

PRIVACY POLICY

1 INTRODUCTION

- 1.1 This Privacy Policy describes how Actelion Pharmaceuticals Australia Pty Limited ABN 32 097 278 512 (**Actelion, we or us**) treats personal information collected by us. This Privacy Policy explains how and why we collect personal information, how we use or disclose it and what controls you have over our use or disclosure of it.
- 1.2 We are bound by the requirements of the Privacy Act 1988 (Cth) (**Act**), and are committed to complying with that Act including the Australian Privacy Principles (**APPs**).
- 1.3 This Privacy Policy uses the definition of personal information which is provided in the Act.

2 COLLECTION OF INFORMATION

- 2.1 We will only collect personal information that is reasonably necessary for the performance of our functions and activities.

2.2 **Kinds of information collected and held by us**

- (a) The kinds of personal information that we collect include an individual's name, contact details, date of birth, occupation, healthcare speciality, employment history, educational qualifications, government related identifiers such as tax file numbers, as well as other information that is relevant to our functions or activities.
- (b) In some cases we will remove information that can identify an individual and maintain it in a de-identified manner.
- (c) Sensitive information, which includes health information, will only be collected by us about you with your consent or if otherwise permitted by the Act. Such information would be collected in specific circumstances, such as when a patient is involved in a clinical drug trial of our products or when adverse event reports are submitted to us.
- (d) We generally collect your personal information directly from you, except to the extent it is unreasonable or impracticable to do so, in which case personal information about you may be collected from third parties, such as recruitment agencies if you are a prospective employee or contractor or from health professionals for patients.

2.3 **How do we collect personal information?**

We collect personal information in a number of ways when you communicate with us including when:

- (a) health professionals and patients make enquiries regarding our products or a disease;

- (b) health professionals submit their contact details for inclusion on our mailing list for newsletters, product information, clinical papers, training or education sessions or other materials;
- (c) health professionals undertake training and accreditation in our products and drug administration;
- (d) individuals request information from us in relation to our products and services;
- (e) health professionals submit adverse event reports to us;
- (f) individuals register for or attend one of our events;
- (g) individuals complete a survey or participate in a competition or promotion;
- (h) individuals use our website or submit information via our website;
- (i) health professionals or other individuals are involved in clinical drug trials of our products;
- (j) individuals provide feedback to us regarding our products or services or contact us for any other reason including to make a complaint;
- (k) individuals apply for prospective employment or contracting opportunities with us; or
- (l) patients participate in our patient support or drug access programs.

2.4 What happens if you do not provide personal information to us?

If we are unable to collect all of the personal information we request, we may not be able to provide you with the relevant services, products or assistance you require.

3 USE OF INFORMATION COLLECTED AND DISCLOSURE OF PERSONAL INFORMATION TO OTHERS

3.1 We collect, use, hold and disclose your personal information for the primary purpose for which it is collected.

3.2 These purposes include to:

- (a) provide information to individuals about our products and/or services, disease management and patient treatment;
- (b) provide training and certification on drug administration;
- (c) provide information about medical education events;
- (d) conduct relevant market research;
- (e) fulfil our regulatory or legal obligations, including in respect of adverse event reporting;
- (f) monitor safety and efficacy of our products;
- (g) control distribution of our products;

- (h) provide government agencies with information reasonably required for purposes of reimbursement under the Pharmaceutical Benefits Scheme; or
 - (i) fulfil specific individual requests.
- 3.3 We may also use such information for a purpose related to the primary purpose of collection (or in the case of sensitive information, directly related to the primary purpose of collection) and where you would reasonably expect us to use or disclose the personal information in such a way.
- 3.4 We may disclose personal information collected to third parties such as:
 - (a) our related companies;
 - (b) third party contractors and providers of goods and services, such as website developers, marketing and promotion companies, training agencies and business support service providers;
 - (c) professional service firms providing services to us, such as legal or accountancy firms;
 - (d) health professionals treating specific patients, for instance where a patient and health professional are participating in a clinical drug trial of one of our products;
 - (e) regulatory or government agencies;
 - (f) market research firms who undertake customer or product surveys on our behalf.
- 3.5 In addition, we may use or disclose personal information held about you:
 - (a) where you have consented to the use or disclosure; or
 - (b) otherwise as specifically provided for by the APPs or as otherwise permitted by law.
- 3.6 **Overseas disclosure of personal information**
 - (a) We may disclose personal information we have collected about you to a recipient overseas. Such recipients are likely to be located in Switzerland.
 - (b) We may store personal information on web-based database systems or servers located outside Australia and/or managed by third parties. We may also disclose personal information to Actelion Pharmaceuticals Ltd, located in Switzerland, for the purpose of secure retention of information related to adverse reactions. This information may be provided to other countries in order to support drug safety. Where possible this information will be de-identified.
 - (c) To the extent it is required to do so by the APPs, we will take reasonable steps to ensure that any overseas recipient of personal information does not breach the APPs.

4 DEALING WITH US ANONYMOUSLY OR USING A PSEUDONYM

- 4.1 You may deal with us on an anonymous basis or by using a pseudonym when making inquiries through our websites, or when you make general inquiries by telephone and do not require a further response from us. However, we may need certain contact details from you to respond to inquiries.
- 4.2 Generally, we will require your personal information in order to correspond with you.

5 SECURITY AND STORAGE

- 5.1 We use industry-standard methods and take such steps as are reasonable to protect your personal information from unauthorised access, modification or disclosure and from misuse, interference and loss.
- 5.2 Among other techniques, we usually:
- (a) store such information on a computer behind our "firewall" in a secure location; and
 - (b) restrict the number of employees internally who can access such data.
- 5.3 We take such steps as are reasonable in the circumstances to de-identify or securely destroy personal information when it is no longer required.

6 ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

- 6.1 We try to maintain accurate, up to date, complete and relevant personal information we hold.
- 6.2 If you wish to access or correct your personal information which is held by us, please contact our Privacy Officer, whose details set out below.
- 6.3 If your request for access or correction is in accordance with the APPs, then we will give you access to that information or make the requested correction.
- 6.4 If we do not agree to provide you with access to your personal information or to amend or annotate the information we hold about you, we will provide reasons for such refusal and you may seek a review of our decision
- 6.5 If we do not agree to make the requested changes to your personal information, you may make a statement about the requested changes and we will attach it to your record.

7 UNSUBSCRIBING FROM OUR MARKETING MATERIALS

7.1 Unsubscribing from email lists

Every time we send emails for marketing or promotional purposes, such emails will contain instructions on how you may unsubscribe from the relevant email list in respect of direct marketing.

7.2 Unsubscribing from hard copy promotional materials

When we send you hard copy promotional materials, such materials will include instructions on how you may unsubscribe from receiving such materials.

8 COMPLAINTS

- 8.1 You may make a complaint about an alleged breach by us of the APPs in relation to our handling of your personal information. The complaint should be in writing and provided to our Privacy Officer, whose details are set out below.
- 8.2 Where possible, the complaint should include the following information about the alleged breach:
- (a) what happened;
 - (b) when it happened;
 - (c) what personal information was affected;
 - (d) when you found out about it;
 - (e) the names of individuals involved (if known);
 - (f) details of any action already taken by us to address the complaint.
- 8.3 We will try to respond to a complaint within 30 days of its receipt of the complaint.
- 8.4 If you are not satisfied with our response to a complaint, you may lodge a complaint with the Office of the Australian Information Commissioner. The OAIC's contact details are [here](#).

9 COOKIES

- 9.1 Our websites only use cookies that collect general statistical information (eg number of website hits) and no personal information is collected by the cookies that are used on the site.
- 9.2 A "cookie" is a small amount of information which is transferred to the hard drive of your computer and which can identify your web browser, but not you. If you want, you can disable your web browser from accepting cookies. If you do so, you can still access our website, but not all services may be available.

10 AMENDMENTS TO THIS POLICY

We may amend this Privacy Policy at any time. Amendments to this Privacy Policy will be posted on our website and will be effective when posted. Please check our Privacy Policy regularly for updates and amendments.

11 HOW TO CONTACT US

For questions about our Privacy Policy, to access personal information held by us, request correction of such personal information or to make a complaint or inquiry, please contact our Privacy Officer at:

Email: privacyofficer.au@actelion.com
Address: Privacy Officer
Actelion Pharmaceuticals Australia Pty Limited
PO Box 372
Frenchs Forest NSW 1640
Ph: (02) 9486 4600

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