

HCP and KOL specific Information

The following information applies for the relationship that Norgine has with HCPs and KOLs. The information herein should be complemented with the general Privacy Policy.

Sources

We will in principle collect personal data provided directly by you to our sales representatives. Additionally, we may collect personal data from publicly available channels, such as:

- websites;
- scientific publications;
- national registries;
- social media; and/or
- third party databases we have contracts with, such as IMS/IQVIA.

Categories of personal data

- Name;
- business contact details;
- related Institutions;
- training and qualifications;
- photographs and video;
- research and publications;
- interactions with our products and services;
- financial and payment information;
- adverse events; and
- any other category as required under the EFPIA code.

Special Categories of personal data may be processed in particular related to the vital interest of the data subjects.

Purposes for processing

In accordance with data privacy laws, we process the forementioned categories of personal data for the purposes stated within our "Privacy Policy" and:

- patient safety;
- pharmacovigilance;
- professional information on our products and indications;
- research;
- organization of congresses;
- compliance with transparency requirements (including financial and payment information as required);
- in order to comply with legal, regulatory, ethical, industry best practice obligations;
- research and development in order to ensure development and cooperation; and
- communications for business operations.

Legal basis

We process your personal data under the legal basis stated in our Privacy Policy:

- consent: when the processing operation requires your consent for collection. You have the right to withdraw your consent at any time without affecting the lawfulness based on the consent provided until its withdrawal;
- contractual obligations: due to the existence or prior to the existence of a contractual/cooperative relationship;
- protecting the vital interest of an individual: in circumstances where the vital interest of data subjects or other persons are compromised;
- in compliance with a legal obligation: it may be the case that the applicable regulation requires for us to process your personal data;
- your personal data may be processed under the legal basis of legitimate interest in order to maintain contact and monitor our interactions with you regarding our products and services, research and cooperation opportunities, statistics, and drug safety. Whenever we process personal data under this legal basis, we ensure that our legitimate interests are not overridden by the rights of the data subjects.

Transfers and recipients

Personal data may be transferred according to the conditions stated in the Privacy Policy to the following recipients: third parties such as regulatory and governmental authorities, third party service providers that may assist us in clinical trials, IT services, and consultants.

Transfer of personal data may be conducted in order to comply with transparency and disclosure obligations as required under applicable laws and regulations.

Data retention

Your personal data will be retained for the duration of your relationship with Norgine. We may retain personal data as established by legal requirements. For further information related to the retention periods applicable within Norgine please [contact us](#).