

PRIVACY NOTICE

PATIENT ADVOCATE

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This privacy notice describes how **Servier Laboratories Limited or Servier Research and Development Limited (“Servier”, “we”, “us”)** whose registered office is located at Sefton House, Sefton Park, Bells Hill, Stoke Poges, Buckinghamshire SL2 4JS, collect and process personal information about you, how we use and protect this information, and your rights in relation to this information.

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

This privacy notice applies to all personal information we collect or process about you in relation to:

- Relationship management with you as a patient expert/advocate/representative including interactions, contractual relationships management;
- Security of visitors and premises (in case you visit Servier’s premises) including access management of premises and car park as well as video surveillance system management.

1. PERSONAL INFORMATION WE USE

We will collect personal information about you from a variety of sources, including information we collect from you directly (e.g. when you contact us or when you meet our representatives in person), and information we collect about you indirectly from other sources, as described below.

1.1 Personal Information collected directly from you

The categories of personal information collected directly from you are:

- (a) personal details (e.g. name, title)

- (b) contact details (e.g. phone number, email address, postal address or mobile number)
- (c) professional details (e.g. place of work, professional title)
- (d) financial details (e.g. bank account) when a transfer of value is to be made
- (e) any other information you provide to us

1.2 Personal Information collected from other sources

We may also collection information about you indirectly from other sources, including public websites of your employer, institution, charity or association and social media sites.

The categories of information collected about you from these other sources are

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

1.3 Other information collected about you

Other information we collect 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.

1.4 Special categories of personal data

Some of the categories of information that we collect are special categories of personal data (also known as sensitive personal information). In particular, we process personal information that relates to your health, such as your medical history and reports on medical diagnoses, injuries and treatment.

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

We use your personal information to:

- (a) 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) identify opportunities, determine your suitability for and invite you to attend and participate at congresses, advisory boards and other meetings that are relevant to you;

- (c) to monitor our interactions with you to ensure we are complying with our obligations under the ABPI Code of Practice in relation to promotional and other activities;
- (d) comply with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies;
- (e) 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 violations of law.

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 to you, for example health and safety obligations or to a third party (e.g. the taxation authorities);
- (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, for example to understand how you use our products or to enable us to derive knowledge from you that enables us to develop new products. 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. For more information about the balancing test that we carry out to process your personal information to meet our legitimate interests, please contact us at the details below.

3. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

You have certain rights regarding your personal information, subject to local law. These include the following rights to:

- access your personal information;
- rectify the 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 or for the establishment, exercise or defence of a legal claim;
- restrict our use of your personal information;
- object to our use of your personal information;
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability);
- lodge a complaint with your local data protection authority.

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

Your personal data processed by Servier will only be accessible by a limited list of recipients on a need to know basis or where required by law. Thus, the main categories of recipients will be Servier's authorised employees and departments acting within their scope of activities including but not limited to:

- Medical Affairs Department;
- Security service and the General Services Department for issues related to the use and the security of the premises (premises and car park access management);
- The Safety service for video surveillance system management;
- Information Technology Department, where necessary.

Note that we may be required by law to collect certain personal information about you, or as a consequence of any contractual relationship we have with you. Failure to provide this information may prevent or delay the fulfilment of these obligations. We will inform you at the time your information is collected whether certain data is compulsory and the consequences of the failure to provide such data.

We may also share your personal information with third parties under the following circumstances:

- **Service providers and business partners:** We may share your personal information with our service providers and business partners that perform marketing services and other business operations for us. (e.g. hosting providers, contractual research organizations, travel agencies, hotels, air carriers, we may partner with other companies to process secure payments, optimise our services, send newsletters and marketing emails, support email and messaging services and analyse information.)
- **Servier group companies:** Servier Laboratories Limited and Servier Research and Development Ltd are ultimately owned by Servier SAS, so we work closely with other businesses and companies that fall under the Servier group family. We may share certain information about with Servier SAS and other Servier group companies for business planning purposes or to identify opportunities for you to work with our other affiliates. A list of companies within the Servier group can be found here: <https://servier.com/en/company/global-presence/>
- **Law enforcement agency, court, regulator, government authority or other third party:** We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, 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 on-going 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 as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Maintain business records for analysis and/or audit purposes;
- Maintain records as evidence of our compliance with our legal obligations;
- Comply with record retention requirements under the law;
- Defend or bring any existing or potential legal claims;
- 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.

More specifically:

- the images of the video surveillance system are kept for 30 days;
- the data related to security of visitors and premises are kept no longer than 3 months.

6. INTERNATIONAL DATA TRANSFER

Your personal information may be transferred to, stored, and processed 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 Limited or Servier Research and Development 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:

- Email: datamanagement-uk@servier.com
- Telephone: 01753 666409
- Post: Compliance Department, Servier Laboratories Ltd, Sefton House, Sefton Park, Bells Hill, Stoke Poges, Buckinghamshire SL2 4JS

Our Data Protection Officer can be contacted at: datamanagement-uk@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 authority of the UK (the Information Commissioner's Office) using their website: <https://ico.org.uk/>.

8. CHANGES TO THIS 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.

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).

[AUGUST 2019]