

Privacy Notice

Novartis Pharma AG, a company organized under the laws of Switzerland and located at Lichtstrasse 35, 4056 Basel, Switzerland, together with its affiliated companies being part of the Novartis Group of Companies (collectively comprising “**Novartis**”), is responsible for the processing of your personal data. As the data processor, Novartis decides why and how data is processed, thereby acting as the “**controller**”. In this Privacy Notice, references to “**we**” or “**us**” means Novartis.

Specific personal data to be collected

When you use the On Line Ordering, we collect your Personal Data (as defined below) that you shared with Novartis.

In this Privacy Notice, “Personal Data” means information that can be used to identify you, such as your name, email address and phone number. The types of Personal Data we collect will depend on the specific website function that you use. For instance:

- When you create an online account, we will collect your name, work email address, work address, and phone number.
- If you sign up for CTL019 patient order notification emails, we will collect the email address you provide to receive these alerts.

For which purposes does Novartis use your personal data and why is this justified?

Novartis will use the collected information for the following specific purposes:

- To operate the On Line Ordering platform and support our business activities related to CTL019;
- To evaluate the effectiveness of the On Line Ordering;
- To conduct audits of the system and your use;
- To establish a log of data entries and verifications related to each product order;
- To monitor and prevent of fraud, infringement, and other potential misuse of the On Line Ordering
- For other internal business purposes.

We will not process your personal data if we do not have a proper justification foreseen in the law for that purpose. Therefore, we will only process your personal data if:

- *the processing is necessary to perform our contractual obligations towards you/the institution you represent*
- *the processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms*

Who has access to your personal data and to whom are they transferred?

Within Novartis:

- Novartis Pharma AG, located at Lichtstrasse 35, Novartis Campus CH-4056 Basel, Switzerland: Customer Service, Ordering and Scheduling functions as well as IT service (for IT support reasons) will have access to data.

- Novartis Pharma GmbH, located at Roonstraße 25, 90429 Nürnberg, Germany, will also manage both customer services and ordering processes and will be responsible for releasing the product for the EU Countries.
- Novartis Pharmaceuticals Corporation, located at 1 Health Plaza, East Hanover, New Jersey, 07936, U.S.A
- Novartis Pharmaceuticals Australia Pty Ltd, located at 54 Waterloo Road, Macquarie park, New South Wales 2113 Australia

will have access to your data in order to manage the process from ordering to supplying [CTL019]

We may share your personal data with the following third parties:

- Salesforce.com Inc., the Landmark@One Market Street, San Francisco CA 94105 US, will store your data in its database
- Accenture AG, Fraumünsterstrasse 16, 8001 Zürich, Switzerland and Accenture HDC 4 – Mantri Cosmos SEZ, Nanakramguda Village, Gachibowli, Serilingampally Mandal, Randa Reddy District, Telangana 500008, India, will have access to data for IT support in its capacity as the system administrator

The above third parties are contractually obliged to protect the confidentiality and security of your personal data, in compliance with applicable law.

Your personal data can also be accessed by or transferred to any national and/or international regulatory, enforcement, public body or court where we are required to do so by applicable law or regulation or at their request.

The personal data we collect from you may also be processed, accessed or stored in a country outside the country where Novartis is located, which may not offer the same level of protection of personal data.

If we transfer your personal data to external companies in other jurisdictions, we will make sure to protect your personal data by (i) applying the level of protection required under the local data protection/privacy laws applicable to Novartis, (ii) acting in accordance with our policies and standards and, (iii) for Novartis located in the European Economic Area (i.e. the EU Member States plus Iceland, Liechtenstein and Norway, the "EEA"), unless otherwise specified, only transferring your personal data on the basis of standard contractual clauses approved by the European Commission or the Swiss Federal Data Protection and Information Commissioner respectively.

For intra-group transfers of personal data, the Novartis Group has adopted Binding Corporate Rules, a system of principles, rules and tools, provided by European law, in an effort to ensure effective levels of data protection relating to transfers of personal data outside the EEA and Switzerland.

How do we protect your personal data?

We have implemented appropriate technical and organisational measures to provide an adequate level of security and confidentiality to your personal data.

These measures take into account:

- (i) the state of the art of the technology;
- (ii) the costs of its implementation;
- (iii) the nature of the data; and

- (iv) the risk of the processing.

The purpose thereof is to protect it against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access and against other unlawful forms of processing. Moreover, when handling your personal data, we:

- only collect and process personal data which is adequate, relevant and not excessive, as required to meet the above purposes; and

The data is accessed and processed solely by the relevant personnel, under the responsibility of one of our representatives who is subject to an obligation of professional secrecy or confidentiality.

Data storage

Novartis will retain your personal data for the period necessary for the manufacturing related data from product order to expiration of the shelf life of the final product + 10 years as per guidelines on data retention related to manufacturing records.

What are your rights and how can you exercise them?

By using the On Line Ordering platform, you agree to all of the above. However, you may change your mind at any time and exercise the following rights in accordance and within the limits of the applicable law:

- the right to access your personal data as processed by us and, if you believe that any information relating to you is incorrect, obsolete or incomplete, to request its correction or updating;
- the right to request the erasure of your personal data or the restriction thereof to specific categories of processing;
- the right to withdraw your consent covering the use of your personal data at any time, without affecting the lawfulness of the processing before such withdrawal; and
- the right to object, in whole or in part, to the processing of your personal data.

If you have a question or want to exercise the above rights, you may send an email to global.privacy_office@novartis.com with a scan of your identity card for identification purpose, it being understood that we shall only use such data to verify your identity and shall not retain the scan after completion of the verification. When sending us such a scan, please make sure to redact your picture and national registry number or equivalent on the scan.

If you are not satisfied with how we process your personal data, please address your request to our data protection officer at global.privacy_office@novartis.com, who will investigate your concern.

In any case, you also have the right to file a complaint with the competent data protection authorities, in addition to your rights above.

Dedicated point of contact

Should you have any question in relation to the processing of your personal data in the above context, please contact global.privacy_office@novartis.com