



Collection and Processing of your Personal Data – Information Notice

Otsuka Pharmaceutical Europe Limited and its affiliates (“Otsuka”) respects your right to privacy.

The data controller of your personal data is Otsuka Pharmaceutical Europe Ltd., with an address at Gallions, Wexham Springs, Framewood Road, Wexham, SL3 6PJ, UK which is registered with the Information Commissioner’s Office with registration number Z9584844.

In this Notice, when we talk about personal data, we mean any information that relates to an identified or identifiable person – in this case, you.

Your personal data will be processed according to applicable legislation, including the Data Protection Act 2018 and the EU General Data Protection Regulation (“**GDPR**”). You should read this Notice, so you know what personal data we collect about you, what we do with it and how you can exercise your rights in connection with it. You should also read any other Notices that we give you, that might apply to our use of your personal data in specific circumstances from time to time.

What personal data does Otsuka collect?

We may collect personal data about you from a variety of sources, including directly from you: documents or forms that you provide in order to participate in Otsuka sponsored or supported initiatives, such as clinical research or development activities, or in other contexts; third parties; publically available sources; CVs and resumes; and online or other databases and websites.

Otsuka may collect and use some or all of the following categories of personal data for the purpose(s) described below:

- Personal details, such as your name, age, gender and contact details;
- Professional details, such as your place of practice, job title, the medical field in which you are active, your professional qualifications and scientific activities (such as previous clinical trial experience), and participation in past or pending research studies with Otsuka or other companies, publication of academic or scientific research and articles, and membership of relevant associations and boards;
- Financial details such as payment-related information, including tax identification number; and
- Details of interactions with us, such as what kind of meetings we have held, topics discussed, your knowledge of and questions you have had on our business and products, what kind of material we have displayed to you and any feedback that you have provided, as well as your opinions and routines on prescribing, routines regarding your patients and diagnosis, and similar information. In some circumstances, it will also be necessary to collect your signature.

For what purpose does Otsuka process personal data and what is the legal basis?

We process the personal data listed above for the following purposes and legal bases, which may vary depending on where you live and where we operate:

Purpose	Legal basis
<p>Managing our relationship with you, including planning our (potential) collaboration, arranging visits, meetings and other activities (in-person and virtual), and contacting you for any such purpose. This includes the processing of your personal data in our customer relationship management system, in particular to build a profile about you and better understand your expertise, interests and preferences. Otsuka will not make any decisions about your profile based solely on automated processing and will ensure appropriate safeguards are maintained, in order to preserve your rights and interests.</p>	<p>We have a legitimate interest in developing our business and relationship with you (Art. 6 (1) f) GDPR)</p> <p>In some cases this processing is conditional on you having provided your prior consent (Art. 6 (1) a) GDPR)</p>
<p>Ensuring that we provide you with information that is relevant given your expertise, interests and preferences.</p>	<p>We have a legitimate interest in managing our business efficiently in the case we have engaged with you in the past (Art. 6 (1) f) GDPR)</p> <p>In some cases, for example receiving information relating to promotional and/or non-promotional materials according to therapeutic areas through electronic means, this processing is conditional on you having provided your prior consent (Art. 6 (1) a) GDPR)</p>
<p>Conducting business and market research, to better understand Otsuka products, disease or therapeutic areas and generally improve our understanding of the pharmaceutical landscape.</p>	<p>We have a legitimate interest to better understand our products and the area we both operate in (Art. 6 (1) f) GDPR)</p> <p>In some cases this processing is conditional on you having provided your prior consent (Art. 6 (1) a) GDPR)</p>
<p>Fulfilling our contractual relationship with you, including the completion of any required due diligence (such as anti-bribery or corruption checks), processing contracts, organising travel and facilitating the payment of fees and expenses (where relevant).</p>	<p>Management of our contractual relationship in the cases where we have a contract or you have requested that we consider executing one with you (Art. 6 (1) b) GDPR)</p> <p>In some cases, this processing may be necessary for compliance with a legal obligation (Art. 6 (1) c) GDPR)</p>
<p>Complying with transparency obligations as a member of EFPIA, in particular the EFPIA</p>	<p>Compliance with a legal obligation (Art. 6 (1) c) GDPR)</p>

code on disclosures of transfers of value and/or any applicable national disclosure codes.	<p>We may also have a legitimate interest in the fulfilment of our regulatory obligations with regard to transparency, as well as the legitimate interest of patients and the general public in the independence of HCOs and HCPs (Art. 6 (1) f) GDPR)</p> <p>In some cases, for example, where this is prescribed by national disclosure codes, this processing is conditional on you having provided your prior consent (Art. 6 (1) a) GDPR)</p>
Complying with our regulatory monitoring and reporting obligations, including those related to adverse events, product complaints and patient safety. In some cases, Otsuka may be required to send you specific communications related to these topics.	<p>Compliance with a legal obligation (Art. 6 (1) c) GDPR)</p> <p>In some cases this processing is conditional on you having provided your prior consent (Art. 6 (1) a) GDPR)</p>

Moreover, Otsuka may also offer mobile apps, provide access to websites, special programs, activities, events or promotions or may sponsor clinical trials (“Initiatives”) that may have unique or additional specific terms, Notices and/or consent forms that explain how any information you provide will be processed in connection with the Initiatives.

Where we have entered into an agreement with you, or where we have a legal and/or regulatory reporting obligation, the provision of your personal data is mandatory. If your personal data is not provided we cannot interact with you.

Who does Otsuka share my personal data with?

We disclose your personal data to the following categories of recipients:

- to our **group companies, third party services providers and partners** who provide data processing services to us, or who otherwise process personal information for purposes that are described in this Notice or notified to you when we collect your personal data;
- to any **competent law enforcement body, regulatory, trade association, government agency, court or other third parties** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights (on the basis of our interest in the defence of our rights), or (iii) to protect your vital interests or those of any other person;
- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Notice (on the legal basis of our legitimate interest in ensuring the business operation);
- to any **other person with your consent** to the disclosure.

These recipients of your personal data may be acting on our behalf or as data controllers in their own right.

How does Otsuka keep my personal data secure?

We use appropriate technical and organisational measures to protect the personal data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the categories of personal data processed.

International data transfers

We may transfer your personal data to other Otsuka group companies, service providers and partners located outside of the European Economic Area (“**EEA**”), for example in the USA or Japan. Please note that countries outside of the EEA may not provide the same level of protection for your personal data as within the EEA. Where we transfer your personal data outside of the EEA, we ensure that appropriate safeguards are put in place and that all transfers of your personal data comply with applicable data protection laws.

The appropriate safeguards that Otsuka uses are based on the model clauses approved by the European Commission. To find out more about how we safeguard your information in relation to data transfers outside the EEA, please contact us using the details in the ‘How to contact us?’ section below.

How long will your information be kept?

We retain personal data we collect from you for as long as necessary where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymise it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will isolate it from any further processing until deletion is possible.

Where you have entered into a contract with Otsuka, we will retain your personal data for the duration of the contract and, beyond that, until both the periods for which (i) the applicable laws require the data to be kept and (ii) the statutes of limitation of any actions for which such data or the documents containing them may be relevant, have elapsed. We retain records related to all transfers of value, for at least five (5) years after the end of the calendar year to which they relate.

Your rights

You have a number of rights, which apply to our use of your personal data. The availability of these rights depends upon our lawful basis for processing your personal data and your rights may also be subject to certain conditions and restrictions. These rights are:

Right	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how your information is used and your rights. This is provided in this Notice.
2. The right of access	You have the right to obtain access to your information (if an organisation is processing it), and certain other information.
3. The right to rectification	You are entitled to have your information corrected if it is inaccurate or incomplete.

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| 4. The right to erasure | This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for an organisation to keep using it. This is not a general right to erasure; there are exceptions (for example, where you have provided consent to processing, this applies only where you have withdrawn your consent, if we are processing in connection with performance of a contract or for compliance with law, this applies only where such data are no longer necessary and where we are relying on our legitimate interests this applies only if there are no overriding legitimate interests). |
| 5. The right to restrict processing | You have rights to ‘block’ or suppress further use of your information in certain circumstances. When processing is restricted, the relevant organisation can still store your information, but may not use it further. Please note that your right to restrict processing is limited in certain situations; for example, when we are processing personal data that we collected from you with your consent, you can only request restriction on the basis of inaccuracy of data or where our processing is unlawful and you don’t want your personal data erased or you need it for a legal claim. You do not have this right where we are processing your personal data for compliance with law. |
| 6. The right to data portability | You have rights to obtain and reuse your personal data in a structured, commonly used and machine readable format in certain circumstances, which do not include where we are processing on the basis of legitimate interests or for compliance with law. |
| 7. The right to object | You have the right to object to certain types of processing, in certain circumstances such as when we rely on our legitimate interests. |

Where your personal data is processed on the basis of your consent, you have the right to **withdraw your consent** at any time. If exercised, this will not affect the lawfulness of processing prior to withdrawal.

You also have the right to **complain to a data protection authority** about our collection and use of personal data. For more information, please contact your local data protection authority. A list of data protection authorities in the European Economic Area is available [here](#).

How to contact us?

Should you have any questions in regards to the protection of your personal data or if you wish to exercise your legal rights, please submit your query [here](#) or contact Otsuka by emailing: privacy@otsuka-europe.com.