

# Privacy Notice

September 2018

This Privacy Notice describes the ways in which we may collect, hold and use information about individuals who visit this website (“**Personal Data**”).

We invite you to carefully read this Privacy Notice, which sets out the context in which we may process your Personal Data and explains your rights and our obligations when doing so.

For the purpose of this Privacy Notice, “**Novartis**” refers to Novartis Pharmaceuticals UK Limited, which is registered at Frimley Business Park, Frimley, Camberley, Surrey, GU16 7SR. Novartis is responsible for the processing of Personal Data and acts as the “**controller**”. Novartis is part of the Novartis group and may exercise this responsibility alone or jointly with other companies in the Novartis group (acting as a “**co-controller**”). In this Privacy Notice, “**we**” or “**us**” refers to Novartis.

## 1 What Personal Data do we process and for which purposes?

This website does not require any form of registration, allowing you to visit our site without telling us who you are. However, in some cases we may need to process your Personal Data, such as your name, birth date, email address or telephone number. For example, we may need your Personal Data to respond to your queries, or to record and follow up on any side effects experienced with our products.

### 1.1 Website usage analytics

We may collect and process information about your visit to this website, such as the pages you visit, the website you came from and some of the searches you perform. Such information is used by us to help improve the contents of the site and to compile aggregate statistics using our site for internal, market research purposes. In doing this, we may install "cookies" that collect the domain name of the user, your internet service provider, your operating system, and the date and time of access. A "cookie" is a small piece of information, which is sent to your browser and stored on your device. Cookies do not damage your device. You can set your browser to notify you when you receive a "cookie", this will enable you to decide if you want to accept it or not, however, if you do not accept, you may not be able to use all functionalities of your browser software.

Occasionally, we may use internet tags (also known as action tags, single-pixel GIFs, clear GIFs, invisible GIFs and 1-by-1 GIFs) and cookies on this site and may deploy these tags/cookies through a third-party advertising partner or a web analytical service partner which may be located and store the respective information (including your IP address) in a foreign country. These tags/cookies may be placed on both online advertisements that bring users to this site and on different pages of this site. We use this technology to measure the visitors' responses to our sites and the effectiveness of our advertising campaigns (including how many times a page is opened and which information is consulted) as well as to evaluate your use of this website. The third-party partner or the web analytical service partner may be able to collect data about visitors to our and other sites because of these internet tags/cookies, may compose reports regarding the website's activity for us, and may provide further services which are related to the use of the website and the internet. They may provide such information to other parties if there is a legal requirement that they do so, or if they hire the other parties to process information on their behalf. If you would like more information about web tags and cookies associated with on-line advertising or to opt-out of

third-party collection of this information, please visit the Network Advertising Initiative website <http://www.networkadvertising.org> (link is external).

We use Google Analytics to rationalise our portfolio of websites by (i) optimising traffic to and between corporate websites, and (ii) integrating and optimising web pages where appropriate. "Google Analytics" is a service offered by Google Inc. ("Google") that generates detailed statistics about a website's traffic and traffic sources and measures conversions and sales. Google Analytics uses cookies stored on your device to help analyse how users use our website. The information generated by the cookies about your use of our website, including your IP address, will be anonymised by use of the appropriate settings prior to be transmitted to Google servers in the United States. For more information on how IP anonymisation works, please see <https://support.google.com/analytics/answer/2763052> (link is external).

You may prevent or stop the installation and storage of cookies by you browser settings by downloading and installing the free Opt-out Browser Add-on available at <https://tools.google.com/dlpage/gaoptout?hl=en> (link is external). If you do not accept cookies, you may not be able to fully experience all functions of our website.

## **2 Who has access to your Personal Data and to whom are they transferred?**

We will not sell, share, or otherwise distribute your Personal Data to third parties except as provided in this Privacy Notice or another notice provided to you. We may share your Personal Data with other Novartis affiliates worldwide. Personal Data may also be transferred to third parties who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed, such as evaluating the usefulness of this website, data management, or technical support.

These third parties have contracted with us to only use Personal Data for the agreed upon purpose, and not to sell your Personal Data to third parties, and not to disclose it to third parties except as may be permitted by us, as required by law, or as stated in this Privacy Notice.

Personal Data collected from you may also be transferred to a third party in the event that the business of this site or a part of it and the customer data connected with it is sold, assigned or transferred, in which case we would require the buyer, assignee or transferee to treat Personal Data in accordance with this Privacy Notice or another notice provided to you.

Also, Personal Data may be disclosed to a third party if we are required to do so because of an applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding here or abroad.

The Personal Data we collect from you may also be processed, accessed, or stored in countries outside the UK. Such countries may offer a different 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 applying the level of protection required under applicable data privacy laws.

For intra-group transfers of Personal Data, Novartis has adopted Binding Corporate Rules, a system of principles, rules, and tools, provided by European law, that ensures effective

levels of data protection relating to transfers of Personal Data outside the EEA and Switzerland. Read more about the Novartis Binding Corporate Rules at <https://www.novartis.com/privacy-policy#bcr> (link is internal).

### **3 How do we protect your Personal Data?**

To ensure the security and confidentiality of Personal Data that we collect online, we implement appropriate technical and organisational measures to ensure a level of security appropriate to protect your information from loss, misuse, unauthorised access, disclosure, alteration or destruction and against other unlawful forms of processing.

### **4 How long do we store Personal Data?**

We will only retain your Personal Data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

### **5 What are your rights and how can you exercise them?**

Whenever we process Personal Data, we take reasonable steps to ensure that your Personal Data is kept accurate and up-to date for the purposes for which it was collected. We will provide you with the ability to exercise the below rights under the conditions and within the limits set forth in the law.

If you wish to contact us regarding the use of your Personal Data or you want to object in whole or in part to the processing of your Personal Data, please contact [privacy\\_uk.ireland@novartis.com](mailto:privacy_uk.ireland@novartis.com). If you have provided consent, you may wish to withdraw consent. You may request to access your Personal Data as processed by us, to ask for correction, erasure or to request portability, where applicable, of your Personal Data (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, subject to your confidentiality obligations).

By contacting us, please note the name of the website related to your request, your relationship and/or interactions with us (as applicable), as well as the specifics of the information you would like us to provide.

We do not currently respond to web browser “do not track” signals or other mechanisms that provide a method to opt out of the collection of information across websites or other online services.

### **6 Contact us**

If you wish to contact us regarding our use of your Personal Data or you wish to exercise your data privacy rights, please contact [privacy\\_uk.ireland@novartis.com](mailto:privacy_uk.ireland@novartis.com).

If you are not satisfied with how we process your Personal Data, please address your request to our Data Protection Officer at [global.privacy\\_office@novartis.com](mailto:global.privacy_office@novartis.com), who will investigate your concern.

In any case, you also have the right to file a complaint with the competent data protection authorities, in addition to your rights above.