

PRIVACY NOTICE FOR HEALTHCARE PROFESSIONALS (HCPS) AND OTHER RELEVANT DECISION MAKERS

Last updated: 22nd May 2019

Shionogi B.V. (“**Shionogi**”) is the European Headquarters of Shionogi & Co., Ltd., a 140 year old global research-driven pharmaceutical company, headquartered in Osaka, Japan. We are dedicated to developing medicines that address unmet medical needs in the core areas of pain, infectious diseases, metabolic disorders, oncology and women’s health.

Under the General Data Protection Regulation, we are required to provide you with certain details about how we collect, use and protect your personal data. Full details, including details of your rights in respect of your personal data, are set out in our Privacy Policy on our website at <http://shionogi.eu/pages/privacy-policy>. The key points are summarised below.

Name of data controller	Shionogi B.V.
Our contact details	<p>Registered office: Kingsfordweg 151, 1043GR, Amsterdam, Netherlands</p> <p>Email: dataprotectionlead@shionogi.eu</p> <p>Phone: +44 (0)20 3053 4200</p> <p>Website: http://www.shionogi.eu</p>
Categories of personal data we collect about you	<p>Identity and contact data: full name, gender, business address, phone numbers, email address.</p> <p>Professional data: workplace and address, position, medical speciality, training and qualifications, publications, awards, affiliations.</p> <p>Interaction data: details of our meetings/calls, your participation in our programmes, activities, industry events, trade shows, clinical trials, your feedback, details of our agreements, your direct marketing preferences.</p> <p>Technical data: details from use of our digital platforms (e.g. IP address, browser type and operating system, access times, pages visited).</p>
Sources of personal data	Directly from you; other Shionogi group companies; IQVIA Solutions UK Limited; public sources
Automated decisions	None
Purposes for processing your personal data	<p>Shionogi will process your personal data for the purposes of:</p> <ul style="list-style-type: none"> managing our relationship with you and conducting our business. notifying you of our press releases and upcoming programs, activities, industry events, educational events, webcast events, trade shows, seminars, speaking engagements, clinical trials and other studies. communicating information about our products and services tailored to your interests, and for participation in surveys and market research (with your consent where legally required). complying with applicable laws, regulations, industry codes and guidance (including responding to adverse events, product safety concerns and complaints, medical information enquiries and reporting transfers of value in accordance with applicable industry codes). complying with requests from regulators, courts, law enforcement authorities, government investigators, or in connection with litigation.
Who we may share your personal data with	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> Shionogi group companies in other parts of the world. certain third party service providers, including professional advisors such as lawyers, insurers, auditors. regulatory bodies, the Prescription Medicines Code of Practice Authority, data protection supervisory authorities, law enforcement bodies, government authorities, courts, tribunals, arbitrators.

	<ul style="list-style-type: none">• partners with whom we develop, sell, market or distribute products and services.• third parties (including other Shionogi group companies) in relation to the sale or reorganisation of our business.• any other person with your consent.
Legal basis for processing your personal data	<p>The legal basis for the collection and processing of your personal data is:</p> <ul style="list-style-type: none">• processing is necessary for us to perform our obligations under a contract between us and you or your organisation.• processing is necessary to comply with a legal obligation.• you have given consent (for example, for direct marketing) or explicit consent (for example, for the processing of special categories of personal data).• processing relates to personal data that you have made public.• processing is necessary for the provision of treating patients and managing health services.• processing is necessary for reasons of public interest in the area of public health (i.e. ensuring high standards of quality and safety of medicinal products).• processing is necessary to protect the vital interests of an individual.• processing is necessary for our legitimate interests, which are to assess, develop and improve healthcare products and these do not prejudice or harm your rights and freedoms.
Your right to withdraw consent	<p>Where you have given your consent to any processing of your personal data, you can withdraw it at any time. If you do, it will not affect the lawfulness of any processing for which we had consent prior to your withdrawing it.</p>
Direct marketing	<p>We hope you will allow us to use your personal data for direct marketing and to tailor our marketing communications to suit what we think you will find interesting and relevant (profiling).</p> <p>You can choose whether to receive information from us, and how you receive it, by selecting your preferences when you speak to our sales representatives. You can change your mind at any time.</p>
Location of your personal data	<p>Shionogi will normally keep your personal data within the UK. If we transfer your personal data to our Shionogi group companies or third party providers outside the EEA for the purposes above, we will take appropriate measures to protect it and comply with law.</p>
How long we will keep your personal data	<p>We normally expect to retain your personal data for 2 years after our last interaction with you, or longer if required by laws or regulations (e.g. in relation to disclosures of transfers of value to HCPs). We will then anonymise your information and keep it for analysis of engagement trends.</p>
Your rights in respect of your personal data	<p>You have the right to access your personal data and, in some cases, to require us to restrict, erase or rectify it or to object to our processing it, and the right of data portability. To prevent your data from being entered into our systems again after your request for erasure, in your interests and for us to comply with GDPR, we may keep your name and email address with a flag “Do not contact anymore” in our systems. To exercise your rights, see the “How to contact us” section below.</p>
Complaints and How to Contact Us	<p>If you are concerned about how we are handling your personal data, have questions, or want to exercise your privacy rights, please email our Data Protection Lead at dataprotectionlead@shionogi.eu in the first instance.</p> <p>You can also make a complaint to the Information Commissioner’s Office at www.ico.org.uk.</p>