

# Data Protection Information Roche Pharma AG

## Business partners/customers/healthcare professionals

The following document provides you with an overview of how we process your personal data and of your rights arising from data protection law with regard to the data we keep in our database about you as a business partner, customer or healthcare professional. Which data we process in particular and how it is used, is largely based on the contracts and services arranged between us. Please also take notice of any additional data protection information that we may provide to you, e.g. when you use our website.

### 1. Responsibility and contact details

Data controller:

Roche Pharma AG, Emil-Barell-Straße 1, 79639 Grenzach-Wyhlen  
Tel. +49 7624 14 0, grenzach.communications@roche.com

You can contact our company Data Protection Officer by adding "c/o Data Protection Officer" to the aforementioned address, as well as via email to grenzach.datenschutz.gd1@roche.com.

### 2. Data and data sources

We collect and process various types of personal data (also referred to as "data") in a professional context. This includes:

**Master data:** Names, title, sex, address(es) and any contact details (telephone and fax numbers, professional email addresses), as well as the organisation you belong to.

**Target group data:** Information about your position or role, specialisations, areas of work and interest, publications and awards, biographical data, visibility and mentions in specialist publications, as well as membership in committees and positions held.

**Interaction data:** Information about preferences regarding the contact and interactions with you (e.g. existing and planned contact), preferences regarding products, languages, demographic data and data about use of our websites (e.g. IP address, region, content you accessed).

**Contract data:** Data related to contracts with you, e.g. data about participation in events and completed training, payment information, registration data, type, amount and date of financial or other benefits granted to you, as well as order/transaction history.

We collect this data directly from you and also via third parties. In particular, these include companies in the Roche Group and specialist service providers for master and target group data of healthcare professionals. This includes IQVIA (IQVIA Commercial GmbH & Co. OHG, Bensheim), Insight Health GmbH & Co. KG, Waldems-Esch, and the Veeva Link database (Veeva Systems GmbH, Frankfurt am Main), which compiles information from publicly accessible sources regarding e.g. medical scientific activity at conventions, in published work, in specialist societies, or in professionally used social networks. In addition, we directly collect data from reliable, publicly accessible sources, such as online portals (e.g. ClinicalTrials.gov, PubMed), medical journals, websites, social networks, or your website.

### 3. Purposes and legal bases

We process this data in compliance with the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (Bundesdatenschutzgesetz or "BDSG") for the following purposes and on the following legal bases:

#### a. Based on your consent (Article 6(1)(a) GDPR)

In case you have provided us with your consent to process your data,

we will process your data on the basis of that consent, e.g. in order to contact you and send you marketing information, to use profiling analysis and predictions to be able to offer content as relevant as possible, to publish transparency data, and to analyse the use of our website.

#### b. In order to fulfil contractual obligations (Article 6(1)(b) GDPR)

Insofar as we have entered into a contract with you, your personal data, in particular master and contract data, will be processed to fulfil our contractual obligations, e.g. for payment processing, checking the requirements necessary for the provision of services (such as training etc.), notifying order status, support, consultation, and registering for the participation in meetings and events. The particular content depends on the specific contract.

#### c. Based on our legitimate interests (Article 6(1)(f) GDPR)

We also process your personal data based on our legitimate interest as follows:

We process your master, target group, and interaction data in business partner and customer management in order to offer you the best possible advice and to be able to select the suitable experts for our activities in the various areas of treatment. In addition to the storage and maintenance of your data in our business partner and customer database, this also includes communication, sending informational materials, and invitations to meetings and events, performing needs analyses, carrying out customer segmentation, enabling access to and creating of accounts and user profiles on Roche web portals and websites, personalisation of our communication, anonymising data for further statistical analysis and determining the potential for optimisation, especially in cooperation with other Roche companies. In addition, we process this data for purposes of market research and opinion polling, business partner and customer surveys, to guarantee the security of your data, to ensure compliance with legal regulations, if necessary, for international sanctions list screening, as well as in individual cases to assert, exercise, and defend against legal claims.

We also process your interaction data to make sure that our website is presented to you securely and in a way that meets your needs.

#### d. Based on legal obligations or in the public interest (Article 6(1)(c) and (e) GDPR)

In some cases we are legally obliged to process your data, for example because of legal storage obligations under commercial and tax law, if necessary, for European sanctions list screening, and in connection with conducting clinical studies. As a company in the healthcare sector, it may also be necessary for us to process data as a result of documentation and notification obligations, or in the public interest. This concerns in particular notifications regarding pharmaceutical and product safety. You will find further information about this at <https://www.roche.com/de/privacy-notice-pv-mi.html>.

### 4. Data recipients

Your data may be transmitted to third parties if that is necessary for aforementioned other reasons, such as the forwarding of your master data to event locations (e.g. for hotel reservations), when utilising specialist service providers (e.g. consultants and law firms), as well as where the transmission is required by law or by judicial or official order.

In addition, we share master and target group data with master data

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management service providers (in particular IQVIA).

To improve our business partner and customer management and consultancy, to determine the potential for optimisation, as well as in cases in which you utilise the services of other companies, we may exchange master, target group and interaction data with other companies in the Roche Group. Depending on the area in which you work, in addition to F. Hoffman-La Roche AG (Basel, Switzerland) this may include in particular RoX Health GmbH, Roche Diagnostics Deutschland GmbH, Chugai Pharma GmbH, and Foundation Medicine GmbH. An up-to-date list of companies belonging to the Roche Group can be found in Roche's financial report at [www.roche.com](http://www.roche.com).

Otherwise, we commission service providers to process data as per Art. 28 GDPR, i.e. on our behalf and following our instructions. In particular, this concerns IT infrastructure, database and software service providers, as well as companies that perform IT maintenance work, marketing, service, and sales services for us.

### 5. Transmission to third countries

In principle, we exclusively use servers located in the EU and Switzerland as storage locations for your data. Since Roche is a global company, it is not possible to rule out that your data may also be forwarded to countries outside the EU or the European Economic Area, in particular to Switzerland, to the USA, and to India. For some of these countries the EU-Commission has issued an adequacy decision (currently, for example, Switzerland). For transfers that are not based on an adequacy decision, an adequate level of data protection is ensured by appropriate safeguards, in particular EU Standard Contractual Clauses, and additional measures, if necessary. For more information about these safeguards, you may contact the Data Protection Officer.

### 6. Duration of storage of data

We process and store your personal data only for as long as it is required to meet the specific purpose and to satisfy our contractual, legal, or official obligations. Once our business relationship has ended, we will store your data where that is necessary in order to comply with retention periods under business and tax law (in particular Section 257 HGB and Section 147 AO) or if it cannot be ruled out that certain data could be required for the enforcement, exercise, and defence of legal claims. In general, this means that your data will be stored for three years after the end of the business relationship or the last interaction. However, legal obligations may require us to store data for a longer time, in general for a maximum

of ten years. Thereafter, we will erase or anonymise your data so that it can no longer be linked to your identity.

### 7. Your rights

If you do not agree with the way your data is processed, please contact us using the contact details specified under Clause 1. As a data subject, you have the following rights (Articles 15 to 21 GDPR):

- Right of access to information about the processing of your data
- Right to rectification of your data
- Right to erasure of data concerning you
- Right to data portability of data you provided
- Right to restriction of processing of your data

**Right to withdraw your consent:** You may revoke your consent to the processing of your data (without any order form necessary) at any time with effect for the future.

**Right to object:** Where we process your personal data based on our legitimate interest under Article 6(1) (e) or (f) GDPR, you may object to this processing, in full or in part, at any time on grounds relating to your particular situation. We will check the interest situation again and will adjust the processing of your data, if necessary. However, this may lead to us no longer being able to collaborate with you in the usual way.

**Right to lodge a complaint with a data supervisory authority:** You have the right to complain to a data protection supervisory authority such as the Baden-Württemberg state authority for data protection ("Landesbeauftragten für den Datenschutz Baden-Württemberg", Stuttgart) or the supervisory authority at your place of residence, place of work, or the place of the alleged infringement (Article 77 GDPR).

### 8. Other information

You are, in principle, not obliged to provide us with personal data. If you collaborate with or enter into a contract with us, this is often only possible if we have the necessary data from you.

We use automated procedures to assist our employees. However, we do not use any automated decision-making process through IT systems under Article 22 GDPR. As part of business partner and customer management in particular, however, we do process your data in the form creating a profile of you, which is called "profiling".

You may find updates to this data privacy policy and further information about processing your data under "Privacy Policy" at [www.roche.com](http://www.roche.com).