

# Organon (Jersey City, NJ, USA)

## Notice of Data Practices for Healthcare Professionals

Effective Date: 16 April 2024

FACTS	<p>This Notice of Data Practices for Healthcare Professionals ("Notice") provides a comprehensive overview of the practices of Organon &amp; Co. (Jersey City, NJ, USA) and its affiliates with respect to the collection, use, and disclosure of personal information about healthcare professionals globally. <i>This Notice is not intended to replace other notices or consents provided by our company to healthcare professionals in accordance with local laws and regulations or for specific programs. In the event of any conflict between notices or consents required by local law and this Notice, the notices or consents required by local law will prevail.</i></p>
Our Approach	<p>At Organon, 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>We collect, receive, use, and share identifiable information ("personal information") about physicians, pharmacists, investigators, researchers, and other health care professionals in accordance with and as permitted by applicable law and as authorized by applicable government authorities, in connection with our everyday business operations, which may include:</p> <ul style="list-style-type: none"> <li>• clinical, epidemiology, and outcomes research study management</li> <li>• adverse experience and product complaint reporting</li> <li>• patient assistance, prescription discounts, and reimbursement support programs</li> <li>• communicating information about our products through our professional representatives, our websites, via e-mail, call centers, postal mail, and other channels, including promotional and other marketing communications</li> <li>• symposia, conferences, and other scientific and educational programs</li> <li>• requests for product samples and orders for our products, where permitted by law</li> <li>• financial disclosure reporting</li> <li>• business research and marketing research</li> <li>• auditing our programs and resources for compliance and security purposes</li> <li>• identifying and engaging scientific experts and leaders</li> <li>• providing access to our resources and keeping track of our interactions with you both offline and online (our online practices are governed by our privacy policy which can be accessed <a href="#">here</a>)</li> <li>• tracking payments made to healthcare professionals for services performed on behalf of our Company</li> <li>• development and enhancement of sales and marketing programs</li> <li>• delivery of programs and materials to your patients</li> <li>• determining the appropriateness, given the requirements of laws applicable to our business or in compliance with our policies, including due diligence, background checks, and screening processes, of engaging health care professionals for certain of the business purposes described above</li> <li>• as required or expressly authorized by laws applicable to our business globally</li> </ul> <p>Depending on the location in which you live, local laws may require that you provide specific consent for the collection, use, and disclosure of personal information for some of these programs. Where required, you may be asked to provide your consent by filling out a paper or online form, in a telephone discussion, by a text message, or by other appropriate and permitted means. Except where we are required by law or regulation to use or disclose personal information for certain purposes, and except in cases where we may be required to work with or refer you to a third party, you also may opt-out of specific programs by contacting us as described in the "Contact Us" section of this form.</p>

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What?	<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"><li>• contact information, including name, email address, physical address, telephone numbers, signature</li><li>• professional credentials, publications, patents and other scientific and medical achievements</li><li>• roles or positions held with governmental bodies or hospital or payor organizations</li><li>• date or birth, day or year of birth, or age</li><li>• organizational and institutional affiliations</li><li>• programs and activities in which you participated</li><li>• information about your prescribing of our products</li><li>• agreements you have executed with the Company</li><li>• payment-related information, including tax identification number</li><li>• your communications preferences</li><li>• information about your scientific and medical colleagues and leaders in your specialty area</li></ul>
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How?	In the section below, we list the reasons that pharmaceutical companies like our company typically may share personal information about healthcare 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.	
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.	Yes
Reporting to government authorities (such as FDA in the USA)	Yes, for example, to report safety information about our products or transfers 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, 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.	Generally, no. We have instituted policy, contractual and administrative mechanisms requiring the 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.  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.

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To affiliates* within the Organon & Co. family of companies globally for everyday business purposes as described in this Notice.  <i>*Affiliates are companies related by common ownership or control.</i>	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 to the USA group responsible for payments.	Generally, no. We have instituted policy, contractual and administrative mechanisms requiring the 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.  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.
To the public, annual reports on the transfers of value provided to HCPs 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 that in some countries, such disclosure is deemed to be in the public interest and may be shared even without your permission.
To other companies with which we collaborate solely for activities related to products or services jointly offered or developed by that company and us.	Yes, based on written agreements in place between those companies and us, which require those companies to protect confidential information provided to them by us.	Yes, if you specifically request to opt out.

## California Health Care Professionals' Privacy Notice

The section below lists the specific rights available to California healthcare professionals under the California Consumer Privacy Act of 2018 and California Privacy Rights Act of 2020 (collectively, the "CCPA"). We also identify the categories of Personal Information we have collected in the last 12 months, the purposes for such collection, the categories of Personal Information we have disclosed and the categories of recipients, and other information concerning our privacy practices in the last 12 months. The privacy practices described below also apply to Personal Information we may collect from you going forward.

### Definitions

- "**Personal Information**" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household but excludes information that is publicly available (i.e., the information is lawfully made available from government records, is lawfully made available to the general public by the consumer or from widely distributed media, or is made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience). Personal Information includes "Sensitive Personal Information," as defined below.
- "**Sensitive Personal Information**" means Personal Information that reveals a consumer's social security, driver's license, state identification card, or passport number; account log-in, financial account number, debit card number, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious beliefs, or union membership; contents of email or text messages; and genetic data. Sensitive Personal Information also includes the processing of biometric information for the purpose of uniquely identifying a consumer and Personal Information collected and analyzed concerning a consumer's health, sex life, or sexual orientation.
- To the extent other terms used in this Notice are defined terms under the CCPA, they shall have the meanings afforded to them in that statute, whether capitalized or not herein.

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Sources from Which We Collect Personal Information	We collect Personal Information directly from California consumers, as well as from joint marketing partners, public databases, providers of demographic data, publications, professional organizations, social media platforms, Vendors, and third parties that help screen and onboard individuals for hiring purposes and Vendors and third parties that share information with Organon.	
Categories of Personal Information Collected and Purposes	<b>CATEGORIES OF PERSONAL INFORMATION</b>	<b>COLLECTION PURPOSES</b>
	<b>Identifiers.</b> Such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	<ul style="list-style-type: none"> <li>Respond to your requests for information about our products and services.</li> <li>Communicate information that we think may be of interest to you through our websites or via e-mail, phone call, postal mail and other channels, including promotional communications about our products and services.</li> <li>Analyze information related to our current interactions with you, including counting ad impressions and unique visitors to our website.</li> <li>Conduct business and marketing research.</li> <li>Better understand the market for our existing products and services and potential new products and services, and adjust our research, development, and marketing strategies accordingly.</li> <li>Process and report adverse event information and product complaints.</li> <li>Identify and engage scientific experts.</li> <li>Identify speakers and invitees to conferences and other scientific and educational programs we host or sponsor.</li> <li>Track and report payments and other transfers of value to healthcare professionals in accordance with financial disclosure transparency requirements.</li> <li>Audit our programs and services for compliance purposes.</li> <li>Meet our contractual obligations to you if you provide us with services.</li> <li>Ensure compliance with applicable laws and regulations.</li> <li>Comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons.</li> </ul>
	<b>Personal Information Contained in Customer Records</b> Contact data, such as phone number, address, email address, or similar information.	
	<b>Characteristics of Protected Classifications Under State or Federal Law</b> Such as age, gender, or race.	
	<b>Commercial Information</b> Such as records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	
	<b>Internet or other electronic network activity information</b> Such as browsing history and interactions with our websites or advertisements.	
	<b>Geolocation Data</b> Such as device location.	
	<b>Audio, Electronic, Visual, and Similar Information</b> Such as call and video recordings.	
	<b>Professional or Employment-Related Information</b> Such as work history and prior employer.	
	<b>Education Information</b> As defined in the federal Family Educational Rights and Privacy Act, such as student records and directory information.	
	<b>Inferences Drawn from Other Personal Information</b> Inferences drawn from any of the above to create a profile or summary about, for example, an individual's preferences and characteristics.	
	<b>Sensitive Personal Information</b>	
	<b>Account Access Credentials</b> Personal information that reveals account log-in, financial account, debit card, or credit card number in combination with access credentials, such as a password.	
	<b>Precise Geolocation</b> Personal information that can be used to locate a consumer within a geographic area that is equal to or less than the area of a circle with a radius of one thousand, eight hundred and fifty (1,850) feet.	
	<b>Racial or Ethnic Origin, Religious or Philosophical Beliefs, or Union Membership</b> Personal information that reveals any of the above.	
	<b>Contents of Communications Not Directed to Us</b> Personal information that includes the contents of emails, text messages, or other communications which the consumer has not sent to the business.	
	<b>Genetic Data</b> Personal information that reveals genetic data.	
	<b>Biometric Information Used to Uniquely Identify Consumers</b> Personal information that reveals the above.	

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	<b>Personal Information Collected and Analyzed Concerning a Consumer's Health</b> Personal information that reveals the above.	<ul style="list-style-type: none"><li>• Exercise or defend the legal rights of Organon and its employees, affiliates, customers, contractors, and agents.</li><li>• Detect security incidents and other fraudulent activity.</li><li>• Monitor and improve our website functionality.</li><li>• Personalize your website experience.</li></ul>
	<b>Personal Information Collected and Analyzed Concerning a Consumer's Sex Life or Sexual Orientation</b> Personal information that reveals the above.	
Retention of Personal Information	We retain your Personal Information for the period reasonably necessary to provide goods and services to you and for the period reasonably necessary to support our business operational purposes.	
Sale or Sharing of Personal Information	We have not sold or shared Personal Information about California consumers in the past twelve months. Relatedly, we do not have actual knowledge that we sell or share the Personal Information of California consumers under 16 years of age. For purposes of the CCPA, a “sale” is the disclosure of Personal Information to a third party for monetary or other valuable consideration, and a “share” is the disclosure of Personal Information to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.	
Disclosures of Personal Information	<b>Affiliates and Service Providers</b>	<b>Third Parties</b>
	We may disclose each of the categories of Personal Information described above to our affiliates and Service Providers for the purposes described above. Our Service Providers provide us with website services, web hosting, data analysis, customer service, infrastructure services, technology services (including email delivery services), legal services, marketing services, and other similar services. We grant our Service Providers access to Personal Information only to the extent needed to perform their functions and require them to protect the confidentiality and security of such information.	We may disclose each of the categories of Personal Information described above to the following categories of third parties: <ul style="list-style-type: none"><li>• At Your Direction. We may disclose your Personal Information to any third party with your consent or direction.</li><li>• Business Transfers or Assignments. We may disclose your Personal Information to other entities as reasonably necessary to facilitate a merger, sale, joint venture or collaboration, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).</li><li>• Legal and Regulatory. We may disclose your Personal Information to government authorities, including regulatory agencies and courts, as reasonably necessary for our business operational purposes, to assert and defend legal claims, and otherwise as permitted or required by law.</li></ul>
Processing Sensitive Personal Information	We, and our Service Providers, collect and process the Sensitive Personal Information described in this Notice only for: <ul style="list-style-type: none"><li>• Performing the services or providing the goods reasonably expected by an average Consumer who requests those goods or services;</li><li>• Ensuring security and integrity to the extent the use of the Consumer's Personal Information is reasonably necessary and proportionate for these purposes;</li><li>• Preventing, detecting, and investigating security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted Personal Information;</li><li>• Resisting malicious, deceptive, fraudulent, or illegal actions directed at the business and prosecuting those responsible for those actions;</li><li>• Ensuring the physical safety of natural persons;</li><li>• Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a Consumer's current interaction with us; provided that we will not disclose the Consumer's Personal Information to a third party and/or build a profile about the Consumer;</li><li>• Performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on our behalf; and</li><li>• Undertaking activities to verify or maintain the quality or safety of a service or device that is owned,</li></ul>	

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	manufactured by, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.
<b>Right to Receive Information on Privacy Practices</b>	<p>You have the right to receive the following information at or before the point of collection:</p> <ul style="list-style-type: none"> <li>• The categories of Personal Information to be collected;</li> <li>• The purposes for which the categories of Personal Information are collected or used;</li> <li>• Whether or not that Personal Information is sold or shared;</li> <li>• If the business collects Sensitive Personal Information, the categories of Sensitive Personal Information to be collected, the purposes for which it is collected or used, and whether that information is sold or shared; and</li> <li>• The length of time the business intends to retain each category of Personal Information, or if that is not possible, the criteria used to determine that period.</li> </ul> <p>We have provided such information in this Notice, and you may request further information about our privacy practices by contacting us at the contact information provided below.</p>
<b>Right to Deletion</b>	You may request that we delete any Personal Information about you that we collected from you.
<b>Right to Correction</b>	You may request that we correct any inaccurate Personal Information we maintain about you.
<b>Right to Know</b>	<p>You may request that we provide you with the following information about how we have handled your Personal Information in the 12 months preceding your request:</p> <ul style="list-style-type: none"> <li>• The categories of Personal Information we collected about you;</li> <li>• The categories of sources from which we collected such Personal Information;</li> <li>• The business or commercial purpose for collecting Personal Information about you;</li> <li>• The categories of Personal Information about you that we shared or disclosed and the categories of third parties with whom we shared or disclosed such Personal Information; and</li> <li>• The specific pieces of Personal Information we have collected about you.</li> </ul>
<b>Right to Receive Information about Onward Disclosures</b>	<p>You may request that we disclose to you:</p> <ul style="list-style-type: none"> <li>• The categories of Personal Information that we have collected about you;</li> <li>• The categories of Personal Information that we have sold or shared about you and the categories of third parties to whom the Personal Information was sold or shared; and</li> <li>• The categories of Personal Information we have disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.</li> </ul>
<b>Exercising Data Subject Rights</b>	You may exercise the data subject rights applicable to you under the CCPA by clicking <a href="#">here</a> , calling 1-844-674-3200, or contacting our <a href="#">Privacy Office</a> . You may also authorize an agent to make data subject requests on your behalf.
<b>Verification of Data Subject Requests</b>	We may ask you to provide information that will enable us to verify your identity to comply with your data subject request. When you authorize an agent to make a request on your behalf, we may require the agent to provide proof of signed permission from the consumer to submit the request, or we may require the consumer to verify their own identity to us or confirm with us that they provided the agent with permission to submit the request. In some instances, we may decline to honor your request if an exception applies under applicable law. We will respond to your request consistent with applicable law.
<b>Non-Discrimination</b>	You have the right not to be discriminated against for exercising your data subject rights. We will not discriminate against you for exercising your data subject rights. For example, we will not deny goods or services to you, charge you different prices or rates, or provide a different level of quality for products or services because you exercise your data subject rights.

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Other Disclosures	<p><b>California Residents Under Age 18.</b> If you are a resident of California under the age of 18 and a registered user of our website, you may ask us to remove content or data that you have posted to the website by writing to <a href="mailto:PrivacyOffice@organon.com">PrivacyOffice@organon.com</a>. Please note that your request does not ensure complete or comprehensive removal of the content or data, as, for example, some of your content or data may have been archived or reposted by another user.</p> <p><b>Disclosure About Direct Marketing for California Residents.</b> California Civil Code § 1798.83 permits California residents to annually request certain information regarding our disclosure of Personal Information to other entities for their direct marketing purposes in the preceding calendar year. We do not distribute your Personal Information to other entities for their own direct marketing purposes.</p>
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><u>To contact the Global Privacy Office:</u> Write to us at: Organon Global Privacy Office 30 Hudson Street Jersey City, NJ 07302</p> <p>E-mail address: <a href="mailto:PrivacyOffice@organon.com">PrivacyOffice@organon.com</a></p> <p><u>Data Subject Rights:</u> You may request your data subject rights by completing the <a href="#">online form</a> (preferred method), or US residents can also call the Organon Service Center at 844-674-3200. To appeal our decision on your request, email <a href="mailto:PrivacyOffice@Organon.com">PrivacyOffice@Organon.com</a> and provide details of your concerns and reference our decision on your data subject request, so that we may adequately address your appeal. We will respond to your appeal in accordance with applicable law.</p>