

Organon Canada Inc. Notice of Data Practices for Healthcare Professionals and Stakeholders in Canada

FACTS	<p>This Privacy Notice provides a comprehensive overview of the practices of Organon Canada Inc., a Canadian corporation, member of the Organon & Co. (Jersey City, NJ, USA) global family of companies ("Organon"), with respect to the collection, use and disclosure of personal information about Healthcare Professionals and Stakeholders in Canada.</p>
Our Approach	<p>At Organon ("Organon" or the "Company"), a global research-based pharmaceutical company, our approach to privacy begins with our values. We are committed to establishing a global privacy program to support compliance with applicable privacy laws and standards for protecting personal information around the world.</p>
Why?	<p>In accordance with Canadian privacy laws, Organon may, from time to time, collect, use and share identifiable information about you ("personal information") in your capacity as a healthcare professional or stakeholder for purposes related to our interactions with you (the "Purposes"). The term "Healthcare Professional" includes physicians, pharmacists, medical investigators, researchers, nurses, and other healthcare professionals. The term "Stakeholder" means individuals who are not healthcare professionals or suppliers of goods and products, excluding patients.</p> <p>The Purposes for which Organon collects your personal information in connection with our everyday business operations with you as a Stakeholder may fall within the following categories:</p> <ol style="list-style-type: none"> 1) to gain an understanding of your current professional needs and preferences to develop, enhance or provide products, services and scientific information geared to those needs and preferences as well as other initiatives, including: <ul style="list-style-type: none"> • gather your insight on policy or reimbursement related issues; • obtain additional information through business and market research; • gain your insight on the development of sales, marketing and learning programs. 2) to provide access to our resources and keep track of our interactions with you both offline and online (our online practices are governed by our Internet Privacy Policy). 3) to comply with legal and regulatory requirements including: <ul style="list-style-type: none"> • required tracking of payments made to Stakeholders for services performed on behalf of the Company; • financial disclosure reporting; • auditing our programs and resources for compliance and security purposes; • determining the appropriateness, given the requirements of laws applicable to our business, of engaging Stakeholders for certain of the business purposes described above; • legal proceedings and government investigations, including preservation of relevant data. <p>The Purposes for which Organon collects your personal information in connection with our everyday business operations with you as a Healthcare Professional fall within the following four categories:</p> <ol style="list-style-type: none"> 1) Medical & research related purposes, for example: <ul style="list-style-type: none"> • your interest in being involved in clinical, epidemiology and outcomes research study management; • to identify and engage scientific experts and leaders. 2) to provide you with information, products, services and features that you have requested or that may be of value to you, for example: <ul style="list-style-type: none"> • delivery of programs and materials for your own patients/customers; • communication of information or programs that may, in your opinion, be of interest to your patients or customers; • patient assistance and reimbursement programs; • communication of information about our products and business (including marketing & sales programs) through our professional representatives, our web sites, via e-mail, call centers, postal mail and other channels; • to determine your interest in symposia, conferences, and other scientific and educational programs; • as requested by you, to provide you with product samples or orders of our product; • to provide access to our resources and keep track of our interactions with you both offline and online (our online practices are governed by our Internet Privacy Policy). 3) to gain an understanding of your current professional needs and preferences to develop, enhance or provide products, services and scientific information geared to those needs and preferences, including: <ul style="list-style-type: none"> • gain your insight on the development of sales and marketing programs; • obtain additional information through business and market research; • perform professional segmentation to better understand your needs and preferences. 4) to comply with legal and regulatory requirements including: <ul style="list-style-type: none"> • adverse experience and product complaint reporting; • required tracking of payments made to you for services performed on behalf of Organon; • financial disclosure reporting; • auditing our programs and resources for compliance and security purposes; • determining the appropriateness, given the requirements of laws applicable to our business, of retaining your services for certain of the business purposes described above; • legal proceedings and government investigations, including preservation of relevant data. <p>Any personal information collected by Organon will be disclosed only on a need-to-know basis within Organon for the Purposes for which the information was collected or as may be required or permitted by law.</p> <p>Personal information is retained on a secure server. Organon being a global company, certain personal information may be located on Organon servers, databases or processes physically located outside of Canada or processed in another country. These databases only collect, store, receive, use and share personal information in keeping with the principles of use for a particular Purpose and on a need-to-know basis and with required safeguards in place.</p>

Effective June 2, 2021

This Privacy Notice is available on <https://organon.com/privacy/transparency-and-privacy-ca-en/>. It may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post a prominent notice to notify you of any significant changes to this Notice and indicate at the bottom when it was most recently updated.

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What?	<p>When Organon engages the services of a third party in the context of the Purposes, then personal information may be obtained from or shared with said third parties with appropriate safeguards in place, including but not limited to contractual safeguards, as relates to the use and retention of your personal information; see the "HOW" section of this Privacy Notice for further details in terms of sharing of personal information with third parties.</p> <p>When personal information is collected, stored, received, used or shared outside of Canada for the Purposes described in this Privacy Notice, safeguard measures are subject to the legal requirements of foreign countries where personal information is collected, stored, received, used, or shared, and Government authorities and national security of these countries could access it in accordance with the applicable laws of these countries. Where local laws require that you provide specific consent for the collection, use and disclosure of personal information for a Purpose, you may be asked to provide your consent by appropriate and permitted means.</p>	
How?	<p>The types of personal information we collect (directly from you or from public or third-party information sources) and share depend on the nature of the relationship you have with our Company and the requirements of applicable laws. This information may include, among other things:</p> <ul style="list-style-type: none"> • contact information, including name, email address, physical address, telephone numbers, signature; • professional credentials, publications, patents, and other scientific and medical achievements; • roles or positions held with governmental bodies or hospitals or payor organizations; • date of birth, day or year of birth, or age; • organizational and institutional affiliations; • programs and activities in which you participated; • information about your prescribing of our products; • agreements you have executed with the Company; • payment-related information, including tax identification number; • your communications preferences; • information about your scientific and medical colleagues and leaders in your specialty area. 	
How?	<p>In the section below, we list the reasons that pharmaceutical companies like our company typically may share personal information about health care professionals, the reasons that we share this information, and whether you can limit this sharing. We implement reasonable and appropriate security measures to protect personal information in accordance with its sensitivity from loss, misuse, unauthorized access, disclosure, alteration, or destruction.</p>	
Reasons personal information about you could be shared	Do we share?	Can you limit this sharing?
To companies we collaborate with to use for their own products and services.	No, unless you provide your express (opt-in) permission for this sharing.	Yes
To companies that we do not collaborate with to use to market to you.	No, unless you provide your express (opt-in) permission for this sharing.	Yes
Reporting to government authorities (such as Health Canada and the FDA in USA).	Yes, for example, to report safety information about our products or transfer of value (where required by law).	No
To parties in relevant legal proceedings as authorized by the presiding court or tribunal and otherwise to the extent required or explicitly authorized by applicable law.	Yes	No
To comply with laws and regulations, including (without limitation) applicable tax, health and safety laws.	Yes	No
In the event that for business reasons, we decide to divest part or all of our business through sale, merger or acquisition, to actual or prospective purchasers.	Yes, based on written agreements that personal information will be protected appropriately in these circumstances.	Generally, no, except where local law permits you to opt-out or requires your express consent.
With companies globally that provide services on our behalf and in accordance with our instructions (for example, to deliver specific information you have requested).	Yes, if the business operation is supported by another company. As a global company, we may work with companies around the world to provide services for or on our behalf, and we will require those companies to protect personal information in accordance with applicable laws, rules and regulations and Company privacy policies.	<p>Generally, no. We have instituted policy, contractual and administrative mechanisms requiring protection of personal information by other companies that process personal information on our behalf globally. However, where local law provides a right for you to limit this sharing, we will comply with such requirements.</p> <p>In circumstances where our business operations are supported by other companies, such as a company that we contract with to mail the materials you request, you will not be able to limit this sharing and still receive the service.</p>
<p>To affiliates* within the Organon & Co. family of companies globally for everyday business purposes as described in this notice.</p> <p><i>*Affiliates are companies related by common ownership or control.</i></p>	<p>Yes, as a global company, we generally share personal information across our offices globally for the purposes described in this notice. However, only those individuals with a legitimate business need to access personal information for these purposes are granted such access. For example, payment information generally will be available only to the local company office in your country and the USA group responsible for payments.</p>	<p>Generally, no. We have instituted policy, contractual and administrative mechanisms requiring protection of personal information across our business globally. However, where local law provides a right for you to limit this sharing, we will comply with such requirements.</p> <p>You may request that we not transfer personal information outside of your country, however, in most cases this will substantially limit the services we can provide to you, particularly where our computer servers, databases or processes are located in another country.</p>

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Reasons personal information about you could be shared	Do we share?	Can you limit this sharing?
To the public, annual reports on the transfers of value provided to healthcare professionals directly related to the provision of services or indirectly through medical education or attendance at congresses.	No, unless you provide your express (opt-in) permission for this sharing.	Yes. Note, in some countries, such disclosure is deemed to be in the public interest and may be shared even without your permission.
To other companies we collaborate with solely for activities related to products or services jointly offered or developed by us and that company.	Yes, based on written agreements in place between us and those companies, which require those companies to protect confidential information provided by us.	Yes, if you specifically request to opt-out.
Contact Us	<p>If you have questions regarding this notice or our privacy data processing practices, please contact us. In some cases, we may be required to work with or refer you to a third party to enable you to opt-out.</p> <p>E-mail: Privacy Office</p> <p>Write to us at: Chief Privacy Officer Organon Canada Inc. 16766 Trans Canada Hwy Suite 300 Kirkland, Qc H9H 4M7</p> <p><u>Global Privacy Office at Organon & Co., the parent company of Organon Canada Inc.:</u></p> <p>E-mail: Privacy Office</p> <p>Write to us at: Organon Global Privacy Office 30 Hudson Street Jersey City, NJ 07302</p>	

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