

## UK Privacy Notice for Healthcare Professionals

The following privacy notice is intended for Healthcare Professionals and explains how OrganonPharma (UK) Limited also known as Organon may collect, use, and share information relating to your professional activities. Organon are the controller and are responsible for your personal data.

### What is personal data?

In this notice the words, “personal data” means any information that identifies you, for example, your name, address and place of work. It also includes transfers of value made to you by Organon for activities that you have engaged in with us.

### Types of personal information collected

The data that we collect, and process is professional information about medical practitioners, pharmacists, nurses and other healthcare professionals.

We hold the following information about healthcare professionals:

- Contact details including your name, professional address and telephone number
- Optional Data for Disclosure UK – email address, third party IDs (where applicable)
- Email address and mobile phone numbers where we have received your explicit consent
- Details including dates and types of our interactions we have had with you, including any details of Information you have requested from us
- Transfers of Value – The amount (whether in payment or benefit in kind) received by you from us and details of the related activities for which you received the Transfers of Value
- Records of any payments made to meet our regulatory obligations
- Information about your medical practice and your areas of professional interest.
- Personal photograph (e.g., Biographic image) that you have provided to Organon, or is publicly available

### How we collect your data

Organon collect your personal data when you interact with us whether for purposes of establishing and maintaining communications with you and sharing information (including promotional information) with you and when a transfer of value is made by us to you and during the course of the activities you undertake with us in respect of the transfer of value.

### How we use your data to enable effective engagement:

We use your information to identify your professional specialties and areas of interest, for the purposes of inviting you to attend conferences, participate in other programmes and deliver educational materials about our product and services; this includes promotional activities that may be of interest to you.

Additionally, we use this information to comply with all legal and regulatory obligations. This information will be used based on our legitimate business interests, to assess how we can support you and further strengthen our relationship. We will also use your information to verify that you are an HCP so we can meet our legal obligation to ensure we only market to Health Care Professionals. Any direct marketing materials will only be sent where we have your consent.

### How we use your data to enable disclosures of transfers of value:

Organon are a signatory of the Association of the British Pharmaceutical Industry (“ABPI”)’s Code of Practice for the Pharmaceutical Industry (the “Code”).

We collect information about the transfers of value that you have received from us so that we can comply with our obligations under the Code and in particular the requirement that “*companies must document and publicly disclose annually certain transfers of value made directly or indirectly to health professionals, other relevant decision makers... located in Europe*”.

We collect your personal data so that we can share it with the ABPI who will validate and collate your personal data for publication on Disclosure UK, the publicly accessible database managed by the ABPI that shows transfers of value from pharmaceutical companies that are signatories to the Code. The ABPI's privacy notice in relation to Disclosure UK can be found [here](#).

We may also collect further data from you such as your email address or third-party ID, in order to share it with the ABPI for purposes other than publication on Disclosure UK, e.g., sending you notifications regarding the disclosure portal or improving the accuracy of data matching.

### **The legal basis for processing your personal data for disclosures of transfers of value**

The law requires us to inform you of the legal basis for collecting and processing your personal data where we are the data controller; and we confirm that we rely on legitimate interests to disclose such data. Where we process data relating to transfers of value made to you, we rely on the following **legitimate interests** to process and disclose such data, and to meet the following objectives:

- to comply with the ABPI Code of Practice
- to address the legitimate public interest in better understanding the financial relationships between the pharmaceutical industry and health professionals and in the interests of transparency and trust in the pharmaceutical industry
- to provide such data to the ABPI who has a legitimate interest in receiving the data for publication, to help meet the overall objectives of the Code, including transparency and public trust. Note, the ABPI will validate and publish your personal data on the ABPI Disclosure UK website. The ABPI's privacy notice in relation to Disclosure UK can be found [here](#)

### **How do we keep your data secure?**

Further information about how we manage and secure your data can be found on our Privacy page, which can be found [here](#)

### **Other uses may also include some of the following:**

- Virtual meetings
- Market research
- Adverse event reporting
- Customer communication networks
- Organon Digital material usage tracking
- Social media listening related to our products and services
- Segmentation and preferences for tailored communications
- Anti-Bribery checking Clinical trial participation

### **Sharing your information:**

Organon Pharma (UK) Limited is a subsidiary of Organon & Co., Jersey City, NJ, USA. We may share your information among Organon affiliates outside of the UK and Europe and will do so in accordance with our Privacy Policy, which has been approved in the European Union. Your personal information may also be passed to other organisations for them to use but solely at the direction of Organon.

Organisations that receive information from Organon will be contractually bound to only use this information in accordance with Organon's instructions and in a manner that is consistent with all relevant data protection laws.

### **Retention:**

Where we have had an interaction with you this will be retained for 3 years after our last interaction. Information may be retained for longer if we have a legal or regulatory obligation or where we have a legitimate interest to do so.

For purposes of transfer of value disclosures, and in compliance with the Code, Organon must retain records of all disclosures made to Disclosure UK for at least five years after the end of the calendar year to which they relate. Organon will therefore keep your personal data about transfers of value or benefits in kind for at least five years, to meet its obligations, to ensure that the information published by the ABPI on Disclosure UK is accurate and to resolve any questions or queries relating to the personal data.

We may keep your personal data for longer if there is a legal reason, such as a dispute between us.



**Your rights:**

Subject to restriction in applicable law, you have certain rights with respect to your personal information, such as, a right of access, correction, restriction of use, deletion, and portability.

If you object to Organon processing your data, we will cease collecting and using your personal information; doing so will limit our ability to interact with you. Organon may still be required to process certain personal information about you in order to meet our legal or regulatory obligations.

If you choose to exercise your data protection rights you can submit a request using the [Data Subject Request Form](#) where you are able to request access, correct, or delete your personal information. If you have any questions or concerns about our use of your personal information, please contact us at the following email address: [privacyteam@organon.com](mailto:privacyteam@organon.com), alternatively you also have the option of contacting the UK Information Commissioners Office.

You also have a right to object to the processing of your personal information where that processing is based on our legitimate interests, such as our disclosure of your transfer of value data to the ABPI. If you make an objection request, we shall seek to ensure a balance is struck between your rights and freedoms and our legitimate interests. Organon will cease processing your data in this way unless we can demonstrate compelling and legitimate grounds for the processing. To object you can contact us at [privacyteam@organon.com](mailto:privacyteam@organon.com).