

Novartis Privacy Policy for Webinars

You are receiving this Privacy Notice because Novartis South Africa (Pty) Ltd (“Novartis”) is processing information about you which constitutes “**personal data**”.

Novartis considers the protection of your personal data and privacy a very important matter. Accordingly, The collection, use, retention and disclosure of your personal information as a result of your registration for this specific webinar that you are attending. The webinar is managed as set forth below.

Novartis is responsible for the processing of your personal data as it decides why and how it is processed, thereby acting as the “**Responsible Party**” under the Protection of Personal Information Act 4 of 2013. In this Privacy Notice, “**we**” or “**us**” refers to Novartis. Please consider the Novartis entity, which processes your personal information as “Responsible Party” of the processing activity.

Personal information collected:

Personal information, including but not limited to your first and last name, e-mail address, race, gender information and country that you enter into the registration form and any information included as part of the questions raised during each webcast will be collected. Depending on the type of webinar, your image and voice (such as video footage, voice recordings) may also be collected. Please note that you will be notified in case of such collection.

The collection of personal information is on a voluntary basis or required by the local applicable legislation. Novartis collects personal information to provide you with access to the services and products that we provide. If you fail to provide necessary personal information to us, Novartis may not be able to provide you with our services fully for the purposes indicated under this Privacy Policy.

Purpose for collecting personal information and related use

Your personal information is collected by our third party partners on behalf of Novartis and other affiliates of the Novartis Group of Companies (“Novartis”).

The personal information will be used to facilitate access and participation in the webcast for which you have registered (“**Purpose**”) and for related recordkeeping for compliance with applicable industry codes, regulations and laws. We also use your personal information to understand, develop, test and improve the webcast and educational resource usage and to allow you to access certain parts of this site without re-registering.

Also, the race and gender information is requested by Novartis as a requirement in order to compile prescribed statistical returns aimed at assisting the government in monitoring and verification of certain practices in terms of applicable legislation under Broad-Based Black Economic Empowerment Act and Broad-Based Black Economic Empowerment Codes of Good Practice.

Your personal information including your name, comments or any information about yourself that may contain your image and voice (such as video footage) may be used for commercial or non-commercial purposes e.g. disease awareness events and scientific training, on internal and external communication channels which may include, among others social media, Facebook, Youtube, marketing e-mails etc.). You will also be informed about such use of personal information.

Data controller of personal information collected

Novartis will operate as the Responsible Party and the third-party partner acts on its behalf as a Data processor. The personal information collected will be shared with Novartis Group of Companies for processing insofar as necessary for achieving the purposes described above. Novartis 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, in particular relating to transfers of personal information outside the EEA and Switzerland.

Personal information collected and legal basis for the processing

We will not process your 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; OR
- The processing is necessary to comply with our legal or regulatory obligations, .e.g Broad-Based Black Economic Empowerment Act.
 - The processing is necessary for our legitimate interests or legitimate interest of data subject and does not unduly affect your or Novartis interests or your fundamental rights and freedoms.
 - The processing of sensitive information, i.e. race is necessary as per Section 29 of the Protection of Personal Information Act (“POPIA”) where the processing is carried out to (a) identify data subjects and only when it is essential for the purpose and (ii) to comply with laws and other measures designed to protect or advance persons or categories of persons, disadvantaged by unfair discrimination.

Personal information disclosure to third parties

“Novartis” or its third-party partner will not sell, share, or otherwise distribute your personal information to third parties except as provided in this Privacy Policy. Your personal information may be transferred to third parties who act for or on our behalf in accordance with the listed purposes, including to place cookies as described above. These third parties may be located in countries or territories, which may not offer the same level of data protection as the country in which you reside. They have contracted with us to use your personal information solely for the agreed upon purpose, not to sell your personal information to third parties, and not to disclose it to third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy.

Your personal information may also be transferred to a third party in the event that this part of our business and the personal information connected with it is sold, assigned or transferred, in which case we would require the buyer, assignee or transferee to treat your personal information in accordance with this Privacy Policy. Also, your personal information may be disclosed to a third party if we are required to do so because of an applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding here or abroad.

Retention of personal information

Novartis will retain your personal information necessary to achieve the purpose for which the information was collected, unless required to do so because of an applicable law, court order or governmental regulation or if such retention is otherwise necessary in support of any criminal or other legal investigation or proceeding here or abroad.

Protection of your personal information

We have implemented appropriate technical and organizational measures to provide an adequate level of security and confidentiality to your personal information, taking into account the nature of the data and the risk of processing such 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. Moreover, when handling your personal data, we comply with the following obligations:

- We only collect and process personal information which is adequate, relevant and not excessive, as required to meet the above purposes;
- We ensure that your personal information remains up to date and accurate. For the latter, we 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.

Exercise of access rights and contact details

You may exercise the following rights under the conditions and within the limits set forth in the local applicable legislations. The rights may include the following::

- 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;
- 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 data;
- the right to object to a channel of communication used for direct marketing purposes; and

If you have a question, if you are not satisfied how we process your personal data or if you want to exercise the above rights, you may send an email to privacy.za@novartis.com. When contacting us, please add a description of your relationship and/or your interactions with us.

When sending us any scans including your identity card for identification purposes, please make sure to redact any further personal information including your picture and national registry number or equivalent on the scan.