

## ALEXION DATA PRIVACY COMMITMENT TO HEALTH CARE PROFESSIONALS

At Alexion, our mission is to provide hope to patients and families affected by rare diseases. As stewards of data about these patients and the health care professionals who treat them, we believe that respecting and protecting that data is a key part of delivering lifesaving medications. We are committed to handling personal data fairly and transparently in support of our mission and in accordance with the laws and regulations that govern data protection and privacy.

Alexion Pharmaceuticals, Inc., 121 Seaport Blvd, Boston, MA 02210, USA and Alexion Pharma International Operations, Ireland as data controllers, and our Astra Zeneca and Alexion affiliates (“Alexion”, “we”) are providing this statement of our privacy and data protection practices to inform you of the reasons that we collect data about health care professionals like you and how we will respect your rights. Alexion is asking you to provide your consent so that we may collect, store, process and use certain information about you.

### **How We Collect Personal Data and How We Use It and What Legal Basis on which we rely**

#### *Customer relationship management based on Legitimate Interest*

We collect data about you both through interactions we have with you as well as from third party professional sources. We use that data, based upon our legitimate interest, to understand your medical preferences, priorities and needs:

- **Communications:** to deliver information about our areas of expertise, our products and the rare diseases for which they are indicated;
- **Insights:** to improve the effectiveness of the promotional, scientific and educational information we provide; to maintain and record our relationship with you;
- **Engagement:** to contact you to arrange visits or to invite you to meetings or events or to engage in market research and to remember how and when we have interacted with you;

We receive information about you such as (first name, middle name, surname, gender, academic title, specialty, work address, phone number work language, type of your practice, your position) (“**your Personal Data**”) from a trusted Third Party that provides industry recognized lists of healthcare professionals. If you attend scientific or educational meetings, conference and workshops we sponsor, we also receive information regarding your attendance from the organizations that conduct those events.

#### *Analysis and profiling based on Legitimate Interest*

We rely on our legitimate interest to better understand the needs of the medical communities we aim to serve; we may analyze information about our interactions, events and activities with you and other health care professionals and store that information in a way that help us improve how we provide information and engage specifically with you. This may include understanding of your diagnosis and treatment approaches and how they correspond to Alexion products and the diseases for which they are indicated for the purposes of a better and more accurate diagnose, treatment and patients referral.

Our goal is to support a true Omnichannel approach, in order to better know our HCPs, and make them better informed about diseases and products. For this purpose, we need to be able to collect and

leverage information about you and other HCPs and propose initiatives that better support the “Customer Journey”.

We may apply some basic profiling on your data in order to better program our visits with you and other health care professionals and to better identify healthcare professionals with which Alexion may wish to collaborate.

We may apply some basic profiling in order to assess your specialties, as well as level of expertise and skills against public sources (such as publications and conferences) and your prior engagements with us.

As we are relying on our Legitimate Interest, we have carefully assessed the potential effects when analyzing and profiling healthcare professionals like you and concluded that there are neither significant nor legal effects or risks posed to you. Under certain circumstances, you may exercise your opposition rights by contacting Alexion at [privacy@alexion.com](mailto:privacy@alexion.com) or by using the contact section below.

We currently do not use any machine/computer/algorithm to provide such analysis or profiling. Your personal data will not be used to make decisions based solely on automated processing operations that will produce legal effects or otherwise will significantly affect you.

#### *Electronic messaging based on Consent as legal basis*

We respect your electronic communications privacy preferences, so we only send information about our products, webinars and scientific events and/or other scientific information to you via email, fax, SMS, WhatsApp or other forms of electronic messaging with your explicit consent. Unless we are required to inform you of certain safety information or contact you where an Alexion colleague is engaging in a direct electronic dialogue with you, or we are responding to an electronic messaging request from you.

- Electronic messaging:** I agree and consent that Alexion can send via email or other electronic messaging, such as SMS or fax, information about rare diseases, about approved products and services of Alexion, invitations to webinars, information about scientific events and/or other scientific information by Alexion and its affiliates, based on your needs.

#### **Personal Data Sharing, Further Processing Purposes**

Alexion will not disclose to third parties your Personal Data without adequate organizational and technical measures in place in order to protect your Personal Data. Third parties Alexion might work with are:

- Vendors and service providers who assist Alexion (e.g. for processing and mailing purposes, customer relationship management, i.e. your Personal Data will be shared back with vendors and service providers in order to improve the data quality, providing customer service, market research, sending marketing communications about approved products, services and offers);
- Third parties in connection with the sale, assignment or other transfer of the Alexion business;
- Third parties to respond to requests of government or law enforcement agencies or where required or permitted by applicable laws, court orders, or government regulations; or
- When needed for corporate audits or to investigate or respond to a complaint or security threat.

Any Astra Zeneca or Alexion affiliated entity, vendor or service provider, or other third party who has permitted access to or to whom we transfer Personal Data is required to keep it confidential

and secure, as well as to process it only for the purposes we have informed you of in this privacy statement or for which you have consented.

### **International Personal Data Transfer**

Alexion is an international organization with affiliates and subsidiaries worldwide. You can find the list of all our affiliates and subsidiaries [here](#). Some of these have their registered offices or are located in countries not providing for the same level of data protection as the country where you reside (including in other countries that do not provide for the same level of regulatory data protection). In order to protect your privacy, to the highest degree, where data are transferred by or on behalf of Alexion to other countries or organizations that have not been recognized as providing regulatory protection similar to your country, Alexion by means of Standard Contractual Clauses available [here](#) or as a party of Astra Zeneca's Binding Corporate Rules available [here](#), contractually obliges its international entities, affiliates and service providers to comply with the applicable data protection laws and principles. You can ask us a copy of our Standard Contractual Clauses or Binding Corporate Rules by contacting us at [privacy@alexion.com](mailto:privacy@alexion.com)

### **Your Rights**

You may contact us at any time to ask us what Personal Data we process about you, to correct inaccurate information, to access a list of providers and their data processing locations currently used by Alexion, or to raise other concerns about how we are handling Personal Data, to object to our data processing or to request deletion, restrictions or withdrawal of your explicit consent. You can also ask us to provide you with your data in a machine readable format for data portability purposes. We will honor your request in accordance with the applicable laws and regulations and in a manner consistent with Alexion's privacy commitment. In case of withdrawal, your Personal Data will be deleted from Alexion, and Alexion will ensure that this Personal Data is deleted from its associated service providers, unless the Personal Data cannot be deleted where we are required to retain it by applicable laws and regulations.

### **Contact us**

You may contact us through the following ways:

**By email:** [dataqueries@alexion.com](mailto:dataqueries@alexion.com)

AstraZeneca and Alexion have assigned a data protection officer responsible for overseeing compliance with EU and UK data protection laws, which you may contact at [privacy@alexion.com](mailto:privacy@alexion.com) or by mail at the Global Data Protection Officer, Astra Zeneca Middlewood Court, Silk Road, Macclesfield, Cheshire SK10 2NA.

Alexion Pharma GmbH,  
Neuhofstrasse 34,  
6340 Baar  
Switzerland

**By email:** [privacy@alexion.com](mailto:privacy@alexion.com)

You also have the right to lodge a complaint with the privacy or data protection regulator in your country of residence. To find your relevant data protection regulator please check [here](#).

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