

Novartis – General Privacy Notice for Business Partners

This privacy notice is addressed to:

- the healthcare professionals with whom we create or maintain a relationship;
- our customers or prospects who are natural persons (such as self-employed pharmacists);
- the representatives or contact persons of our customers or prospects who are legal entities (such as wholesale pharmacists).

You are receiving this privacy notice because Novartis is processing information about you which constitutes “**personal data**” and Novartis considers the protection of your personal data and privacy a very important matter.

This privacy notice describes how the “**German Novartis Companies**”, Novartis Pharma GmbH as well as Novartis Radiopharmaceuticals GmbH, all: Sophie-Germain-Straße 10, 90443 Nürnberg, process personal data. Unless indicated otherwise, each of the German Novartis Companies is independently responsible for the processing of your personal data as it individually decides why and how it is processed, thereby acting as the “**controller**”.

In this privacy notice, “**Novartis**”, “**we**” or “**us**” refers to the respective Novartis company you are interacting with. We invite you to carefully read this privacy notice, which sets out in which context we are processing your personal data and explains your rights and our obligations when doing so.

Should you have any further question in relation to the processing of your personal data, we invite you to contact digitale.information@novartis.com.

1. What information do we have about you?

This information may either be directly provided by you, by our business partners (i.e. the legal entity for whom you work), by third parties (e.g. medical agencies) or be obtained through trusted publicly available sources (such as PubMed, Clinical Trials.gov, congress websites or university websites), having obtained your consent to provide us with such personal data where necessary under applicable law. We collect various types of personal data about you, including:

- your general and identification information (e.g. name, gender, email and/or postal address, fixed and/or mobile phone number);
- your function (e.g. title, position, name of company, as well as, for healthcare professionals, first specialty, second specialty, year of graduation from medical school, publications, congress activities, awards, biography, education, links to universities, expertise and participation in/contribution to clinical trials, guidelines, editorial boards and organizations);
- payment information (e.g. credit card details, bank account details, VAT or other tax identification number);

- Novartis unique business partner ID and profile;
- your electronic identification data where required for the purpose of delivering products or services to our company (e.g. login, access right, passwords, badge number, IP address, online identifiers/cookies, logs, access and connection times, image recording or sound such as badge pictures, CCTV or voice recordings);
- information regarding your preferences including in terms of channels of communication and frequency;
- data you provide to us for example when you fill in forms or during events you attend, or when you answer questions in a survey;
- data which relate to our products and services; and
- information about the scientific and medical activities/interactions you have with us, including potential future interactions.

If you intend to provide us with personal data about other individuals (e.g. your colleagues), you must provide a copy of this privacy notice to the relevant individuals, directly or through their employer.

2. For which purposes do we use your personal data and why is this justified?

We always process your personal data for one or more specific purposes and only the data that is necessary to achieve the respective purposes. We will not process your personal data if we do not have an appropriate legal basis for the respective purpose ("**legal basis**").

2.1. Contract Management

We process your personal data for the initiation or fulfillment of a contract (e.g. professional lecture), in particular:

- to perform tasks for the preparation or execution of existing contracts;
- to provide you with access to our training modules so that you can perform certain services for us;
- in connection with the storage of supporting documents for transactions; and
- to ensure invoicing and accounting.

The processing of this personal data is necessary for the performance of a contract with you (article 6 (1) b) GDPR) or is necessary for the pursuit of our legitimate interests in a business relationship with your employer (article 6 (1) f) GDPR).

2.2. Relationship Management

We contact you to inform you about our products and services. The processing of your personal data is necessary in order to:

- send you marketing material by post, although you have the right to opt-out of receiving marketing and promotional communications at any time;

- to prepare or co-ordinate the activities of the sales force;
- to keep track of communication and cooperation with you (e.g. by operating a database in which cooperation with healthcare professionals is recorded or calls are planned and documented);
- answer your questions and provide you with the best possible support;
- track our activities (e.g. evaluation of collaboration or sales, number of appointments/calls);
- send you surveys (e.g. to improve our future cooperation with you);
- invite you to events or promotional events sponsored by us (e.g. medical events, lectures, conferences);
- to make a selection;
- benefit from cost-effective services (e.g. we may use certain vendor platforms for data processing);
- build a close and trusting professional relationship with healthcare professionals;
- provide healthcare professionals with knowledge about Novartis medicines and scientific developments;
- promote innovation in the pharmaceutical field;
- ensure that the right medicine reaches the patient according to the professional opinion of a well-informed healthcare professional;
- to sell part of our business or its assets or to facilitate the acquisition of all or part of our business or assets by a third party.

The processing of personal data is based on our legitimate interests (article 6 (1) f) GDPR) in order to maintain and shape our business relationship with you, to ensure efficient business communication and ultimately to positively influence our products.

It is also our goal to personalize our relationship with you and to provide you with the most relevant information possible and to connect with you in the best possible way. Achieving effective communication with important business partners, such as you, is a central and a legitimate business interest for us (article 6 (1) f) GDPR). To achieve this greater efficiency, we typically create profiles of healthcare professionals and then assign you to such a profile that matches the information we have collected about you, including your preferences and responses to marketing communications or your areas of interest. Your profile will ultimately determine the type of communications we send you, the information they contain and the timing of those communications ("**profiling**").

Should a profiling activity go beyond normal business practices in individual cases, we would contact you in advance to obtain clear and explicit consent from you (article 6 (1) a) GDPR), especially if we consolidate many different segments over time and thus create a 360° view of you;

2.3. Online Interactions

In order to enable and optimize our online interactions with you, we process your personal data if you have given us your express consent (article 6 (1) a) GDPR), in particular in the following cases:

- to set cookies on your device (e.g. cell phone, laptop) to determine how you use our websites so that we can personalize what you see by tailoring content and notifications to your interests;
- before we send you certain electronic marketing communications (e.g. email, SMS).

2.4. Compliance with legal and regulatory obligations

We process your personal data to fulfill legal requirements (article 6 (1) c) GDPR), for example:

- obligations to document regulatory monitoring and reporting, including those related to adverse events, product complaints and product safety;
- compliance with anti-corruption and transparency obligations;
- archiving and logging within the scope of statutory retention obligations; and
- other legally and officially prescribed purposes.

2.5. Management of our company's activities

We process your personal data for the protection or administration of our company, which is part of our legitimate interest (article 6 (1) f) GDPR), in particular to:

- prevent fraud or criminal activity, misuse of our products or services and the security of our IT systems, architecture and networks;
- protect the commercial interests of the company and ensure compliance and reporting (e.g., compliance with our policies and local legal requirements, taxes and deductions, handling suspected cases of misconduct or fraud, conducting audits and defending litigation);
- manage our IT resources, including infrastructure management and business continuity;
- sell any part of our business or its assets or facilitate the acquisition of all or part of our business or assets by a third party; and
- to achieve our corporate and social responsibility objectives.

2.6. Who has access to your personal data and to whom are they transferred?

We will not sell, share, or otherwise transfer your personal data to third parties other than those indicated in this privacy notice.

In the course of our activities and for the same purposes as those listed in this privacy notice, your personal data can be accessed by or transferred to the following categories of recipients, on a need to know basis to achieve such purposes:

- our personnel (including personnel, departments or other companies of the Novartis group);

- our independent agents or brokers (if any);
- our suppliers and services providers that provide services and products to us;
- our IT systems providers, cloud service providers, database providers and consultants;
- our business partners who offer products or services jointly with us or with our subsidiaries or affiliates;
- any third party to whom we assign or novate any of our rights or obligations; and
- our advisors and external lawyers in the context of the sale or transfer of any part of our business or its assets.

The above third parties are contractually obliged to protect the confidentiality and security of your personal data, in compliance with applicable law.

Your personal data can also be accessed by or transferred to any national and/or international regulatory, enforcement, public body or court, where we are required to do so by applicable law or regulation or at their request.

The personal data we collect from you may also be processed, accessed or stored in a country outside the country where Novartis is located, which may not offer the same level of protection of personal data.

If we transfer your personal data to external companies in other jurisdictions, we will make sure to protect your personal data by (i) applying the level of protection required under the local data protection/privacy laws applicable to Novartis, (ii) acting in accordance with our policies and standards and, (iii) for Novartis located in the European Economic Area (i.e. the EU Member States plus Iceland, Liechtenstein and Norway, the "EEA"), unless otherwise specified, only transferring your personal data on the basis of standard contractual clauses approved by the European Commission. You may request additional information in relation to international transfers of personal data and obtain a copy of the adequate safeguard put in place by exercising your rights as set out in Section 5 below.

For intra-group transfers of personal data to our group companies (which you can identify by clicking this link https://www.novartis.com/about/locations?tid=All&name_list=DE, the Novartis group has adopted binding corporate rules, a system of principles, rules and tools, provided by European law, in an effort to ensure effective levels of data protection relating to transfers of personal data outside the EEA and Switzerland. Read more about the Novartis binding corporate rules by clicking here <https://www.novartis.com/privacy-policy/novartis-binding-corporate-rules-bcr>.

3. How do we protect your personal data?

We have implemented appropriate technical and organizational measures to provide an adequate level of security and confidentiality to your personal data. These measures take into account:

- the state of the art of the technology;
- the costs of its implementation;

- the nature of the data; and
- the risk of the processing.

The purpose thereof is to protect it against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access and against other unlawful forms of processing.

Moreover, when handling your personal data, we:

- only collect and process personal data which is adequate, relevant and not excessive, as required to meet the above purposes; and
- ensure that your personal data remains up to date and accurate.

For the latter, we may request you to confirm the personal data we hold about you. You are also invited to spontaneously inform us whenever there is a change in your personal circumstances so we can ensure your personal data is kept up-to-date.

4. How long do we store your personal data?

We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

Personal data we hold in our database about you which is not related to a specific contract will be stored for 24 months after your last interaction with us.

For contracts, the retention period is the term of your (or your company's) contract with us, plus the period of time until the legal claims under this contract become time-barred, unless overriding legal or regulatory schedules require a longer or shorter retention period. When this period expires, your personal data is removed from our active systems.

Personal data collected and processed in the context of a dispute are deleted or archived (i) as soon as an amicable settlement has been reached, (ii) once a decision in last resort has been rendered or (iii) when the claim becomes time barred.

5. What are your rights and how can you exercise them?

You may exercise the following rights under the conditions and within the limits set forth in the law:

- the right to access your personal data as processed by us and, if you believe that any information relating to you is incorrect, obsolete or incomplete, to request its correction or updating;
- the right to request the erasure of your personal data or the restriction thereof to specific categories of processing;
- the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal;
- the right to object, in whole or in part, to the processing of your personal data; the right to object to a channel of communication used for direct marketing purposes; and

- the right to request its portability, i.e. that the personal data you have provided to us be returned to you or transferred to the person of your choice, in a structured, commonly used and machine-readable format without hindrance from us and subject to your confidentiality obligations.

If you have a question or want to exercise the above rights, you may send an email to digitale.information@novartis.com.

If you have any other question on how we process your personal data, please send an email to datenschutz@novartis.com or a letter at Novartis Business Services GmbH, Datenschutz, Sophie-Germain-Straße 10, 90443 Nürnberg. If we have doubts concerning your identity we may, as the case may be, ask you to provide us with a scan of your identity card, whereas not required information may be blacked out (article 12 (6) GDPR).

In any case, you also have the right to file a complaint with the data protection authorities, in addition to your rights above.

6. Information on Joint Controllership

If you have given Novartis Pharma GmbH and Novartis Radiopharmaceuticals GmbH joint advertising consent, we, i.e. Novartis Pharma GmbH and Novartis Radiopharmaceuticals GmbH, will store your personal data in a jointly operated CRM system. For this reason, we concluded a separate agreement to specify which of us takes care of which data protection obligations. The agreement refers in particular to the exercise of your data protection rights. This is primarily the responsibility of Novartis Pharma GmbH which can alter the content of the CRM system. Of course, you can exercise your data protection rights in respect of and against each of us.

7. How will you be informed of the changes to our privacy notice?

Any future changes or additions to the processing of your personal data as described in this privacy notice will be notified to you in advance through an individual notice through our usual communication channels (e.g. by email or via our internet websites).