

General Privacy Notice for Third Parties

March 23, 2021

Novartis considers privacy as a very important matter. Accordingly, Novartis is pursuing the greatest transparency concerning its processing of personal information.

Novartis Pharma AG having its registered office at Novartis Campus, CH-4056 Basel, Switzerland, is responsible for the processing of your personal information as it decides why and how it is processed, thereby acting as the “data controller”. It may exercise this responsibility alone or jointly with other company(-ies) in the Novartis group, acting as “co-controller(s)”. In this Privacy Notice, “**we**” or “**us**” refers to Novartis Pharma AG and its group companies.

We are committed to ensuring that any personal information we receive is protected and processed in accordance with applicable data protection laws and Novartis policies and standards.

For the purpose of the scope of this Privacy Notice, third parties are as follows:

- **Suppliers:** An external natural or legal person/entity outside the Novartis Group from whom Novartis sources goods or services. This includes, for example:
 - i. Contract Manufacturing Organizations (CMOs)
 - ii. Institutions and collaborators carrying out research for or on behalf of Novartis, where Novartis is acting as the sponsor and paying for the research, including collaborators of both Contract Research Organizations (CROs) and Academic Research Organizations AROs)
 - iii. Third parties that handle or distribute Novartis products (i.e. logistics services) where the ownership of the products is not transferred to the third party service provider
 - iv. HCPs acting as "third parties" only, i.e. where they provide goods or services against a fee for a service beyond their profession as an HCP, such as app developers or commercial/marketing consultants, etc. (otherwise HCPs are out of scope).
- **Business Development & Licensing (BD&L):** Any third party with whom a product in-licensing agreement has been contracted with Novartis.
- **Distributors and Wholesalers:** Any third party that imports and/or resells for its own business purposes Novartis Products (whether or not they provide promotion services for the specific Novartis Products on behalf of Novartis).

The purpose of this Privacy Notice is to clarify the way Novartis is processing personal information of representatives and/or employees as contact persons (data subjects) of a third party or its subcontractor (who will be further referred in this Privacy Notice as “**you**”).

We invite you to carefully read this Privacy Notice, which sets out in which context we are processing information that relates directly or indirectly to you (“personal information”) and explains your rights with respect to the processing of your personal information.

We have separate privacy notices in relation to processing personal information of our employees, business partners which are not providing services to us, patients and users of our other websites, and you should refer to those where appropriate.

Should you have any further questions in relation to the processing of your personal information, you are invited to contact our data protection officer at global.privacy_office@novartis.com.

▶ **What information do we have about you?**

▶ **For which purposes do we use your personal data and why is this justified?**

▶ **Who has access to your personal data and to whom are they transferred?**

▶ **How do we protect your personal information?**

▶ **How long do we store your personal information?**

▶ **What are your rights and how can you exercise them?**

▶ **How will you be informed of the changes to our Privacy Notice?**

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