

HEALTH CARE PROFESSIONALS PRIVACY NOTICE

1. INTRODUCTION AND SUMMARY

At Celgene we recognize the importance of, and are fully committed to protecting, the privacy of information related to Health Care Professionals (HCPs) and other medical professionals (such as statisticians, representatives of hospitals, clinicals, universities, government authorities, non-profit organizations) with whom we interact (altogether “HCPs”).

This notice includes information about what, why and how data is processed, as well as the rights of individuals.

References to “Celgene”, “group”, “affiliates”, “we”, “us” and “our” are references to Celgene Corporation and its worldwide affiliates.

2. INFORMATION WE MAY PROCESS ABOUT YOU

We only keep information about you that is necessary for managing our relationship with you. Depending on the relationship, we may process information about you including:

- **General information:** name, postal and/or email address, phone number, date of birth, and other information such as photographs, digital imagery and sound recordings, payment-related information, government issued identification (e.g. driving license, passport, tax identification number), agreements, communications preferences, queries made to Celgene, special conditions (dietary preferences/requirements, accessibility information);
- **Professional information:** such as a job title, educational information, professional qualifications, prescribing history, work experience, professional licenses, networks and affiliates, programs and activities participated in, publications authored or co-authored, awards, board memberships, professional conference and events, employment status, influence rankings, individual travel and expenses information.
- **Assessment information:** such as internal assessments, feedback, evaluations, classifications or performance ratings of your professional activities and outcomes.

Transparency information: information related to payments and services provided, invoices and tax related information.

3. SOURCES OF INFORMATION

In most cases, we will collect information directly from you, although sometimes we will obtain information about you from alternative sources including, but not limited to: publicly accessible sources (such as websites, social media and other digital platforms, publication databases, journals, societies, editorial board websites, national registries,

professional directories and third party healthcare professionals databases), or third party vendors and service providers acting on our behalf.

4. WHY WE PROCESS YOUR INFORMATION

We will only process information for purposes permitted by applicable laws, which may vary depending on where you live and where we operate. We may process information about you in order to:

- **Conduct our business operations:** for example, responding to questions and comments, managing our collaboration and payments, managing data where international or business travel is required for education or consultancy, inviting you to our events or to participate in our activities, advising on activities involving HCPs, Health Care Organizations (HCOs), patient organizations, individual patients and clinical studies organizations and providing HCPs with literature required to decide on treatment, and other commercial activities such as but not limited to the provision of scientific information;
- **Comply with legal, regulatory, industry best practices and ethical obligations:** for example; reporting of interactions with HCPs for transparency purposes, enforcing our Terms of Use or other legal rights; complying with applicable laws, regulations and requests from governmental agencies e.g. complying with pharmacovigilance data capture and reporting obligations; and complying with industry standards and our policies;
- **Achieve strategic and research purposes:** for example we will engage with Key Opinion Leaders to enable us to make more informed and objective decisions;
- **Communications in the context of business operations:** for example, communications with the individuals, entities and institutions in the context of the business activity. Provision of services and management of the relationships with customers and potential customers. Marketing and commercial communications as permitted by law.
- **Conduct security and fraud detection and prevention:** for example to ensure security and confidentiality of your data, ensuring a safe environment at our events, facilities or networks.
- **Any other purpose that is relevant in the relationship between Celgene and HCPs.**

We will process information for **further purposes**, where lawful to do so (such as for archiving, scientific or market research purposes) or when legally obliged to do so (such as reporting information for Celgene's risk management and drug safety obligations).

Legal Basis of Processing

We may process information based on one or more of the following legal bases:

- You have provided **consent** (in such cases, consent can be withdrawn at any time);
- It is necessary to comply with our **contractual obligations** with you;
- Where required for **vital interests** of any individual;
- The processing is necessary for our compliance with a **statutory or legal obligation**;

- in certain circumstances the processing information is necessary for Celgene's or a third party's **legitimate interest** – for example, we process information for scientific and statistical research purposes, for drug safety and risk management purposes, to conduct business relationships and operations including strategy and marketing activities.

The processing of information for scientific research purposes is considered to be compatible with the initial purposes for which information was initially collected.

Please note that where you have a contract with us, or where information is required under statute if the requested information is not provided, we may be unable to fulfil our obligations to you, or fulfil regulatory reporting obligations (e.g. where HCPs provide adverse event information).

Special Categories of Data

In addition to the above, where we process **special categories of personal data** of individuals in specified jurisdictions – for example, information about individuals' health – we shall only do so in accordance with the obligations of the law.

We rely on conditions including, but not limited to:

- where individuals provide **explicit consent** (e.g. accessibility information where you attend Celgene events);
- where required for rights and obligations related to **employment**;
- or processing is necessary for the purposes of **provision of healthcare or occupational medicine**; and

necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices.

5. WHERE WE PROCESS YOUR INFORMATION

We have headquarters in the United States, with operations in Europe, Asia, North America and South America. Information about individuals may be accessible to our headquarters in the United States, and to some of our affiliates, and selected vendors and partners, globally. Where we process information in countries that may not provide the same level of protection as an individual's own country, we will implement reasonable and appropriate legal and security measures to protect your information from unauthorized access, use or disclosure including, but not limited to, maintaining binding contracts that require appropriate protection of information about individuals.

For residents of EEA: whenever we transfer your information outside of the EEA or Switzerland, we will take necessary steps to ensure that adequate safeguards are put in place to protect your information. Such safeguards include the use of European Commission approved standard contractual clauses

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We disclose individual information where this is reasonably required to pursue our legitimate business aims and as required by law. Information will be disclosed only in accordance with applicable laws, and appropriate safeguards will be established, where possible, to protect your information. We may disclose information within Celgene Corporation and our worldwide affiliates.

In order to conduct our business, we may also disclose information to third parties such as public/regulatory authorities/governmental bodies (government, including social and benefits departments), third parties that provide services to us (such as conducting audits, IT services, assisting in our clinical trials and studies or health care compliance activities), business partners and collaborators (such as external scientists).

If Celgene or substantially all of our assets are acquired by a third party, personal information held by us about individuals will be included as transferred assets.

We may also disclose information to enforce any agreements we have with you or to protect our rights or the rights, property or safety of our employees, patients or others (e.g. visitors to Celgene premises).

7. CLASSIFICATION, AUTOMATED DECISION MAKING AND YOUR RIGHTS

Your personal data may be combined with other information we may already have about you or obtained through public means such as scientific and medical publications, national registries and the Internet. We may also carry out internal assessments, evaluations, classifications or ratings of your activities, and/or your site's performance (where applicable).

Celgene uses an algorithm to tier HCPs according to their research activity (including publications) and skills (such as years of experience and qualifications). Applicable rates for speaking and event participation are set according to the tiering of HCPs.

Any final decision is taken by an individual

8. INDIVIDUAL CHOICES: RIGHTS AND ACCESS TO INFORMATION

Access, Revision and Deletion

Under applicable privacy law, you may have a right to request a copy of your information held by us. You may also have the right to revise, correct, or delete such information. Your rights to this information may be subject to limited legal and regulatory restrictions. Please refer to the "[Contact Us](#)" page.

Choices about Marketing

You may have the right to object to information being used for the purposes of direct marketing and sending scientific information and newsletters. Where this right applies,

please use “opt-out” or “unsubscribe” functionality in communications. If you have registered online or through any of our resources and have a user account, you can update your information and preferences here. Please refer to the “[Contact Us](#)” page.

Objection to Processing and Additional Rights

Under applicable privacy law, where we rely on legitimate interests or public interest to process your information, and where we conduct direct marketing, you can formally object to processing of your information for these purposes. You should clearly state “objection to processing” when contacting us to exercise your right to objection.

In certain circumstances, you have the additional rights to restrict aspects of the processing of your information or ask for a copy of your data to be provided to you, or a third party, in a digital format.

Please refer to the “[Contact Us](#)” page.

Lodging a Complaint with Data Protection Authorities

You may have the right to lodge a complaint directly with the relevant data protection authority or supervisory authority if you believe that we have processed information in a manner that is unlawful or breaches your rights under applicable data privacy law.

Without limiting any rights to complain directly to an authority, we are committed to protecting personal information, and complaints may be made directly with us, please refer to the “[Contact Us](#)” page of this privacy notice.

9. HOW LONG WE RETAIN YOUR INFORMATION

We aim to retain your information for no longer than is necessary for the specific business purpose or purposes for which it was collected. Information may be retained for a longer duration where applicable laws or regulations require, or allow us to do so.

10. PROTECTION OF INFORMATION - SECURITY

We use appropriate technical and organizational measures to protect information. When handling the information of HCPs, we take reasonable steps to protect it from loss, misuse, unauthorized access, disclosure, alteration or destruction.

11. CHANGES TO PRIVACY NOTICE

We may update this notice from time to time by posting any revisions on www.celgene.com/celgene-privacy-policy/health-care-professionals-privacy-notice. Where any material revisions are made, we may directly notify individuals when legally required to do so, or may place a prominent notice on www.celgene.com/celgene-privacy-policy. Please regularly refer to this page for updates.

12. CONTACT US

For HCPs in European Economic Area/Switzerland, Asia, Middle East, Africa: If you have any questions about this privacy notice, or to obtain more information about

Celgene's privacy practices, you can contact the European Data Protection Officer by completing the [Privacy Contact Us](#) or by postal mail at:

European Data Protection Officer
Route de Perreux 1,
2017 Boudry,
Switzerland

For HCPs in the USA or Canada, you can contact the Celgene's Chief Privacy Officer, by completing the [Privacy Contact Us](#) or by postal mail at:

Chief Privacy Officer
86 Morris Avenue
Summit, NJ 07901
United States

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