



## Medical Information Privacy Notice

Date: 1 June 2019

Biogen is committed to providing medicines of the highest standard and to answering enquiries in relation to our products. This Privacy Notice describes how **Biogen Switzerland AG** ("**Biogen**") collects and processes your "**personal data**" (meaning any information relating to an identified or identifiable natural person) in performing its medical information services.

### Personal data that we collect and how we use it

In the course of maximising patient safety in using Biogen products, Biogen provides a medical information service to respond to enquiries from consumers, patients, and healthcare professionals relating to any aspect of use or information surrounding a Biogen product. The personal data that we will usually include:

- name;
- contact details, such as address, e-mail address and/or phone number;
- details of the enquiry; and
- additional physician professional information (for example, in order to verify that we are liaising with a qualified doctor).

We usually receive the data from someone directly (for example, when someone e-mails or phones us) or from a third party which passes this information on to us, such as a distributor, homecare programme, or contact centre which takes calls on our behalf.

If an enquiry reveals an adverse event (meaning an unwanted, untoward, unintended or harmful event associated with the use of a Biogen medicinal product) or a complaint in relation to a Biogen product, we are required to process additional personal data in relation to this in order to comply with safety reporting laws. We process this data in accordance with our Safety Reporting Privacy Notice which you can find on our website (click on "Privacy Policy" and then "Safety Reporting Privacy Notice").

### Our legal basis for processing personal data

We process personal data in our medical information service based on Biogen's legitimate interests to ensure general enquiries are addressed in relation to our products, as a responsible pharmaceutical company.

We may also ask for your permission to contact your doctor to obtain further information on the enquiry and will only contact the doctor with such permission. We do not make any further contact with the doctor once the enquiry is closed.

### How we share personal data with others and international transfers

Biogen shares personal data with third parties in providing medical information services. Depending on the nature of the enquiry and the particular product in question, we may need to share personal data with our marketing partners in order to answer the enquiry. We may disclose personal data to our group companies for the purposes described in this notice. Biogen may use third parties to provide services to us which may require disclosure of personal data to them, including service providers which assist Biogen with our data processing activities, e.g. by providing cloud technology and data storage facilities. Such transfers may include transfers outside your country to countries which do not implement an adequate level of protection for personal data under your national or European data protection law. In such cases, Biogen takes appropriate steps to ensure your data is adequately protected if transferred to such countries, such as



having EU-approved Standard Contractual Clauses in place where necessary to provide an adequate level of data protection. Upon your request, Biogen will provide further information on recipients of personal data and data transfer agreements with recipients outside the European Economic Area.

### **How we store personal data**

Biogen retains personal data for no longer than is necessary for the purposes for which it has been collected and in accordance with any specific retention periods required by law. In general, we keep personal data for medical information purposes for up to 6 years.

### **Your rights**

You may contact Biogen at any time if you would like to access your personal data or require information about the personal data that we hold about you. You may object to the processing of your personal data for legitimate reasons, request restriction of the processing of it and you may also request the correction or erasure of it. Please note that some of these rights are limited by applicable data protection law and we have the right to collect, process and store personal data to perform our legal obligations under safety reporting laws.

### **Contact information**

Under European data protection laws, a "data controller" is the legal entity that is responsible for protecting your personal data and helping you to exercise your data protection rights. Biogen is the data controller of your personal data. If, at any time, you have questions or concerns about this Privacy Notice or the processing of your personal data, or would like to exercise your rights as outlined above, you can contact Biogen's Data Protection Officer at [privacy@biogen.com](mailto:privacy@biogen.com). You may, should you feel it necessary, lodge a complaint with your local data protection authority if you feel your privacy rights have been infringed.