

Privacy Notification

H. Lundbeck A/S (“Lundbeck” or “we”) will, as a pharmaceutical company, process personal data about you in your capacity as a health care professional or if you register to participate in a Lundbeck event. Lundbeck will process your personal data according to applicable legislation, including the EU General Data Protection Regulation (“**GDPR**”) as Lundbeck is located in Denmark.

What categories of personal data are we processing and for what purposes?

The following types of personal data may be processed:

- Name
- Preferred salutation
- Contact information (email, mail, delivery address, country, telephone number)
- Password (if you log into one of our HCP dedicated websites)
- Primary organization and workplace
- Degrees, Curriculum Vitae (CV), area of specialty and/or other professional information
- Medical licence number (if relevant)
- Information regarding transfer of value related to you as a health care professional, including services and fee

We process your personal data for one or more of the following purposes:

- Ensure the conduct and facilitation of Investigator Initiate Trials (IITs) or for Educational Grants
- Provide you access to educational material, e.g. when you log into one of our websites dedicated to provide you with relevant information
- Ensure collaboration for professional purposes with you in your capacity as an expert.
- To contact you regarding services or other deliverables you have requested (e.g. receiving newsletters)
- Carry out surveys about how to improve our services towards you and/or patients
- Respond to requests or questions specifically asked by you
- Enforce an agreement between you and Lundbeck
- Comply with national laws and/or pharmaceutical industry standards requiring Lundbeck to
 - accommodate inspections by national or regional health authorities
 - publicly disclose transfers of value made to or for the benefit of an individual healthcare professional, healthcare organisations, patient organisations, etc.

How did we obtain your personal data?

Depending on your relationship with Lundbeck and the context of our collaboration, your personal data is collected:

- Directly from you as, e.g. while registering to the Lundbeck Contribution Portal, registering yourself on a Lundbeck website or if you contact us;
- Via segmentation of public available information about HCP experts within Lundbeck field of products and research areas; and/or
- Obtained by a local Lundbeck affiliate.

If we collaborate, it might be necessary that we obtain certain personal data from you. However, when you contact us directly, you provide the personal data on a voluntary basis.

What is the legal basis for our processing of your personal data?

The legal bases for our collection and processing of your personal data as set out above are (depending on the circumstances):

- GDPR Article 6 (1) (f) (“the balancing of interest test”). It is Lundbeck’s assessment that the processing of your personal data is necessary to enable us to potentially offer contributions such as support for independent research initiatives and educational grants and/or to be able to provide you with our services.
- GDPR Article 6 (1) (c) processing is necessary to comply with a legal obligation to which Lundbeck is subject.
- GDPR Article 6 (1) (b) processing is necessary for the performance of a contract.
- GDPR Article 6 (1) (a) if you have provided us with your consent.

Will we disclose your personal data to third parties?

To accommodate inspection requests and to continuously ensure the high standards of quality and the safety of Lundbeck’s products, we may disclose and share your personal data with the following recipients:

- Relevant local or regional health authorities (globally); and/or
- Other entities in the Lundbeck group (only if relevant).

The disclosure to third parties is done in accordance with the legal bases listed above – i.e. Article 111 of Directive 2001/83/EC on the Community code relating to medicinal product for human use, cf. GDPR Article 6 (1) (c), or local legislation, as applicable.

Will we disclose your personal data to data processors?

Lundbeck will disclose your personal data to our IT providers and vendors. All data processors will process your personal data on our behalf and in strict accordance with our instructions. Such processing is subject to the provision of sufficient guarantees by the data processor to implement appropriate technical and organisational measures to ensure the protection of your rights as a data subject.

Will we transfer your personal data to recipients in countries outside the EU/EEA?

In order to comply with applicable legislation, we may transfer your personal data to relevant health authorities, including outside the EU/EEA. The legal basis for such transfer is GDPR Article 49 (1) (d), as the transfer is deemed necessary for important reasons of public interest (public health).

If your personal data is transferred to other entities in the Lundbeck group, the transfer will be based on the Lundbeck Intra-Group Data Protection Agreement or the Lundbeck Binding Corporate Rules (once approved and implemented). When the data is processed by our IT providers and vendors, this transfer will rely on the [EU Standard Contractual Clauses](#) unless transfer is made to a country which the EU Commission has assessed to ensure an [adequate level of data protection](#). More information regarding this can be obtained by contacting your local Lundbeck company or Lundbeck’s Group Data Protection Officer (dataprivacy@lundbeck.com).

How long will we store your personal data?

We store your personal data for as long as necessary to fulfil the purposes described above, however, for no longer than seven (7) years plus the time period of our active engagement, if any. For data we process solely for disclosure purposes, we will delete your data five (5) years after

disclosure. For supported IITs, for compliance reasons Lundbeck retains relevant documents (e.g. IMP documentation and contracts) that may contain personal data, as long as the Lundbeck product related to the IIT in question is on the market.

Your rights

Subject to certain exceptions and restrictions set out in applicable legislation, you enjoy the right to request access to your personal data, to have your personal data rectified, to have your personal data deleted, to have the processing thereof restricted and right to data portability. If we base the processing of your data on your consent you can always withdraw by contacting Lundbeck via dataprivacy@Lundbeck.com.

Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on legitimate interests as legal basis for the processing (as set out in article 6(1)(f) of the GDPR) including profiling and direct marketing based on this provision. If you are not satisfied with Lundbeck's handling of your request, you have the right to lodge a complaint with the competent supervisory authority, e.g. the Danish Data Protection Agency (Datatilsynet) or the national supervisory authority in your EU country, as applicable. A list of all EU authorities is available [here](#).

Contact details of Lundbeck and Lundbeck's Group Data Protection Officer

Should you have any questions regarding the protection of your personal data, or if you wish to exercise your rights, please contact H. Lundbeck A/S or Lundbeck's Group Data Protection Officer (DPO) by using the below contact details:

H. Lundbeck A/S

Ottiliavej 9
2500 Valby
Denmark
Phone no.: +45 3630 1311

Lundbeck's Group Data Protection Officer (DPO):

E-mail: dataprivacy@lundbeck.com