

Privacy Notice

Effective: 22nd June 2022.

This Privacy Notice was updated 22nd June 2022 and the changes affect users that access this website via a Novartis email link **and** enable Performance cookies. Novartis will track, and identify users via an encrypted ID, how they engage with content to enable Novartis to provide tailored communications, subject to users' consent.

Novartis Pharmaceuticals UK Limited ("Novartis") as data controller is responsible for the processing of your personal data on this website. In this Privacy Notice, "Novartis", "we" or "us" refers to Novartis Pharmaceuticals UK Limited.

Please carefully read this Privacy Notice, which describes the ways in which we collect information about individuals who visit this website ("personal data"), how we hold and use personal data, and how we respect your privacy rights.

We may change or update this Privacy Notice from time to time by posting a new Privacy Notice on this website.

1. What personal data is collected on this website?

If you register on this website, we will collect the information on the [registration form](#), including your name, work email address, and areas of expertise.

If you request contact with a Novartis representative, we will collect your name, work email address, and work postcode.

If you complete and submit an Expression of Interest Form ("**Form**") in relation to a Patient Support Programme on this website, we will collect the information submitted, including your name, practice address, your position and contact preferences.

If you have accessed the site via a Novartis email link **and** enabled Performance cookies then we will track how you engage with content and functionality on the site via an encrypted ID identifiable to Novartis and its affiliates only.

2. Why is personal data collected on this website?

We collect personal data on this website to:

- control access to content;
- enable you to register to receive information about our products, programmes, meetings and events, and services in therapeutic areas that may interest you;
- enable you to request contact with a Novartis representative;
- enable you to initiate a Patient Support Programme; and
- improve and in some instances tailor the content and services we offer you on this website and in other communication channels, e.g. emails.

We may also be required to process your personal data for other purposes, as described in our Privacy Notices at novartis.co.uk/privacy-policy.

We will not process personal data without a proper justification, and we will only process your personal data if:

- we have obtained your prior consent (e.g. to send you promotional and marketing emails and in some instances track your activity on this website to tailor our communications to you);
- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request (e.g. if you provide services to Novartis);
- the processing is necessary to comply with our legal or regulatory obligations (e.g. when sending you safety information about our products); or
- the processing is necessary for our legitimate interests (e.g. when responding to your queries).

For further information, please refer to our Privacy Notices.

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

In the event that you submit an Expression of Interest Form, we will share the details with the chosen healthcare provider as indicated in the Form for the purposes of initiating the Patient Support Programme.

We will not sell, share, or otherwise transfer your personal data to third parties other than those indicated above and in our Privacy Notices.

The personal data we collect from you may 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 Pharmaceuticals UK Limited, (ii) acting in accordance with our policies and standards and, (iii) for Novartis entities located in the European Economic Area (i.e. the EU Member States plus Iceland, Liechtenstein and Norway, the "EEA") and the UK, unless otherwise specified, only transferring your personal data on the basis of standard contractual clauses. 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 below. For intra-group transfers of personal data, 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 UK, EEA and Switzerland. You can read more about the Novartis Binding Corporate Rules at novartis.com/privacy/novartis-binding-corporate-rules-bcr.

4. How do we protect personal data?

Appropriate technical and organisational measures have been implemented to provide a 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 of these measures is to protect your personal data against accidental or unlawful destruction or alteration, accidental loss, unauthorised disclosure or access, and against other unlawful forms of processing.

5. How long do we store personal data?

We will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements, in accordance with our Privacy Notices at novartis.co.uk/privacy-policy.

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

You have a right to request a copy of the personal data we hold about you. You may also object to its use or ask for it to be updated, restricted, deleted, or transferred to another organisation

If you wish to contact us regarding our use of your personal data, or you wish to exercise your data privacy rights, please email privacy_uk.ireland@novartis.com or write to Data Privacy, Novartis Pharmaceuticals UK Limited, The WestWorks Building, White City Place, 195 Wood Lane, London, W12 7FQ.

If you are not satisfied with how we process your personal data, please contact our Data Protection Officer at global.privacy_office@novartis.com. You also have the right to file a complaint with the Information Commissioner's Office at ico.org.uk.

7. How will you be informed of the changes to our Privacy Notice?

We keep our Privacy Notice under regular review and update it as and when required. The last version of the notice was last updated on 22nd June 2022.