# **Privacy Policy**

Boehringer Ingelheim International GmbH (hereafter "Boehringer Ingelheim", "we", "our", "us") takes the protection of your personal data seriously. This Privacy Policy describes how we use, store and disclose (together "process") the personal data we collect about you through this website. The nature, extent and purposes for which we process your personal data depends on your use of this website. In any event, we will only process your personal data in accordance with applicable data protection and privacy laws (i.a. the General Data Protection Regulation).

# 1. General Privacy Notice

We process your data in order to provide you with the agreed or requested services on this website:

- If you register and log in;
- if you take part in training courses or events;
- if you send us inquiries about products or possible adverse event.

The legal basis is Article 6 (1) b) GDPR and Article 6 (1) c) GDPR if you send information about possible adverse events (see Section 7 for specific information about adverse events).

# 2. Log data

# 2.1 Log data and technical Cookies

When using the website, certain data, including data sent by the browser (e.g. IP address, Cookies, previous website, time and date, displayed contents) is temporarily stored. We use this data to enable you to use our website and, if necessary, to review and assert our and third party rights in the event of damage or violations of legal regulations, our terms of use and the rights of third parties. These Cookies are not used to analyse the use of our website. The legal basis is Article 6 (1) f) GDPR.

We use Cookies and similar technologies such as pixel tags, web beacons and clear GIFs (hereinafter referred to as "Cookies"). We use Cookies for technical reasons, such as to resume a user's session when logging in if the previous session was interrupted due to inactivity. These Cookies are not used to analyse the use of our website. The legal basis is Article 6 (1) f) GDPR.

#### 2.2 2 Analytics Adobe Analytics (Omniture)

We use Cookies from Adobe Analytics, a web analytics service provided by Adobe Systems Software Ireland Limited ("Adobe"). Adobe Analytics uses Cookies on behalf of Boehringer Ingelheim to analyze all traffic and usage patterns. The IP address collected by the Cookies is made anonymous before it is geolocated. In addition, it is replaced by a generic IP address. Adobe

will not associate your IP address with other information held by Adobe. You can prevent Adobe from collecting and using information (Cookies and IP address) by using your options at http://www.adobe.com/privacy/opt-out.html (link is external) As data can be transferred to the USA in exceptional cases, Adobe is self-certified itself to the EU-U.S. Privacy Shield. The analyses help us to improve our services. The legal basis is Article 6 (1) f) GDPR.

# 2.3 Social Plugins

On our websites we integrate social plugins ("Plugins") from Facebook Ireland Ltd., 5-7 Hanover Quay 2 Dublin, Ireland ("Facebook") and other providers to allow you the interaction with our content (e.g. by liking it).

To protect your privacy, we integrated the so-called Shariff solution: Only if you click on the button of a social media provider on our website (e.g. the Facebook like button), your browser will establish a direct connection with the servers of the respective provider, which may be located in the USA. If you are logged into your user account with the respective provider, it may add gained insights of your usage of our content to your profile data. The provider is responsible for processing your personal data (including data listed under section 2.1 of this Privacy Policy). Please consult the provider's website for further information about its processing of personal data. Our legal basis for the use of the plugin is Art. 6 (1) lit. f GDPR.

Further information on specific service providers whose Plugins we use:

• Facebook has self-certified its adherence under the EU-U.S. Privacy Shield (as you may see here). Please note that we have no influence on Facebook's data processing activities, nor are we aware of the entire scope and purposes of the processing and its duration. Further information on the purpose and scope of data collection and processing by Facebook can be found here.

# 3. Further purposes for which we process your personal data

We process your personal data to:

- meet our legitimate interests, including to:
  - (i) complete a corporate transaction (e.g., corporate restructuring, sale or assignment of assets, merger); and
  - (ii) protect our rights or property, enforce our terms of use and legal notices, and for the establishment, exercise and defence of legal claims.
- meet our legal obligations, any court order or other binding decision;
- with your consent for other purposes, such as, the subscription to a newsletter; in this case you have the possibility to withdraw your consent at any time.

#### 4. Data Transfer

We may share personal information with third parties.

# 4.1 Reporting obligations to regulatory authorities and enforcement of rights

We may share personal data in pharmacovigilance cases as specified in Section 5.

In order to protect our rights or the rights of third parties, we may also disclose data to rights holders, consultants and authorities in accordance with legal provisions..

#### 4.2 Service provider

We engage service providers to process your personal data for the purposes described in this data protection information. These service providers process the data only on our behalf, in accordance with our instructions and under our control in accordance with this data privacy declaration.

One of these service providers is Adobe Systems Software Ireland Limited, 4-6 River-walk, Citywest Business Campus, Dublin 24, Ireland, providing data and web analytics services.

#### 4.3 Boehringer Ingelheim companies

As part of a global group of companies, we involve other Boehringer Ingelheim companies that support us in data processing. These group companies process the data exclusively for the purposes stated in this data protection declaration.

# 4.4 Data transfer to recipients outside the EU

Some of these service providers and Boehringer companies process personal data outside the EU. In these cases, we ensure an adequate level of data protection to comply with European law (usually through EU standard contractual clauses published by the European Commission).

# 5. Specific Privacy Notice for Pharmacovigilance

If you report adverse events or other pharmacovigilance relevant information to a Boehringer Ingelheim product we will use and share this data solely for pharmacovigilance purposes. (Pharmacovigilance is the detection, assessment, understanding and prevention of adverse effects or any other medicine-related problem.)

All reports will be shared with Boehringer Ingelheim International GmbH who is operating the global pharmacovigilance database.

Boehringer Ingelheim is obliged to report pharmacovigilance relevant information to health authorities worldwide (including to countries that may have another level of data protection compared to the EU). Legal basis: Art. 6 (1) c), and for transfers outside EU Art. 6 (1) f) and Art. 49 (1) e) GDPR.

The reports will contain details about the incident but only limited personal data:

- For Patients, the report will only contain, age, gender and initials as provided, but never the patient's name.
- For the reporting individuals, the report will include the name, profession (e.g. physician, pharmacist), initials or address, e-mail and phone number as provided. The contact information is required to be able to follow-up with the reporter to gain high quality and complete information on adverse events. If the reporter does not wish to provide his contact details to Boehringer Ingelheim or authorities, "Privacy" is entered in reporter's names field.

Where your data is shared with other Boehringer Ingelheim companies, business partners or service providers outside of the EU, we will provide an adequate protection of personal data.

As reports about adverse events are important for public health reasons, reports are kept for minimum of 10 years after withdrawal of the product in the last country where the product is marketed.

#### 6. Deletion

Boehringer Ingelheim processes your personal data for as long as necessary for the purpose of the processing, which mainly is the provision of our services requested by you. This means for example that we send you newsletters for as long as you did not withdraw your subscription or that we store your user account data (login, profession, name etc.) for as long as you maintain a user account with us.

We will retain personal information for as long as necessary for the particular business purpose or purposes for which it was collected. If you revoke your consent, delete user accounts or object to data processing, we will delete the data collected in a timely manner.

In some cases we are obliged to keep data to comply with statutory retention periods (e.g. in the context of pharmacovigilance). In such a case, we will ensure that your data will only be used to comply with the retention obligations and not for other purposes.

# 7. Your Rights

Subject to limitations in applicable law, you have a right of access, rectification, restriction, erasure, and portability of your personal data, as well as the right not to be subject to automated individual decision-making.

You also have the right to withdraw your consent at any time.

# Right to object:

To the extent we base the tracking on our legitimate interests, you may opt-out from such processing at any time. You may also object to the processing of your personal data for the transfer to authorities outside the EU described above in Section 5 for pharmacovigilance cases unless the interests of Boehringer Ingelheim prevail.

Please send your request or any question you have in relation to our processing of your personal data to:

Boehringer Ingelheim International GmbH

- Data Protection Officer -

Binger Straße 173

D-55216 Ingelheim am Rhein

Germany

E-mail: datenschutz@boehringer-ingelheim.com

If you still have concerns, you may have a right to lodge a complaint to the supervisory authority for privacy in your country.