

PRIVACY NOTICE FOR YOURCHOICE ENGAGE

EFFECTIVE: APRIL 2023

This Privacy Notice is addressed to patient users of YOURCHOICE ENGAGE, a Patient Support Programme provided by Novartis (the "Programme").

You are receiving this Privacy Notice because Novartis Pharmaceuticals UK Limited ("Novartis") is processing information about you which constitutes "personal data" and Novartis considers the protection of your personal data and privacy a very important matter.

Novartis is responsible for the processing of your personal data in the context of the Programme as it decides why and how it is processed, thereby acting as the "controller". In this Privacy Notice, "we" or "us" refers to Novartis.

This Privacy Notice is divided into two parts. Part I contains key information about what personal data we process, why and how. Part II contains more general information about the context in which we are processing patient data as well as your rights in that respect.

We invite you to carefully read this Privacy Notice, as it contains important information for you.

PART I – KEY INFORMATION ABOUT OUR COLLECTION AND USE OF YOUR PERSONAL INFORMATION IN RELATION TO THE PROGRAMME

Novartis is processing personal data about you in the context of your participation in the Programme and the services provided to you under the Programme.

Specific personal data to be collected

For the purpose of the Programme, we will collect the following personal data about you and/or your condition:

- Your first name and last name;
- Your age range (if you choose to provide this information);
- Your gender (if you choose to provide this information);
- Your email address;
- Your mobile number; and
- Confirmation that you are on a Novartis treatment and the duration that you have been on treatment for.

Specific purposes for which we require your personal data

The collected information will be used by us for the following specific purposes:

- To facilitate your use of the Programme. The Programme is designed to provide you with emails and SMS reminders to help you learn more about your treatment, manage possible side effects, and gain access to a range of Novartis resources to support you with your treatment. Processing of your personal data for this purpose is based on your consent, which you can withdraw at any time at the contact details below or responding to the email which we send to you.
- To provide you with feedback surveys, so that Novartis may improve the Programme or future Novartis Patient Support

Programmes. Your responses to our surveys will be anonymised and grouped with the responses of other individuals participating on the Programme and will not be able to identify you.

- Please note that the collected data may also be used by us for a number of other standard purposes (e.g. for investigating side effects), as set out in Part II below.

Specific third parties with whom we share your personal data

We will share your personal data with the following third parties:

- **Bionical Solutions Limited** (registered number 04313379) ("**Bionical**"). Bionical are a UK registered limited company who designed and created the Programme on Novartis' instructions. Bionical host the Programme. Bionical are a data processor who act on the instructions of Novartis as data controller.

Please note that we may also have to share your data with a number of other recipients (e.g. another entity of the Novartis Group if the entity collecting the data is not the same as the one using it) but always under strict conditions, as further explained in Part II.

Duration of storage

We will only store the above personal data and the personal data listed in Part II for a period of six (6) years following your last use of the Programme.

Dedicated point of contact

Should you have any question in relation to the processing of your personal data in the above context, please contact privacy_uk.ireland@novartis.com.

Cookies

The Programme website uses cookies. For more information, please refer to our Cookie Policy.

PART II – GENERAL INFORMATION

The second part of this Privacy Notice sets out in more detail in which context we are processing your personal data and explains your rights and our obligations as a patient when doing so.

1. What information do we have about you?

We will collect the information identified on the two first pages of this Privacy Notice.

Please note that we will not knowingly collect, use or disclose personal data from a minor under the age of 16 without obtaining prior consent from a parent or legal guardian.

2. For which purposes do we use your personal data and why is this justified?

2.1 Legal basis for the processing

We will not process your personal data if we do not have a proper justification foreseen in the law for that purpose. Therefore, we will only process your personal data if:

- we have obtained your prior consent (this is the main legal basis upon which we collect and use your personal information in the context of your participation in the Programme). Your consent is entirely voluntary and you can withdraw your consent at any time. Please note that withdrawal of your consent will not affect the lawfulness of our use of your personal information up to the time you withdrew your consent, and that we may need to archive your personal information after withdrawal in order to comply with our legal and regulatory obligations (e.g. in relation to adverse event reporting or if needed for legal claims);
- the processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms;
- the processing is necessary to comply with our legal or regulatory obligations; or
- the processing is necessary to protect your vital interests or those of another person.

Example of such 'legitimate interests' in the context of the Programme include data processing activities which improve the functioning of the Programme and/or design of future Novartis Patient Support Programmes.

2.2 Purposes of the processing

We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. In addition to the specific purposes identified on the first two pages, we also process your personal data for the following general purposes:

- for pharmacovigilance purposes (tracking side effects) and following up with you or your healthcare professional; scientific research purposes or statistical purposes, subject to us applying appropriate safeguards to your personal data such as pseudonymising or anonymising it;
- provide you with adequate and updated information about disease, drugs, as well as our product and services;
- organise patients support or assistance programs (including connecting you with health resources and patients associations upon your request) and patients testimonials;
- answer any questions or requests you may have;
- manage our IT resources, including infrastructure management and business continuity;
- ensure compliance (such as complying with our policies and local legal requirements, conducting audits and defending litigation);
- archiving and record-keeping; and
- any other purposes imposed by law and authorities.

3. Who has access to your personal data and to whom is your personal data transferred?

We will not sell, share, or otherwise transfer your personal data to third parties other than those indicated in this Privacy Notice.

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal data can be accessed by, or transferred to the specific third parties identified in Part I above and to the following categories of recipients, on a need-to-know basis to achieve such purposes:

- our personnel (including personnel, departments or other companies of the Novartis group);
- our suppliers and services providers that provide services and products to us;

- our IT systems providers, cloud service providers, database providers and consultants;
- any third party to whom we assign or novate any of our rights or obligations; and
- our advisors and external lawyers in the context of the sale or transfer of any part of our business or its assets

The above third parties are contractually obliged to protect the confidentiality and security of your personal data, in compliance with applicable law. Your personal data can also be accessed by or transferred to any national and/or international regulatory, enforcement, public body or court where we are required to do so by applicable law or regulation or at their request.

The personal data we collect from you may also be processed, accessed or stored in a country outside the country where Novartis is located, which may not offer the same level of protection of personal data.

If we transfer your personal data to external companies in other jurisdictions, we will make sure to protect your personal data by: (i) applying the level of protection required under the local data protection/privacy laws applicable to Novartis in the United Kingdom; (ii) acting in accordance with our policies and standards; and (iii) unless otherwise specified, only transferring your personal data on the basis of standard contractual clauses approved by the European Commission. You may request additional information in relation to international transfers of personal data and obtain a copy of the adequate safeguard put in place by exercising your rights as set out in Section 6 below.

For intra-group transfers of personal data (that is, transfers between companies which are members of the Novartis Group), the Novartis Group has adopted Binding Corporate Rules, a system of principles, rules and tools, provided by European law, in an effort to ensure effective levels of data protection relating to transfers of personal data outside the EEA and Switzerland. Read more about the Novartis Binding Corporate Rules at <https://www.novartis.com/privacy-policy>

4. How do we protect your personal data?

We have implemented appropriate technical and organisational measures to provide a level of security and confidentiality to your personal data. These measures take into account:

- the state of the art of the technology;
- the costs of its implementation;
- the nature of the data; and
- the risk of the processing.

The purpose of these measures is to protect your personal data against accidental or unlawful destruction or alteration, accidental loss, unauthorised disclosure or access and against other unlawful forms of processing.

Moreover, when handling your personal data, we:

- only collect and process personal data which is adequate, relevant and not excessive, as required to meet the above purposes;
- ensure that your personal data remains up to date and accurate (for the latter, we may request you to confirm the personal data we hold about you, e.g. a request to confirm that you are still on a Novartis treatment. You are also invited to spontaneously inform us whenever there is a change in your personal circumstances so we can ensure your personal data is kept up-to-date); and
- process any sensitive data about yourself (including your medical/health related data) you provide in compliance with applicable data protection rules and strictly as required for the relevant purposes listed above. The data is accessed and

processed solely by the relevant personnel, under the responsibility of one of our representatives who is subject to an obligation of professional secrecy or confidentiality.

5. How long do we store your personal data?

We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements. The retention period is set out at Part I of this Privacy Notice. When this period expires, your personal data is removed from our active systems.

6. What are your rights and how can you exercise them?

You may exercise the following rights under the conditions and within the limits set forth in the law:

- the right to access your personal data as processed by us and, if you believe that any information relating to you is incorrect, obsolete or incomplete, to request its correction or updating;
- the right to request the erasure of your personal data or the restriction thereof to specific categories of processing;
- the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal;
- the right to object, in whole or in part, to the processing of your personal data; and
- the right to request its portability, i.e. that the personal data you have provided to us be returned to you or transferred to the person of your choice, in a structured, commonly used and machine-readable format without hindrance from us and subject to your confidentiality obligations.

If you have a question or want to exercise the above rights, you may send an email to privacy_uk.ireland@novartis.com or a letter to Data Privacy, Novartis, The WestWorks Building, White City Place, 195 Wood Lane, London, W12 7FQ. If you wish to exercise your rights, please provide a copy of an identity document, it being understood that we shall only use such data to verify your identity and shall not retain the scan after completion of the verification. When sending us a copy of your identity document, please make sure to redact any photographs. If you are not satisfied with how we process your personal data, please address your request to our data protection officer at global.privacy_office@novartis.com, who will investigate your concern.

In any case, you also have the right to file a complaint with the competent data protection authorities, in addition to your rights above.

7. How will you be informed of the changes to our Privacy Notice?

Any future changes or additions to the processing of your personal data as described in this Privacy Notice will be notified to you in advance through an individual notice through our usual communication channels (e.g. this website). You can see the current version of this Privacy Notice at the top of this document.