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General Privacy Notice for Business Partners

May 2023

Sandoz processes information of its business partners, which for the purposes of this General Privacy Notice for Business Partners (the "Privacy Notice") mean in particular:

- healthcare professionals;
- our customers or prospective customers who are natural persons (such as self-employed pharmacists);
- representatives or contact persons of our customers or prospective customers who are legal entities (such as wholesale pharmacists);
- representatives of state institutions, representatives of health insurance companies, management of hospital facilities, management of research institutes or universities, etc.;
- other professionals;

as such information constitute "personal data" and Sandoz considers the protection of personal data and privacy a very important matter.

Sandoz AG, with its registered office at Lichtstrasse 35 Basel, BASEL, 4056 Switzerland, is responsible for the processing of personal data as it decides why and how it is processed, thereby acting as the "controller". It may exercise this responsibility alone or jointly with other company(-ies) in the Sandoz group, acting as "co-controller(s)". In this Privacy Notice, "Sandoz", "we" or "us" refers to Sandoz AG.

1. What information do we have about you?

Information Sandoz may have about you may either be directly provided by you, by our business partners (i.e. the legal entity for whom you work), by third parties (e.g. external vendors or medical agencies) or be obtained through trusted publicly available sources (such as PubMed, Clinical Trials.gov, congress websites or university websites). We may collect various types of personal data about you, including:

- your general and identification information (e.g. name, first name, last name, gender, email and/or postal address, fixed and/or mobile phone number);
- your function (e.g. title, position, name of company, as well as, for healthcare professionals, first specialty, second specialty, year of graduation from medical school, publications, congress activities, awards, biography, education, links to universities, expertise and participation in/contribution to clinical trials, guidelines, editorial boards and organizations);
- payment information (e.g. credit card details, bank account details, VAT or other tax identification number);
- Sandoz unique business partner ID and profile;
- your electronic identification data where required for the purpose of delivering products or services to our company (e.g. login, access right, passwords, badge number, IP address, online identifiers/cookies, logs, access and connection times, image recording or sound such as badge pictures, CCTV or voice recordings);
- information regarding your utilization, responses and/or preferences including in terms of types of messages discussed, channels of communication and frequency;
- data you provide to us, for example when you fill in forms or during events you attend, or when you answer questions during a conversation or in a survey;
- data which relate to our products and services and information about the scientific and medical activities/interactions you have with us, including potential future interactions.

If you intend to provide us with personal data about other individuals (e.g. your colleagues), you must provide a copy of this Privacy Notice to the relevant individuals, directly or through their employer.

2. For which purposes do we use your personal data and why is this justified?

2.1. Legal basis for the processing

We will not process personal data. Sandoz may have about you, if we do not have a proper justification foreseen in the law for that purpose.

Therefore, we will only process your personal data if:

- we have obtained your prior consent;
- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- the processing is necessary to comply with our legal or regulatory obligations; or
- the processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms.

Please note that, when processing your personal data on this last basis, we always seek to maintain a balance between our legitimate interests and your privacy.

Examples of such 'legitimate interests' are data processing activities performed:

- to develop a proximity and trustful professional relationship with health care professionals;
- to provide knowledge to the health care professionals about Sandoz medicines and scientific developments;
- to manage Sandoz human and financial resources and optimize the interactions with health care professionals;
- to ensure that the right medicine according to a well-informed HCP's technical and professional opinion reaches the patient;
- to benefit from cost-effective services (e.g. we may opt to use certain platforms offered by suppliers to process data);
- to offer our products and services to our customers;
- to prevent fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks;
- to sell any part of our business or its assets or to enable the acquisition of all or part of our business or assets by a third party; and
- to meet our corporate and social responsibility objectives.

You can obtain further information on the balancing test of the above specific interests upon an express request to Sandoz.

2.2. Purpose of processing

We always process your personal data for a specific purpose and only process the personal data, which is relevant to achieve that purpose. In particular, we process the personal data we may have about you for the following purposes:

- manage our relationship with you (e.g. through our databases);
- implement tasks in preparation of or to perform existing contracts;
- evidence transactions and ensuring transparency on transfer of value;
- provide you with appropriate, adequate and updated information about diseases, drugs as well as our products and services;
- improve the quality of our interactions and services by adapting our offering to your specific needs;
- answer your requests and provide you with efficient support;
- send you surveys (e.g. to help us improve your future interactions with us);
- send you communications regarding products or services that we promote;
- manage, plan and execute communications and interactions with you (e.g. through the operation of a database keeping records of interactions with healthcare professionals or managing call planning as well as call reporting);
- track our activities (e.g. measuring interactions or sales, number of appointments/calls);
- invite you to events or promotional meetings sponsored by us (e.g. medical events, speaker events, conferences);
- grant you access to our training modules allowing you to provide us with certain services;
- manage our IT resources, including infrastructure management and business continuity;
- preserve the company's economic interests and ensure compliance and reporting (such as complying with our policies and local legal requirements, income taxes and national insurance and tax deductions, managing alleged cases of misconduct or fraud; conducting audits and defending litigation);
- manage mergers and acquisitions involving our company;
- archiving and record keeping;
- billing and invoicing; and
- any other purposes imposed by law and authorities.

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

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal data may be accessed by or transferred to the following categories of recipients, on a need-to-know basis to achieve such purposes:

- our personnel (including personnel, departments or other companies of the Sandoz group);
- our independent agents or brokers (if any);
- our suppliers and services providers that provide services and products to us;
- our IT systems providers, cloud service providers, database providers and consultants;
- our business partners who offer products or services jointly with us or with our subsidiaries or affiliates;
- any third party to whom we assign or novate any of our rights or obligations.
- our consultants and external lawyers in connection with the sale or transfer of any part of our company or its assets.

The above third parties are contractually obliged to protect the confidentiality and security of your personal data, in compliance with applicable law.

The personal data we collect from you will be processed mainly in Switzerland, but also may be processed in the European Union, in particular in the Czech Republic, as well as in India, Mexico and the United States. In addition, your personal data may also be processed, accessed and stored in countries where Sandoz has a registered office. A list of these countries can be found [here](#).

Your personal data can also be accessed by or transferred to any national and/or international regulatory, enforcement, public body or court, where we are required to do so by applicable law or regulation or at their request.

The personal data we collect from you may also be processed, accessed or stored in a country outside the country where Sandoz 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 Sandoz;
- II. acting in accordance with our policies and standards and;
- III. for Sandoz located in the European Economic Area (i.e. the EU Member States plus Iceland, Liechtenstein and Norway, the "EEA"), unless otherwise specified, only transferring your personal data on the basis of standard contractual clauses approved by the European Commission.

For transfers of personal data between our group companies, Sandoz group has concluded the Sandoz Intra-Group Data Transfer and Processing Agreement (all Sandoz entities are parties to) to ensure that this global exchange of personal data complies with data protection laws and in which Sandoz rely on Standard Contractual Clauses approved by the European Commission as the relevant transfer mechanism for transfers of personal data outside the EEA, United Kingdom, and Switzerland.

4. How do we protect your personal data?

We have implemented appropriate technical and organizational measures to provide an adequate level of security and confidentiality to your personal data.

These measures take into account:

- I. the state of the art of the technology;
- II. the costs of its implementation;
- III. the nature of the data; and
- IV. the risk of the processing.

The purpose thereof is to protect it against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access and against other unlawful forms of processing.

Moreover, when handling your personal data, we:

- only collect and process personal data which is adequate, relevant and not excessive, as required to meet the above purposes; and
- we may request you to confirm the personal data we hold about you. You are also invited to spontaneously inform us whenever there is a change in your personal circumstances so we can ensure your personal data is kept up-to-date.

5. How long do we store your personal data?

We will only retain personal data we may have about you for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

For agreements, the retention period is the same as the duration of an agreement entered into between you or your company with us, extended by the period after which the legal claims arising from this contract become time-barred if the main legal or regulatory schedules do not require a longer or shorter retention period. After expiry of this period, your personal data will be removed from our active systems.

Personal data collected and processed in the context of a dispute shall be erased or archived (i) as soon as an amicable settlement is reached, (ii) as soon as a final and enforceable decision has been issued as a last option, or (iii) as soon as the claim is time-barred.

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

You may exercise the following rights under the conditions and within the limits set forth in the law:

- the right to be informed about what personal data we have about you and how we process your personal data;
- the right to access your personal data as processed by us and, if you believe that any information relating to you is incorrect, obsolete or incomplete, to request its correction or updating;
- the right to request the erasure of your personal data or the restriction thereof to specific categories of processing;
- the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal;
- the right to object, in whole or in part, to the processing of your personal data;
- the right to object to a channel of communication used for direct marketing purposes; and
- the right to request its portability, i.e. that the personal data you have provided to us be returned to you or transferred to the person of your choice, in a structured, commonly used and machine-readable format without hindrance from us and subject to your confidentiality obligations.

If you wish to exercise your data privacy rights, under the conditions and within the limits set forth in the law, please [click here](#).

If you have a question or if you are not satisfied with how we process your personal data, you may send an email to sandoz_global.dpo@sandoz.com.

In any case, you also have the right to file a complaint with the competent data protection authorities.

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

We may change or update this Privacy Notice from time to time by posting a new privacy notice on our corporate website. Please keep checking this Privacy Notice occasionally so that you are aware of any changes.

TIMESTAMP

SANDOZ



Key resources

Media
Patients & Caregivers
Partners (B2B)
Job seekers
Suppliers

Explore

Contacts
Our policies
Open positions
Sandoz Site Directory

Tools & Services

Report Adverse Event
Speak Up

Our companies

1 A Pharma
Hexal
Lek

