

General Notice on the Processing of Personal Data for Third Parties

This Notice on the processing of personal data (hereinafter referred to as the Notice) is intended for third parties, which for the purposes of the scope of this Notice, are as follows:

- Suppliers: An external natural or legal person/entity outside the Novartis Group from whom Novartis sources goods or services. This includes, for example:
 - i. Contract Manufacturing Organizations (CMOs)
 - ii. Institutions and collaborators carrying out research for or on behalf of Novartis, where Novartis is acting as the sponsor and paying for the research, including collaborators of both Contract Research Organizations (CROs) and Academic Research Organizations AROs)
 - iii. Third parties that handle or distribute Novartis products (i.e. logistics services) where the ownership of the products is not transferred to the third party service provider
 - iv. HCPs acting as "third parties" only, i.e. where they provide goods or services against a fee for a service beyond their profession as an HCP, such as app developers or commercial/marketing consultants, etc. (otherwise HCPs are out of scope).
- Business Development & Licensing (BD&L): Any third party with whom a product in-licensing agreement has been contracted with Novartis.
- Distributors and Wholesalers: Any third party that imports and/or resells for its own business purposes Novartis Products (whether or not they provide promotion services for the specific Novartis Products on behalf of Novartis).

The purpose of this Privacy Notice is to clarify the way **Novartis Poland Sp. z o.o.**, part of the Novartis Group (hereinafter: Novartis, the Company, "we" or "us") is processing personal information of representatives and/or employees as contact persons (data subjects) of a third party or its subcontractor.

Novartis makes decisions about why and how your personal data is processed and therefore acts as a controller of your personal data.

We invite you to carefully read this Privacy Notice, which sets out in which context we are processing information that relates directly or indirectly to you (“personal information”) and explains your rights with respect to the processing of your personal information.

Should you have any further questions in relation to the processing of your personal information, you are invited to contact our data protection officer at global.privacy_office@novartis.com.

What information do we have about you?

This personal information may either be directly provided by you or provided by our third party (i.e. the legal entity you work for or on behalf of).

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

- your general contact and identification information (e.g. first name, last name, date and place of birth, nationality, ID card or passport numbers, email and/or postal address, fixed and/or mobile phone number and car registration number);
- your function (e.g. title, position and name of company);
- your financial information (e.g. bank account details, financial health checks), taxation information including government issued tax ID or account number, information about transactions (delivery and payment history) and background information about your business capabilities and operational performance when you individually act as a third party (e.g. one person company/sole proprietorship);
- your electronic identification data where required for the purpose of the delivery of products or services to our company (e.g. login, access right, passwords, badge number, IP address, online identifiers/cookies, system activity logs, access and connection times, image recording or sound such as badge pictures, CCTV or voice recordings and meeting recordings).

We do not collect any health data unless it is for making reasonable arrangements for a person with disability.

If you intend to provide us with personal information about other individuals (e.g. your colleagues), you must ask the relevant individuals to go through this Privacy Notice available on our corporate website (www.novartis.pl in the Privacy Policy tab) before providing us with such personal information.

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

Legal basis for the processing

We will not process your personal data in the absence of an appropriate legal justification for such activities. Therefore, we will only process your personal data if:

- we have obtained your prior consent;
- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- the processing is necessary to comply with our legal or regulatory obligations; or
- the processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms.

Please note that, when processing your personal data on this last basis, we always seek to maintain a balance between our legitimate interests and your privacy.

Examples of such 'legitimate interests' are data processing activities performed:

- to develop a proximity and trustful professional relationship;
- to promote innovation in the pharmaceutical field;
- to manage Novartis human and financial resources;
- 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; or
- to meet our corporate and social responsibility objectives.

Mostly we process your personal information on a legal basis other than consent. However, if you have consented to the processing of your personal information, you have the right to withdraw that consent at any time. The processing we carry out before you withdraw your consent will be lawful. To withdraw your consent or to get more information on our specific interests and your rights, Novartis can be contacted as indicated below.

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 particular, we process the personal information for any or all of the following purposes:

- to manage our third parties throughout the relationship;
- to organise tender-offers, implement tasks in preparation of or to perform existing contracts;

- to monitor activities at our facilities, including compliance with applicable policies as well as health and safety rules in place;
- to grant you access to our training modules allowing you to provide us with certain services;
- to communicate with you during the term of the contract and contact you in case of emergency;
- to manage our IT resources, including infrastructure management and business continuity;
- to preserve Novartis' economic interests and ensure compliance and reporting (such as complying with our policies and local legal requirements, tax and deductions, managing alleged cases of misconduct or fraud, conducting audits and defending litigation);
- to manage mergers and acquisitions involving our company;
- for archiving and record-keeping;
- for billing and invoicing; or
- any other purposes imposed by law and authorities.

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

We will not share your personal information 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 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 other 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 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.

The personal information 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 information.

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

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 outside the European Economic Area (EEA) and Switzerland. 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.

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.

How long do we store your personal information?

We will only retain your personal information 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 the term of your (or the third party's) relevant commercial agreement with Novartis plus the period of time until the legal claims under such commercial agreement become time-barred, unless overriding legal or regulatory schedules require a longer or shorter retention period. When this period expires, your personal information is removed from our active systems.

Personal information collected and processed in the context of a dispute are deleted or archived (i) as soon as an amicable settlement has been reached, (ii) once a decision in the last resort has been rendered or (iii) when the claim becomes time barred.

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 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 your personal information 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 information. With certain exceptions, this includes the right to object to direct marketing and the right to object to your personal information being used for research;
- 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 object to automated decision-making including profiling, i.e. you can request an human intervention in any automated decision-making process related to processing of your data and where such processing is not based on your consent, authorized by law or necessary for the performance of a contract. However, we don't currently make decisions using automated processes.

If you have any questions about the above rights or if you wish to exercise them, you can send a request via <https://www.novartis.com/privacy/dsr> or by e-mail to ochrona.danych@novartis.com, providing data that allow you to verify your identity in order to respond.

If you are not satisfied with how we process your personal information, you may address your request to our data protection officer at global.privacy_office@novartis.com, who will investigate your concern.

The third party you work for is also a data controller for your information. To exercise your data protection rights you may need to contact the third party you work for in relation to your personal information.

In addition to the rights indicated above, you also have the right to lodge a complaint with the competent data protection authority, which in Poland is the Office for Personal Data Protection.

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

We may change or update this Notice from time to time by posting a new privacy notice in our procurement systems or our corporate website (www.novartis.pl in the Privacy Policy tab). Please keep checking this notice occasionally so that you are aware of any changes.