



Privacy Policy

Privacy at Upjohn

Current as at 24 April 2020.

Upjohn New Zealand ULC and its New Zealand affiliates (separately and together, 'Upjohn') are bound by the Privacy Act 1993 ('Act') and will only collect and use personal information in accordance with the Act and this Policy.

We understand that the privacy and confidentiality of your personal information is important to you. Upjohn's intention is to use the personal information provided to us by you to make any dealings with Upjohn better suited to your needs.

Upjohn believes that choice is one of the most important privacy principles. You have the choice not to submit personal information (other than as may be required by law) to us although this may result in us being unable to provide products and services to you or reduce your ability to fully participate in all aspects of our web sites. We will inform you if it is possible for an interaction to occur on an anonymous basis and, where it is, it will be optional for you to provide personal information.

By providing personal information and/or continuing to engage with Upjohn you consent to your personal information being collected, used and disclosed in accordance with this Privacy Policy.

What information does Upjohn collect?

Upjohn may collect personal information about you through our interactions with you. Generally, Upjohn may keep a record of your name, contact details (i.e. address, telephone number, etc), and when collecting personal information for business purposes your professional details (e.g. qualifications, speciality, areas of interest), details on your practice/business (e.g. size, use of products, prescribing practices) and details of your dealings with us. Upjohn may also collect some health information if you register for particular patient support programs. Other information may be collected from other sources but those sources will provide details of what personal information is being collected and why. By way of example, Upjohn may collect information about:

Healthcare Professionals (eg. doctor, nurse, pharmacist etc.) in the course of:

- responding to their product queries;
- meetings with our sales representatives;
- complying with our regulatory obligations (eg. notification of important product safety information or recording reporter details for adverse event reporting); and
- participation in Pfizer sponsored programs (eg. clinical trials, expert panels, educational programs, research grants and disease management programs);



Members of the general public in the course of:

- using our customer or product information services;
- participation in non-prescription product promotional activities; and
- participation in Pfizer sponsored programs (eg. clinical trials, educational programs and disease management programs);

Service providers in the course:

- providing services to Upjohn; and
- completing due diligence questionnaires.

The personal information collected may vary depending on your particular interaction with Upjohn but will be limited to that information necessary to record and manage our interaction with you or as permitted or required by law.

In addition, Upjohn may gather information about you automatically through your use of our web sites (e.g. your Internet Protocol ("IP") address and how you navigate our web sites. See also the section below on cookies and other tools

How does Upjohn use personal information and to whom does Upjohn disclose it?

Upjohn uses the personal information we collect for the primary purposes for which it is collected, other related purposes or as permitted or required by law including the following purposes :

In general, Upjohn uses personal information for the following purposes:

- maintaining a record of medical queries, complaints and adverse event or adverse reaction reports relating to our products and reporting these to relevant regulatory bodies, such as Medsafe , as may be required;
- to provide health products or services (including advice) that have been requested;
- sending you material on our activities and products or developments in pharmaceutical treatments that Upjohn believes may be of interest to you and tailoring marketing services to suit your needs;
- administering conferences, symposia, expert panels, seminars or other similar programs organised by us, which you agree to participate in or be involved with;
- administering disease awareness/management programs or other similar programs organised by us, which you agree to participate in or be involved with;
- to involve doctors/investigators (and people who assist them) in clinical trials;
- to comply with legal obligations such as notifying you of matters that we may be required by law to notify you of (e.g. product recalls);
- to conduct due diligence with respect to our service providers;
- managing, planning and arranging meetings between healthcare practitioners and our sales representatives;
- monitoring and reviewing our compliance with relevant regulations and codes of conduct in our dealings with you and monitoring the quality, safety and efficacy of our products;
- to gain insights in to how Upjohn's products are prescribed and used in practice; and



- generating customer lists for the purposes of market research.
- For one or more of the above purposes, Upjohn may disclose personal information to:
- its affiliates within or outside of New Zealand (a full list of Upjohn Affiliates and their locations is available here), in which case your personal information will be collected, used, disclosed, managed and stored in accordance with this policy; and
 - third parties within or outside of New Zealand (Upjohn's service providers are mainly located in the USA, Europe, Singapore, China, India, Costa Rica and Australia). However from time to time we may need to engage a service provider in a country not identified here. A list of all countries where we may send your information can be found here; and
 - regulatory authorities, within or outside of New Zealand, and ethics committees as part of a clinical trial evaluation, monitoring or inspection process.

As Upjohn changes and grows Upjohn might buy or sell companies, subsidiaries or assets and generally, customer information is one of the transferred business assets, particularly if Upjohn or substantially all of its assets are acquired.

Generally, we require that third parties who handle or obtain personal information as service providers to Upjohn acknowledge the confidentiality of this information, undertake to respect an individual's right to privacy and comply with the Act and this Policy. However, you acknowledge that, by agreeing to the disclosure of your personal information to these third parties operating outside of New Zealand, we will no longer be required to take reasonable steps to ensure the overseas third parties' compliance with the Act (including the privacy principles) in relation to your personal information and we will not be liable to you for any breach of the Act by these overseas third parties and on this basis you consent to such disclosure.

Sensitive information is subject to greater restrictions

Some personal information collected by Upjohn is considered 'sensitive'. Sensitive information which Upjohn may collect includes a person's state of health and medical history.

Sensitive information will be used and disclosed only for the purposes for which it was provided, or a directly related secondary purpose, unless you agree otherwise or for other specific reasons such as if the use or disclosure of this information is required by law or to prevent a serious and imminent threat to life or health of an individual.

Security of personal information

Upjohn takes reasonable precautions to protect your personal information from loss, misuse, alteration disclosure or interference and unauthorised access.

While we endeavour to keep information on Upjohn web sites, including the personal information provided by you or on your behalf, secure and confidential, we will not be responsible for any breach of security caused by third parties and do not represent that Upjohn websites are completely secure.



Upjohn has directed its staff that personal information must be dealt with in accordance with this Policy and kept secure from unauthorised access or disclosure. We will limit access to personal information to Upjohn personnel on a need to know basis. We educate our staff about their duty to protect your privacy and provide training regarding this Policy.

In the aggregate/de-identified

Upjohn may also disclose aggregate or de-identified data that is not personally identifiable with third parties. Aggregate data is created by pooling information about individuals and describing the data in the aggregate (e.g. 20% of customers who clicked on the X promotion participated in the promotion).

Cookies and other tools

Upjohn and its business partners, in common with many web site operators, may use standard technology called cookies on its websites. Cookies are small data files that are downloaded onto your computer when you visit a particular website. Cookies help provide additional functionality to the web site or to help us analyse site usage more accurately. We use information collected from cookies to better understand, customise and improve user experience with our websites, services and offerings, as well as to manage our advertising. For instance, our server may set a cookie that keeps you from having to enter a password more than once during a visit to one of our sites. Also, we may use web analytics services that leverage cookies to help us to understand how visitors engage with and navigate our site (e.g. how and when pages in a site are visited and by how many visitors).

We are also able to offer our visitors a more customised, relevant experience on our sites using cookies by delivering content and functionality based on your preferences and interests. If you have provided us with personal information (e.g. through a registration or a request for certain materials), we may associate this personal information with information gathered through cookies. This allows us to offer increased personalisation and functionality.

In all cases in which cookies are used, the cookie will not collect personal information except with your explicit permission. Your web browser can be set to allow you to control whether you will accept cookies, reject cookies or to notify you each time a cookie is sent to your browser. If your browser is set to reject cookies, websites that are cookie-enabled will not recognise you when you return to the website, and some website functionality may be lost. The Help section of your browser may tell you how to prevent your browser from accepting cookies.

In addition to Upjohn cookies, certain third parties may deliver cookies to your computer for a variety of reasons. For example, we sometimes use various web analytics tools that help us understand how visitors engage with our websites. Any third party links or advertising on our site may also use cookies; you may receive these cookies by clicking on the link to the third party site or advertising. We do not control the collection or use of information by these third parties, and these third party cookies



are not subject to this Policy. You should contact these companies directly if you have any questions about their collection and/or use of information.

In addition, we may use other tracking systems like pixel-tags. Pixel tags, sometimes called web beacons, are similar in function to cookies but because of their insignificant size, they are not visible. However, they are used to pass certain information to our servers to personalize our websites and to track your usage across other Upjohn websites. In addition, we may also use pixel tags in our HTML based emails.

For more information about cookies, visit

www.aboutcookies.org

Online behavioural advertising

Upjohn hopes to deliver to you advertising for products and services you need or want. There are many ways to do this in the online advertising world. For example, Upjohn partners with websites with whom you have shared your interests, condition and concerns directly and asks that they serve our ads to users who have expressed an interest in Upjohn products or health conditions that our products treat. We may also partner with advertising companies to serve you ads based on your web browsing activity, purchases and/or interests. Some techniques for delivering content based on your interests are referred to as online behavioural advertising ("OBA").

We want it to be easy for you to understand how we and our business partners use information to serve ads tailored for you and to opt-out from targeting based on OBA. We, therefore, offer plain English explanations for our practices in this Policy. We also provide you with an easy-to-use means for opting-out from the use of your information for OBA. If you have any questions about our use of OBA, please do not hesitate to contact our Privacy Officer (see contact details below)..

Links

Upjohn websites may contain links to other web sites that we think may be of interest to you. However, Upjohn is not responsible for the privacy practices or the content of such web sites. When linking to the other site, you should always check that the web site's privacy policy before providing any personal information.

Accessing and Updating personal information that Upjohn holds about you

Upjohn has appointed a Privacy Officer to oversee Upjohn's management of personal information in accordance with this Policy and the Commonwealth Privacy Act. The Privacy Officer's contact details are set out below.

You can, in most cases, access the personal information Upjohn holds about you. If you wish to do so, please contact the Privacy Officer.



Upjohn endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. Please contact the Privacy Officer if you believe that the information Upjohn holds about you requires changing or becomes out-of-date.

Changes to our Privacy Policy

Upjohn reserves the right to change this Policy at any time, as Upjohn deems appropriate. Should any changes occur to our Privacy Policy, it will be posted on our websites.

You should regularly review this Policy for any modifications or amendments to this Policy, as your continued use of our web sites, products services or provision of further personal information to use after a modification or amendment of the revised Privacy Policy constitutes your deemed acceptance of the revised Privacy Policy.

What if you have a complaint?

If you wish to make a complaint about a breach of this Privacy Policy or any applicable privacy laws, please contact the Upjohn Privacy Officer, as set out below. You will need to provide us with sufficient details regarding your complaint as well as any supporting evidence and/or information.

The Privacy Officer will investigate the issue and determine the steps (if any) that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation. If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the New Zealand Privacy Commissioner via www.privacy.org.nz.

How to contact us

If you have questions about Upjohn and privacy, wish to provide feedback about this policy, would like to update your personal details held by Upjohn, wish to access information held by Upjohn about you or wish to make a privacy related complaint please contact Upjohn's Privacy Officer at:

Phone:
+61 (02) 9850 3221

Email:
PrivacyAus@pfizer.com

Postal address:
The Privacy Officer
Upjohn New Zealand ULC
GPO Box 7015
Sydney NSW 2000
Australia