

Canada Notice of Privacy Practices for HCPs

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.

Who is this notice intended for?

This privacy notice explains how Alexion Pharma Canada Corp. ("Alexion", "we," "us," "our") collects and uses personal data about healthcare professionals, such as nurses, physicians, and pharmacists, and other professionals with whom we wish to collaborate or who already work with us ("you", "your").

Personal data means any information which could reasonably be used to identify you either directly (e.g., your name) or indirectly (e.g., a unique ID number). It includes information about your professional activity.

This privacy notice is in line with our parent company, AstraZeneca's [Global Privacy Standard](#) and aims to comply with privacy and data protection laws around the world. If a particular jurisdiction requires us to collect or use your personal data differently, we will comply with applicable law.

From where do we collect personal data about you?

We collect personal data about you from a range of sources depending on the circumstances, including:

- *From you directly*, such as when you:
 - use our websites, attend a virtual event or webcast, or complete an online survey;
 - attend one of our live meetings, such as advisory boards, congresses, or conferences. 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;
 - create or maintain an account on one of our websites, platforms, applications, or systems;
 - register to receive promotional materials from us;
 - share adverse events or medical information enquiries with us (in the event you report an adverse event related to an AstraZeneca product, please review the [adverse event reporting notice](#) for your relevant country, to get further information on how we process your personal data in that context);
 - write to us or contact us with questions or comments;
- *Automatically from your device* when you use one of our platforms, websites, applications, or systems, or when you open an email from us for which we collect email open rate metrics;
- *From other sources* (where permitted by and in accordance with applicable law) including:
 - public sources such as official registers, hospital websites, healthcare provider directories and social media;
 - joint marketing partners or partners in joint scientific projects;

- third parties providing services to the healthcare sector, including third-party providers of demographic data and directories;
- patient organizations;
- from our affiliates;
- career social networking sites; and
- social media platforms when you publicly share opinions about Alexion or mention an Alexion product in a comment.

We may use artificial intelligence when processing your personal data. When artificial intelligence is used, we adhere to applicable laws, including obtaining and your consent to use artificial intelligence where required by applicable law.

You are free to choose not to provide us with your personal data when we ask for it. However, if you choose not to provide us with your personal data, it may limit or prevent us from assisting you, responding to your request(s), providing you with the services you have requested, or entering into a collaboration with you, among other things.

What Personal Data Do We Collect and for Which Purposes?

The following Personal Data may be used for all Processing Purposes listed below.

- Your name and business contact information (such as your email address, mailing address, telephone number(s), and/or other mobile messaging app IDs), gender, age, and preferred language.
- Professional information and experience, such as: information related to your medical specialty; qualifications, skills and areas of expertise; area(s) of interest or focus; and/or place of practice.
- Information about your experience with our products and services, including browsing history, your interactions and other network activity on our portals, websites, applications and social media platforms.

Additional categories of Personal Data are listed for each Processing Purpose as listed in the table below:

Processing Purpose	Additional Personal Data
Marketing & Promotional Communications	
To send you marketing and promotional information, including: <ul style="list-style-type: none"> • Providing you with information about our products, services, news, and the latest scientific developments. • Sending you invitations or offers to participate in scientific meetings, events such as congresses, symposiums, educational events and surveys. • To coordinate visits to your facility by our representatives, such as sales representatives, medical science liaisons, or other personnel that interact with you and to store information about interactions in order to remember how and when we have interacted with you. 	<ul style="list-style-type: none"> • Preferred method of communication with us.

Market Insights	
<p>To perform data analyses, market research and segmentation (including by producing metrics using mathematical or statistical procedures, artificial intelligence and/or machine learning) in combination with information from different sources, to understand and improve the effectiveness of the promotional, scientific and educational information we provide; to build profiles to predict your preferences, to identify which products, services, and offers may be relevant or of interest to you and to improve the quality of our visits to your facility, to establish fair market value rates and identify opportunities for scientific collaboration with you.</p>	<ul style="list-style-type: none"> • Your professional opinion about scientific and health-related topics. • Insights and information regarding our meetings, communications, visits, activities and events conducted with you and other health care professionals.
<p>To understand your expertise, your scientific interest concerning the treatment areas that Alexion is engaged with and your scientific information requests and needs concerning these areas in order to better understand the needs of the medical communities we aim to serve; to determine and to improve the opportunity and the methods for getting contact with you; to determine the main scope of our promotional activities and visits regarding our products and to determine how often and intensively conducting these events is appropriate; to arrange the field activities of the Alexion more effectively and to use the workforce of Alexion more effectively and efficiently.</p>	<ul style="list-style-type: none"> • Your professional opinion about scientific and health-related topics. • Insights and information regarding our meetings, communications, visits, activities and events conducted with you and other health care professionals.
<p>To improve the content and functionality of our products, services, and websites.</p>	<ul style="list-style-type: none"> • Technical information about devices from which you access Alexion websites and other services and network activity information, such as your IP address, device ID, hardware model and version, browser type and version, browsing history, search history, access time, pages viewed, physical location, and other standard server log information and online identifiers. Please consult the cookie notice (and/or cookie consent interface) on the Alexion website you are visiting for more information about the technical information we collect.
Collaborations	
<p>To identify and maintain information about professionals with whom we want to collaborate on scientific initiatives such as clinical trials, advisory boards, and educational activities.</p>	<ul style="list-style-type: none"> • Information about your publications, participation in meetings, seminars, advisory boards and conferences; information about your relationship with other institutions; and information about your participation in clinical trials and non-interventional studies. • Information about your engagements with us. • Information about your interest in our

<p>To confirm the existence or absence of conflicts of interest, establishing whether you hold relevant government or other positions, or have committed relevant violations of law impacting our ability to collaborate with you.</p>	<ul style="list-style-type: none"> products, services, and content. Your opinion about scientific and health-related topics, including where posted publicly on social media. Any personal data that is relevant to these purposes.
<p>To contact you regarding receiving your consultancy services on topics, to the extent permitted by the relevant regulations; to record your personal data on the databases used by us in order to communicate with you; and to store that information in order to remember how and when we have interacted with you.</p>	
<p>To perform contractual obligations owed to you and manage our contractual relationship with you, including payment of honoraria and taxes and management of your travel and accommodation arrangements, as well as to monitor compliance with our internal policies on engagements with healthcare professionals and experts, and for our own internal evaluation and business analytics purposes.</p>	<ul style="list-style-type: none"> Financial and travel-related identification information, such as your bank account number, credit/debit card numbers and other financial and compensation details. Your social insurance number, passport number, driving license number, tax identification number, and travel preferences.
<p>To publicly disclose transfers of value, such as consultancy fees, to you (as a healthcare professional) including submission of records about our collaboration with you to government authorities under applicable law.</p>	<ul style="list-style-type: none"> Documentation regarding payments, transfers of value or any other exchange of value or money in the course of your interaction with Alexion.
<p>To collect feedback, opinions and insights through photographs, voice/video recordings, and statements from you in connection with the services rendered by you to Alexion or in relation to an event held by us, including using artificial intelligence to record, transcribe, and summarize the interaction.</p> <p>We keep and make such information available for educational purposes for authorized personnel. Our practice is not to publish such recordings externally, but if we plan to do so, you will be clearly informed prior to any such recordings.</p>	<ul style="list-style-type: none"> Your likeness in images, video, and audio recordings from our virtual or live meetings and events that you attended or similar information made in relation to articles, publications, and trainings where we collaborated with you.
<p>Other</p> <p>To manage and maintain our network and information system security.</p> <p>To test and develop new IT systems and applications that we use to conduct and improve our business operations.</p>	<ul style="list-style-type: none"> Technical information about devices from which you access our websites and other services and network activity information, such as your IP address, device ID, hardware model and version, browser type and version, browsing history, search history, access time, pages viewed, physical location, and other standard server log information and online identifiers. Please consult the cookie notice (and/or cookie consent interface) on the website you are visiting for more information about the technical information we collect.

To comply with laws and regulations applicable to pharmaceutical companies with respect to their relationship with healthcare professionals and other experts and to provide regulatory authorities and other governmental entities with appropriate information related to your interaction with Alexion/Alexion products to the extent required by law, such as clinical trial records, pharmacovigilance information and other similar records.	• Potentially any of the information listed in this table.
To defend against potential or actual legal claims and manage security, risk and prevent crime.	
To support activities related to a sale, divestment, collaboration, or joint venture for all or part of our business.	

We may process your personal data for other purposes not listed above where such processing is at your direction or with your consent.

Transfer to Third Parties:

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 to whom Alexion might transfer your data are specified below:

- Vendors and service providers who assist Alexion's business processes (e.g. for processing and mailing purposes, customer relationship management) in order to improve the data quality, providing customer service, market research, sending marketing communications about approved products, services and offers);
- Affiliates with whom we may have a joint relationship with you;
- 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 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 notice or for which you have consented.

Transfers Abroad:

Within the framework of the purposes stated above, your personal data may be processed abroad, stored and transferred to:

- Companies located abroad that are part of the group of companies in which Alexion is included;
- Third party companies located abroad from which Alexion receives service/support/ counselling services;
- The countries where the online databases and the servers used by Alexion are located due to being involved in a global group of companies; and
- To other third parties at your direction or with your consent.

If your personal data is transferred by Alexion or on behalf of Alexion, to the countries where data protection laws may not provide the same level of protection as those in your country of residence or to the third parties or entities, in order to protect your privacy to the highest degree, Alexion provides that all necessary measures including imposing contractual requirements through the standard provisions (if applicable) accepted and attested by the regulatory authorities to its international entities, affiliates and service providers for complying with the applicable data protection laws and principles.

How long do we keep your personal data and how do we protect it?

We keep your personal data for as long as we need it for the purposes set out above, or where local law imposes a retention period, in accordance with such law. When your personal data is no longer needed for these purposes, it will be deleted.

We have implemented a variety of privacy and security policies, measures, and technologies to help protect your personal data from a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. In particular, Alexion has implemented physical security controls and developed and implemented robust data transmission and storage systems designed to ensure an appropriate level of security and protection of personal data.

We have a dedicated process for carefully selecting the service providers and partners we work with, which includes verifying that they have appropriate technical and organizational security measures in place to protect your personal data. We also confirm that these service providers and partners are able to comply with the obligations they have undertaken in the data processing and sharing agreements we sign with them.

We would like to remind you that under the PIPEDA, you are entitled to:

- Learn whether your personal data is processed or not, and to request information in that regard;
- Learn the purpose of the processing of your personal data and whether it is used in accordance with that purpose;
- Know the third parties who your personal data is transferred to;
- Request correction, in cases where your personal data is processed erroneously or deficiently, and when you enforce this right, to request the notification of the correction to third parties to whom your personal data is transferred; and
- Request destruction or deletion of your personal data.

In order to contact Alexion regarding these rights, you may contact us via the contact information stated below:

By mail:

Data Privacy Officer
Alexion Pharma Canada Corp.
1004 Middlegate Road, Suite 5000
Mississauga, ON
L4Y 1M4

By email: Privacy@alexion.com



ANY CHANGES TO THE ALEXION NOTICE OF PRIVACY PRACTICES WILL BE PROMPTLY POSTED ON [Legal | Alexion Global Site](#). THE DATE ON WHICH THE NOTICE WAS LAST UPDATED IS INCLUDED AT THE END OF THIS LEGAL STATEMENT. WE MIGHT NOT NOTIFY YOU OF ANY CHANGES TO THIS PRIVACY NOTICE, YOU SHOULD CHECK THIS PAGE PERIODICALLY FOR ANY CHANGES. BY ACCESSING AND UTILIZING THESE SITES, YOU AGREE THAT ALL DISPUTES AND OTHER MATTERS THAT MAY ARISE BETWEEN YOU OR YOUR REPRESENTATIVES AND ALEXION OR ITS EMPLOYEES, CONTRACTORS OR AGENTS IN CONNECTION WITH THESE SITES SHALL BE GOVERNED UNDER THE LAWS OF ONTARIO, CANADA, UNDER THE EXCLUSIVE JURISDICTION OF THE COURTS OF TORONTO, ONTARIO.

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