

PERSONAL DATA PROCESSING BY SERVIER INFORMATION NOTICE FOR INVESTIGATORS AND OTHER STUDY STAFF INVOLVED IN A CLINICAL TRIAL

As a data controller, SERVIER processes your personal data mainly on the basis of its legitimate interest to develop and promote its products along with relevant medical information or on the basis of your prior consent when applicable but also in order to comply with its legal obligations related to the conduct of clinical trials, including pharmacovigilance and transparency. In certain cases (e.g. when you visit SERVIER's premises), your personal data may be also processed in relation to security management, whereas, in case you act as an investigator / any other involved study staff in the field of clinical research your personal data will also be processed for the execution of your contract with SERVIER.

Your personal data are collected and processed by SERVIER for the following purposes:

- Management of clinical study conduct, including the checking of necessary qualification and training information;
- Communication and relationship management activities in connection with clinical trials and pharmacovigilance activities including interactions, contractual relationships management, congress and meetings management, therapeutic area experts databases, social media, E-services (e-conferencing, etc.);
- Transparency management (disclosure of transfers of value from SERVIER to health stakeholders) when relevant;
- Security of visitors and premises (in case you visit SERVIER's premises)
 - Premises and car park access management
 - video surveillance system management to ensure security of persons and premises.

Your personal data processed by SERVIER will only be accessible by a limited list of recipients on a need to know basis or where required by law.

Thus, the main categories of recipients will be SERVIER's authorized employees and departments acting within their scope of activities including but not limited to:

- Research & Development mainly the Clinical Operations Departments
- Medical Affairs Department;
- Pharmacovigilance Department;
- Information Technology Department where necessary.

Other services and individuals may need to have access to your personal data in relation to specific purposes of data processing, such as:



- The Security service and the General Services department for issues related to the use and the security of the premises (premises and car park access management);
- The Safety service for video surveillance system management.

SERVIER also uses third party providers (e.g. hosting providers) and business partners (e.g. contractual research organizations, travel and conferences agencies, agencies, hotels, air carriers etc.) who may also access to your personal data in order to provide their services. Finally, SERVIER shall communicate some of your personal data to the competent authorities such as health authorities and ethics committees.

Your personal data may be transferred to other SERVIER entities, and to third-parties providers and health authority which may be located inside or outside the EEA, including in the countries which do not have the same level of protection of personal data as in the EEA, in particular for hosting and IT support purposes. In such cases, SERVIER ensures that such transfers are carried out in compliance with the applicable data protection laws and regulation. Data transfers to other SERVIER entities are covered by the Group's Binding Corporate Rules submitted to the CNIL, French Data Protection Authority, for approval in December 2017 whereas transfers to third-party providers outside the EEA are secured through appropriate contractual guarantees such as the EU Commission's Standard Contractual Clauses or an adherence to the Privacy Shield for transfers to the USA where applicable. You may request and receive copy of such documents.

Your personal data collected by SERVIER are kept in a form which permits your identification for no longer than is necessary for the purposes for which the personal data are processed. More specifically:

- Personal data collected for clinical trials management activities are kept until the study product is marketed or until the final research report or until 2 years after the publication of the research results. They are then archived in paper or electronic form for a period in accordance with applicable laws and regulations;
- Personal data collected for pharmacovigilance activities are kept for 10 years after the relevant marketing authorisation has ceased to exist, then data are deleted or archived in an anonymised form, unless otherwise provided by mandatory local regulations;
- Personal data related to transparency management are kept, archived and deleted in accordance with applicable laws and regulations;
- The images of the video surveillance system are kept for 30 days;
- Data related to security of visitors and premises are kept no longer than 3 months.

As a data subject, you have the right at any time to request from SERVIER as far as permitted by applicable laws and regulations, access to and rectification or erasure of your personal data. On legitimate grounds, you are also entitled to request a restriction of the processing of your personal data or to object to such processing. When a data processing is based on a contractual relationship with SERVIER, you may also have the right to receive the personal data concerning only you which and which you alone have provided to SERVIER in a structured, commonly used, machine-



readable and interoperable format, and to transmit it to another Data Controller (data portability).

Finally, you are entitled to lodge a complaint with the Data Protection Authority, related to SERVIER's compliance with the applicable data protection laws and regulation.



CONTACT DETAILS

DATA PROTECTION CONTACTS			
	ROLE	NAME	CONTACT DETAILS
Data Protection Contact	To ask questions and exercise your rights	Mrs. Athanassia KARAGIANNI	7, Fragkoklissias Str. 151 25 Maroussi Tel: 210 9391000 Fax: 210 9391003 Email:compliance- gr@servier.com
Data Controller	Responsible of the use of your personal data	SERVIER HELLAS	7, Fragkoklissias Str. 151 25 Maroussi Tel: 210 9391000 Fax: 210 9391003
Local/National Data Protection Authority	To lodge a complaint	Hellenic Data Protection Authority	1-3, Kifissias ave. 151 23 Athens Tel: 210 6475600 Fax: 210 6475628 Email: <u>complaints@dpa.gr</u>