

General Privacy Notice for Business Partners

February 2026

This Privacy Notice is addressed to our business partners, in particular health care professionals, we engage with in the context of our business activities, which may include informing about our products and services and for other promotional and non-promotional activities (hereinafter “**business partner**” or “**you**”).

This Privacy Notice describes the ways in which Novartis (Hellas) SACI having its registered office at Kifissias Avenue 199, 15124 Maroussi, Attica, Greece (hereinafter “**Novartis**” or “**we**”, “**us**”, “**our**”) collects, uses and otherwise processes information about you that may identify you directly or indirectly (hereinafter referred to as “**personal data**”). Novartis is responsible for the processing of your personal data as it decides why and how it is processed, thereby acting as the “**controller**”. To the extent you will be provided with other, specific privacy notices when interacting with us or in our website, for example when reporting an adverse event, these privacy notices shall govern the processing of your personal data for the purposes described in those notices and shall not be superseded by this Privacy Notice.

What information do we have about you?

Information Novartis may have about you may either be directly provided by you, such as when you share personal data with us or we receive information through your interactions with us, by our business partners (i.e. the organization for whom you work), or by third parties (e.g. our external service providers or medical agencies). We may further obtain your personal data through public sources where you may publish information in a professional context or other trusted publicly available sources (such as PubMed, ClinicalTrials.gov, congress websites or university websites). Information about you may also be inferred from personal data we or our service providers have about you.

We may collect various types of personal data about you, such as:

- your general professional contact and identification information (e.g. name, first name, last name, gender, email and/or postal address, phone number);
- your function and professional activities/experience (e.g. title, position, name of company, as well as, for health care professionals, specialties, year of graduation, publications, congress activities, awards, biography, education, links to universities, expertise and participation in/contribution to clinical trials, guidelines, editorial boards, organizations, conferences, events, and speaking engagements);
- 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 us (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 of Novartis premises or voice recordings);
- information regarding your utilization, responses and/or preferences including in terms of types of messages discussed, channels of communication, and time and frequency;
- user behavior and interaction with our websites, online portals, and electronic communications (such as website usage analytics information, or email click, read and/or open rates);
- publicly available information from social media interactions and/or membership in groups (such as public blogs, forums, posts or interactions via social media accounts relating to the professional/therapeutic area);
- data which relate to your use of and your experience with our products and services;
- information about the scientific and medical activities/interactions you have with us, including services you may provide to us and potential future interactions; and
- other data you provide to us, such as when filling out forms, making an enquiry, responding to a survey, or participating in market research.

If you intend to provide us with personal data 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.

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

We will always process your personal data for a specific purpose, and we will not process such 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 (“**consent**”);
- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps (“**contractual necessity**”);
- the processing is necessary to comply with our legal or regulatory obligations (“**legal obligation**”); or
- the processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms (“**legitimate interest**”).

In the table below, we set out for which purposes we process your personal data and indicate the corresponding legal justification/basis (where required).

<p>Purpose</p>	<p>Justification (legal basis)</p>
<p><i>We always process your personal data for a specific purpose and will only process the personal data, which is relevant to achieve that purpose. In particular, we process the personal data we may have about you for the following purposes:</i></p>	<p><i>The applicable legal basis may vary depending on the specific processing purpose and the applicable requirements in your jurisdiction.</i></p> <p><i>Please note that in some countries, we may ask for your consent to process your personal data which in such case is the legal basis for our processing.</i></p>
<p>Contract management:</p> <p>We process your personal data for the purpose of initiating or performing a contract (e.g. a specialist lecture), including as necessary for:</p> <ul style="list-style-type: none"> • implementing tasks in preparation of or to perform existing contracts; • granting you access to our training modules allowing you to provide us with certain services; • evidencing transactions and ensuring transparency on transfer of value; and • billing and invoicing. 	<p>Contractual necessity:</p> <p>To the extent we enter into a contractual relationship with you we will collect certain personal data in the context of that contractual relationship. Our processing of such data which is necessary to perform the negotiation or execution of the contract will be based on the legal basis of the contractual necessity.</p> <p>The contractual necessity may also include:</p> <ul style="list-style-type: none"> • to establish a business/contractual relationship with you or your employer; and • to administer the payment for our products and services.
<p>Business partner relationship management:</p> <p>We process your personal data to manage, maintain and organize our professional relationship with you, including as necessary for:</p>	<p>Legitimate interest or consent:</p> <p>Our legitimate interests may include:</p> <ul style="list-style-type: none"> • to administer, organize, maintain and optimize our professional relationship with you, and ensure efficient business communication;

- contacting you with marketing, medical and other communications regarding products, therapeutic areas or services that we promote, including in the form of personal visits, calls, emails and mobile messaging;
- managing, evaluating, documenting and maintaining our relationship with you (e.g. through our databases), including segmentation and profiling activities to provide appropriate and educational, scientific and business-related support and care tailored to your specific characteristics, needs and preferences;
- inviting you to events or promotional meetings sponsored by us (e.g. medical events, speaker events, conferences);
- providing you with appropriate, adequate and updated information about diseases, drugs as well as our products and services;
- answering your requests and providing you with efficient support;
- sending you surveys (e.g. to help us improve your future interactions with us);
- tracking our activities (e.g. measuring interactions, engagement or sales, number of appointments/calls, website usage, or email click, read and/or open rates);
- managing, plan and executing communications and interactions with you (e.g. through the use of AI-assisted technology and operation of a database keeping records of interactions with business partners or managing call planning as well as call reporting); and
- improving the quality of our interactions and services by

- to develop a proximity and trustful professional relationship with you;
- to provide knowledge to you about Novartis medicines and scientific developments;
- to promote innovation in the pharmaceutical field;
- to manage our human and financial resources in the context of our engagement with you;
- to optimize our interactions and engagement with you;
- to provide you with information and insights which may help you with taking technically and professionally well-informed decisions so that the right medicine may reach the right patient;
- to offer our products and services to our customers.

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 achieve our legitimate interests in ensuring effective, adequate and proportionate communication and interaction with you, including optimizing the content, means and timing of our communications, 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).

<p>adapting our offering to your specific needs.</p>	<p>Your profile will be adapted and will evolve over time, and will ultimately drive what type of communications we send you, what content they contain, and when and through which channels these communications occur.</p> <p>Our segmentation and profiling activities may involve the use of artificial intelligence (AI), including for analyzing your personal data and other information, such as aggregated and/or estimated sales or market data, or for predicting future trends and behavior. We may occasionally optimize such AI solutions by training or fine-tuning them with some limited amount of your personal data, always ensuring that we are not compromising your privacy, rights and interests, and we remain within the realm of our legitimate interest.</p> <p>Depending on local law requirements or local guidance, where our business partnering activities, including segmentation and profiling, go beyond usual business practices or where otherwise required by law, we will obtain your prior consent. In such case your consent is the legal basis for our processing.</p>
<p><i>Fulfilment of our legal and regulatory obligations:</i></p> <p>We process your personal data to fulfil our legal and regulatory requirements as necessary for</p> <ul style="list-style-type: none"> ensuring and documenting compliance with reporting and other legal obligations (such as regulatory monitoring and reporting, adverse event and product safety related obligations, local legal requirements, anti-corruption and anti-bribery laws, 	<p><i>Legal obligation or legitimate interest:</i></p> <p>Our legal obligations may include:</p> <ul style="list-style-type: none"> to ensure compliance with legal or regulatory requirements. <p>Our legitimate interest may include:</p> <ul style="list-style-type: none"> to document compliance with legal or regulatory requirements. <p>Depending on laws and regulations applicable in your country, we may ask</p>

<p>tax laws, transparency disclosure obligations, and/or statutory retention obligations);</p> <ul style="list-style-type: none"> • archiving and record keeping; and • any other purposes imposed by law and authorities. 	<p>for your consent. In such case your consent is the legal basis for our processing.</p>
<p><i>Managing company activities:</i></p> <p>We process your personal data for our operational business purposes to manage and protect our company, including as necessary for:</p> <ul style="list-style-type: none"> • preserving the company’s economic interests and ensuring compliance and reporting (such as complying with our policies, industry standards and practices and legal requirements, tax deductions, managing alleged cases of misconduct or fraud; conducting audits and defending litigation); • managing our IT resources, including infrastructure management and business continuity, and protect the security of our IT-systems, architecture and networks; • preventing fraud or criminal activity, or misuses of our products or services; • managing mergers and acquisitions involving our company; and • achieving our corporate social responsibility goals 	<p><i>Legitimate interest:</i></p> <p>Our legitimate interests may include:</p> <ul style="list-style-type: none"> • to benefit from cost-effective services (e.g. we may opt to use certain platforms offered by suppliers to process data); • 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; and • to meet our corporate and social responsibility objectives.

Our processing activities may include the use of artificial intelligence (AI) when processing your personal data for the purposes listed above. We may also occasionally optimize such AI solutions by training or fine-tuning them with some limited amount of your personal data, always ensuring that we are not compromising your privacy, rights and interests, and remain within the realm of our legitimate interest. When using AI Novartis does so in compliance with applicable laws and adheres to human-centric principles, applies appropriate transparency, and uses AI responsibly, always applying adequate security measures.

You can obtain further information on the purposes and applicable legal justification/basis, including the balancing test of the above specific interests, upon an express request to Novartis. In addition, you may object to the processing of your personal data under the conditions and within the limits set forth in applicable law and as further described below (Section: 'What are your rights and how can you exercise them').

Who has access to your personal data 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 data 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 suppliers and service providers that provide services and products to us, including consultants and technical service providers, such as cloud services and other IT services;
- our independent agents or brokers (if any);
- our advisors and external lawyers, including in the context of investigations/litigation;
- our advisors, external lawyers and other third parties directly involved in the sale or transfer of any part of our business or its assets or directly involved in acquisition or transfer of a third-party business or asset;
- our business partners who offer products or services jointly with us; and
- 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 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. In addition, some of your personal data may need to be made available publicly following legal and regulatory obligations which we may have, such as meeting our transparency obligations.

The personal data we collect from you may also be processed, accessed or stored in a country outside the country where you are 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 applying the level of protection required under the data protection/privacy laws applicable to Novartis, and acting in accordance with our policies and standards. To the extent that our processing of personal data is subject to the privacy laws of the European Economic Area ("**EEA**"), Switzerland, or the United

Kingdom (“UK”), or any other country prescribing the use of protective measures for the transfer of personal data to third countries, we are only transferring personal data to countries not providing for the same level of data protection on the basis of standard contractual clauses approved by the European Commission or other alternatives prescribed by the applicable privacy laws. You may request more information or a copy of such measures by contacting us as described below (Section: ‘What are your rights and how can you exercise them’).

For intra-group transfers of personal data to our group companies, 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 to Novartis affiliates outside the EEA, UK and Switzerland. Read more about the Novartis Binding Corporate Rules [here](#).

How do we protect your personal data?

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

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; and
- may request you to confirm the personal data 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 data is kept up to date.

How long do we store your personal data?

We will only retain personal data we may have about you for as long as we reasonably consider it necessary for achieving the purposes set out in this Privacy Notice and 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 law:

- the right to object, in whole or in part, to the processing of your personal data including opting out from our communications for direct marketing purposes;
- 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; 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.

Furthermore, you have the right to withdraw any consent you provided, without affecting the lawfulness of the processing prior to such withdrawal.

If you want to exercise the above rights, [click here](#).

Should you have any further questions, or if you want to contact our data protection officer, you may send an email to privacy.novartisgr@novartis.com or write to Novartis (Hellas) SACI having its registered office at Kifissias Avenue 199, 15124 Maroussi, Attica, Greece.

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 addition to the rights above, you may have the right, under applicable law, to file a complaint with the competent supervisory authority at contact@dpa.gr.

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

This Privacy Notice was last updated in February 2026. We invite you to visit our website (novartis.com/privacy) from time to time for any updates of 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 via an update on our website (novartis.gr) and/or other communication channels as appropriate, e.g. via e-mail.