# TOPPAN MERRILL

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Advancing business.
Expanding possible.
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## Legal Compliance and Privacy

Toppan Merrill adheres to a range of applicable laws and regulations based on the diverse industries within which our clients operate. We have a robust privacy program that protects clients' sensitive data such as Protected Health Information (PHI) and Personally Identifiable Information (PII). To identify and address organizational risk, Toppan Merrill utilizes an internal Enterprise Risk Management (ERM) committee to address risk from a cross-functional perspective.

#### **EU-US Data Privacy**

- Toppan Merrill maintains compliance with the EU-US Data Privacy Framework (EU-US DPF) and the UK Extension to the EU-US DPF Principles regarding the collection, use and retention of personal information as well as the notice, choice, onward transfer, security, data integrity, access and enforcement requirements from European Union member countries as well as the United Kingdom.
- <u>https://www.dataprivacyframework.gov/list</u>

#### **Compliance and Training**

- Toppan Merrill's operations are designed to manage PHI in compliance with the Health Insurance Portability and Accountability Act (HIPAA).
- Toppan Merrill complies with The General Data Protection Regulation (GDPR) and the California Privacy Rights Act (CPRA) – as well as other privacy laws and regulations. Our privacy notice can be found here: <u>https://www.toppanmerrill.</u> <u>com/privacy-notice/</u> We monitor the ever-changing privacy legal landscape on an ongoing basis.
- Toppan Merrill ensures that its employees and non-employee laborers (contractors, consultants and temporary workers) have been trained in handling sensitive data and are bound to maintain that data's confidentiality and security.
- Annual legal compliance training ensures employees and non-employee laborers are aware of their obligations in handling sensitive data throughout the various phases of operation.

#### **Enterprise Risk Management**

• Toppan Merrill's Enterprise Risk Management (ERM) function includes a committee of cross-functional designated leaders from across the globe who meet regularly to manage organizational risk, including the ever-changing legal landscape in areas critical to our clients' operations. Members present risks on behalf of their functional areas to be evaluated from a cross-functional perspective. The collective group is responsible for determining recommended solutions to mitigate risk. ERM representatives directly report risks, recommendations, and outcomes to Toppan Merrill's Executive Leadership.



### Health Insurance Portability and Accountability Act (HIPAA)



General Data Protection Regulation (GDPR)



California Privacy Rights Act (CPRA)

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