

## Octapharma Ltd Privacy Notice

### Introduction

Octapharma Ltd, The Zenith Building, 26 Spring Gardens, Manchester, United Kingdom, M1 2AB (hereinafter “Octapharma” or “we” or “us”) respects the rights of individuals regarding their personal data.

This Privacy Notice describes the way Octapharma Ltd process or uses personal data and explains your rights in relation to your personal data in line with the UK Data Protection legislation and regulations.

### Responsibilities

The Data Protection Officer is responsible for ensuring this notice is made available to data subjects prior to Octapharma processing their personal data.

All employees of Octapharma who interact with data subjects are responsible for ensuring this notice is drawn to the data subject’s attention and their consent to the processing of their data is secured.

Our Data Protection Officer contact details are:

Telephone 0161 837 3770  
Emailing [dataprivacy.uk@octapharma.com](mailto:dataprivacy.uk@octapharma.com)

### Collection of Personal Data

We collect personal data from you for one or more of the following reasons:

- To manage the relationship and communication between us.
- To initiate a contract or agreement that we have entered with you or the entity that you represent. In these circumstances it may be your entity, rather than yourself, that has provided us with your personal data.
- To publicly disclose transfers of value we have made to you in connection with the development or sale of medicines, provided you consent to such disclosure.
- To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and services.
- To provide you with information that you have requested or which we think may be relevant to a subject in which you have demonstrated an interest.
- To follow up on reports of suspected product quality defects, customer service complaints, and adverse drug reactions.
- To satisfy legal or contractual obligations, or for Octapharma to establish, defend or exercise legal claims.
- To enable us to communicate with you on topics relevant to your role in relation to the medicines we supply to you or your organisation.

We will only use your personal data when the law allows us to. Most commonly, we will rely on the lawful grounds listed below:

- If you have consented to the collection and use of your personal data.
- If we need to use your personal data to perform a contract between us.

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- Legal obligations e.g. documenting a suspected adverse drug reaction.
- If our use of your personal data is needed to protect the vital interests of you or another person.
- If use of your personal data is needed in the public interest.
- If use of your personal data is for our legitimate interest.

We get your data from the following sources:

- Directly from you.
- Providers that have received consent from you to process your information.
- Providers that provide us with your information to allow us to fulfil our legal obligations.
- Publicly available sources such as publications, websites, or social media.

The table below describes the types of personal data we may collect from you and the lawful basis for processing this data.

<b>Purpose of collection</b>	<b>Personal data type</b>	<b>Reason for processing</b>	<b>Lawful basis for processing</b>	<b>Retention period</b>	<b>Shared with</b>
To provide you with information	Name, occupation, department, company name, geographical location, telephone number, email address, business sector, demographic	Provide appropriate information about products and services that you have requested	Legitimate interest / consent	Closure of account + 7 years	Internally
		Inform you about our product developments	Legitimate interest / consent	Closure of account + 7 years	Internally
		Provide you with relevant product-related information and product updates	Legitimate Interest / consent	Closure of account + 7 years	Internally
		Provide medical information in response to your enquiry	Legitimate Interest	7 years	Internally
		Inform you of any meetings and events that are relevant to your area of medical expertise	Consent	7 years	Internally and the third party organising the event and travel arrangements
		Access to our training	Legitimate interest	6 years after the training event	Internally
Transaction information	Name, address, email address, telephone number, bank account details	For you to be able to order products from us or for us to be able pay you for a service or	Contractual performance	Closure of account + 7 years  Six months from the date the data subject has input	Internally

Purpose of collection	Personal data type	Reason for processing	Lawful basis for processing	Retention period	Shared with
		supplies provided to us		personal information but has not proceeded with a transaction	
		For accounting and taxation purposes	Statutory obligation	Closure of account + 7 years	Internally and professional advisers
		Credit reference checks to facilitate your ability to purchase product or service	Contractual obligation	Not stored deleted once completed	Internally
		Billing and invoicing	Contractual obligation	Closure of account + 7 years	Internally
Fulfilment Information	Name, email address, contract details, dietary requirements	Appropriate catering arrangements for an event	Contractual performance	Closure of account + 7 years	Internally and meeting venue
	Name, address, email address, contact details	Actual delivery of products or services that you have purchased from us	Contractual performance	Closure of account + 7 years	Internally and any third-party logistics company whom we contract to fulfil these requirements Internally
		To allow you to return products to us that are no longer viable	Contractual performance	Closure of account + 7 years	
		To carry out an investigation into the complaint	Contractual performance	Closure of account + 7 years	
Product Quality Queries and Complaints	Name, address, occupation, email address, telephone number	To address your general enquiries in regard to the quality of our products	Compliance and legal safety obligation	5 years	Internally
		To address product quality complaints	Compliance and legal safety obligation	5 years	Internally
		To carry out an investigation of product misuse and advise on how to use our products in future	Compliance and legal safety obligation	7 years	Internally

Purpose of collection	Personal data type	Reason for processing	Lawful basis for processing	Retention period	Shared with
Safety Information	Reporter name, occupation, address, email address, telephone number	To address your general enquiries and concerns in regard to safety of our products	Compliance and legal safety obligation	For at least 10 years after the marketing authorisation has ceased to exist	Internally
	Identifying the patient - gender, age, date of birth or initials Identifying the reporter – name, occupation, address, telephone number or email	To evaluate suspected adverse drug reactions from the use of our products	Compliance and legal safety obligation	For at least 10 years after the marketing authorisation has ceased to exist	Internally and with third party regulatory authority (e.g. Eudravigilance, MHRA or HPRA)
Customer Services	Name, address, email address, telephone number	To seek feedback in order to evaluate and review our products and services	Consent	If anonymised for statistical research, this data may be kept indefinitely  Where not anonymised, it shall be retained for one year	Internally
Sponsorship of individuals to provide their service such as training, speak at meetings or writing up clinical trial work etc.	Title, name, role, institution, address, email address, bank details	To provide transfers of value and disclose them publicly, provided you consent to such disclosure	Contractual performance, statutory obligation, consent	Five years after the end of the calendar year to which the transfer of value relates.  Bank details are deleted as soon as payment has been made	Internally and with third parties processing data for inclusion on a central disclosure platform

## Consent

Under certain circumstances, where the legal basis for using your personal data is that you have provided your consent, you may withdraw your consent at any time. If you withdraw your consent, this will not make processing which we undertook before you withdrew your consent unlawful.

If you wish to withdraw your consent, please email [dataprivacy.uk@octapharma.com](mailto:dataprivacy.uk@octapharma.com).

## **Security**

All information and personal data that you provide will be kept securely in line with our security measures to prevent your personal data from being accidentally lost or used, accessed, altered, or accessed in an unauthorised way.

## **Data Access**

Access to your personal data is only given to those employees, service providers, and to individuals who need access to perform their job or provide a service. They will only use your personal data on our instructions and are required to keep your personal data confidential. If we suspect a data security breach, we will notify you and any applicable regulators of breaches in accordance with relevant legal requirements.

## **Retention period**

We will only retain your personal data for as long as necessary. To determine the retention period, we will assess the length of time required to fulfil the purpose we collected it for and for the purpose of satisfying any legal or reporting requirements.

In some cases, we may anonymise the data so it cannot be associated with you, in such a case we may use such information without further notification to you.

## **Your Rights as a Data Subject**

At any point while we are in possession of or are processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review – if Octapharma refuses your request under right of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

All the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

## **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Octapharma (or third parties), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority (for the United Kingdom the Information Commissioner's Office [ico.org.uk](https://ico.org.uk) and for the Republic of Ireland the Data Protection Commission [dataprotection.ie](https://dataprotection.ie)) and Octapharma's data protection officer at [dataprivacy.uk@octapharma.com](mailto:dataprivacy.uk@octapharma.com).

## **Update of this Notice**

We may update or amend this notice at any time to clarify information provided in the notice or in accordance with applicable data protection laws.

We will directly notify you about changes to this notice or the way we use your personal data when we are legally required to do so.