

## Privacy Policy

### Website Privacy Policy

Effective: August 31, 2018

This Privacy Statement describes the ways in which Novartis Pharmaceuticals Canada Inc. collects, holds, uses and shares information about individuals who visit this website as well as general information on the collection, use and disclosure of Personal Information in the context of our online activities. In this Privacy Policy, "Novartis", "we" or "us" refers to such Novartis Pharmaceuticals Canada Inc.

We invite you to carefully read this Privacy Policy, which sets out in which context we are processing your Personal Information and explains your rights and our obligations when doing so. The term "Personal Information" as used in this Privacy Policy refers to information that can be used to identify you as an individual, including for example your name, birth date, e-mail address, mailing address, or telephone number.

Please note that we may periodically change, modify, add, remove or otherwise update this privacy policy from time to time by posting a new privacy policy on this website.

#### **Accordion:**

What Personal Information do we process and for which purposes?

Most of our services do not require any form of registration, allowing you to visit our site without telling us who you are. However, some services may require you to provide us with Personal Information, which may include your direct identifiers, such as name, birth date, email address or telephone number. We may collect and use Personal Information to provide you with products or services, to bill you for products and services you request, to market products and services which we think may be of interest to you, or to communicate with you for other purposes which are evident from the circumstances or about which we inform you when we collect Personal Information from you.

Personal Information used for website usage analytics:

We may collect and process information about your visit to this website, such as the pages you visit, the website you came from and some of the searches you perform. Such information is used by us to help improve the contents of the site and to compile aggregate statistics using

our site for internal, market research purposes. In doing this, we may install "cookies" that collect the domain name of the user, your internet service provider, your operating system, and the date and time of access. A "cookie" is a small piece of information, which is sent to your browser and stored on your computer's hard drive. Cookies do not damage your computer. You can set your browser to notify you when you receive a "cookie", this will enable you to decide if you want to accept it or not. , however, if you do not accept, you may not be able to use all functionalities of your browser software. We may also use external service providers to help us collect and process the information described in this section.

Occasionally, we may use internet tags (also known as action tags, single-pixel GIFs, clear GIFs, invisible GIFs and 1-by-1 GIFs) and cookies at this site and may deploy these tags/cookies through a third-party advertising partner or a web analytical service partner which may be located and store the respective information (including your IP-address) in a foreign country. These tags/cookies are placed on both online advertisements that bring users to this site and on different pages of this site. We use this technology to measure the visitors' responses to our sites and the effectiveness of our advertising campaigns (including how many times a page is opened and which information is consulted) as well as to evaluate your use of this website. The third-party partner or the web analytical service partner may be able to collect data about visitors to our and other sites because of these internet tags/cookies, may compose reports regarding the website's activity for us and may provide further services which are related to the use of the website and the internet. They may provide such information to other parties if there is a legal requirement that they do so, or if they hire the other parties to process information on their behalf. If you would like more information about web tags and cookies associated with on-line advertising or to opt-out of third-party collection of this information, please visit the Network Advertising Initiative website <http://www.networkadvertising.org> [1]

We use Google Analytics to rationalize our portfolio of websites by (i) optimizing traffic to and between corporate websites, and (ii) integrating and optimizing web pages where appropriate. "Google Analytics" is a service offered by Google Inc. ("Google") that generates detailed statistics about a website's traffic and traffic sources and measures conversions and sales. Google Analytics uses "cookies" stored on your computer to help analyze how users use our website. The information generated by the cookies about your use of our website, including your IP address, will be anonymized by use of the appropriate settings prior to be transmitted to Google servers in the United States. For more information on how IP anonymization works, please see <https://support.google.com/analytics/answer/2763052>. [2]

You may prevent or stop the installation and storage of cookies by you browser settings by downloading and installing the free Opt-out Browser Add-on available at <https://tools.google.com/dlpage/gaoptout?hl=en> [3]. If you do not accept cookies, you may not be able to fully experience all functions of our website.

Google may transfer this information to third parties if required to do so by law or if a third party processes the information on Google's behalf.

By using our website, you consent to the processing of any Personal Information that Google collects about you in the manner and for the purposes described above

Who

We will not sell, share, or otherwise distribute your Personal Information to third parties except as provided in this Privacy Policy. We may share your Personal Information with other Novartis affiliates worldwide. Personal Information may also be transferred to third parties who act for or on our behalf, for further processing in accordance with the purpose(s) for which the Personal Information were originally collected or may otherwise be lawfully processed, such as services delivery, evaluating the usefulness of this website, marketing, data management, or technical support.

These third parties have contracted with us to only use Personal Information for the agreed upon purpose, and not to sell your Personal Information to third parties, and not to disclose it to third parties except as may be permitted by us, as required by law, or as stated in this Privacy Policy.

Personal Information collected from you may also be transferred to a third party in the event that the business of this site or a part of it and the customer data connected with it is sold, assigned or transferred, in which case we would require the buyer, assignee or transferee to treat Personal Information in accordance with this Privacy Policy.

Also, Personal Information may be disclosed to a third party if we are required to do so because of an applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding here or abroad.

The Personal Information we collect from you may also be processed, accessed, or stored in countries outside Canada. Such countries may offer a different level of protection of Personal Information. If we transfer your Personal Information to external companies in other jurisdictions, we will make sure to protect your Personal Information by applying the level of protection required under applicable data privacy laws.

For intra-group transfers of Personal Information, Novartis has adopted Binding Corporate Rules, a system of principles, rules, and tools, provided by European law, that ensures effective levels of data protection relating to transfers of Personal Information outside the EEA and Switzerland. Read more about the [Novartis Binding Corporate Rules](#).

#### How do we protect your Personal Information?

To ensure the security and confidentiality of Personal Information that we collect online, we use data networks protected, inter alia, by industry standard firewall and password protection. In the course of handling your Personal Information, we take measures reasonably designed to protect that information from loss, misuse, unauthorized access, disclosure, alteration or destruction and against other unlawful forms of processing.

#### How long do we store Personal Information?

We will only retain your Personal Information for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

### What are your rights and how can you exercise them?

Whenever we process Personal Information, we take reasonable steps to ensure that your Personal Information is kept accurate and up-to date for the purposes for which it was collected. We will provide you with the ability to exercise the following rights under the conditions and within the limits set forth in the law:

If you wish to contact us regarding the use of your Personal Information, please email us at [privacy.pharmacanada@novartis.com](mailto:privacy.pharmacanada@novartis.com) <sup>[4]</sup> or reach out to us at the contact information stated in the Contact us section below. If you have provided consent, you may wish to withdraw consent. You may request to access your Personal Information as processed by us, or ask for correction, where applicable.

By contacting us, please note the name of the website related to your request, your relationship and/or interactions with us (as applicable), as well as the specifics of the information you would like us to provide.

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.

Any request to delete Personal Information will be subject to the ethical and legal obligations to which we are bound with respect to document reporting, storage and retention. We may take reasonable steps to verify your identity before giving you access to your Personal Information or making corrections thereto.

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### Communiquiez avec nous

If you wish to contact us regarding our use of your Personal Information or you wish to exercise your data privacy rights, please email us at [privacy.pharmacanada@novartis.com](mailto:privacy.pharmacanada@novartis.com) <sup>[5]</sup> or at 385 Bouchard Boulevard, Dorval, Quebec, H9S 1A9. If you contact us, please include the following information in your email, so that we may efficiently respond to your request and so that we may identify you and the subject of your request:

- the name of the website your inquiry is referring to;
- your relationship and/or interactions with us (as applicable); and
- the specifics of the information you would like us to provide or you want us

to take action upon.

[Read more](#) <sup>[6]</sup>

## Binding Corporate Rules ("BCR")

Binding Corporate Rules, so called "BCR", are the system of privacy principles, rules and tools based on European Law that govern data privacy at Novartis. BCR represent today's best practice to meet the European Economic Area's ("EEA") data protection requirements for the transfer of Personal Information within a Group of companies.

To be legally effective, the BCR have to be approved by EEA Data Protection Agencies. You may find more information on BCR on the official European site.

## Utilisation des cookies <sup>[7]</sup>

### **Accordion:**

What is a cookie?

Cookies are small text files that are sent to your computer when you visit a website. Cookies on Novartis Group company (Novartis) web sites do lots of different jobs, like letting you navigate between pages efficiently, storing your preferences and generally improving your experience of a website.

The EU Directive 2009/136/EC states that we can store cookies on your machine, if they are essential to the operation of this site, but that for all others we need your permission to do so.

Novartis sites can use some non-essential cookies. We do not do this to track individual users or to identify them, but to gain useful knowledge about how the sites are used so that we can keep improving them for our users. Without the knowledge we gain from the systems that use these cookies we would

not be able to provide the service we do.

### The types of cookies we use

If you decide to set the language, font-size or specific version of the site (e.g. high-contrast), we use “user interface customization cookies”. Once set, you do not need to specify your preferences again on another visit to the site.

If you use parts of the site that require registration to access content, we will place an “authentication cookie” on your computer. This allows you to leave and return to these parts of the site without re-authenticating yourself.

If you have Adobe Flash installed on your computer (most computers do) and you use video players, we store a “flash cookie” on your computer. These cookies are used to store data needed to play back video or audio content and store the user’s preferences.

Novartis likes to understand how visitors use our websites by using web analytics services. They count the number of visitors and tell us things about the visitors’ behaviour overall – such as identifying the search engine keywords that lead the user to the site, the typical length of stay on the site or the average number of pages a user views. For this purpose we place a “first party analytics cookie” on your computer.

We may also use services such as Google Analytics to track web statistics. In this case, Google will place a “3rd party cookie” on your computer. This is also the case when we use Google Maps.

Any data collected by using these cookies will be stored and managed by Novartis or one of its trusted affiliates in countries Novartis operates in.

For more information or how to contact Novartis, please refer to the [Novartis Data Privacy Policy](#) [8].

### How to control cookies

If you don't want to receive cookies, you can modify your browser so that it notifies you when cookies are sent to it or you can refuse cookies altogether. You can also delete cookies that have already been set.

If you wish to restrict or block web browser cookies which are set on your device then you can do this through your browser settings; the Help function within your browser should tell you how. Alternatively, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org) [9], which contains comprehensive information on how to do this on a wide variety of desktop browsers.

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Twitter Tweet Facebook Share [Share](#) [10]  
Twitter Facebook LinkedIn Email

[Read more](#) [11]

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**Source URL:** <https://www.novartis.ca/en/privacy-policy>

#### Links

[1] <https://www.networkadvertising.org>

[2] <https://support.google.com/analytics/answer/2763052>

[3] https://tools.google.com/dlpage/gaoptout?hl=en&lt;/"

[4] <https://www.novartis.ca/en/privacy.pharmacanada%40novartis.com%E2%80%9D>

[5] <https://www.novartis.ca/en/privacy-policy>

[6] <https://www.novartis.ca/en/content/communiquez-avec-nous>

[7] <https://www.novartis.ca/en/utilisation-des-cookies>

[8] <https://www.novartis.com/privacy-policy>

[9] <http://www.aboutcookies.org/>

[10] <https://www.novartis.ca/en/javascript%3Avoid%280%29>

[11] <https://www.novartis.ca/en/content/binding-corporate-rules-bcr>