

# VIFOR PHARMA PRIVACY NOTICE

## for medical information enquiries

This privacy notice explains what information we collect and use to handle requests for medical information. How we store, process and protect this information is explained, as are your data privacy rights.

This privacy notice applies regardless of how we receive a medical information enquiry, whether by telephone, post, e-mail, verbal communication or via another channel. It applies whether you submit the medical information request yourself or it is made by a healthcare professional or another third party.

### **What is a medical information enquiry?**

A medical information enquiry is an unsolicited request for medical information concerning a company's medicinal products or disease areas.

Patients, healthcare professionals, healthcare organisations or any other members of the public can send unsolicited medical information enquiries to Vifor Pharma concerning its medicinal products or disease areas.

### **What personal data do we collect and why?**

Personal data is information that relates to a person who is, or who could be, identified.

To respond to a medical information enquiry, we collect from the requester the details of the

enquiry, name and contact information, e.g. email, postal address and/or telephone number.

Sometimes the information that we collect can include sensitive personal data such as data concerning the health of an identified or identifiable person.

We or our service providers may on occasion contact requesters about their medical information enquiry to clarify relevant details or to seek further information so that we can provide an objective and compliant response.

The primary purpose of collecting and processing the personal data is to answer the medical information enquiry. However, we are required by law to process and forward such data to health authorities if it contains safety information.

The legal basis for collecting and using your personal data in the course of processing medical information enquiries is public interest in the area of public health. In relation to the reporting of safety information the personal data processing is performed to comply with legal obligations and in furtherance of the public health objective of ensuring high standards of quality and safety of medicinal products.

## What is safety information?

Safety information is information on any of the following types of events that a person might experience.

1. An “adverse event”: any untoward medical occurrence in a patient or clinical investigation subject administered a pharmaceutical product and which does not necessarily have a causal relationship with the product.

2. An “adverse drug reaction”: a noxious and unintended response to a medicinal product related to any dose is considered an adverse drug reaction. This means that a causal relationship between a medicinal product and an adverse event is at least a reasonable possibility.

3. An event relevant to the safety of a medicinal product, such as exposure to the product during pregnancy or breastfeeding, intentional off-label use, abuse or misuse of the product, overdose, medication errors, occupational exposure, drug interaction, lack of efficacy or unexpected therapeutic or clinical benefit.

Please refer to the “Vifor Pharma privacy notice for reporting safety information” for information about how we collect and use personal data for our pharmacovigilance activities.

## With whom do we share your personal data?

Your personal data are stored in our global medical information database, which is accessible by companies of the Vifor Pharma Group worldwide for alignment in our medical information service. Strict security standards are applied to this database.

We work with third-party service providers who help us to collect and process medical information enquiries or who provide other services such as technical support or data hosting. These service providers may have access to your personal data in order to provide the services.

We may also disclose your personal data to:

- official authorities if required by law, court order or governmental regulation or if required for an investigation or legal proceeding,
- distributors, license partners or other companies with whom we collaborate, for the purposes specified in this privacy notice,
- our legal and other expert advisors.

These service providers and collaboration partners are legally bound to keep all personal data confidential and to use them only to perform the services for which we engaged them.

We could disclose your personal data to third parties in connection with the sale or transfer of all or part of our business, in which case we would require the third parties to treat that information in accordance with this privacy notice.

Some of the above-mentioned recipients of your personal data are located outside the country where you live, including in the United States and other countries that are not regarded by the competent authorities as providing an adequate level of protection for personal data. In such cases, we ensure that appropriate safeguards are in place to protect your personal data, such as the EU standard contractual clauses. A copy of the EU standard contractual clauses may be obtained from our group data protection officer ([GroupDPO@viforpharma.com](mailto:GroupDPO@viforpharma.com)).

## How long do we store your personal data?

We store your personal data for as long as necessary to achieve the purpose for which the information was collected, as described above.

## What are your rights regarding your personal data?

You are entitled at any time to access your personal data. You can request that errors be corrected or that processing of your personal data be restricted. You can also object to our processing of your personal data or request it to be erased.

If you would like to exercise your rights, please contact us as described in the section "How to contact us" below. Please note that applicable laws may prevent us from complying with requests to erase safety information or to restrict our processing of it.

You are entitled to lodge a complaint with a supervisory authority if you wish.

## How to contact us

Please contact us if you have any questions about this privacy notice or if you wish to exercise your privacy rights in relation to your personal data.

- [Our group data protection officer:  
GroupDPO@viforpharma.com](mailto:GroupDPO@viforpharma.com)
- [safety@viforpharma.com](mailto:safety@viforpharma.com)
- The "controller" of the personal data:  
Vifor Pharma Management Ltd.  
Flughofstrasse 61  
P.O. Box  
CH-8152 Glattbrugg  
Switzerland  
+ 41 58 851 80 00
- Vifor's representative in the European Union/European Economic Area for data privacy purposes:  
Vifor Pharma Deutschland GmbH  
Baierbrunner Strasse 29  
D-81379 Munich  
Germany  
dataprivacy\_EEArep@viforpharma.com

- Vifor's representative in the UK for data privacy purposes:  
Vifor Pharma UK Ltd.  
Second Floor, Waterfront  
Watermans Business Park  
Kingsbury Crescent  
Staines-upon-Thames  
TW18 3BA  
United Kingdom  
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