

Privacy Policy

Thank you for visiting this website or interacting with Roche via e-mail.

Roche is committed to protecting your personal data. This Privacy Notice outlines the types of personal data Roche may collect; the means by which Roche may collect, use or share your personal data; the steps Roche take to protect your information; and the choices you make with respect to the use of your personal data.

This Notice only applies to websites that link to this Notice. Our websites may also contain links to third-party websites. We do not endorse and are not responsible for the content of third-party websites or resources and our privacy policy does not apply to websites not linked to Roche, even if you access them via a link on our website. You should review the privacy policies of any third-party websites before providing any information.

For the purposes of this Privacy Notice, “Personal Data” means any information by which you can be individually identified directly and indirectly, including, but not limited to, your name, address, e-mail address and telephone number.

We only collect personally identifiable information to the extent that you choose to provide it to us. We do not share such information with third parties for commercial purposes unless you expressly consent to it.

Minors

This website is not designed or intended for use by children under the age of 16. We do not knowingly collect any personal data from children under the age of 16 without the prior verifiable consent of their parents or guardians. Such parent or guardian may have the right, upon request, to view the information provided by the minor and request that it be deleted. Moreover, all minors should seek permission from their parents or guardians before using or disclosing any personal data on this website or online resource.

The Responsible/**Data Controller** for the processing of personal data is:

Roche Farma, S.A.

Calle Ribera del Loira, 50

CP-28042

Madrid (Spain)

E-mail: spain.datospersonales@roche.com

The entity is registered in the Mercantile Registry of Madrid, Volume 15,195, Page 121, Sheet M-4383

In case the processing of your personal data is covered by the European General Data Protection Regulation (EU) 2016/679, you can contact the data controller in the following emails:

Roche Farma, S.A.: spain.datospersonales@roche.com

How and Why We Process Your Personal Data

On this website, we may request personal data about you. Examples of personal data that we may collect that directly or indirectly include your name, address, e-mail address, telephone number, and other information in combination with such identifiers. We may also collect certain personal data that does not personally identify you by name, but that could be used to identify that a particular computer or device has accessed the website.

Data Privacy Policy

For the purposes of the provisions of Organic Law 3/2018, of 5 December, on the Protection of Personal Data, the EU General Regulation 2016/679 (GDPR) and the current regulations on data protection, ROCHE informs you, as a user, of the following aspects:

Who is responsible for the processing of your personal data?

The data controller is ROCHE FARMA, S.A. Soc. Unipersonal (further referred to as "ROCHE"), with CIF A08023145 and registered office at C/Ribera del Loira, 50 - CP-28042 Madrid Spain (further referred to as "ROCHE")

ROCHE has formally appointed a Data Protection Officer and has also set up the following communication channel: spain.datospersonales@roche.com

How do we collect your personal data?

On this website, we may request personal data about you, based on your consent (article 6.1. a GDPR), consent given when entering the registration at the website.

Examples of personal data that we may collect and that directly identify include your name, contact information, e-mail address, and other information in combination with those identifiers. We may also collect certain personal data that does not directly identify you by name, but that could be used to identify that a specific computer or device has accessed our website.

Moreover, to answer this question, a distinction must be made between the sources from which your personal data comes from and the type of personal data processed by ROCHE:

a) Sources of personal data.

- Provided by you in your relationship with ROCHE.
- The very management, maintenance and development of the relationship.
- External sources.

b) Types of personal data.

- Identifying data.
- Professional data

For what purposes do we process your personal data?

At ROCHE we process your personal data in order to achieve the following purposes:

Allow you can participate in the II EDITION Startup Creasphere Spain.

Maintain and manage the relationship with you as a user; propose, agree and execute professional collaborations; inform, promote and train (congresses, symposia, sessions, courses, scientific events, etc.) on our products and services, on scientific developments and other third party initiatives in the healthcare field that we believe are of interest to you, including communications by post, telephone or electronically. All this if you are a healthcare professional.

Also to answer your questions or requests; to complete an operation, customise your experience, conduct website analytics and measure your performance, monitor adverse events and other pharmacovigilance activities and maintain the website and/or apps, including safety reasons.

Many areas on our websites/apps require personal data if you choose to access them, including questionnaires, registration, and content sharing functions (i.e. “send an e-mail to a friend” links). Roche and its partners collect this information about you only if you voluntarily choose to provide it to us. Please note that certain features of this page/app may not be available to you if you choose not to provide such data. Any personal data that you provide us will be used in accordance with this Privacy Notice.

More Information on our Processing Activities:

This table outlines each web-related processing activity in greater detail and provides information on the categories of information collected for each activity as well as the legal basis for processing the activity:

Purposes and Categories of Data and Legal Basis:

Respond to requests or questions: We may use the information you provide to take the steps necessary to respond to your request, for example, responding to a request for medical information, a question about a product, or subscribing to one of our mailing lists or StartUp Creasphere Spain. Depending on your request, we may collect your contact information (such as your name, mailing address, phone number, title), your interests and preferences (such as products or areas of interest), and any other information you provide to us. For more information on how we collect personal data to respond to requests for medical information, please refer to the [Privacy Policy for Pharmacovigilance, Medical Information and Product Complaints](#).

We collect and process your personal data for such purposes based on our legitimate interest in responding to your request. If you submitted sensitive Personal Data as part of your inquiry, we will also base such processing on your explicit consent. If reporting is required, we will process your data to comply with our legal obligations.

All in accordance with Articles:

Article 6(1)(f)

GDPRrulebook 6(1)(a) and 9(2)(a)

GDPRrulebook 6(1)(c) and Article 9(2)(i) GDPR

Completing transactions: Some parts of the website/app may collect your Personal Data to complete the services you have requested and to understand your interests and preferences. In these instances, we may collect your contact information as well as the history of your previous transactions with us (such as order history, customer account information). We use this information to refine our agreement with you

All this in accordance with Article 6(1)(b) GDPR

Personalising your experience: We may collect certain information about you, your preferences and how you have interacted with us in the past in order to understand your interest in our products and services so that we can best serve you. This includes information about your contact and product preferences, languages, marketing preferences, and demographic data. In cases where we collect such information automatically, we collect and process it for our legitimate business interests. In other cases, we will collect and process this information pursuant to your consent.

According to Articles 6(1)(f) GDPR and 6(1)(a) GDPR

Analytics and Tracking: Where permitted by law, we may combine Personal Data you have provided with us with other information you have provided to us through our

websites and online resources. Where permitted by the law, we may also combine such data from online sources with offline records and information provided by third parties.

In cases where we collect this information automatically, we will collect it for our legitimate business interests. In other cases, we will collect and process this information in pursuant to your consent.

All in accordance with Articles:

6(1)(f) GDPR and 6(1)(a) GDPR

Monitoring and Tracking of adverse effects and pharmacovigilance: Some specified parts of our website may collect Personal Data related to adverse events or other pharmacovigilance activities. This information is very important from a health point of view and will be used for the detection, evaluation, understanding and prevention of adverse events and other medicine-related issues. For more information on how we collect personal data to respond to requests for medical information, please refer to the [Privacy Policy for Pharmacovigilance, Medical Information and Product Complaints](#).

We collect and process your information for these purposes, in order to comply with our legal obligations and may be required by authorities to report such information.

Articles: 6(1)(c) and 9(2)(i) GDPR

To Run and Maintain the website: We use this information to secure our websites, network systems, and other assets. This may include information about your IP address, geographical location, resources you have accessed and similar information. We collect this information automatically, in pursuant to our legitimate business interest to run, maintain, and secure our websites.

Article 6(1)(f) GDPR

What is Roche's legal standing for the processing of its data?

The basis for processing your personal data is in the development and execution of the relationship entered into with you.

To whom will your personal information be disclosed?

Personal Data processed by ROCHE to achieve the purposes previously set out may be disclosed to the following recipients/third parties depending on the legal standing of the correspondence:

Entities engaging in market research, the organisation or logistics of events, or services related to the information or promotion of medicines, to assist Roche in the

performance of business transactions, or to provide services for the Roche Group, for the following purposes, among others:

- * Perform technical maintenance of our websites and other web platforms
- * To facilitate a merger, integration, transfer of control or other corporate reorganization involving Roche or resulting from a financial arrangement undertaken by Roche
- * To respond to requests from authorities, or in case of legal or regulatory imposition or court injunction
- * If required for corporate audits, or for investigations or complaints or security threats

Companies of the Roche Group for their storage or management or for the purposes previously detailed. The Roche Group companies are identified in the annual financial information available on the corporate page www.roche.com.

International Transfers of your Personal Data

According to the above, your data may be transferred outside the European Union to countries that do not have equivalent legislation to the European legislation, with less restrictive rules on the protection of personal data, although, ROCHE will protect the confidentiality and proper use of your data, by selecting third parties and signing agreements or protocols according to international standards. All transfers shall be made in accordance with applicable laws.

If your personal data is covered by the GDPR: for transfers of personal data to a non-EU third country, European Economic Area (EEA) or in the absence of an adequacy decision, in the Roche Group, business partners and vendors, we will enter into contracts containing the Standard Contractual Clauses, in accordance with the European Commission decisions of 27 December 2004 (2004/915/EC) and 5 February 2010 (C(2010) 593), providing safeguards to ensure compliance with the GDPR.

How long do we keep your data?

The length of time during which we retain your Personal Data will vary depending on the purpose for which it was collected and processed. In most cases, we will keep your data for a period of three (3) years since the last interaction with you. However, we may retain your data for a longer period of time, if there is a legal requirement. For example, pharmacovigilance reports are kept for a minimum period of 10 years after a product recall in the last country where the product has been marketed.

Cookies and Other Web Trackers

Roche web pages and online resources also collect other basic information about you that does not directly identify you, but which may correspond to you or a particular device. Roche uses some of that information to better understand how our websites

and online resources are used and to otherwise improve their administration and use. We also use the information to provide you with information tailored to your interests and preferences, based on your use of the portal. For example, we may collect the IP address assigned to your PC by your service provider. This address may change each time you connect to the internet (a “dynamic” IP address) or may remain the same (a “static” IP address). In most cases, this information is collected automatically, based on our legitimate business interest. In some cases, we ask for your consent before collecting this information, in which case you will have to choose the option that allows the collection and use of that type of information.

Information concerning your Rights with regards to the processing of your Personal Data

If the protection of your personal data is protected under the GDPR (in the case you are a “subject/interested” in the European Economic Area), you have the following rights to your Personal Data:

What are your rights in relation to the processing of your data?

ROCHE informs you that you have the right to access the personal data Roche has about you. You also have the right to request rectification of incomplete or inaccurate data or, where appropriate, to request deletion where, among other reasons, the data is no longer necessary for the purposes collected by ROCHE, and the right to restrict its processing to certain purposes, when deletion is not possible.

You also have the right to obtain a copy of your data in electronic form so that you can pass it on to a third party, or to request that Roche directly transfer your Personal Data to one or more parties.

You have the right to oppose the processing of your data for marketing and other purposes.

Please note that withdrawing from or limiting processing is only possible if and to the extent that such processing is based on consent or legitimate interest. If it is based on consent, you have the right to withdraw it at any time, although withdrawal does not affect the legality of processing based on your consent prior to withdrawal. In the event of a request for deletion, we may retain a copy of your Personal Data for our record-keeping purposes and to prevent access to your Personal Data on our systems after your request.

Finally, if you believe or have the impression that the processing of your Personal Data does not comply with the GDPR, you may file a complaint with the supervisory authority.

You may exercise such rights by writing an e-mail to spain.datospersonales@roche.com

It is necessary to prove the identity of the person exercising their rights, by sending a copy of their ID, NIE (Foreigner Identification Number), passport or equivalent documentation.

Data Security:

Roche and its providers and collaboration partners take reasonable steps to protect Personal Data we access or receive through this website from loss, misuse, unauthorised access, disclosure, alteration or destruction. Nevertheless, Roche makes no guarantee the security of your Personal Data and disclaims, to the fullest extent permitted by law, all liability and damage caused by loss, misuse and unauthorised use, disclosure, alteration or destruction. We recommend that you take the necessary precautions to protect the Personal Data you submit on this website.

Updates to this Privacy Policy

From time to time, we may revise this Privacy Policy. Any changes to this Privacy Policy will be reflected on this page. Roche recommends that you review this Policy regularly for any changes. The date on which this notice was last revised is at the foot of this notice.

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Last revised: 26.02.2024

Privacy Notice for Pharmacovigilance, Medical Information and Product Complaints

General Information

At Roche Farma, S.A. (hereafter referred to as "Roche" or "we"), we take the privacy of personal data very seriously and process it in accordance with the Privacy Policy and applicable regulation, which includes the storage, processing, access and transfers of personal data.

This privacy notice is intended to explain how Roche collects and handles your Personal Data for the purposes of pharmacovigilance and related activities, medical information inquiries and product complaints. The scope of this notice is limited to the collection and processing of your personal data for pharmacovigilance, medical information inquiries and/or product complaints. For general information on processing of personal data please visit > [Roche Legal Notice and Privacy Policy: https://www.rocheplus.es/aviso-legal-y-politica-de-privacidad.html](https://www.rocheplus.es/aviso-legal-y-politica-de-privacidad.html)

Purposes and Legal Basis for Processing.- Pharmacovigilance

Any personal data provided to Roche relating to adverse events or other activities related to pharmacovigilance will be used solely for these purposes. This information is very important for public health and will be used for the detection, assessment, understanding and prevention of adverse events or any medicinal product-related problem. To the extent that this processing is subject to the GDPR (General Data Protection Regulation), we collect and process your data for these purposes, in compliance with our legal obligations (Articles 6(1)(c) and 9(2)(i) of the Personal Data Protection Regulation (EU)). We may also be required to report the data to health authorities. Your data will not be used for purposes other than those mentioned.

Purposes and Legal Basis for Processing - Medical Inquiries

Any personal data provided to Roche regarding a medical inquiry will be used solely for resolving, tracking, and keeping the information in a medical information database for reference. If necessary according to the regulation (e.g. pharmacovigilance and medicine safety), we may also be required to report the data to regulatory authorities. Your data will not be used for purposes other than those mentioned. To the extent that this processing is subject to the GDPR, we collect and process your data to respond to your inquiry, based on legitimate interests (Article 6(1)(f)) and, if you are a patient, your consent (explicit (Articles 6(1)(a) and 9(2)(a) of the Personal Data Protection Regulation (EU))). If you are not a patient, your consent, if obtained by ticking a consent box, will not

be considered as consent to the processing of Personal Data, as another legal basis, namely legitimate interest (Article 6(1)(f)), is more appropriate and therefore applicable.

To the extent that this processing is subject to GDPR, if the reporting of adverse events is required, its data will be processed in compliance with Roche's legal obligation for pharmacovigilance (GVP) (GDPR Articles 6(1)(c) and 9(2)(i)). If your medical inquiry concerns a product complaint, your data will be processed to comply with our legal obligations in the context of pharmacovigilance (Articles 6(1)(c) and 9(2)(i)).

Purposes and Legal Basis for Processing.- Product Complaints

Any personal data provided to Roche in connection with a product complaint will be used solely for that purpose. This information is very important for public health and will be used for the evaluation, classification and assessment of the complaint, to track it, and to keep the information in a product complaint database for reference.

To the extent that this processing is subject to the GDPR, we collect and process your data in order to comply with our legal obligations in this context (Articles 6(1)(c)) and, if you are a patient, your consent (explicit (Articles 6(1)(a)) and 9(2)(i) of the Personal Data Protection Regulation (EU)). We may also be required to report the data to the regulatory authorities.

A summary of the purposes and basis of legitimacy for processing. - if and to the extent that data processing is subject to the GDPR.- Pharmacovigilance, Medical Information Inquiries and Product Complaints:

Purpose	Legal Basis	Reference
Your Personal Data relating to adverse events or other pharmacovigilance-related activities will only be used for these purposes.	This processing is necessary to comply with Roche's legal obligations on pharmacovigilance. Obligations (GVP).	Articles 6(1)(c) and 9(2)(i) GDPR
Your personal data relating to a product complaint will be used only for such purposes (e.g.: for the evaluation, classification and assessment of the product complaint, tracking it and keeping the information in a product complaints database for reference).	This processing is necessary to comply with Roche's legal obligations in this context.	Articles 6(1)(c) and 9(2)(i) GDPR
Your personal information regarding a medical inquiry may be used to resolve the inquiry, track the inquiry, and keep the information in a database of medical information for reference.	This processing is in the legitimate interest of Roche to follow up on your inquiries. If you are a patient, we will process your data based on your explicit consent.	Articles 6(1)(f) GDPR 6(1)(a) and 9(2)(a) GDPR
Your Personal Data relating to a medical inquiry requiring the reporting of adverse events or other pharmacovigilance-related activities will be used only for those purposes.	This processing is necessary to comply with Roche's legal Pharmacovigilance obligations: Obligations (GVP).	Articles 6(1)(c) and 9(2)(i) GDPR
Your Personal Data relating to a medical inquiry about a product complaint will be used only for those purposes.	This processing is necessary to comply with Roche's legal obligations in this context.	Articles 6(1)(c) and 9(2)(i) GDPR

Categories of Personal Data processed

The type of information we collect about you depends on the person concerned and the type of processing activity:

- **Pharmacovigilance:** We collect your name, contact details and affiliation/profession as a reporting individual. We may collect additional personal information regarding the health or medical history of the individual experiencing the adverse event if required for processing of the adverse event for pharmacovigilance purposes.
- **Medical Inquiries:** We may collect the name, contact details and affiliation/profession of the individual making the inquiry.
- **Product Complaints:** We may collect the name, contact details and affiliation/profession of the individual reporting the complaint. We may also collect additional personal information regarding the health or medical history of the individual affected by the product complaint if such information is relevant to the evaluation, classification and assessment of the product complaint.

Recipients of your Personal Data

Roche may share the data you provide with other Roche Group companies and affiliates, business partners and service providers, where necessary to manage Roche's global pharmacovigilance database, Roche's global product complaints database and to comply with pharmacovigilance regulations and/or legislation related to medicine safety.

Roche is also required to provide certain pharmacovigilance and product information to Health Authorities worldwide, including those that provide a different level of protection than the EU regarding the protection of personal data. The reports contain details about the incident, limiting personal data:

- **Patients:** The information they have provided, including age or date/year of birth and gender (patient name will never be included)
- **Notices:** The information they have provided to enable the regulatory authority to track with the reporter, including name, profession, initials, address, email and telephone number.

Additional information in case your personal data is covered under the Data Protection Regulation (EU); it is possible that, in the exchange of data in the Roche Group with business partners and service providers, your personal data will be transferred to countries that do not provide the same level of protection as Spain/the EU. In that case, contracts containing the Standard Contractual Clauses in accordance with Commission decisions of 27 December 2004 (2004/915/EC) and 5 February 2010 (C(2010) 593) constitute adequate safeguards to ensure compliance with the Data Protection Regulation (EU).

Storage Period

As pharmacovigilance information (adverse event reports) is relevant for public health reasons, such reports are kept for at least 10 years after the withdrawal of the medicinal product in the last country where the medicinal product is marketed.

Personal data stored as part of a health information inquiry are kept for a minimum of 10 years and a maximum of 15 years upon receipt. Similarly, because product complaint and pharmacovigilance information is important for public health reasons, complaint records, including the personal information contained therein, are kept for a minimum of 15 years.

Information about your rights

If your personal data is covered by the Data Protection Regulation (EU), please be aware that you have the right to ask Roche for information about what personal data we hold and the purpose for which we process it. You can also request access and rectification of your personal data, as well as your right to portability, if applicable (if the legal basis for the collection of your data was consent). The deletion or limitation of processing is only possible if and to the extent that the processing of personal data is based on consent or legitimate interest. Please note that due to our legal obligations regarding pharmacovigilance, Roche may not be able to delete or limit the processing of your data if it has been processed for pharmacovigilance reasons.

If the processing of your data is based on consent, you have the right to withdraw it at any time, without affecting the lawfulness of the processing based on your consent before you withdraw it. If you would like to contact us to exercise your right to withdraw

consent, please see our contact details in the section; "Controller Identity and Contact Details" below.

In order to prevent your data from being entered into our systems again once you have requested its deletion, in your interest and for our compliance with the Data Protection Regulation, we will keep your name and email address with the identification: "Do not contact again" in our systems.

If you believe that the processing of your personal data does not comply with the current Regulation and standards, you can lodge a complaint with the supervisory authority: Spanish Data Protection Agency.

Identity and contact details of the Controller of your Personal Data

The data controller is ROCHE FARMA, S.A. Soc.Unipersonal (hereinafter "ROCHE"), with CIF A08023145 and registered office in C/Ribera del Loira, 50 - CP-28042 Madrid Spain

ROCHE has formally appointed a Data Protection Officer and has also set up the following communication channel: spain.datospersonales@roche.com. Please direct any questions or requests related to your personal data to this email address.

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