. law, will be accepted from E.U.-based employees only in situations where the person making the report has substantial reasons to fear retaliation. Anonymous reports from callers located outside of the E.U. will be accepted.

## No Retaliation for Calling The Hotline

DJO will not retaliate against anyone who submits a report to the Compliance Hotline in good faith, even if the investigation concludes there was no wrongdoing. However, anyone who misuses the Compliance Hotline may be subject to appropriate action.

## Data Processing and Transfer of Data to the U.S.

Personal data created or received in connection with a report to the Compliance Hotline will be processed by NAVEX Global, 5500 Meadows Road, Suite 500, Lake Oswego, OR 97035, a data processor acting under the direction of DJO, LLC, 1430 Decision Street, Vista, CA 92081 and/or the DJO subsidiary that employs the person who is the subject of the report, both of which will act as the data controller. By calling DJO's Compliance Hotline, you accept that your personal data will be processed in this way.

Information provided to NAVEX Global maybe transferred to NAVEX Global's offices located in the U.S. or to DJO's headquarters in the U.S. Both DJO and NAVEX Global have certified to the U.S.-E.U. and U.S.-Swiss Safe Harbor Agreements to provide an adequate level of protection for personal data received from the E.U.

The personal data collected through the Compliance Hotline will not be kept any longer than is necessary to investigate the report and for any related proceedings.

## Rights of the Subject of a Report

DJO will promptly notify any person who is the subject of a report to the Compliance Hotline except where notice needs to be delayed to ensure preservation of relevant information. The subject of the report has the right to access information concerning the report (with the exception of the identity of the complainant) and to request correction of personal data that is inaccurate or incomplete in accordance with applicable law. The notice will inform the subject of a report on how to exercise these rights.

Customers, independent agents, and vendors who submit a report to the Compliance Hotline also have the right to access information about them and to request corrections in accordance with applicable law. To exercise these rights, please contact Bradley Tandy, DJO EVP, General Counsel and Secretary at <a href="mailto:brad.tandy@djoglobal.com">brad.tandy@djoglobal.com</a>.

Should you have any questions about this communication, please feel free to contact Kim Tyrrell-Knott, SVP, Chief Compliance Officer and Government Relations, at <a href="mailto:kim.tyrrellknott@djoglobal.com">kim.tyrrellknott@djoglobal.com</a>.