

CAREER SITE PRIVACY POLICY

Version 3.0. Last Revised: 7/17/2017

This Privacy Policy is provided by Express Scripts Holding Company ("**Express Scripts**", "**we**", "**us**" or "**our**") to visitors ("**you**" or "**your**") who use the Career site available through <https://careers.express-scripts.com> (the "**Site**"). This Site is provided to you as a service to facilitate applying for positions with various subsidiaries of Express Scripts Holding Company and includes the Career Website. The "**Career Website**" is a registration-only account portal available through the Site that enables Registered Users to apply for positions with the Express Scripts. "**Registered Users**" are individuals that have completed the registration process to obtain login credentials for the Site. This Site is operated from within the United States of America in accordance with its laws which may differ from the laws of your country if you are located outside the United States.

We are firmly committed to protecting the confidentiality and security of your Personal Information. The term "**Personal Information**" means any information which can be used to identify a person including by way of example, but not limitation, name, date of birth, mailing address, home phone number, mobile phone number, e-mail address, title, current employer, prior employment history, job qualification requirements, Social Security number or foreign equivalent (where permitted) and/or any device ID (such as your IP address), either by itself or when linked with other Personal Information.

For at least individuals residing in the European Union and United Kingdom, we comply with applicable data protection legislation for your use of the Site, including European data protection laws. Express Scripts operates the Site and is the data controller in respect of your Personal Information for the purposes of European data protection law. In accordance with these laws, we have appointed UBC Late Stage (UK) Limited (26-28 Hammersmith Grove, London, W6 7HA (UK)) as our representative in Europe.

COLLECTION, USE, AND DISCLOSURE OF PERSONAL INFORMATION

Career Website Registration

Registration is optional; however, Registered Users are provided access to the Career Website and the ability to electronically apply for positions with Express Scripts, as well as the ability to login to the Career Website when revisiting the Site. When you register as a Registered User, the Personal Information required to be submitted is limited to information that is reasonably necessary to allow you access to and use of the Career Website. Once you are a Registered User, you may be required to provide additional Personal Information as necessary to apply for positions with Express Scripts. If you apply for a position with Express Scripts using your LinkedIn profile, we may receive and import your name, e-mail address, LinkedIn personal profile summary, job experience, job history, dates of employment, and education information from your LinkedIn profile. The Personal Information disclosed to us during registration and in connection with the services is provided strictly on a voluntary basis. However, failure to provide certain required Personal Information or other information may prevent you from applying or otherwise being considered for particular positions with Express Scripts. We may also collect Non-Personal Information during the registration process as described below.

As part of a job application, we may request collection of ethnic and/or nationality information. You have the right not to provide this information to us. When provided, we collect and process this information for diversity reporting of various aggregate employee populations and internal diversity knowledge of our employee population.

By registering on our Career Website you also consent to Express Scripts using your Personal Information to contact you for such matters as notifications of positions available with Express Scripts or promotion of content that may be of interest to you.

Talent Community Submission

Submission is optional; however, a user that submits Personal Information to the Talent Community (“**Registered Community Member**”) seeks to receive from us automatic and/or customized notification of positions available with Express Scripts. When you submit your information as a Registered Community Member, the Personal Information required is limited to information that is reasonably necessary to notify you of available positions of interest. The Personal Information you disclose to us during submission is provided strictly on a voluntary basis. However, failure to provide Personal Information in combination with this submission will exclude you from utilizing the Talent Community. By registering for our Talent Community, you also consent to Express Scripts using your Personal Information to contact you for such matters as notifications of positions available with Express Scripts or promotion of content that may be of interest to you.

We may thus use your Personal Information to communicate with you regarding opportunities matching your interests. We may also collect Non-Personal Information during the submission process as described below.

Use and Disclosure within the Career Website and Talent Community

In addition to the above, we use the Personal information that we collect through the Site for the following purposes:

USE	GROUNDS FOR USE
To review job application information against future opportunities.	Legitimate interests (e.g., ensure a successful recruitment strategy)
To enable you to utilize the Talent Community so that Express Scripts can communicate with you about job opportunities.	Contractual necessity and legitimate interest grounds (e.g., ensure that our services function smoothly)
To communicate with you about opportunities matching your interests.	Individuals' consent and legitimate interest grounds (e.g., ensure you are provided with meaningful job offers)
To service your account (if you are a Registered User or a Registered Community User).	Contractual necessity, legal requirements, legitimate interest grounds
To compile statistics and analysis about the use of our Site and related services, which statistics are used to enable us to provide a better experience, features and functionality to you and other Site users.	Individuals' consent and legitimate interest grounds (e.g., ensure that our services function smoothly and we understand your interests)

Social Media

When you communicate with us through social media, or provide a comment directed at us through social media, we may use social media to communicate with you. We may also promote content of interest to you through social media. You may opt out or configure your social media account settings to limit promotion of such content.

Analytics

We may use certain in-house or third-party functionality to log and analyze your communications with us and interactions with the Site. This functionality enables us to

communicate with you about our services, and to monitor the services provided to you, so that we can improve your Site experience and address certain Site or job application related issues. These third parties will be required to protect your Personal Information in a manner consistent with this Privacy Policy. Other analytics capabilities are reflected in the description of Non-Personal Information.

Other Uses and Disclosure of Your Personal Information

We will not use or disclose your Personal Information in a manner inconsistent with applicable law or this Privacy Policy. Examples of our uses and disclosures include:

- We may collect, use, access, transmit, store, process and disclose the information obtained through your use of the Site or electronic employment related documents, including but not limited to the Personal Information you submit in connection with your employment as permitted by law. This includes the use, access, transmittal, storing, processing, and disclosure of your information by and among Express Scripts affiliate partnerships, regardless of location.
- Except as otherwise provided by this Privacy Policy and the Terms of Use, Express Scripts employees, associates, recruiters, human resources staff, managers and their designees, consultants and/or other service providers affiliated with Express Scripts who are involved in human resources/personnel supervisory or pay processing functions and website administration or maintenance will be the only individuals or entities with access to your Personal Information, except as otherwise provided by this policy or as permitted by law.
- We may use third parties to facilitate the job application process including their use in capturing and storing Personal Information and other information associated with job submissions on our behalf. The Personal Information will be shared and used as described elsewhere in this Privacy Policy.
- We may use Personal Information received from a third party (e.g., LinkedIn) to customize Site Content to provide you with a more relevant and personalized experience.
- We may use your Personal Information and Non-Personal Information in communicating with you via e-mail, facsimile, letter, text message, mobile application, through the Site via a pop-up message, or otherwise.
- We may share your Personal Information with relevant third parties, selected service providers or consultants acting on our behalf, such as, auditors, lawyers or other professional advisors. Those third parties will be required to protect your Personal Information in accordance with this Privacy Policy and will only be provided with your Personal Information when there is a legitimate business purpose.
- Statements here and elsewhere on the Site concerning the treatment of your Personal Information may not apply with respect to information already in our possession.

Compelled and Necessary Disclosures

In certain circumstances, we may be legally compelled to release your Personal Information in response to a court order, subpoena, search warrant, or law or regulation. In addition, we may disclose your Personal Information as reasonably necessary to protect the rights or property of us, our affiliates, and our users, or to enforce the terms and conditions associated with the Site including this Privacy Policy and the Terms of Use.

HOW YOU CAN CORRECT/UPDATE YOUR PERSONAL INFORMATION

Registered Users can correct or update their Personal Information by modifying their profile with us on the Career Website. Registered Community Members can correct or update their Personal Information by re-registering as a Registered Community Member on the Site. See

also the section Your Access and Rights to Personal Information for further information below.

COLLECTION, USE, AND DISCLOSURE OF NON-PERSONAL INFORMATION

Collection of Non-Personal Information (applicable to non-EU and UK individuals)

When you apply for a position with Express Scripts, join the talent community, and/or visit the Site, and during your interactions with the Site, we may collect Non-Personal Information from you. “**Non-Personal Information**” means a data element or collection of data elements that by itself cannot ordinarily be associated with a specific individual. Non-Personal Information includes by way of example but not limitation, the Internet browser or computer operating system you are using, your navigation of the Site including the pages of the Site that you access, the amount of time spent on various portions of the Site, the length and dates of your visits to the Site, and certain Site data captured through your interactions with the Site and other sites. Non-Personal Information may include information provided by you through the Site or otherwise (e.g., through a third-party site) that is not Personal Information. Certain Non-Personal Information may be collected on an aggregated, anonymous basis through web server logs, cookies, ad servers, tracking pixels, web beacons, and similar Internet tracking devices (collectively “**Tracking Mechanisms**”). Web servers automatically collect Non-Personal Information, with your IP address, when you request pages of the Site or other sites. Based on certain interactions with the Site, third-party sites, mailings, other communications with us, and/or our system configurations, certain Non-Personal Information may be associated with your Personal Information such that your Non-Personal Information is identifiable with you. The ability to opt-out of certain third party associations is described in greater detail below.

Use of Non-Personal Information

The collected Non-Personal Information may be used by us and our affiliated companies for a variety of analytic and developmental purposes including to improve and enhance the Site and our products and services, to create new products and services, to customize your experience on the Site and other sites that you visit on the Internet, to identify and/or offer products, services and website functionality that may be of interest to you, and other legitimate business purposes.

We may embed tracking pixels within various pages of the Site to enable use of site analytics. The site analytics enable us to determine the usage frequency of various areas of the Site and identify areas of the Site for enhancement. While you are visiting and after you leave the Site, we may use web beacons to notify you of areas of the Site and other aspects of our organization and its affiliated companies in which you may be interested. Certain tracking pixels and web beacons may be cleared or reset through configuration of your web browser such as by clearing your cache. We may use ad servers to provide you with offers of possible interest.

We use your IP address so that we can send data (such as the pages you request) to you and collect Non-Personal Information during the process. We aggregate this Non-Personal Information with similar Non-Personal Information collected from other users to track overall visitor traffic patterns and help us understand Site usage and preferred and most frequently used pages, products and services, to provide you with better service, to improve Site use and functionality, and to provide you with information on other products and services that may be of interest to you.

We may analyze Non-Personal Information in the aggregate to study outcomes, costs, and provider profiles, and to suggest benefit designs for employers or health plans. These studies may generate Aggregate Data (described below) which we may utilize for a variety of purposes.

We may perform statistical analyses of the traffic patterns, Site usage, and behaviors associated with the Site. We may use these analyses to generate Aggregate Data from the original Non-Personal Information. We may combine, separate, aggregate, or otherwise parse and process Non-Personal Information. The parsing and processing of such information may generate Aggregate Data. "**Aggregate Data**" is summary level data, such as the number of web visitors in a specific geographic area. Aggregate Data does not contain information that can be used to identify or contact you, such as your name, address, telephone number or e-mail address, and does not reflect the original form of the Non-Personal Information collected from you.

Disclosure of Non-Personal Information

We may disclose Non-Personal Information as follows:

- We may share Non-Personal Information with our affiliated companies, third parties who provide services to us, and other parties that you have authorized.
- We may disclose Aggregate Data to other companies or organizations for any legitimate business purpose.
- We may disclose products and services developed using the Non-Personal Information, including products and services that disclose anonymous and/or deidentified Site data for any legitimate business purpose.
- We will not sell your Non-Personal Information to other companies or organizations.

"Do Not Track" Signals and Similar Mechanisms

Our Site does not respond to web browser "do not track" signals and similar mechanisms. However, you may control certain Tracking Mechanisms as described above.

COOKIES

One of the Tracking Mechanisms we use on our Site is cookies. Cookies are small pieces of information sent by a web server through a web browser which allows the server to uniquely identify the browser on each page.

We use the following categories of cookies:

- **Strictly Necessary Cookies**
 - o These cookies are essential in order to enable you to move around the Site and use its features. Without these cookies, services you have asked for such as remembering your login details or submitted information cannot be provided.
- **Performance Cookies**
 - o These cookies collect anonymous information on how people use our Site. For example, we may use Google Analytics cookies to help us understand how customers arrive at our Site, browse or use our Site and highlight areas where we can improve areas such as navigation and marketing campaigns. The data stored by these cookies never shows personal details from which your individual identity can be established.
- **Functionality Cookies**
 - o These cookies remember choices made such as the country from which you visit our Site, language, and search parameters such as size or color. These choices can then be used to provide you with an experience more appropriate to your selections and to make the visits more customized. The information

these cookies collect may be anonymised and cannot be used to track your browsing activity on other sites.

Within these categories, we may use different kinds of cookies including session ID cookies and persistent cookies. Session ID cookies are used to personalize your user experience, to determine ways to improve the Site, Site content, and the services we offer. These cookies are deleted from your hard drive when you close your browser session. Persistent cookies are used to collect non-personally identifiable information such as browser type, Internet Service Provider (ISP), referring/exit pages, platform type, date/time stamp and number of clicks.

You may set your browser to accept cookies, warn you when a cookie is sent, delete any cookies that are already on your device or turn off all cookies (except Flash cookies). Check your web browser's help menu or your mobile device settings to find out how. Some mobile devices store cookies not only in areas connected to the web browsers but also in an app-specific area, so you may have to check your app settings options to determine how to manage or delete cookies stored in these other areas. If you do not accept cookies, some features, services, or activities available through the Site may not function correctly and you may be unable to access certain content.

TRACKING MECHANISMS OPT-OUT

You may be able to opt-out of certain third-party associations by following third party customization and/or opt-out options. Google®, Twitter®, and LinkedIn® may provide customization and/or opt-out of certain Tracking Mechanisms through their respective sites. For example, Google's Ads Settings, DoubleClick opt-out page, Twitter's promoted content settings, LinkedIn account settings, and Network Advertising Initiative opt-out page may limit the collection and usage of certain third-party Tracking Mechanisms.

TRANSFER OF PERSONAL INFORMATION AND NON-PERSONAL INFORMATION

We are the custodian for all Personal Information and Non-Personal Information obtained through our Site. Accordingly, if we are acquired, merge with another entity, or divest one or more of our businesses, affiliates or subsidiary companies, the Sites, and any Personal Information and Non-Personal Information obtained through them, may be transferred to an applicable entity for the purpose of continuation of services, in accordance with applicable law.

STORAGE OF PERSONAL INFORMATION

Generally, the Personal Information that we collect from you will be transferred to and stored in the United States. The United States may have different levels of privacy protection than apply in your country. Your Personal Information may also be processed by Express Scripts employees located in the United States or a related affiliate or subsidiary. Where your Personal Information is transferred outside your country of origin it will be subject to the applicable laws of each country in which it is held and may not be subject to the same protection as your country of residence.

RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

Subject to any applicable business, legal, or regulatory requirements, we securely destroy Personal Information when it is no longer required to fulfill our services and commitments to you or to enforce our rights or meet our obligations. Personal Information used as part of a job profile or application for employment may be retained for up to 10 years (e.g., post termination of potential employment).

PERSONNEL ACCESS TO PERSONAL INFORMATION

Unauthorized access to and/or disclosure of Personal information by any Express Scripts employee is strictly prohibited and all employees are expected to treat Personal Information securely and confidentially and failure to do so will result in appropriate disciplinary measures being taken, which may include dismissal.

YOUR ACCESS AND RIGHTS TO PERSONAL INFORMATION

Where allowed by law, such as in the EEA, Switzerland, or Canada, you may request access to the Personal Information we hold about you by sending an e-mail to privacy@express-scripts.com. We will process that request in accordance with any local laws and our policies and procedures in place for dealing with such requests. There may be circumstances where we are either unable to provide access or where we deny or restrict access for legally permissible reasons, such as where the rights of other individuals may be violated or where disclosure is prohibited by law. We will advise you of any reason for denying or restricting an access request. Where you request such access, we may ask you to verify your identity and to provide other details to assist us in responding to your request.

In addition to your right to access the Personal Information we hold about you, if you wish to opt-out of direct marketing or review, amend, correct, update or delete any Personal Information that we have collected about you or limit how we use it, contact us by sending an e-mail to privacy@express-scripts.com. You may also have rights to object to some processing of Personal Information or to request the transfer of data to another data controller.

Third-Party Usage

We may use third parties to: (a) operate and maintain the server(s) on which the Site operates, (b) provide Tracking Mechanism(s) that we embed in or use with the Site, (c) provide advertisements and other information to you about the Site, products, and services through a third-party site based on a prior visit to the Site, (d) analyze communication with us and interactions with the Site, (e) capture, with your authorization and direction, Personal Information from a third party information source with whom you have previously shared your Personal Information (e.g., LinkedIn), (f) capture Personal Information and other information used in the job application process, (g) de-identify data, and (h) collect Non-Personal Information from you (e.g., on your interactions and/or experience with the Site and/or us). The third party may then share the Personal Information, Non-Personal Information, Aggregate Data, and/or other data with us.

LINKING POLICY

Our Site may contain hyperlinks allowing our users to connect to other websites owned by us and our affiliated companies and websites owned by our third-party vendors, distributors, and providers ("**Linked Sites**"). You may also access our Site through a hyperlink embedded in a Linked Site. We provide hyperlinks to the Linked Sites to enable you to conveniently access websites that may be of interest to you. Please note that once you click on a hyperlink that transfers you from our Site to a Linked Site, you have left our Site, and this Privacy Policy will immediately cease to apply to any subsequent activity on the Linked Site. We are under no obligation to notify you when you have left our Site and have accessed a Linked Site. Use of any Linked Site will be governed by the privacy policy, terms of use, and/or other policies (if any) on the Linked Site. You may, at your option,

participate in surveys or provide other information to our affiliates that control a Linked Site, and that information may be shared with us or with others subject to the privacy policy terms set forth on that Linked Site. Certain Non-Personal Information that you choose to provide through a Linked Site (such as comments) that is subsequently provided to us by the Linked Site provider in connection with a service engagement may be identifiable to us as your Personal Information.

SECURITY STATEMENT

We are committed to protecting the privacy and security of this Site. We take reasonable technical and procedural precautions to protect the information received by us. Our Internet infrastructure is protected using industry recognized commercial security products, including current encryption technology, and best practice procedures for maintenance of the website. In addition, our infrastructure is monitored 24 hours a day, seven days a week.

No method of transmission over the Internet or storage of data on an Internet server is 100% secure. Although we use commercially acceptable and reasonable precautions to protect your information, we do not guarantee its absolute security.

YOUR ACCEPTANCE OF THIS PRIVACY POLICY

You are deemed to have assented to the terms and conditions contained in this Privacy Policy when you use the Site and/or when you have indicated in your online registration that you accept the Terms of Use into which this Privacy Policy is incorporated. You are deemed to have read and accepted this Privacy Policy each time you access the Site and/or the Career Website after initial registration by using your login credentials. If you do not agree to the terms of this Privacy Policy, please do not use the Site. The terms and conditions contained in this Privacy Policy are subject to and may be superseded by applicable federal/national, provincial and state laws.

RELATIONSHIP TO THE TERMS OF USE

This Privacy Policy, and your and our performance in connection herewith, is further governed by and subject to the Terms of Use for the Site, including but not limited to the disclaimer, limitation of liability, governing law, jurisdiction, and venue provisions set forth therein.

CHANGES IN OUR PRIVACY POLICY

We use Personal Information and Non-Personal Information collected from you pursuant to the Site only within the scope of use described in this Privacy Policy. However, we reserve the right, from time to time in our sole and absolute discretion, to change, to modify, or to add terms or remove terms from this Privacy Policy. Changes to this Privacy Policy will be reflected when we post a new version number and updated revision date. The version number includes a major number, a decimal point, and a minor number. A change to the major number reflects a significant change to the policy, while a change to the minor number reflects a less significant change to the policy. Examples of significant changes include additional provisions that reflect new Site functionality, significant modifications to existing provisions, and more significant changes to Site functionality that cause provisions to be modified, added, or removed. Examples of less significant changes include additional provisions that clarify current Site functionality, minor modifications to existing provisions, and less significant changes to Site functionality that cause provisions to be modified, added, or removed.

We will provide an advance notice of a major change prior to your access of any portion of the Site for which registration is required. For example, we may (i) require that you reaccept the updated version of the web policies, (ii) send an electronic notification advising of the update to the web policies, (iii) include a notice on the Site viewable without login advising of the update to the web policies, and/or (iv) advise of the updated web policies during a phone call. We do not ordinarily provide advance notice of a minor change.

We recommend that you check the version number and revision date prior to using the Site, and that you review this Privacy Policy on a frequent basis. Your continued use of the Site and/or utilization of any Site benefits after this Privacy Policy has been updated (and after advance notice for a major change) indicates your agreement and acceptance of the updated version of the Privacy Policy.

POLICY COMMENTS AND ASSISTANCE

We welcome your questions and comments on this Privacy Policy and the Terms of Use. If you have general comments regarding these policies, please e-mail us. Specific questions regarding the enforcement of these policies should be directed to expressscriptscanada_privacy@express-scripts.com for users based in Canada and privacy@express-scripts.com for users based in the United States and all other countries. For technical assistance with the Site, or for assistance with submitting a job submission through the Careers Website, please e-mail enable@express-scripts.com.

If you reside in the European Union, and at any time you do not believe that we have complied with this Privacy Policy, you have the right to lodge a complaint with the relevant supervisory authority.