

PRIVACY NOTICE

HEALTHCARE PROFESSIONALS (HCP's*), RELEVANT DECISION MAKERS, RESEARCH COLLABORATIONS AND OTHER PARTNERS

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This privacy notice describes how **Servier Laboratories Ltd**, whose registered offices are located at Block 2, West Pier Business Campus, Old Dunleary Road, Dun Laoghaire, Co. Dublin, Ireland and **Servier (Ireland) Industries Ltd.** whose offices are located at Gorey Road, Arklow, Co. Wicklow, Ireland ("**Servier**", "**we**" or "**us**") collect and process personal information about you, how we use and protect this information, and your rights in relation to this information.

This privacy notice applies to:

- Healthcare professionals ("**HCPs**") working in a therapeutic field related to Servier's products and business activities, and to relevant decision makers, including those with whom Servier has a relationship;
- Persons with whom Servier collaborates or may potentially collaborate for research such as (prospective) trial investigators and others who may assist with research or post-study work;
- All other partners or prospective partners.

For information on how we use your personal data to respond to enquiries (including medical information enquiries) and reports of suspected adverse events and other special situations, please visit our Privacy Notice (Enquiries and reports of Suspected Side Effects), available here: <https://servier.ie/content/privacy-notices>. For information on all other uses of your personal data, please continue reading below.

Personal information is information, or a combination of pieces of information that could reasonably allow someone to be identified.

1. **PERSONAL INFORMATION WE USE**

We collect personal information from you directly (e.g. when you meet in person with one of our representatives) as well as from other sources as described below.

1.1 **Personal information we collect directly from you**

The categories of personal information that we collect directly from you are:

- (a) personal details (e.g. name, title)
- (b) contact details (e.g. business phone number, business email address, business address and any other contact details you provide us)
- (c) professional details (e.g. place of work, professional title and speciality)
- (d) enquiries and expressions of interest
- (e) any other information you provide to us or one of our representatives.

1.2 **Information we collect about you from other sources**

We also collect information about you from public sources (including the websites of your employer or institution and social media sites), from the Irish Medicines Directory and from the internet.

The categories of information that we collect about you from these other sources are:

- (a) personal details (e.g. name, title)
- (b) contact details (e.g. business phone number, business email address, business address)
- (c) professional details (e.g. place of work, professional title and speciality)
- (d) relevant professional history (e.g. biography, publications, congress activities, education, membership/associations with institutions, conflicts of interest information, experience in clinical trials).

1.3 **Other information we use about you**

Other information we use about you includes information generated by Servier, including the history of our relationship with you such as previous communications with us, information about the interactions you have with us and our representatives, details of previous services you have provided or projects or activities on which you have worked with us and details of your attendance at congresses, speaker meetings, advisory boards and other meetings.

We combine the information we collect from you directly with information collected from other sources and/or generated by us in our databases that record our relationship and interactions with HCPs, relevant decision makers and other partners.

2. **HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT**

We use your personal information for the following purposes:

- (a) to identify opportunities, determine your suitability for and communicate with you in relation to current and future potential collaborations, projects and other activities on which we would like to work with you for example in relation to consultancy services, clinical trials and other research activities
- (b) to identify opportunities, determine your suitability for and invite you to attend and participate at congresses, advisory boards and other meetings that are relevant to your practice
- (c) to monitor our interactions with HCPs and relevant decision makers to ensure we are complying with our obligations under the IPHA Code in relation to promotional and other activities
- (d) for business planning and management including to monitor Servier's promotional activities and scientific information service and to monitor the performance of our employees through business analytics
- (e) to document compliance with our risk minimisation obligations to provide important product information to relevant HCPs
- (f) to exercise our legal rights where it is necessary to do so, for example to detect, prevent and respond to fraud claims, intellectual property infringement claims or other legal claims

We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- (a) to comply with our legal obligations and to cooperate with regulators and law enforcement bodies as described above
- (b) for the performance of a contract that we have with you or to take steps to enter into such a contract at your request
- (c) to meet our legitimate interests, in particular in relation to business management, to identify opportunities to work with you and to monitor our compliance with the IPHA Code. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

3. **YOUR RIGHTS OVER YOUR PERSONAL INFORMATION**

You have certain rights regarding your personal information, subject to certain exceptions in accordance with applicable law. These include the following rights to:

- access your personal information. There may be some exceptions, which means you may not always receive all the information we process about you;

- rectify any inaccurate information we hold about you;
- erase your personal information except in certain circumstances for example if it is necessary for us to process your personal information to comply with a legal obligation (as described in section 2 above) or for the establishment, exercise or defence of a legal claim;
- restrict our use of your personal information in certain circumstances;
- object to our use of your personal information in certain circumstances where we use your personal for our legitimate interests (as described in section 2 above); and
- lodge a complaint with your local data protection authority (the Data Protection Commission in Ireland ; <https://www.dataprotection.ie>).

If you would like to discuss or exercise such rights, please contact us at the details below.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honour your requests.

4. **INFORMATION SHARING**

We may, under certain circumstances, share your personal information with third parties as below:

- Service providers (e.g. hosting providers) and business partners (e.g. contractual research organisations, travel and conferences agencies, agencies, hotels, air carriers etc.) who may also access to your personal data in order to provide their services.
- Servier group companies. Servier Laboratories Ltd is ultimately owned by Les Laboratoires Servier, so we work closely with other businesses and companies that fall under the Servier group family. We may share certain information about you with Les Laboratoires Servier and other Servier group companies where this is necessary for business planning purposes or to identify opportunities for you to work with our other affiliates. Information on the global presence of the Servier group can be found here: <https://servier.com/en/company/global-presence/>.
- Law enforcement agencies, courts, regulators (including appropriate medicines regulatory authorities in the European Union), government authorities or other third parties. We will share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or to support a legal or criminal investigation or otherwise to protect our rights or the rights of any third party.
- Asset purchasers. We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice.

Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on "International Data Transfer" below for more information.

5. INFORMATION SECURITY AND STORAGE

We implement technical and organisational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the ongoing integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

We will keep your personal information for the duration of our relationship with you and/or as long as you work in a field relevant to our products and business activities. If you no longer have a relationship with us and no longer work in a relevant field, we will retain your personal information for a period of time that enables us to:

- Maintain records for business management and planning;
- Maintain records to evidence our compliance with our legal obligations described in section 2 above;
- Comply with record retention requirements under the law;
- Defend or bring any existing or potential legal claims; and/or
- Deal with any complaints from you regarding our products or services.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

6. INTERNATIONAL DATA TRANSFER

Given the global nature of the Servier Group, we may transfer personal information including sensitive personal information to other entities of the Servier Group based outside Ireland to appropriately deal with your enquiry. A list of Servier Group entities and where they are based is available here: <https://servier.com/en/company/global-presence/>.

In addition to Servier Group entities overseas, your personal information may be transferred to, stored, and processed by an international organisation or a third party located in a country that is not regarded as ensuring an adequate level of protection for personal information under European Union law or by the European Commission.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

7. CONTACT US

Servier Laboratories Ltd. / Servier (Industries) Ireland Ltd. is the controller responsible for the personal information we collect and process.

If you have questions or concerns regarding the way in which your personal information has been used, please contact us using the contact details below:

Servier Laboratories Ltd.

- Email: dataprivacy-dublin@servier.com
- Telephone: 01 663 8110
- Post: Servier Laboratories Ltd, Block 2, West Pier Business Campus, Old Dunleary Road, Dun Laoghaire, Co. Dublin, Ireland
- Our Data Protection Relay can be contacted at: dataprivacy-dublin@servier.com.

Servier (Ireland) Industries Ltd.

- Email: dataprivacy-arklow@servier.com
- Telephone: 0402 20800
- Post: Servier (Ireland) Industries Ltd, Gorey Road, Arklow, Co. Wicklow, Ireland
- Our Data Protection Relay can be contacted at [:dataprivacy-arklow@servier.com](mailto:dataprivacy-arklow@servier.com).

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the Data Protection Commission in Ireland (<https://www.dataprotection.ie>) or your local data protection authority if you are based outside Ireland

8. CHANGES TO THE POLICY

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time.

If we change this privacy notice, we will notify you of the changes by way of a banner on our Website. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

[NOVEMBER 2018]

*The term "healthcare professional" means a person of any of the following classes: (i) Registered medical practitioners, (ii) Registered dentists, (iii) Registered pharmacists, (iv) Registered nurses as defined in IPHA Code of Practice for the Pharmaceutical Industry. Edition 8.3 – 1st February 2018