

PRIVACY NOTICE

CUSTOMERS, SUPPLIERS AND OTHER BUSINESS PARTNERS

1. The personal information we use

1.1 Information we collect directly from you

1.2 Other information we use about you

2. How we use your personal information and the basis on which we use it

3. Your rights over your personal information

4. Information Sharing

5. Information Security and Storage

6. International Data Transfer

7. Contact Us

8. Changes to the Policy

This privacy notice describes how **Servier Laboratories Ltd** ("**Servier**", "**we**" or "**us**"), whose registered office is located at Sefton House, Sefton Park, Bells Hill, Stoke Poges, Buckinghamshire SL2 4JS, collect and process personal information about you, how we use and protect this information, and your rights in relation to this information.

This privacy notice applies to current, past and prospective customers, suppliers and other business partners who are individuals, as well as employees and representatives of corporate customers, suppliers and other business partners.

If you are a healthcare professional, relevant decision maker or person with whom Servier collaborates for research, please visit our Privacy Notice (HCPs, relevant decision makers, research collaborations and other partners), available here: <https://servier.co.uk/content/privacy-notices>.

For information on how we use your personal data to respond to enquiries (including medical information enquiries) and reports of suspected adverse events and other special situations, please visit our Privacy Notice (Enquiries and reports of Suspected Side Effects), available here: <https://servier.co.uk/content/privacy-notices>.

For information on all other uses of your personal data, please continue reading below.

Personal information is information, or a combination of pieces of information that could reasonably allow someone to be identified.

1. PERSONAL INFORMATION WE USE

We collect personal information from you directly (e.g. when you meet in person with one of our representatives) as well as from other sources as described below.

1.1 Personal information we collect directly from you

The categories of personal information that we collect directly from you are:

- (a) personal details (e.g. name, title)
- (b) contact details (e.g. business phone number, business email address, business address and any other contact details you provide us)
- (c) professional details (e.g. place of work, professional title)
- (d) Information relating to pharmacovigilance training (if relevant)
- (e) Bank details

1.2 Other information we use about you

Other information we use about you includes information generated by Servier, including the history of our relationship with you such as previous communications with us and details of previous products or services you have provided to us.

2. HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT

We use your personal information for the following purposes:

- (a) to communicate with you with respect to past, current or prospective products or services;
- (b) to communicate with you in relation to quality complaints and recalls in relation to our products;
- (c) to process payments;
- (d) for business planning and management including to manage our human and financial resources and to monitor compliance with anti-bribery legislation;
- (e) to exercise and defend our legal rights where it is necessary to do so, for example to detect, prevent and respond to fraud claims, intellectual property infringement claims or other legal claims;

We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- (a) to comply with our legal obligations and to cooperate with regulators and law enforcement bodies in relation to tax reporting and auditing requirements and drug safety obligations
- (b) for the performance of a contract that we have with you or to take steps to enter into such a contract at your request
- (c) to meet our legitimate interests, in particular in relation to business planning and management and monitoring compliance, as described above. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms. For more information about the balancing test that we carry out to process your

personal information to meet our legitimate interests, please contact us at the details below.

3. **YOUR RIGHTS OVER YOUR PERSONAL INFORMATION**

You have certain rights regarding your personal information, subject to certain exceptions in accordance with applicable law. These include the following rights to:

- access your personal information. There may be some exceptions, which means you may not always receive all the information we process about you;
- rectify any inaccurate information we hold about you;
- erase your personal information except in certain circumstances for example if it is necessary for us to process your personal information to comply with a legal obligation (as described in section 2 above) or for the establishment, exercise or defence of a legal claim;
- restrict our use of your personal information in certain circumstances;
- object to our use of your personal information in certain circumstances where we use your personal for our legitimate interests (as described in section 2 above); and
- lodge a complaint with your local data protection authority (the Information Commissioner's Office in the UK: <https://ico.org.uk/>).

If you would like to discuss or exercise such rights, please contact us at the details below.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honour your requests.

4. **INFORMATION SHARING**

We will share your personal information with third parties under the following circumstances:

- Service providers and business partners. We share your personal information with our auditors to comply with our tax and auditing obligations. We also share your personal information with our IT system providers and cloud service providers.
- Servier group companies. Servier Laboratories Ltd is ultimately owned by Les Laboratoires Servier, so we work closely with other businesses and companies that fall under the Servier group family. We may share certain information about you with Les Laboratoires Servier and other Servier group companies where this is necessary for business planning purposes and internal auditing purposes. Information on the global presence of the Servier group can be found here: <https://servier.com/en/company/global-presence/>.
- Law enforcement agencies, courts, regulators (including the tax authorities), government authorities or other third parties. We will share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or to support a legal or criminal investigation or otherwise to protect our rights or the rights of any third party.

- Asset purchasers. We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice.

Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on "International Data Transfer" below for more information.

5. INFORMATION SECURITY AND STORAGE

We implement technical and organisational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

We will keep your personal information for the duration of our relationship with you, after which we will retain your personal information for a period of time that enables us to:

- Maintain records for business management and planning;
- Maintain records to evidence our compliance with our legal obligations described in section 2 above;
- Comply with record retention requirements under the law including accounting rules;
- Defend or bring any existing or potential legal claims; and/or
- Deal with any complaints regarding our products or services or the products or services you have provided to us.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

6. INTERNATIONAL DATA TRANSFER

[In addition to Servier Group entities overseas,] your personal information may be transferred to, stored, and processed by an international organisation or a third party located in a country that is not regarded as ensuring an adequate level of protection for personal information under European Union law or by the European Commission.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

7. CONTACT US

Servier Laboratories Ltd is the controller responsible for the personal information we collect and process.

If you have questions or concerns regarding the way in which your personal information has been used, please contact us using the contact details below:

- Email: datamanagementuk@servier.com
- Telephone: 01753 666409

- Post: Compliance Department, Servier Laboratories Ltd, Sefton House, Sefton Park, Bells Hill, Stoke Poges, Buckinghamshire SL2 4JS

Our Data Protection Officer can be contacted at: datamanagementuk@servier.com.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority of the UK (the Information Commissioner's Office: <https://ico.org.uk/>) or your local data protection authority if you are based outside the UK.

8. CHANGES TO THE POLICY

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time.

If we change this privacy notice, we will notify you of the changes by way of a banner on our Website. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

[SEPTEMBER 2018]