



Novartis Binding Corporate Rules Appendix 1

Date: 03 September 2018

Appendix 1 to Novartis BCR

Categories of Data Subjects and Transfer Purposes covered by the BCR

The Novartis BCR apply to the collection and Processing of Personal Information, as permitted and/or required by applicable local laws, pertaining to the following categories of Data Subjects:

1. Associates

1.1 Definition

Novartis Associates include:

- i. Present Employees, including managers and temporary staff;
- ii. Past Employees, job applicants, trainees, retirees;
- iii. Third party Associates, including service providers, consultants and contractors.

1.2 Categories of Personal Information relating to Associates

In accordance with applicable local laws, the following categories of Personal Information relating to Associates are or may be collected, Processed and Transferred for the purposes as set out in 1.3 below:

- i. General and Identification Information, such as name, first name, last name, address, telephone, fax, e-mail, and other relevant contact details; emergency contacts; nationality; date of birth; ID card number, passport number; civil status; domestic partners'/family members'/dependents' names and dates of birth gender, photograph, etc.;
- ii. Electronic identification data, (e.g. login, access right, passwords, badge number, IP address, online identifiers/cookies, logs, access and connection times, sound or image recording such as CCTV or voice recordings);
- iii. Social Security Information, such as tax/social security codes/status, insurance details, sickness leave, disabilities, etc.;
- iv. Administrative and Financial Information, such as function; degree and job title; hire and termination date; Associate's number or code; cost center; organizational management data such as unit, department, supervisor and subordinates; credit card/bank account number, compensation details and history, such as salary, stocks, options, bonus, expense information,
- v. Talent Management Information, such as employment and education history, other details included in the CVs; professional qualifications and experience, information necessary to complete a background check, performance and development programs and reviews and career development plans, etc.;
- vi. Sensitive Information, as defined by local laws, including health and medical information and other sensitive information such as biometric data (e.g. fingerprints and iris scans), judicial data (criminal records), investigation data, religion or church

affiliation where required for statutory tax deductions; diversity-related sensitive information (such as gender, race or ethnicity) in order to comply with legal obligations and internal policies relating to diversity and anti-discrimination; labor union membership, and data collected regarding harassment complaints.

1.3 Purposes for Processing Personal Information relating to Associates

Personal Information is or may be collected, Processed and Transferred for the following purposes:

- i. Managing Workforce, such as managing work activities and personnel generally, including recruitment, onboarding, training and development, performance management, appraisals, promotions and succession planning; administering remuneration and other contractual benefits, salaries and pay reviews and other awards such as stock options, stock grants and bonuses; administering pensions and savings plans; providing benefits to Associates and their families; managing business expenses; arranging travel, relocation, transfers and secondments; making business travel arrangements; performing background checks; planning and managing professional development and skills, including training; creating and maintaining internal employee directories; managing disciplinary matters and terminations; monitoring in the workplace, IT administration (including internet, e-mails and company electronic devices monitoring) in accordance with applicable laws;
- ii. Communications and Emergencies, such as facilitating communication with Associates for business purposes and for global initiatives; to be disbursed at their workplace, home and while traveling; for protecting the health and safety of Associates and others; for facilitating communication in an emergency; and for providing references;
- iii. Maintaining Business Operations, such as operating and managing technology and communications systems; safeguarding Company's interests and property including IT infrastructure, and office equipment; managing product and service development; improving products and services; allocating company assets and human resources; strategic planning; project management, ensuring business continuity, compilation of audit trails and other reporting tools; budgeting, financial management and reporting; managing mergers and acquisitions, and reorganizations or sale;
- iv. Ensuring Compliance, such as complying with Novartis policies and with (local) legal requirements, such as income tax and national insurance deductions; managing alleged cases of misconduct or fraud; record-keeping and reporting obligations; conducting audits; complying with inspections and other requests from law enforcement or other public authorities; responding to legal processes such as subpoenas; pursuing legal rights and remedies; defending litigation and managing any internal complaints or claims, etc.
- v. Conducting health risk appraisals only as permitted and/or required by local law for the sole purpose of managing the employment relationship.

The Personal Information might be retained in both physical files and electronic files for as long as it is necessary to satisfy Novartis' Legitimate Business Purposes, unless overriding legal or internal retention schedules or other legal requirements require a longer or shorter retention period.

2. Consumers and Patients

2.1 Definition

Consumers are individuals who purchase, receive or seek information about Novartis, about Novartis' products, diseases or disease related programs dedicated to patients and their caregivers and families as well as patients who receive treatment and services for their personal use. This includes patients, prospective Consumers and healthy individuals whose data is collected through sources like: social media, applications, websites and devices.

2.2 Categories of Personal Information relating to Consumers and Patients

In accordance with applicable local laws, the following categories of Personal Information relating to Consumers are or may be collected, Processed and Transferred for the purposes as set out in section 2.3 below:

- i. General and Identification Information, such as name, address, telephone and fax number, e-mail address, unique identifiers, and other relevant contact details and information linked to the use of the digital channel mentioned above (i.e. conversation history, social media account information), etc.;
- ii. Patient Support Information, such as healthcare data and supplementary product ordering; inquiries about products and services; due diligence and other information collected in connection with consumer transactions, such as health insurance information, income, etc; online information such as user password and preferences, support queries and/or complaints, etc.;
- iii. Health Information, such as physical characteristics (weight, height, blood type, etc.); genetic data, biological samples, prescription information and disease-related information, lifestyle information (smoking habits, alcohol use, etc.), dietary preferences, general health information, information collected through patient support programs, etc.;

2.3 Purposes for Processing Personal Information relating to Consumers and Patients

Personal Information is or may be collected, Processed and Transferred for the following purposes:

- i. Patient and consumers support Information, patient programs and research, such as providing healthcare and other services; meeting specific requests from consumers regarding products and services; technical and other support; managing product and service development and delivery; managing focus groups; managing disease awareness programs; managing patient support programs; conducting market and development research for new products; marketing and sales of products and services; spontaneous adverse event reporting concerning drug safety or product complaint; facilitating communication with customers including marketing communications and other general marketing activities such as consumer testimonials and feedback concerning services and products, etc.; supporting future scientific research purposes advancing science and public health;
- ii. Ensuring Compliance, such as complying with Novartis policies and with (local) legal requirements, such as income tax and national insurance deductions; record-keeping and reporting obligations; conducting audits; managing mergers and

acquisitions, and reorganizations or sale; detecting fraud; complying with inspections and other requests from law enforcement or other public authorities; responding to legal processes such as subpoenas; pursuing legal rights and remedies; defending litigation and managing any internal complaints or claims, etc.

The Personal Information might be retained in both physical files and electronic files for as long as it is necessary to satisfy Novartis' Legitimate Business Purposes, unless overriding legal or internal retention schedules or applicable laws require a longer or shorter retention period.

3. Business Customers and Other Stakeholders

3.1 Definition

Business Customers and Other Stakeholders include:

- i. Where legal persons are covered by local data protection laws: legal entities such as hospitals, Clinical Research Organizations (CRO), managed care organizations, insurance providers and other healthcare providers, governmental agencies and other public authorities, retail outlets and any other legal entity that provides healthcare products and services to the public;
- ii. Individuals acting on behalf of the legal entities;
- iii. Healthcare Professionals including physicians, nurses, pharmacists, veterinarians, etc.

3.2 Categories of Personal Information relating to Business Customers and Other Stakeholders

In accordance with applicable local laws, the following categories of Personal Information relating to Business Customers and Other Stakeholders are or may be collected, Processed and Transferred for the purposes as set out in 3.3 below:

- i. General and Identification Information, such as name; address, telephone and fax number, e-mail address, company or healthcare institution; and other relevant contact details;
- ii. Professional Background, such as details contained in CVs; educational and professional background; professional career achievements including specialization, academic and professional degrees and titles, licenses; publications; memberships in professional associations; and other information concerning preferences, , professional background and development;
- iii. Financial & Transactional Information, such as information collected for the purpose of establishing and maintaining relationships with Novartis; information collected in connection with sales and promotional activities, including profiling and future potential interactions; financial information including transaction details, bank details, payment methods and terms; travel information, information regarding utilization, responses and/or preferences including in terms of types of messages discussed, channels of communication and frequency;

3.3 Purposes for Processing Personal Information relating to Business Customers and Other Stakeholders

Personal Information is or may be collected, Processed and Transferred for the following purposes:

- i. Sales and Marketing, such as providing Business Customers and Other Stakeholders with appropriate, adequate and updated information about disease, drugs as well as Novartis products and services, improving the quality of our interactions and services, managing communications and interactions with Business Customers, tracking Novartis activities (e.g. measuring interactions and number of appointments/calls), enlisting specialists for speaking engagements and congresses, soliciting expert advice regarding new products and services, etc.;
- ii. Business Operations, such as managing product and service delivery; contract management and related financial transactions including invoicing for services and any transparency obligations; travel and expense management; and spontaneous adverse event and quality reporting concerning drug safety or product complaint;
- iii. Ensuring Compliance, such as complying with Novartis policies and with (local) legal requirements, such as income tax and national insurance deductions; record-keeping and reporting obligations; conducting audits; managing mergers and acquisitions, and reorganizations or sale; complying with inspections and other requests from law enforcement or other public authorities; responding to legal process such as subpoenas; pursuing legal rights and remedies; defending litigation and managing any internal complaints or claims, etc.

The Personal Information might be retained in both physical files and electronic files for as long as it is necessary to satisfy Novartis' Legitimate Business Purposes, unless overriding legal or internal retention schedules or other legal requirements require a longer or shorter retention period.

4. Vendors and Business Partners

4.1 Definition

Vendors and Business Partners include:

- i. Legal entities in countries that protect legal persons under their local data protection laws;
- ii. Individuals acting on behalf of the legal entities, including consultants, independent contractors, and agents.

4.2 Categories of Personal Information relating to Vendors and Business Partners

In accordance with applicable local laws, the following categories of Personal Information relating to Vendors and Business Partners are or may be collected, Processed and Transferred for the purposes as set out in 4.3 below:

- i. General and Identification Information, such as name, address, telephone, fax, e-mail, and other contact details;
- ii. Financial and Transactional Information, such as information collected in connection with vendor and business partner transactions, financial information including tax number, classification, bank details, payment methods and terms, and due diligence information on Vendors and Business Partners.

4.3 Purposes for Processing Personal Information relating to Vendors and Business Partners

Personal Information is or may be collected, Processed and Transferred for the following purposes:

- i. Financial & Transactional, such as establishing and maintaining business relationships with the respective Vendors and or Business Partners and managing contractual and financial obligations;
- ii. Business Operations, such as managing product and service development, including product joint ventures, joint publications, strategic planning, project management, financial management and reporting, business development and licensing;
- iii. Ensuring Compliance, such as complying with Novartis policies and with (local) legal requirements, including income tax and national insurance deductions; record-keeping and reporting obligations; conducting audits; managing mergers and acquisitions, and reorganizations or sale; complying with inspections and other requests from law enforcement or other public authorities; responding to legal processes such as subpoenas; pursuing legal rights and remedies; defending litigation and managing any internal complaints or claims, etc.

The Personal Information might be retained in both physical files and electronic files for as long as it is necessary to satisfy Novartis' Legitimate Business Purposes, unless overriding legal or internal retention schedules or applicable laws require a longer or shorter retention period.

5. Data Subjects Participating in or Contributing to Research and Pharmacovigilance

5.1 Definitions

Data Subjects participating in or contributing to research and Pharmacovigilance:

- i. Research Participants, including Patients who are individuals affected with a disease or condition and healthy volunteers enrolled in the early phase of clinical trials;
- ii. Healthcare Professionals who conduct biomedical or other research on behalf of Novartis, including physicians, pharmacists, nurses, and the supporting technical and research staff, etc.,

5.2 Categories of Personal Information relating to Data Subjects participating in or contributing to research and Pharmacovigilance

In accordance with applicable local laws, the following categories of Personal Information relating to Data Subjects participating in the clinical and biomedical research are or may be collected, Processed and Transferred for the purposes as set out in 5.3 below:

- i. General and Identification Information, concerning:
 1. Research Participants, such as clinical trial codes, initials, date of birth, gender, Research Participant's name and contact information when collected for adverse event reporting;
 2. Healthcare Professionals, such as name, address, telephone, fax, e-mail, and other contact details;
- ii. Financial and Transactional Information, concerning Healthcare Professionals such as information collected for the purpose of establishing and maintaining relationships with Novartis; information collected in connection with the conduct of a clinical trial; financial information including transaction details, bank details, payment method and terms; travel information and profile;
- iii. Professional Background concerning Healthcare Professionals, such as details contained in CVs; educational and professional background; professional career achievements including specialization, academic and professional degrees and titles, licenses; publications; memberships in professional associations; and other information concerning professional background and development;
- iv. Health Information concerning Research Participants, such as physical characteristics, medical history, including medical history in the family, biological tissue samples (blood, sputum, urine, etc.), including extracted genetic data (DNA/RNA), lifestyle information (fitness and physical exercise, smoking habits, alcohol use, etc.), accelerometry or motion detection data, dietary preferences, event onset and end dates, vital signs, biomarkers, dose administration, adverse events, protocol specific measures (labs, images, MRIs, x-rays, diary), lab data, concomitant drugs, etc.;
- v. Other Sensitive Information concerning Research Participants, such as race or ethnic origin, sex life, etc.

5.3 Purposes for Processing Personal Information relating to Data Subjects participating in or contributing to research and Pharmacovigilance

Personal Information is or may be collected, Processed and Transferred for the following purposes:

- i. Business Operations, such as conducting and managing preclinical, clinical and biological research, genomic and genetic research, developing new drugs, managing biological samples, managing clinical trial systems and non-interventional studies, supporting future scientific research purposes advancing science and public health
- ii. Administering Pharmacovigilance Activities, such as complying with regulatory reporting obligations, reporting and managing adverse events and effects that

occurred during the biomedical and clinical research and after the products have been approved for use, analyzing of drug safety data for triggers and trends;

- iii. Financial and Contractual Obligations concerning Healthcare Professionals, such as contract management and related financial transactions including invoicing for services; travel and expense management;
- iv. Ensuring Compliance, such as complying with Novartis policies and with (local) legal requirements, including income tax and national insurance deductions; record-keeping and regulatory reporting obligations; conducting audits; managing mergers and acquisitions, and reorganizations or sale; quality management; complying with inspections and other requests from law enforcement or other public authorities; responding to legal process such as subpoenas; pursuing legal rights and remedies; defending litigation and managing any internal complaints or claims, etc.

The Personal Information might be retained in both physical files and electronic files for as long as it is necessary to satisfy Novartis' Legitimate Business Purposes, unless overriding legal or internal retention schedules or applicable laws require a longer or shorter retention period.

Version History

Effective Date	Owner	Version	CNIL
3 July 2012	Group Data Privacy	1.0	3 July 2012
3 September 2018	Group Data Privacy	2.0	3 September 2018