

CellChain Website Privacy Policy

Thank you for your trust in Novartis Singapore Pte. Ltd. (“Novartis Pharmaceuticals” “we”, “our”, or “us”). We are a Singaporean -based affiliate of the Novartis Global Group.

This Privacy Policy describes how we use and disclose the information we collect from you about you through our CellChain website when you use the website to order KYMRIA[®] for your patients / patients treated at your health care institution (“On Line Ordering”) and the choices you have about how we use that information.

By using this website, you consent to the collection and use of information as set forth in this Privacy Policy.

1. What Information Do We Collect?

When you use the On Line Ordering, we collect the Personal Data that you provide to us about you and Personal Data about your use of the website. In this Privacy Policy, “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 be based 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 KYMRIA[®] patient order notification emails, we will collect the email address you provide to receive these alerts.

We also collect Personal Data about your use of the On Line Ordering, such as pages visited, IP address from where you visit, and when you login. For more information about how we collect this information, please see “Data Collection Technologies” below.

2. How Do We Use Your Personal Data?

Generally, the Personal Data that we collect is used to support the processing and tracking of patient biomaterial that is created and supplied in order for Novartis to manufacture the patient specific KYMRIA[®] dose. We may also use the information we collect in the following ways:

- To operate the On Line Ordering platform and support our business activities related to KYMRIA[®];
- 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; and
- 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*

We may combine, aggregate, or anonymize any of the Personal Data we collect about you with information from any other online or offline sources. If such information can be used to identify you, we will treat such information as Personal Data in accordance with this Privacy Policy. Unless prohibited by law, we may use information that does not personally identify you for any purpose. We will not use your Personal Data to send you promotional emails or other marketing materials.

3. When and to Whom Do We Disclose Your Personal Data?

The Personal Data we collect from you and about you may be disclosed:

- To our subsidiaries and affiliates within the Novartis Global Group for the purposes described in this Privacy Policy;
- To our service providers who act for or on our behalf for further processing in accordance with the purposes described above.
- **Please note that our service providers may be located in countries or territories other than your country of residence. The Personal Data we collect from you may therefore be processed, accessed or stored in a country outside of your country of residence, which may not offer the same level of data protection as the country in which you reside.**
- 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, and (ii) acting in accordance with our policies and standards. We have implemented appropriate technical and organizational measures to provide an adequate level of security and confidentiality to your personal data.
- **Our service provider have contracted with us to use your Personal Data for the agreed upon purpose, not to sell your Personal Data to third parties, and not to disclose it to third parties except as may be required by law, as permitted by us, or as stated in this Privacy Policy;**

For intra-group transfers of personal data to our group companies, 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. Read more about the Novartis Binding Corporate Rules by clicking here <https://www.novartis.com/sites/www.novartis.com/files/bcr-individual-rights-2012.pdf>.

- To third parties, advisors, and other entities to the extent reasonably necessary for development of or to proceed with the negotiation or completion of a corporate or commercial transaction, including a reorganization, merger, acquisition, joint venture, sale or other disposition of all or a portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

- When we believe in good faith that disclosure is necessary to protect legal rights or the security or integrity of the On Line Ordering; protect your safety or the safety of others; investigate fraud, a breach of contract, or a violation of law; or respond to a government request; and
- As required by law, such as to law enforcement, to health authorities to report possible adverse events, during government inspections or audits, as ordered or directed by courts or other governmental agencies, or in order to comply with a subpoena or other legal process;

4. Data Collection Technologies

We do not currently respond to web browser "do not track" signals or other mechanisms that provide a method to opt out of the collection of information across websites or other online services.

5. Your Choices

When we process your Personal Data, we take reasonable steps to ensure that it is kept accurate and up-to-date for the purposes for which it was collected. You have the right to request access to, modification or deletion of your Personal Data.

If you wish to contact us with such a request or a question regarding our use of your Personal Data, write to our local Country Data Privacy Officer at sg.cdpo@novartis.com or call KYMRIA[®] CARES[®] at 1800 407 5614 / +65 6722 6126 . Requests to delete personal data will be subject to any applicable legal and ethical reporting or document filing or retention obligations imposed on us.

6. Information Retention and Security

We retain your Personal Data for the period necessary to fulfill our business purposes, including those outlined in this Privacy Policy. We use reasonable safeguards to protect your Personal Data 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.

but we cannot guarantee the absolute security of your information, especially information transmitted over the Internet. We encourage you to also take precautions to protect your Personal Data.

7. Links to Third Party Websites

This Privacy Policy only applies to the On Line Ordering and not to websites owned by third parties. We may provide links to third-party services, including social networking sites, that we believe may be of interest to you. These third party websites are not under our control and we are not responsible for the privacy or security practices of other organizations. We encourage you to review the privacy policies and terms of use of these third party websites before disclosing your information.

8. Changes to This Privacy Policy

We may update this Privacy Policy from time to time by posting a new Privacy Policy on our website. Please consult our website regularly for any changes. Your continued use of the On Line Ordering after such changes have been made constitutes acceptance of those changes. The amended Privacy Policy supersedes any previous versions.

9. How to Contact Us

If you have any questions about our Privacy Policy, please write to our local Country Data Privacy Officer at sg.cdpo@novartis.com or call KYMRIA[®] CARES[®] at 1800 407 5614 / +65 6722 6126.