Novartis - privacy statement for medical study staff [1]

When you participate as a staff member to a clinical trial, Sandoz NV/SA, Medialaan 40, 1800 Vilvoorde ("**Sandoz**") processes personal data about you in compliance with the EU General Data Protection Regulation 2016/679 ("**GDPR**"). This data includes your contact information / CV-résumé details / details on your involvement in the clinical trial / site training records / information and outcome of the clinical trial / financial interests. Your personal data is processed as it is necessary to conduct and evaluate the clinical trial / to meet regulatory and legal requirements / to post on publicly accessible registries and / for site relationship management activities.

Such processing is based on a legal ground foreseen in the GDPR, i.e. Sandoz legal obligations and its legitimate interest to conduct clinical trials and develop new medicines and therapies, such interest not being outweighed by your interests, fundamental rights and freedoms. Novartis may transfer or give access to your personal data to: its personnel (including in other companies of the Novartis group) / independent agents or brokers / suppliers and (IT) services providers / business partners / third parties to whom Sandoz assigns or novates any of its rights or obligations / advisors and external lawyers.

Your personal data can also be processed, accessed or stored in a country outside the European Economic Area (EEA) which may not offer the same level of data protection as the EEA. For intra-group transfers outside the EEA, the Novartis group (to which Sandoz belongs) has adopted Binding Corporate Rules (i.e. a system of principles, rules and tools to ensure an adequate level of data protection, accessible by clicking here [2]). For external transfers outside the EEA, we protect your personal data by only transferring it on the basis of standard contractual clauses approved by the European Commission. You have the right to obtain a copy thereof by exercising your rights as set out below. All recipients are legally or contractually obliged to protect the confidentiality and security of your personal data.

Your personal data collected as part of a clinical trial data will be retained for 20 years as of the end of the trial.

You can exercise your right of access and correction of your personal data as well as, under certain circumstances, your right to object or restrict its processing and you right to request erasure and data portability. You always have the right to file a complaint with the competent supervisory authority.

If you have any question or want to exercise any of the above rights, please address your request to our data protection officer by post at Sandoz NV/SA, Medialaan 40, 1800 Vilvoorde or send an e-mail to privacy.belgium@novartis.com [3].

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