

General Privacy Notice for Business Partners

July 15, 2025

Novartis processes information of its Health Care Professionals business partners which constitutes personal information and considers the protection of **personal information** and privacy a very important matter.

Novartis Pharmaceuticals Canada Inc ("**Novartis**") is responsible for the processing of your personal information as it decides why and how it is processed. It may exercise this responsibility alone or jointly with other companies in the Novartis group,". In this Privacy Notice, "**we**" or "**us**" refers to Novartis Pharmaceuticals Canada Inc.

This General Privacy Notice for Business Partners ("**Privacy Notice**") applies to Novartis business partners ("**you**"). To access our Website Privacy Notice, General Privacy Notice for Third Parties, General Privacy Notice for External Stakeholders, or Privacy Notice for Pharmacovigilance, Medical Information, and Product Quality Complaints, please visit the [Novartis Canada Privacy Hub](#).

We invite you to carefully read this Privacy Notice, which sets out in which context we are processing your personal information and explains your rights and our obligations when doing so

Definitions

"**Applicable Privacy Laws**" means any legislation, regulation, recommendation or opinion applicable to privacy and the protection of Personal Information, including, where applicable, the Act Respecting the Protection of Personal Information in the Private Sector (Québec), as well as any other applicable legislation, regulation, recommendation or opinion replacing, adding to or amending, extending, reconstituting or consolidating the Applicable Privacy Laws.

"**business partners**" means health care professionals that Novartis create or maintain a relationship with, their customers or prospective customers who are natural persons (such as self-employed pharmacists), and representatives or contact persons of Novartis' customers or prospective customers who are legal entities (such as wholesale pharmacists).

"**personal information**" means any information which relates to a person and allows that person to be identified either directly or indirectly.

What information do we have about you?

Information Novartis may have about you may either be directly provided by you, by our business partners (i.e. the legal entity for whom you work), by third parties (e.g. external vendors, medical agencies and advertising companies) or be obtained through trusted publicly available sources (such as PubMed, Clinical Trials.gov, congress websites or university websites). Therefore, by continuing to interact with us, you hereby consent to the collection of personal information from third persons.

We may collect various types of personal information about you, including:

- your general and identification information (e.g. name, first name, last name, gender, email and/or postal address, fixed and/or mobile phone number);
- your function (e.g. title, position, name of company, as well as, for healthcare professionals, first specialty, second specialty, year of graduation from medical school, publications, congress activities, awards, biography, education, links to universities, expertise and participation in/contribution to clinical trials, guidelines, editorial boards and organizations);
- payment information (e.g. credit card details, bank account details, VAT or other tax identification number);
- Novartis unique business partner ID and profile;
- your electronic identification data where required for the purpose of delivering products or services to our company (e.g. login, access right, passwords, badge number, IP address, online identifiers/cookies, logs, access and connection times, image recording or sound such as badge pictures, CCTV or voice recordings);
- information regarding your utilization, responses and/or preferences including in terms of types of messages discussed, channels of communication and frequency;
- your feedback or comments (e.g. received during our meetings, calls or virtual events);
- information you provide us for example when you fill in forms during events you attend or when you answer questions during a conversation or in a survey;
- data which relate to our products and services; and
- information about the scientific and medical activities/interactions you have with us, including potential future interactions.

The types of information that you provide are based on the specific scope of the services that you use or the Novartis program or service for which you register, and might include, for instance, your name, address, age, gender, email address, phone number, photo, social media account number, medical license number, postal code, education, professional experience, demographic information, information about health and/or medical conditions and specialties. For example, when you register for or use a Novartis program or service, participate in a survey, provide a testimonial, order a product, participate in an interactive feature or forum (such as chat features), or contact us with a question, comment, or request. If you intend to provide us with personal information about other individuals (e.g. your colleagues), you must provide a copy of this Privacy Notice to the relevant individuals, directly or through their employer information and you would like to request that such personal information be deleted, please contact us as explained below under “How can you contact us?”

How do we obtain your consent?

We collect, use and disclose your personal information with your consent or as permitted or required by law. How we obtain your consent (that is, in what manner) will depend on the circumstances, as well as the sensitivity of the information collected.

Your consent may be express or implied, depending on the circumstances and the sensitivity of the personal information in question. If you choose to provide personal information to us, we assume that you consent to the collection, use and disclosure of your personal information as outlined in this Privacy Notice.

Typically, we will seek your consent at the time your personal information is collected. Where we want to use your personal information for a purpose not previously identified to you in this Privacy Notice, we will seek your

consent prior to our use of such information for this new purpose.

If you provide personal information about another individual to us, you are responsible for obtaining their consent to enable us to collect, use and disclose their information in accordance with this Privacy Notice.

You may withdraw your consent to our collection, use or disclosure of your personal information at any time by contacting us using the contact information in the **“What are your rights and how can you exercise them?”** section below. However, before we implement the withdrawal of consent, we may require proof of your identity. In some cases, withdrawal of your consent may mean that we will no longer be able to continue the business relationship.

For which purposes do we use your personal information?

Purposes of the processing

We always process your personal information for a specific purpose and only process the personal information, which is relevant to achieve that purpose. In particular, we process the personal information we may have about you for the following purposes :

- manage our relationship with you (e.g. through our databases);
- implement tasks in preparation of or to perform existing contracts;
- evidence transactions and ensuring transparency on transfer of value;
- provide you with appropriate, adequate and updated information about diseases, drugs as well as our products and services;
- improve the quality of our interactions and services by adapting our offering to your specific needs;
- answer your requests and provide you with efficient support;
- help us, our subsidiaries, affiliates, and business partners better understand our audiences, evaluate user interest in our Services, improve our Services, and perform other market research activities, for example to send you surveys (e.g. to help us improve your future interactions with us);
- send you communications regarding products, therapeutic areas or services that we promote;
- manage, plan and execute communications and interactions with you (e.g. through the operation of a database keeping records of interactions with healthcare professionals or managing call planning as well as call reporting) and deliver Targeted Advertising (as described below);
- track our activities (e.g. measuring interactions or sales, number of appointments/calls);
- personalize your experience and better tailor content to you;
- analyze your engagement with our marketing campaigns and measure their effectiveness;
- to gain insights into the current opinions and sentiments related to our areas of treatment and services, topics, brands and industries tracking and reviewing online conversations, mentions and discussions;
- improve the skill and development of our staff by assessing the content of their meetings, calls and virtual events with you which may include your feedback and comments;
- invite you to events or promotional meetings sponsored by us (e.g. medical events, speaker events, conferences);
- grant you access to our training modules allowing you to provide us with certain services;
- manage our IT resources, including infrastructure management and business continuity;
- preserve the company's economic interests and ensure compliance and reporting (such as complying with our policies and local legal requirements, tax deductions, managing alleged cases of misconduct or fraud; conducting audits and defending litigation);
- manage mergers and acquisitions involving our company;

- archiving and record keeping;
- billing and invoicing;
- to develop a proximity and trustful professional relationship with health care professionals;
- to provide knowledge to the health care professionals about Novartis medicines and scientific developments;
- to promote innovation in the pharmaceutical field;
- to manage Novartis human and financial resources and optimize the interactions with health care professionals;
- to ensure that the right medicine according to a well-informed HCP's technical and professional opinion reaches the patient; to benefit from cost-effective services (e.g. we may opt to use certain platforms offered by suppliers to process data);
- to offer our products and services to our customers;
- to prevent fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks;
- to sell any part of our business or its assets or to enable the acquisition of all or part of our business or assets by a third party; to meet our corporate and social responsibility objectives;
- to serve you advertisements for our products and services that may be of interest to you; and
- any other purposes imposed by law and authorities.

We may also combine the personal information we collect from you with information that we receive about you from other sources, such as joint marketing partners, public databases, providers of demographic information, publications, professional organizations, social media platforms, people with whom you are connected on social media platforms, individuals with whom you are connected on social media platforms, and other third parties.

To manage our relationship with you, in particular as a business partner, our goal is to personalize our relationship with you, and – depending on your personal characteristics, history of interactions, needs and preferences – to provide you with the most relevant information and to contact you in the best possible way.

To support this—and to ensure proportionate and effective communication with you, including optimizing the content, method, and timing of our outreach— we will segment our business partners, and allocate you to a profile that matches the information that we have about you (such as your personal characteristics, expertise, preferences, prior interactions with Novartis, responses to marketing communications, and/or areas of interests). These profiles evolve over time and determine the content, timing, and channels of our communications.

We may use artificial intelligence (AI) in our segmentation and profiling efforts, including analyzing personal data and related information such as aggregated or estimated market data to anticipate trends and behaviors. In some cases, we may refine these AI tools using a limited amount of personal data—always ensuring your privacy, rights, and interests are protected, and staying within the bounds of our legitimate interests.

Novartis is engaged to use AI responsibly, in line with applicable laws, applying human-centric principles, transparency, and strong security measures. Depending on local legal requirements or guidance, if our business partnering activities go beyond standard practices or if required by law, we will obtain your prior consent.

We may use information that does not personally identify you (including personal information that we have anonymized, de-identified, and/or aggregated) for any purpose, except where we are required to do otherwise under applicable law.

Who has access to your personal information and to whom are they transferred?

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal information may be accessed by or transferred 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 independent agents or brokers (if any);
- our suppliers and services providers that provide services and products to us, such as:
 - fulfilling requests for information;
 - answering calls;
 - administering programs or projects;
 - processing speaker honoraria and expense reimbursement;
 - processing payment card transactions or bank account transfers;
 - arranging travel;
 - assisting in research and development; or
 - delivering advertisements or other communications.
- our IT systems providers, cloud service providers, database providers and consultants;
- our business partners who offer products or services jointly with us or with our subsidiaries or affiliates;
- any third party to whom we assign or novate any of our rights or obligations.

The above third parties are contractually obliged to protect the confidentiality and security of your personal information, in compliance with applicable law. We also require that they only use your personal information for the limited purposes for which it is provided. When our service providers no longer need your personal information for those limited purposes, we require that they dispose of the personal information. In some circumstances, we may permit our service providers to retain aggregated, anonymized or statistical information that does not identify you. We do not authorize the service providers to disclose your personal information to unauthorized parties or to use your personal information for their direct marketing purposes.

Your personal information 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.

In addition, we may transfer your personal information and other information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets.

If we otherwise intend to disclose your personal information to a third party, we will identify that third party and the purpose for the disclosure, and obtain your consent.

Where is your personal information located?

The personal information we collect from you may also be processed, accessed or stored in a country outside the country, or province where you are located. While such information is outside of your country or province of residence, it is subject to the laws of the country in which it is located, which may not offer the same level of protection of personal information, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country or province.

If we transfer your personal information to external companies in other jurisdictions, we will make sure to protect your personal information by applying the level of protection required under Applicable Privacy Laws, acting in accordance with our policies and standards, and by ensuring such transfers are governed by a contract or other legally valid mechanisms.

For intra-group transfers of personal information to our group companies, the Novartis Group has adopted Binding Corporate Rules, a system of principles, rules and tools. Read more about the Novartis Binding Corporate Rules [here](#).

How do we protect your personal information?

We have implemented appropriate technical and organizational measures to provide an adequate level of security and confidentiality to your personal information.

These measures take into account:

- the sensitivity and nature of the personal information;
- the state of the art of the technology;
- the costs of its implementation;
- the purposes for which the personal information is to be used;
- the quantity and distribution of the personal information;
- the medium on which the personal information is stored; and
- the risk of the processing.

The purpose thereof is to protect it against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access and against other unlawful forms of processing.

Unfortunately, no data transmission or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you have with us has been compromised), please immediately notify us in accordance with the “How can you contact us?” section.

Moreover, when handling your personal information, we:

- only collect and process personal information which is adequate, relevant and not excessive, as required to meet the above purposes; and
- may request you to confirm the personal information we hold about you. You are also invited to spontaneously inform us whenever there is a change in your personal circumstances so we can ensure your personal information is kept up-to-date.

How long do we store your personal information?

We will only retain personal information we may have about you for as long as necessary to fulfil the purpose for which it was collected or as permitted required under applicable laws, notably to comply with legal or regulatory requirements.

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 applicable privacy law:

- the right to access your personal information 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, or the de-indexation of, your personal information or the restriction thereof to specific categories of processing; and
- the right to request its portability, i.e. that the personal information 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; and
- the right to be informed of and submit observations regarding automated decision-making.

If you have a question or want to exercise the above rights, please [click here](#).

If you are not satisfied with how we process your personal information, 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.

How can you contact us?

If you want to contact our Data Protection Officer, please email us at: global.privacy_office@novartis.com or write to Data Privacy Office, Novartis Pharmaceuticals Canada Inc., 700 St-Hubert, Suite 100, Montreal, Quebec, H2Y 0C1.

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

This Privacy Notice was last updated on July 15, 2025.

We may change this Privacy Notice. Any future changes or additions to the processing of your personal information as described in this Privacy Notice will be notified to you in advance through an individual notice or through our usual communication channels (e.g. by email or via our internet websites) and will become effective immediately.

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