



Privacy Notice for Medical Information, Medicinal Products safety Service and Product Complaints

Last updated date: 02/12/2020

AB Science ensures new product development for human and veterinary medicine and markets medicinal products for veterinary use.

Human beings and animals vary in their biological reactions to medicinal products. Capturing adverse events, in the development and marketing phases of all products, from worldwide sources is of paramount importance. Monitoring the safety of all AB Science medicines, includes adverse events reporting management, named pharmacovigilance. At the same time, AB Science may receive inquiries or product complaints from various people such as healthcare professionals, nurses, or caregivers and from patients with respect to the products.

For these purposes, our legal obligations require us to process certain received information (for any reason), which allow to directly or indirectly identify a person, "Personal Data" of a patient and/or the reporter of an adverse event, and/or the inquirer of an information. The treatment of personal data in this context is performed on a voluntary basis, with the purpose of protecting public health and, in particular, ensuring the quality and safety of all AB Science products.

This Privacy Notice was developed to inform you about how AB Science respects your right to privacy and treats your "personal data" in accordance with AB Science General Privacy Policy and applicable privacy and data protection laws, including the General Data Protection Regulation (GDPR), and other applicable local laws that regulate the storage, process, access and transfer of personal data.

What personal information does AB Science treat?

The types of information we may collect and process, will depend on the category of data subjects and/or the data processing activity. All the personal data we may collect are described in a table available at the end of this Privacy Notice and for each, the legal basis is detailed.

How does AB Science keep my personal information secure?

We have implemented appropriate state of the art technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

Who will obtain right to access to my personal data?

Your personal data will be accessible only to authorized persons, including third-party service providers, including our distribution and Information Technology systems (software) service providers. Also, AB Science is obliged to report certain pharmacovigilance and product relevant information to Health Authorities worldwide, including those with different level of data protection compared to EU. It is possible that in the exchange of data as detailed previously, your personal data may be transferred to countries that do not provide the same level of protection as your own.

Before sharing your personal data with third parties for purposes stated in this Privacy Notice, personal data will be pseudonymized where appropriate or required by applicable law.

In addition, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. If relevant, these include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the European Economic Area (EEA) in accordance with European Union data protection law.

How many times will my personal data be retained?

- Your contact data shall be stored for 18 months, other personal data depends on the purpose.
- We will use and store your Personal Data in accordance with mandatory legal requirements governing storage and reporting of Pharmacovigilance related information. Such mandatory requirements oblige us to archive PV information which may include Personal Data at least for the duration of the product life-cycle and for an additional ten years after the respective medicinal product and medical devices has been taken from the market.
- Personal data retained as part of a medical information inquiry are kept for minimum of 10 and maximum of 15 years after receipt.

After the expiry of the retention period, personal data will be erased, destroyed, or anonymized, without prejudice to potential data retention period provided by the law.

What are my rights regarding data protection?

- You have the right **to access, correct, or update** your personal information,
- You have the right **to object** to processing of your personal information, or to ask us **to restrict processing** of your personal information **or to delete** your personal information, or **to request portability** of your personal information (request of the transfer of your personal data to you or another person in a commonly utilizable format). These rights may be limited where there is a legal ground for example, AB Science cannot delete information that has been collected as part of an adverse event report unless it is inaccurate. Similarly, if we have collected and processed your personal information with your consent, then **you can withdraw** your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have **the right to complain** to a data protection authority about our collection and use of your personal information.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may require you to provide proper identification before we comply with any request to access or correct your Personal Data. Please, direct any questions and requests related to this information to : AB Science, Data Protection Officer, 3 avenue George V, 75008 PARIS or use the following mailbox : dpo@ab-science.com

For more information, please contact your local data protection authority.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical, or business developments. Any changes to this Pharmacovigilance Privacy Notice will be communicated at the AB Science website. We recommend you consult our Privacy Notice when revisiting our website to review any changes and to keep informed about our ongoing commitment to respecting the right to privacy and to providing the highest possible level of data protection. You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

This table allow to answer to the following questions:

- For what purposes will Ab Science collect personal data?
- What personal information does AB Science treat?
- What are the legal bases?

Purpose	Type of Data Collection	Legal Basis	Additional Comments
<p>A - Pharmacovigilance.</p> <p>Any personal data provided to AB Science related to adverse events or other activities related to, will be used solely for these purposes.</p>	<p>We collect the name, contact details, affiliation/profession of the reporting individual.</p> <p>We may collect some additional personal data related to health and medical history of the individual experiencing an adverse event, if relevant to process the adverse event for pharmacovigilance purpose.</p>	<p>The processing is necessary to comply with AB Science legal pharmacovigilance (GVP) obligations. Article 6 (1) (c) and Article 9 (2) (i) GDPR. We may collect your consent in some particular contexts Article 6 (1) (a).</p>	<p>We may receive personal information about you from third party sources (such as the physician who treats you), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.</p>
<p>B - Medical information (information inquiry)</p> <p>Any personal data provided to AB Science related to Medical Information or other activities related to, will be used solely for these purposes.</p>	<p>We may collect the name, contact details and affiliation/profession of the individual making the inquiry. We collect this information to respond to your enquiry and follow up with you if necessary. We may maintain the information in a Medical Information database.</p>	<p>The processing is in the legitimate interest of AB Science to follow up on your inquiries. I you are a patient or a reporter, if relevant, we will process your personal data based on your explicit consent. Article 6 (1) (f) GDPR Article 6 (1) (a) and 9 (2) (a) of the GDPR</p>	<p>In the case of a medical inquiry where reporting of adverse event or other activities related to pharmacovigilance, please refer to A.</p> <p>In the case of a medical inquiry that consist of a product complaint, please refer to C</p>
<p>C - Product Complaints</p> <p>Any personal data provided to AB Science related to product complaint or other activities related to, will be used solely for these purposes.</p>	<p>We may collect the name, contact details and affiliation/profession of the individual reporting the complaint. We may collect some additional personal data related to health and medical history of the individual affected by the product complaint if such information is relevant to evaluate, classify and assess the product complaint</p>	<p>The processing is necessary to comply with AB Science legal obligations in the context Article 6 (1) (c) and Article 9 (2) (i) GDPR</p>	