

Data Security & Privacy - Country-by-Country Analysis

EU DPA Due Diligence

Region	Country	Registration	Notice & Consent	Security Measures	Enforcement
EU Member Country	Netherlands	Green	Green	Red	Yellow
	Germany	Red	Red	Red	Red
	Austria	Red	Green	Yellow	Yellow
	Belgium	Green	Red	Yellow	Green
	Denmark	Red	Yellow	Yellow	Green
	Finland	Red	Red	Yellow	Yellow
	France	Red	Red	Red	Red
	Ireland	Red	Green	Red	Red
	Italy	Red	Green	Red	Red
	Spain	Green	Red	Red	Yellow
	Sweden	Green	Green	Green	Yellow
	UK	Yellow	Yellow	Yellow	Red
	Switzerland*	Yellow	Yellow	Yellow	Green

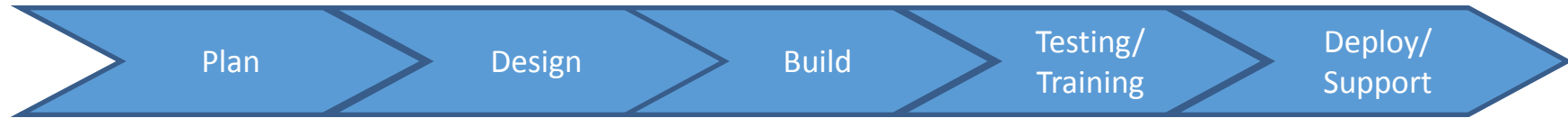
* Not an EU member country

Key Findings

- EU Member states employ varied approaches to EU Directive implementation
- Strategic decisions are required to support EU expansion efforts including registration requirements
- Security measures will need to be incorporated into enterprise policies and procedures in order to comply with requirements
- Ownership of privacy responsibilities must be established in order to provide a cohesive expansion effort and ensure successful compliance

KEY	Registration	Notice & Consent	Security Measures	Enforcement
Green	▪ Requirements map directly to EU DPA – No additional requirements			
Yellow	▪ Minimal deviation from EU DPA Directive (e.g. fines, required registration, appointment of Data Privacy Officer)			
Red	▪ Significant deviations from EU DPA (e.g. specific data security controls, pre-certification audits, high fines, criminal prosecution)			

Path to Enable EU DPA Compliance



Key Activities

- Mobilize project
- Confirm Dendreon Executive Sponsorship
- Identify Key Dendreon Stakeholders across CMO, ROW and Steady State (US) streams
- Develop Growth Impact & Readiness Assessments
- Develop Communication Plan
- Continue with input on existing Policy/SOPs development

Key Activities

- Confirm approach of “Safe Harbor (SH)” Certification is the chosen compliance mechanism
- Develop detailed integration plan specific to Safe Harbor
- Approve Growth Impact & Readiness Assessments
- Approve Communication Plan

Key Activities

- Develop, edit, and/or revise policies and standard operating procedures specific to EU Data Protection requirements
- Develop country specific documentation for pre-registration
- Confirm training rollout schedule

Key Activities

- Refine deployment and adoption approach
- Develop training materials
- Conduct train-the-trainer sessions
- Develop the Enterprise Wide DS&P checklist, readiness review and adoption plan
- System Testing (if e-deployment)

Key Activities

- Execute the Enterprise Wide DS&P checklist, readiness review, & adoption plan
- Conduct user training
- Apply and receive Safe Harbor Certification
- Complete registration with EU DPA authorities
- Transition to operational support in the EU

EU Regulatory Support

Project Management Controls