

# Notice at Collection and Supplemental U.S. Patients and HCPs Privacy Policy



Last Updated: 01 December, 2024

This additional Notice at Collection and Supplemental U.S. Patients and HCPs Privacy Policy (“Policy”) supplements the [SERB Global Patients and HCPs Privacy Policy](#) and describes how BTG International Inc. (“**Company**”, “**we**”, “**us**”, “**our**”), a United States-based entity of SERB Group, collects, uses and discloses your Personal Information, whether online through our website, applications, other digital platforms or offline, in the context of our business operations and services intended for U.S patients and healthcare professionals (“HCP”) (collectively “you”, “your”).

This Policy is for residents of U.S. states that have adopted comprehensive privacy legislation and others that may come into effect from time to time and are applicable to our business (together with applicable federal privacy laws, the “Applicable US Data Privacy Laws”).

**For residents of California and other states that provide additional rights, more information about the data we collect is available below.** If you are a resident of Washington, Nevada or other US state with specific health data privacy legislation, please refer to our [Consumer Health Data Privacy Policy](#) which forms a part of this Policy.

We may provide additional privacy notices to individuals at the time we collect their personal information. For example, we may provide a specific privacy notice to participants that describes our privacy practices in connection with conducting clinical trials or when you submit your information for recruitment to one of our clinical trials. These additional privacy notices may supplement this Policy or may apply in lieu of this Policy.

## I. What Personal Information do we collect?

The Company collects the information, as indicated in the following table, that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“**Personal Information**”), within the 12 months preceding the date this Policy was last updated.

Categories of personal information	Concerned individual
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# Notice at Collection and Supplemental U.S. Patients and HCPs Privacy Policy



<b>Identifier:</b> such as name, address, IP address, social security number	Reporters* for any adverse events and medical information; Social security number is applicable only to HCPs for transparency or other compliance reporting purposes.
<b>Demographic information and protected characteristics:</b> such as age, birth year, gender, ethnicity	Patients*
<b>Pseudonymized information:</b> such as patient number	Patients*
<b>Professional-related information:</b> workplace, job title, NPI number, practice and therapeutic areas, specialty, professional license, degree, professional qualification and experience, specialty or taxonomy code, scientific activities, practice-related information, medical preferences and practice etc..	HCPs
<b>Contact information:</b> such as email, phone number, fax, postal address	Reporters* for any adverse events and medical information
<b>Health information:</b> treatments, diseases, diagnoses; medical interventions; medical history, use or purchased of prescribed medication; health-related surgeries or procedures; bodily functions, vital signs, symptoms, or measurements; your healthcare provider's information etc.	Patients*
<b>Financial information:</b> such as transfers of value, credit card information	HCPs
<b>Information relating to meetings with our sales and medical representatives:</b> such	HCPs

# Notice at Collection and Supplemental U.S. Patients and HCPs Privacy Policy



as time and location of the meeting, the cost of shared meals, comments	
<b>Inferences</b> drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics	HCPs, Patients

Reporters\* may be HCPs, patients and any consumers of our products.

Patient\* may be collected from patients only after receiving appropriate consent

## II. How we use your personal information

We may collect and use your personal information for the following purposes:

(a) If you are a patient, your personal information may be processed to:

- Manage your report to any adverse effect events.
- Reply to your requests or questions in relation to any medical information or to provide administrative information to you.
- Support our sponsored clinical research in which you are enrolled. Please be aware that, in this case, an Informed Consent Form, including specific privacy statements corresponding to the study, may also be provided to patients by a study doctor or investigator. Patients always have the right to decline consent for their personal information to be used in clinical research.
- Provide and improve our products and services or to develop new products and services.
- Operate and manage our business and other administrative purposes.
- Detect security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecute those responsible for that activity.
- Ensure internal quality control and safety.
- Authenticate and verify individual identities, including requests to exercise your rights under this Policy.
- Debug to identify and repair errors with our online services.
- Enforce our agreements and policies.
- Other business purposes as permitted by Applicable US Data Privacy Laws.

# Notice at Collection and Supplemental U.S. Patients and HCPs Privacy Policy



(b) If you are a HCP, your personal information is collected and used for:

- Pharmacovigilance and materiovigilance monitoring (collection of adverse events, risks of incidents and/or incidents, patient monitoring (such as registers, database), writing reports of adverse reactions that may be related to the use of medicines), monitoring of the “off-label” use;
- Processing of medical information requests.
- Planning and support for the interaction between our in-field teams and you to create a tailored profile about you and categorize into different segments in accordance with this profile, and to identify you in the appropriate therapeutics areas and establish connections and interactions with you, being specified that no automated decision are made that would result in legal effects or have significant impact on you;
- Maintenance interaction and communication with you with the support of our Customer Relationship Management (“CRM”) system:
  - (1) Engagement of effective direct communication with you by remote electronic channels (such as email, telephone, SMS etc.) and visit in person to provide : (i) pertinent news, research, educational materials within your specialty, (ii) relevant information about our products, which may include medical, clinical and marketing promotional materials(iii) all other kinds of updates related to products you are interested in.
  - (2) Invitation to attend the medical/healthcare events, such as conferences, both national and international.
- Follow-up of Medical Scientific Liaisons (MSL) activities for providing specific medical information to HCPs and collecting feedback and opinions from HCPs.
- Management of event registration and organization, principally facilitate you to receive the invitation and event-related information, ensuring seamless participation and attendance.
- Establishment and management of collaboration with you, including the selection, planning, organization and review of any collaboration with you, as well as payment for your services, particularly involving research and development (such as clinical trials or other research studies), consultancy services or participation as a speaker in webinars or conferences.
- Transparency and ethics compliance: Fulfillment of legal and compliance obligations imposed on pharmaceutical manufacturers to ensure ethical interactions with HCPs, which may involve public or non-public disclosure

# Notice at Collection and Supplemental U.S. Patients and HCPs Privacy Policy



of information related to engagements, anti-bribery and corruption, and handling conflicts of interest..

- Assistance in complying with other regulatory obligations to which the Company is subject.
- Provision of access or use of certain services, products and information offered by Company but required to meet specific eligibility or criteria, such as several product websites that are uniquely open and accessible to licensed healthcare professionals with their personal login.
- Other business purposes as permitted by Applicable US Data Privacy Laws.

### III. Sources of Personal Information

The Personal Information that we collect is sourced from the following channels:

- Directly from you. For example, when you reach out to us through our website contact form or call us to report an adverse event or request medical information. Or HCPs may provide their personal information during conferences, forums, webinars or other events.
- Indirectly from either publicly available sources including social media, journals, websites etc, or from third party business partners, such as the doctors who prescribe our product to you or the study investigator engaged into our study research, and HCPs reference database provider we use for marketing and communication purposes.

### IV. To whom the personal information may be disclosed

We may disclose your personal information to the following recipients:

- Our affiliates and relevant entities within SERB Group;
- Our business partners and selected service providers or vendors, such as distributors, our technical service providers for hosting, archiving and telephone permanence, Clinical Research Organization for management of clinical studies;
- Purchasers or other parties to whom we sell or transfer a business unit or an asset or in the course of restructuring or reorganization operations, mergers and acquisitions, financing due diligence, bankruptcy, receivership, or transition of service to another provider.
- Government entities and administration authorized to access and/or obtain your personal information, which is necessary to comply with

# Notice at Collection and Supplemental U.S. Patients and HCPs Privacy Policy



regulatory requirement, judicial proceeding, court order, government request imposed to us.

- Law enforcement authorities in the event of the observation or suspicion of the occurrence of an offence involving you in accordance with or as required by applicable law.

Your personal information is not (i) “sold” or (ii) “shared” (for purposes of targeted advertising) by us, nor do we have actual knowledge of any such activity involving the personal information of minors under 16 years of age. The following table provides information about the categories of third parties to whom we disclose and have disclosed each category of your information for the business purposes described in Section II over the preceding 12 months.

Categories of personal information	Category of Third Parties to which Personal Information is Disclosed for a Business Purpose
<b>Identifier:</b> such as name, address, IP address, social security number.	Affiliates; business partner and service providers; public and government authorities.
<b>Demographic information and protected characteristics:</b> such as age, gender, ethnicity	Affiliates; business partner and service providers; public and government authorities.
<b>Pseudonymized information:</b> such as patient number	Affiliates; business partner and service providers; public and government authorities.
<b>Professional-related information:</b> workplace, job title, NPI number, practice and therapeutic areas, specialty, professional license , degree, professional qualification and experience, , specialty or taxonomy code, scientific activities etc..	Affiliates; business partner and service providers; public and government authorities.
<b>Contact information:</b> such as email, phone number, fax, postal address	Affiliates; business partner and service providers; public and government authorities.

# Notice at Collection and Supplemental U.S. Patients and HCPs Privacy Policy



<b>Health information:</b> treatments, diseases, diagnoses; medical interventions; medical history, use or purchased of prescribed medication; health-related surgeries or procedures; bodily functions, vital signs, symptoms, or measurements; your healthcare provider's information etc.	Affiliates; business partner and service providers; public and government authorities.
<b>Financial information:</b> such as transfers of value, credit card information <sup>2</sup>	Affiliates; business partner and service providers; public and government authorities.
<b>Information relating to meetings with our sales and medical representatives:</b> such as time and location of the meeting, the cost of shared meals, comments	Affiliates; business partner and service providers; public and government authorities.
<b>Inferences</b> drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics	Affiliates; business partner and service providers; public and government authorities.

## V. Retention of Personal Information

We may retain your Personal Information for as long as necessary to fulfill the purposes for which it has been collected, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws, or based on other criteria, such as:

- The duration of our ongoing relationship with you, and the subsequent period during which we may legitimately need to reference your Personal Information to address any potential issues that may arise.
- The sensitivity and volume of the information collected;
- Where there is a legal obligation to which we are subject (such as for adverse effect);
- whether retention is advisable in light of our legal position (such as in regard to the enforcement of the Site Terms of Use, applicable statutes of limitations, litigation or regulatory investigations).

# Notice at Collection and Supplemental U.S. Patients and HCPs Privacy Policy



## VI. Individual Rights Request

As per Applicable US Data Privacy Law, you may be entitled to make a request to exercise certain privacy rights. To submit a request for exercising your data rights, please contact Group DPO at [DPO@serb.com](mailto:DPO@serb.com) or as provided in "Contact Us" below.

Subject to certain exceptions and depending on the law of your state of residence, you may have the following rights:

### (a) Access to and portability of information:

You can request that the Company provide information to you about our collection and use of your personal information, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; and (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (also known as the "right of data portability")

### (b) Right to Deletion:

You also have the right to request that the Company delete any of your personal information that we collected from you.

### (c) Right to correct:

You may request to correct your personal information if it is inaccurate or incomplete.

### (d) Right to withdraw your consent or limit the use of your sensitive Personal Information

You may request to revoke your consent for certain processing activities with respect to your sensitive Personal Information and/or right to limit the use and disclosure of your sensitive Personal Information.

### (e) Right to opt-out of the processing of your Personal Information for purpose of profiling:

# Notice at Collection and Supplemental U.S. Patients and HCPs Privacy Policy



You may request to opt-out of the processing of your Personal Information for purpose of profiling, which may result in decisions with legal or similarly significant effects concerning you.

## **(f) Right to appeal and Right to lodge a complaint**

You may have a right to appeal a decision we make relating to your request to exercise your rights under applicable local law. To appeal a decision, please reach out to our Group DPO at [DPO@serb.com](mailto:DPO@serb.com).

If the appeal is denied, you may submit a complaint to the attorney general or relevant data protection authority in your jurisdiction.

## **(h) California Shine the Light.**

The California “Shine the Light” law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

**Exercising your rights.** If you would like to exercise any of these rights, contact us as set forth below. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request. You have the right to not receive discriminatory treatment or be retaliated against for exercising these rights.

**Authorized agents.** Under Applicable US Data Privacy Laws, an agent authorized to act on your behalf, may make a verifiable consumer request to exercise the rights described above related to your personal information. You may also make a verifiable request on behalf of your minor child. To authorize an agent, provide written authorization signed by you and your designated agent and contact us as set forth below for additional instructions.

## **VII. De-Identified information**

In certain circumstances, we may collect and use your de-identified information, or de-identify your Personal Information by removing the identifiers for our

# Notice at Collection and Supplemental U.S. Patients and HCPs Privacy Policy



business operation purposes. We will not attempt to re-identify such information, except to comply with Applicable US Data Privacy Law or in accordance with our Policy.

## VIII. Cookies

When you visit our website, it may store or retrieve information on your browser, mostly in the form of cookies. This information might be about you, your preferences or your device and is mostly used to ensure the site functions as you expect it to. We are not able to connect such data to you as an individual.

For more details regarding the cookies we use and the relevant purposes, you can refer to our [Website Legal Notice](#). You can manage the performance cookies at any time by visiting Customize Cookies Center at the bottom of our website.

## IX. Minors:

Our website and any online service are not intended for children, and we do not knowingly collect children's personal information under the age of 13 without their parents' verified consent, except to inform them of the necessity of obtaining such consent before collecting their personal information. If the child has been prescribed our product, their Personal Information and health information may be collected for the purposes described in Section II (a) of the Policy.

If you are a parent or guardian and wish to review information collected from your child, or have that information modified or deleted, you may contact us as described in "Contact Us" below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it.

## X. Change to this Privacy Policy

The Policy is currently effective as of 01 December, 2024. The Company reserves the rights to change and update this Policy at any time. If there are any material changes to this Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Policy if you continue to use our products and services after the new Policy takes effect.

## XI. Contact Us

# **Notice at Collection and Supplemental U.S. Patients and HCPs Privacy Policy**



If you have any questions about our privacy practices or this Policy or our privacy practices, or to exercise your rights as detailed in this Policy, please contact us at:

BTG International Inc.  
Attention : Data Privacy Officer  
Four Fall Corporate Center  
300 Conshohocken State Road  
Suite 300  
West Conshohocken, PA 19428  
Phone: +1 877 377 3784  
[DPO@serb.com](mailto:DPO@serb.com)