

Novartis UK Social Media Community Guidelines

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Welcome

Welcome to the Novartis Pharmaceuticals UK Limited ("**Novartis UK**") social media community. We are pleased you are here and appreciate your engagement across our various social media platforms.

When it comes to your use of Novartis UK's social media accounts, your use of those accounts is governed by the terms and conditions of the relevant platform. The following are our comprehensive community guidelines, which we ask you to also adhere to so that we can provide the best experience for all followers of our Novartis UK social media accounts.

Section 1: General Guidelines

Overview

Novartis UK observes each social media platform's respective terms of service. The content on our pages is for informational use only and concerns the company and its initiatives. It is important to note that our social media presence is not intended to be, and must not be relied upon as, a substitute for professional medical advice, diagnosis, or treatment. For medical advice, please contact your doctor or other qualified healthcare provider.

Our Regulatory Context

We welcome the opportunity to hear from you via your comments, messages, and tags. However, we would like to remind you that we work in a regulated industry with specific legal obligations and a code of conduct. As such, we cannot engage in sensitive topics, or discussion(s) about medicinal products – ours or other companies' – or treatment options on social media.

We reserve the right to remove spam and content or posts that are off-topic, abusive, discriminatory, or harassing. Content may only be uploaded by Novartis UK or its authorised representatives.

Community Standards

We ask that you respect other members of our community by ensuring that you do not:

- Mention medicinal products
- Include profanity, defamatory, libellous, offensive, abusive, discriminatory or demeaning content (including images, videos and links)
- Include disparaging or threatening language or content, or condone or promote violence or illegal behaviour
- Go off-topic
- Offer health or medical advice

- Include any personal information such as your email address or telephone number
- Violate another's copyright or other intellectual property rights
- Solicit business or share commercial information, e.g. sell products and/or services, or recruit fans and followers
- Post material that is excessively repetitive and/or disruptive to the community or constitutes spam
- Post information containing proprietary, confidential, sensitive, or non-public information
- Breach the platform's terms of service

Content Moderation

If your comment or post tagging Novartis UK does not comply with our Community Guidelines, it may be hidden, deleted, blocked or reported to the relevant platform.

Language and Audience

At this time, Novartis UK is only able to accept and monitor comments to our social media accounts in English, and these accounts are intended for the UK audience only. Novartis UK may remove content from our sites posted in languages other than English.

Response Times

All platforms maintain consistent response times of 48 hours for direct messages and priority engagement during UK business hours (9:00-17:00 GMT/BST, Monday-Friday, excluding bank holidays).

Endorsements and Associations

Social media accounts that Novartis UK follows, or is followed by, do not constitute an indication of Novartis UK's endorsement of those accounts or the content they produce. Any content that Novartis UK shares, likes, or reacts to does not constitute an endorsement of the content itself, nor of the producer of the content.

Section 2: Medical Side Effects (Adverse Events)

Reporting Side Effects Related to Novartis Products

Please do not use social media to report side effects or product quality issues, but instead use the mechanisms detailed below.

If you have experienced a medical side effect related to a Novartis product, [please report it using the Novartis online system](#). If you experience any problems with the site, you can email uk.patientsafety@novartis.com or telephone +44 (0)1276 698370.

If you need to report a product quality complaint relating to a Novartis product, please email medinfo.uk@novartis.com or telephone +44 (0)1276 698370.

It is contrary to our Community Guidelines for users to post about medicines and we strongly recommend sharing as little personal information as possible on social media. Sharing specific data concerning your personal health should be avoided. Should you, however, post on any Novartis UK social media page with details of any side effects that you experience, Novartis UK may need to contact you to obtain further information.

Where we process your personal information in the context of side effects or product quality complaints, we will process your personal information in accordance with our Privacy Notice for Individuals Involved in an Adverse Event, Medical Information Query, or Product Complaint.

Reporting Side Effects Related to All Other Products

If you experience side effects with any medication you are taking, speak to your doctor, pharmacist or nurse. This includes any possible side effects not listed in the patient information leaflet that comes with the medicine. You can report side effects via the Yellow Card Scheme at <https://www.mhra.gov.uk/yellowcard>. By reporting side effects, you can help provide more information on the safety of your medication.

Section 3: Additional Information

Novartis shall not be liable for any use of your comments outside of the intended purposes set out in these guidelines, whether by you or any third party. No part of our responses to you may be published or disseminated to third parties outside the context of the original enquiry without our express written consent.

Contact Information

For general inquiries related to our social media presence or these guidelines, please contact our communications team through the appropriate channels listed in the Privacy Notice section.

Section 4: Privacy Notice

Overview

This Privacy Notice must be read in conjunction with each social media platform's respective data protection policy and privacy policy, which governs data processed by those platforms.

If you contact Novartis (for example by sending a message directly to our pages), information about you ("personal data") may be collected and stored on Novartis' systems, but only where this is necessary for the purposes described below. In such cases, and limited to such cases, Novartis UK is the data controller responsible for the processing of your personal data, as it determines the purposes for which and the manner in which your personal data is processed. In this Privacy Notice, "we" or "us" refers to Novartis Pharmaceuticals UK Limited.

What Information Do We Collect?

As necessary for the purposes described below, we may collect personal data, including:

- Your basic profile information (e.g. name, sex, country)
- Personal data contained in your posts to our accounts
- Personal data contained in messages sent to us

For Which Purposes Do We Use Personal Data and Why Is This Justified?

We will only process your personal data where we have a lawful basis for doing so under applicable data protection legislation. We will process your personal data on one or more of the following lawful bases:

- We have obtained your explicit consent
- The processing is necessary to perform our contractual obligations towards you or to take steps at your request prior to entering into a contract
- The processing is necessary for compliance with a legal or regulatory obligation to which we are subject
- The processing is necessary to protect the vital interests of you or another natural person

- The processing is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. We always seek to maintain a fair balance between our legitimate interests and your privacy. Examples of such 'legitimate interests' include the purposes described below

How We Use Your Personal Data

Personal data may be used by us for the following purposes:

Direct Purposes:

- To manage and answer any questions, requests, or complaints you raise
- To inform our communications activities, including the content and target audience of the posts from our social media accounts
- We ask you not to do so, but if you use social media to alert us to medicinal side effects, product quality complaints or other regulated situations, we may log your query and contact you for additional information. We may also be required to disclose your personal data to regulatory authorities

General Purposes:

- Improve our products and services
- Research, development and commercialisation of products
- Scientific research purposes or statistical purposes subject to appropriate safeguards such as pseudonymisation
- Training or educational purposes within or outside Novartis Pharmaceuticals UK Limited
- Provide you with adequate and updated information about disease, drugs, as well as our product and services
- Organise patient support or assistance programs (including connecting you with health resources and patients associations upon your request) and patients testimonials
- 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 and deductions, managing alleged cases of misconduct or fraud, conducting audits and defending litigation)
- Manage mergers, acquisitions, and divestments involving our company
- Archiving and record-keeping
- Any other purposes imposed by law and authorities

Who Has Access to Personal Data and to Whom Are They Transferred?

We will not sell, share, or otherwise transfer your personal data 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 can 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 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
- 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 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.

International Data Transfers

The personal data we collect from you may be processed, accessed, or stored in countries outside the UK. Such countries may offer a different 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 applicable data privacy laws. For intra-group transfers of personal data, Novartis has adopted Binding Corporate Rules, a system of principles, rules, and tools, provided by European law, that ensures effective levels of data protection relating to transfers of personal data outside the EEA and Switzerland. Read more about the Novartis Binding Corporate Rules at <https://www.novartis.com/privacy/novartis-binding-corporate-rules-bcr>

How Long Do We Store Personal Data?

We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

What Are Your Rights and How Can You Exercise Them?

Under applicable data protection legislation, you have the following rights:

- **The right of access** - to obtain confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, access to the personal data
- **The right to rectification** - to obtain without undue delay the rectification of inaccurate personal data concerning you
- **The right to erasure ('right to be forgotten')** - to obtain the erasure of personal data concerning you without undue delay in certain circumstances
- **The right to restrict processing** - to obtain restriction of processing in certain circumstances
- **The right to data portability** - to receive your personal data in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller in certain circumstances
- **The right to object** - to object, on grounds relating to your particular situation, to processing of personal data concerning you which is based on legitimate interests
- **Rights in relation to automated decision making and profiling** - not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you

These rights are not absolute and may be subject to certain conditions or restrictions as set out in applicable data protection legislation.

Contact Us

If you wish to contact us regarding our use of your personal data or you wish to exercise your data privacy rights, please contact privacy_uk.ireland@novartis.com. 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 any case, you also have the right to file a complaint with the Information Commissioner's Office (ico.org.uk), in addition to your rights above.

Section 5: Platform-Specific Guidelines

Whilst the general guidelines above apply to all our social media platforms, each platform has specific features and community standards that require additional consideration. The following platform-specific guidelines supplement our general Community Guidelines.

Instagram (@NovartisUK)

Platform Compliance:

- All content must comply with Instagram's [Terms of Use](#) and [Community Guidelines](#)
- Users must not violate Instagram's policies on harassment, hate speech, or misinformation

Content and Engagement:

- Visual content (images, videos, Stories, Reels) is the primary method of communication
- Comments on posts, Stories, and direct messages are monitored during business hours
- Instagram Live sessions may be conducted for company communications and will be moderated in real-time
- User-generated content featuring Novartis UK may be shared with appropriate attribution, subject to these guidelines

Specific Restrictions:

- Do not use Instagram Shopping features to discuss or promote medicinal products
- Stories mentioning health conditions or treatments will be removed
- Direct messages containing adverse event reports will be redirected to appropriate channels

LinkedIn (Novartis UK)

Platform Compliance:

- All interactions must adhere to LinkedIn's [User Agreement](#) and [Professional Community Policies](#)
- Content must maintain professional standards appropriate for a business networking environment

Content and Engagement:

- Content focuses on corporate updates, career opportunities, industry insights, and professional development
- Professional networking context applies to all interactions and content sharing
- LinkedIn messaging for business inquiries is monitored and responded to during business hours
- Company page posts may include longer-form content appropriate for professional audiences

Specific Restrictions:

- Healthcare professional connections do not imply endorsement of their professional views or treatments
- Job-related discussions must not include references to medicinal products or treatment protocols
- Professional recommendations and endorsements are personal views and do not represent Novartis UK positions

X (formerly Twitter) (@NovartisUK)

Platform Compliance:

- All content must comply with X's [Terms of Service and Rules](#)
- Rapid response expectations require careful adherence to our community standards

Content and Engagement:

- Real-time engagement through @mentions, replies, and direct messages
- Content optimised for immediate news sharing and brief corporate updates
- Retweets and quote tweets are monitored for compliance with these guidelines
- Thread conversations are actively moderated during business hours

Specific Restrictions:

- The fast-paced nature of X requires immediate removal of non-compliant content
- Hashtag campaigns must not encourage discussion of medicinal products
- Trending topic participation is limited to corporate communications only
- Live-tweeting from events must comply with all regulatory restrictions

Clarification on Engagement:

- Retweets, likes, and other reactions do not constitute endorsement of the content, its accuracy, or its producer
- Following accounts does not indicate business relationships or endorsements

Facebook (Novartis UK)

Platform Compliance:

- All content must adhere to Facebook's [Terms of Service](#) and [Community Standards](#)
- Group discussions and community features are subject to enhanced moderation

Content and Engagement:

- Content includes longer-form posts suitable for detailed corporate communications
- Facebook Messenger inquiries are monitored and responded to during business hours
- Comments on posts are actively moderated to ensure compliance
- Event pages may be created for corporate events, subject to these guidelines

Specific Restrictions:

- Facebook Groups or community features must not facilitate discussions about medicinal products
- Polling features must not be used to gather health-related information
- Marketplace features are not utilised for any commercial purposes
- Live streaming events are pre-approved and moderated in real-time

Privacy Considerations:

- Enhanced privacy settings are maintained to protect community member information
- Personal health information shared in comments will result in content removal and private follow-up where appropriate

YouTube (Novartis UK)

Platform Compliance:

- All users must comply with YouTube's [Terms of Service](#) and [Community Guidelines](#) when engaging with our channel
- Users must not post content that violates YouTube's policies on harassment, hate speech, or misinformation

Viewing and Engagement:

- Our YouTube channel provides corporate communications, educational initiatives, and approved public health information
- Comments on videos are actively moderated and may be disabled for certain content types
- Users may subscribe to receive notifications of new content, subject to these Community Guidelines
- Live stream participation requires adherence to real-time moderation guidelines

User Comment Restrictions:

- Do not use video comments to seek or provide medical advice, diagnosis, or treatment recommendations
- Do not share personal health information or medical experiences in comments or live chat
- Do not mention specific medicinal products (ours or competitors') in comments or discussions
- Do not request information about treatment options or drug availability
- Do not share contact details or attempt to arrange private medical consultations

Prohibited Content in User Comments:

- Patient testimonials or personal medical case discussions
- Requests for medical advice or treatment recommendations
- Sharing of personal health data or medical history
- Discussion of specific medicinal products, dosages, or treatment protocols
- Links to external medical resources or non-approved health information

Community Features:

- Community tab interactions are subject to the same restrictions as comments on other social media platforms
- Users participating in premieres or live chat must follow real-time moderation instructions
- Sharing or embedding our videos must not be accompanied by medical advice or product promotion
- User-generated video responses discussing our content must comply with these guidelines

General Platform Notes

Response Protocols: All platforms maintain consistent response times of 48 hours for direct messages and priority engagement during UK business hours (9:00-17:00 GMT/BST, Monday-Friday, excluding bank holidays).

Escalation Procedures: Content that may constitute an adverse event report, product complaint, or regulatory concern is immediately escalated through internal channels regardless of the platform on which it appears.



Content Archiving: All platform interactions are archived in accordance with pharmaceutical industry regulations and data retention requirements.

Thank you for reading and for following Novartis UK across our social media platforms.