

PRIVACY NOTICE FOR INVESTIGATORS AND RESEARCH STAFF

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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 Investigator or Research Staff in connection with clinical trials and Pharmacovigilance activities,
- Transparency management (disclosure of transfers of value from Servier to Investigators or Research Staff, when applicable),
- 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 employees 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. business phone number, business email address, business postal address, business mobile number)
- (c) professional details (e.g. place of work, professional title, registration number)
- (d) Bank details (e.g. bank account) when a transfer of value is made
- (e) any other personal information you provide to us in connection with clinical trials

1.2 Personal Information collected from other sources

We may also collect information about you indirectly from other sources, including public websites of your employer, institution, charity or association or social media sites. We will collect information in a way that you would expect from other sources, but if we have any doubts you should be informed before the collection of the data.

The categories of information collected 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 postal address, business mobile number),
- (c) professional details (e.g. place of work, professional title, registration number),
- (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 employees, details of previous services you have provided or projects or clinical trial activities on which you have worked with us and details of your attendance at congresses, speaker meetings, advisory boards, investigator meetings 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 may process personal information that

relates to your health, such as allergies or dietary requirements for meetings where subsistence is provided.

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, investigator meetings 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 clinical trial 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. a competent authority);
- (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 for scientific purposes 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 regarding this process, please contact us using the details in section 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. There may be some exceptions, for instance in the event of a manifestly unfounded or excessive request, or if the exercise of this right affect a legal

investigation or the right of freedom of another data subject, which means you may not always receive all the information we process about you;

- rectify the inaccurate personal 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 or investigation;
- 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 (the Information Commissioner's Office in the UK: <https://ico.org.uk/global/contact-us/> or call on 0303 123 1113).

If you would like to discuss or exercise your rights, please contact us using 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:

- Clinical Operations Department,
- Pharmacovigilance Department,
- Medical Affairs Department;
- Information Technology Department, where necessary.
- 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.

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 clinical trial services and other business operations for us. (e.g. hosting providers, contractual research organizations, travel and conference 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 Limited 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, such as with a competent authority (the MHRA), 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 data collected for clinical trials are kept at the latest 15 years after the end of the last clinical trial in which you participated. They are then archived in paper or electronic form for a period in accordance with applicable laws and regulations;
- the data collected for pharmacovigilance activities are kept for 10 years after the relevant marketing authorisation has ceased to exist, then data are deleted or archived in an anonymised form, unless otherwise provided by mandatory local regulations;
- the data related to transparency management are kept, archived and deleted in accordance with applicable laws and regulations;
- 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

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 the UK 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 **Data Protection Law applicable in UK**, including but not limited to the retained EU law version of the General Data Protection Regulation ((EU) 2016/679), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018; the Data Protection Act 2018; and the Privacy and Electronic Communications Regulations 2003 as amended or by the Information Commissioner's Office in the UK.

We have put in place appropriate safeguards (such as contractual commitments and standard contractual clauses) 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 Limited 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:

- The Data Protection Relay can be contacted at: DataPrivacy-UK@servier.com
- Telephone: 01753 666409



- Post: Compliance Department, Servier Laboratories Ltd, Sefton House, Sefton Park, Bells Hill, Stoke Poges, Buckinghamshire SL2 4JS

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 in the UK: <https://ico.org.uk/global/contact-us/> or call on 0303 123 1113) or your local data protection authority if you are based outside the 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.

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).

FEBRUARY 2022