Privacy Policy 私隱政策

Effective: 10 March 2020 (只提供英文版本)

Thank you for your trust in Novartis Pharmaceuticals (HK) Limited (hereinafter referred to as "Novartis", "we", "our", or "us" in this Privacy Policy). We are a Hong Kong-based affiliate of the Novartis Group, a world leader in healthcare. The responsible use of personal data is a core value of Novartis. Novartis fully respects privacy laws and is subject to an internal framework of privacy rules and policies.

This Privacy Policy describes how we use and disclose the information we collect from you ("Personal Data") through our Hong Kong website, mobile applications, social media forums, newsletter platforms, and other services, both offline and online, that link to, incorporate, or for which you are provided a copy of this Privacy Policy (collectively, "our services"), and the choices you have about how we hold and use your Personal Data and how we respect your privacy rights.

We may change or update this Privacy Policy from time to time by posting an updated Privacy Policy on our official website or the specific website or online programs or platforms under which you are using our services (collectively, "our sites") or sending a copy of the updated Privacy Policy via email or mail depending on the communication channel of your choice for using our services.

What Personal Data do we collect and for which purposes?

- Information you provide:
  Most of our services do not require any form of registration, allowing you to visit our site without telling us who you are. However, some of our services may require you to voluntarily provide us with Personal Data when you use our services, such as when you register for or use a Novartis program or service, subscribe for Novartis newsletters, 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. The types of information that you provide are based on the specific function of our services that you use or the Novartis program, service or newsletter subscription for which you register to enable us to provide you with products, services, and customer support, to bill you for products and services you request, to market products and services which we think may be of interest to

you (subject to your consent), or to communicate with you for other purposes which are evident from the circumstances or about which we inform you when we collect your Personal Data and might include, for instance, your name, address, age, birth date, gender, email address, phone number, photo, education, professional experience, specialties, demographic information, information about health and/or medical condition. If you submit personal information relating to other people to us or to our service providers in connection with our services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

- Information we receive from other sources/third parties:
  We may combine, aggregate, or anonymize Personal Data with data we may collect from or about you from other sources, both online and offline, such as public databases, providers of demographic information, joint marketing partners, social media platforms, and other third parties.

- Personal Data used for website usage analytics:
  We may also collect and process information about your visit to our sites when using our services, such as the pages you visit, the website you came from and the searches you perform. We may also collect and process information about your subscriptions, such as demographic data and click behaviour. We may use such information to help improve the contents of our services and to compile aggregate statistics about people using our site for our internal usage statistics and market research purposes. In doing this, we and our third-party service providers may use a tracking tool which links to the URL and/or install "cookies" that collect the domain name of the user, your internet service provider, your operating system, and the date and time of access. A "cookie" is a small piece of information, which is sent to your browser and stored on your computer's hard drive. Cookies do not damage your computer. You can set your browser to notify you when you receive a "cookie", this will enable you to decide if you want to accept it or not. You can also refuse cookies altogether. However, if you do not accept our cookies, you may not be able to use all functionalities of our sites.

  We do not currently respond to web browser "do not track" signals or other mechanisms that provide a method to opt out of the collection of information across websites or other online services.

  Occasionally, we and our third-party advertising and service providers may use internet tags (also known as action tags, single-pixel GIFs, clear GIFs, invisible GIFs and 1-by-1 GIFs) and cookies at our sites and may deploy these tags/cookies through a third-party advertising partner or a web analytical service partner which may be located and store the respective information (including your IP address) in a foreign country. These tags/cookies are placed on both online advertisements that bring users to our sites and on different pages of our sites. We use this technology to measure the visitors' responses to our sites and the effectiveness of our advertising campaigns (including how many times a page is opened and which information is consulted) as well as to evaluate your use of our sites. The third-party partner or the web analytical service partner may be able to collect data about visitors to our and other sites because of these internet tags/cookies, may compose reports regarding our sites' activity for us and may provide further services which are related to the use of our sites and the internet. They may provide such information to other parties if there is a legal requirement that they do so, or if they hire other parties to process information on their behalf. If you would like more information about web tags and cookies, please visit the Network Advertising Initiative website: https://www.networkadvertising.org

We may use a number of technologies offered by different providers to support website analytics and user tracking, including technologies offered by the providers below. If you wish to prevent or control the use of these technologies, you may follow the links with that particular third party (the following links are provided for convenience only, please refer to the links of the particular third party at the material time):

Crazy Egg (Crazy Egg, Inc., 16220 E. Ridgeview Lane, La Mirada, CA, 90638, USA) Privacy Policy, Opt-out

DoubleClick (Google Inc.,1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) Privacy Policy, Opt-out

Facebook (Facebook, Inc., 1601 S. California Avenue, Palo Alto, CA, 94304, USA) Privacy Policy, Plug-in, Opt-out

Google Analytics (Google Inc.,1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) Privacy Policy, Opt-out

LinkedIn (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland) Privacy Policy, Opt-out

Twitter (Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA, 94103, USA) Privacy Policy, Plug-in, Opt-out

Glassdoor (Glassdoor Inc., 100 Shoreline Highway, Mill Valley, CA 94941, USA) Privacy Policy, Opt-out

- How do we use your information:
  We may use your information for our business purposes, including audits, monitoring and prevention of fraud, infringement, and other potential misuse of our products and services, and for modifying our services.

  In addition to using your information to deliver the services, programs, products, newsletters or information you request, and for the purposes described above, we may also use it:

1. to provide our services and customer support to you and to follow up with your requests, such as to provide the membership services that you have subscribed for, to provide you with the newsletter services that you have subscribed for etc.;
2. to communicate with you regarding our services that you have required and to provide you with information about our products and services, programs, your accounts and notices pursuant to your requests;
3. to deliver direct marketing communications to you regarding our pharmaceutical products and services that may be of interest to you, such as medical/scientific updates or events, health talks/ forums, conferences, promotion offers, membership benefits etc. (subject to your prior consent);
4. to process and follow up with your use of our services and pharmaceutical products (including any adverse events), to conduct a drug safety analysis or study (subject to your prior consent);

5. to permit you to participate in polls, surveys, promotions, subscriptions or other interactive features, such as chat features and newsletter subscriptions;
6. to personalize your experience and better tailor contents to you;
7. to help us, our affiliates, and business partners better understand our audiences, evaluate user interest in our sites and services, improve our services, and perform other market research activities;
8. for our business purposes, such as data analysis; audits; monitoring and prevention of fraud, infringement, and other potential misuse of our services; modifying our services; determining the effectiveness of our promotional campaigns; and operating and expanding our business activities; and
9. as we believe in good faith to be necessary or appropriate: 1) under applicable laws, including laws outside Hong Kong; 2) to comply with legal process; 3) to respond to requests from public and government authorities, including public and government authorities outside Hong Kong; 4) to enforce our terms and conditions; 5) to protect our operations or those of any of our affiliates; 6) to protect the security and integrity of our services and our rights, privacy, safety or property, and/or that of our affiliates, you or others; and 7) to allow us to pursue available remedies or limit the damages that we may sustain.
10. We may use information that does not personally identify you for any purpose, except where we are required to do otherwise under applicable law.

When and to whom do we disclose your information?

This Privacy Policy describes the circumstances in which we may share your Personal Data.

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

We may share your Personal Data with other Novartis affiliates worldwide. We also may transfer your Personal Data to third parties who act on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed, such as services delivery, evaluating the usefulness of services, marketing, advertising, data management, or technical support. These third parties have contracted with us to only use Personal Data for the agreed upon purpose, and not to sell Personal Data to third parties, and not to disclose it to third parties except as may be permitted by us, as required by law, or as stated in this Privacy Policy.

We may disclose your Personal Data to a third party in the event that the business or a part of it and the customer data connected with it is sold, assigned or transferred, in which case we would require the buyer, assignee or transferee to treat Personal Data in accordance with this Privacy Policy.

Also, we may disclose your Personal Data to a third party if we are required to do so, including but not limited to the following situations:-

1. because of an applicable law, requests from public and government authorities (including court order, subpoena, or governmental regulation) and to health authorities to report possible adverse events, even outside Hong Kong;
2. to respond to a government or regulatory request;
3. if we need to enforce our terms and conditions;
4. when we believe in good faith that the disclosure is necessary to protect legal rights, the security or integrity of our business and our sites;
5. to protect your safety or the safety of others;

6. as part of any criminal or other legal investigations or proceedings in Hong Kong or in other jurisdictions;
7. to third parties, advisors, and other entities to the extent reasonably necessary for development of or to proceed with the negotiation or completion of a corporate or commercial transaction including a reorganization, merger, acquisition, joint venture, sale or other disposition of all or a portion of our business, assets, or stock;
8. by you, on message boards, chats, profile pages, blogs, and other services to which you post information and materials. Because any information you post may become public, we urge you to be very careful when deciding to disclose any information on or through our services;
9. to any person you direct us to contact, such as your designated caregiver(s);
10. to our affiliates within the Novartis Group, for the purposes described in this Privacy Policy;
11. to third parties that provide services to us, such as fulfilling requests for information, answering calls, administering programs or projects, assisting in research and development, or delivering advertisements or other communications;
12. to our IT systems providers, cloud service providers, database providers and consultants;
13. to business partners who offer products or services jointly with us or with our affiliates;
14. to permit a third-party business partner to deliver marketing communications or products that may be of interest to you, subject to any choices you have expressed and consented to;

Your Personal Data may also be processed, accessed, stored and/or transferred to our affiliates or third party service providers outside Hong Kong. Such locations may offer a different level of protection of personal data. If we transfer your Personal Data to our affiliates or third party service providers in other jurisdictions, we will make sure to protect your Personal Data by applying the level of protection required under applicable data privacy laws.

How do we protect your Personal Data?

We use appropriate technical, administrative, and physical safeguards to protect the information collected through our services. Unfortunately, no organization can guarantee the absolute security of information, especially information transmitted over the internet.

How do we deal with children ' s information?

Our services are directed for local users above the age of 18 in Hong Kong and are not directed at children. We do not knowingly collect Personal Data from children under the age of 18 without obtaining prior parental consent, other than to inform the child that we must have parental consent before collecting personal information.

How long do we store Personal Data?

We will only retain your Personal Data for as long as necessary to fulfill the purpose for which they were collected or to comply with applicable legal or regulatory requirements.

Links to Third Party Websites?

Our services may contain links to third-party services that are not under our control. We are not responsible for the collection and use of your information by such services, and we encourage you to review their privacy policies. In addition, we are not responsible for the information collection, use, disclosure, or security practices of other organizations, such as Facebook, Apple, Google, Microsoft,

RIM, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider, or device manufacturer, including in connection with any information you disclose to such other organizations through or in connection with our services.

What are your rights and how can you exercise them?

Whenever we process Personal Data, we take reasonable steps to keep your Personal Data accurate and up-to-date for the purposes for which they were collected. We will provide you with the ability to exercise the following rights under the conditions and within the limits set forth in the law, subject to confidentiality obligations:

1. 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;
2. the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal. If you wish to withdraw the consent, please use the "unsubscribe" option in the digital messages we send to you or contact us directly.
3. the right to object, in whole or in part, to the processing of your personal data.

If you have a question about our Privacy Policy or wish to exercise any of the above rights, you may email us at info.hk@novartis.com or write to us at the following address:-

Novartis Pharmaceuticals (HK) Limited
7/F, Citi Tower, One Bay East,
83 Hoi Bun Road, Kwun Tong, Kowloon,
Hong Kong

For your protection, we may only implement requests with respect to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request.

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

We may change or update this Privacy Policy from time to time by posting an updated Privacy Policy on our sites under which you are using our services or sending a copy of the updated Privacy Policy via email or mail depending on the communication channel of your choice for using our services.

You are advised to consult our sites regularly for any changes/updates to this Privacy Policy, and your continued use of our services after such changes/updates have been made constitutes your acceptance of those changes.

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- https://www.facebook.com/privacy/explanation
- https://developers.facebook.com/docs/plugins
- https://www.facebook.com/ads/preferences/edit/
- https://tools.google.com/dlpage/gaoptout
- https://www.linkedin.com/legal/privacy-policy
- https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out?trk=microsites-frontend_legal_cookie-policy
- https://twitter.com/privacy
- https://twitter.com/about/resources/buttons
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