



Healthcare Professionals Privacy Notice

Date: 1 June 2019

Biogen Canada Inc (“**Biogen**” or “**we**”) interacts with healthcare professionals (“**HCPs**”) in many ways. This Privacy Notice describes how we collect and use HCP “**personal information**” (meaning any information relating to an identifiable individual) and why, as well as HCPs’ rights in relation to this collection and use.

Information we collect and how we use it

Biogen collects information about HCPs directly from the HCPs themselves, third parties (such as patients, caregivers or other medical professionals) and from publicly-available sources, for different purposes. The following are examples of personal information we may collect about HCPs and how we use this personal information.

(a) Product complaints and adverse events

Pharmacovigilance laws require us to collect product complaints and other safety information to enable us to monitor the safety of all products that we market or have in clinical development. These obligations include taking detailed records of every unwanted, untoward, unintended or harmful event in relation to the use of a Biogen medicinal product (“**adverse event**”) passed to us, which allows the adverse event to be evaluated and collated with other adverse events or complaints recorded about that product. To help us meet these obligations and ensure the safety of our products, we collect personal data about HCPs including:

- name;
- relationship with the subject of the report;
- contact details (address, e-mail address, phone number or fax number); and
- profession/specialism (this information may determine the questions an HCP is asked about an adverse event, depending on their assumed level of medical knowledge).

We collect this information directly from the HCP when they provide us with information in relation to an adverse event that has affected a patient. We may also collect this information directly from a patient or another third party reporting an adverse event that affected the patient (such as caregivers or other medical professionals). Biogen has a legal obligation to collect this information because pharmacovigilance laws require us to ensure that adverse events are traceable and available for a follow-up. As part of our pharmacovigilance obligations, we may use HCP personal data to:

- investigate the adverse event or product complaint;
- contact the HCP for further information about the adverse event or product complaint reported;
- collate the information about the adverse event or product complaint with information about other adverse events or product complaints received by us to analyse the safety of a batch, Biogen product or active ingredient as a whole; and
- provide mandatory reports to national or regulatory authorities so that they can analyse the safety of a batch, Biogen product, generic or active ingredient as a whole, alongside reports from other sources.

Information provided as part of an adverse event report is shared within Biogen on a worldwide basis through Biogen’s Global Safety Database, hosted in the United States by Biogen, Inc. Biogen is also obliged to transfer adverse event data to national regulatory authorities for their databases.



(b) Customer relationship management

Biogen collects and uses HCP personal information in order to administer our relationship with an HCP (such as to arrange visits) and to build a profile about the HCP, in order to understand his/her areas of expertise and topics of interest better. This includes:

- name;
- contact details (address, e-mail address, phone number or fax number); and
- academic and professional information (such as employment history, academic background, field of expertise and specialisation, publications and public speeches, interest in Biogen products and treatment habits).

Biogen collects most of this information directly from the HCP, but we may also collect information from publicly-available sources and from industry databases that contain details about HCPs (for example, to make sure that the records Biogen maintains about the HCP are up-to-date and accurate, or to supplement incomplete information).

(c) Key Medical Experts

Biogen collects and uses personal information about HCPs who are considered Key Medical Experts (KMEs) in their field. This may include:

- name;
- contact details (address, e-mail address, phone number or fax number); and
- academic and professional information (such as employment history, academic background, field of expertise and specialisation, publications and public speeches, interest in Biogen products and treatment habits).

Biogen collects most of this information from publicly available sources but also from interactions with the KME directly.

(d) Business relationship management

Biogen collects and uses HCP personal information to determine if it should enter into, or renew, a business relationship with an HCP (for example, to perform studies, surveys or market research, present or speak to internal or external audiences, to participate in advisory boards or attend any other meetings or events, including congresses). The personal data that we collect in this regard includes:

- name;
- hotel rewards code or frequent flyer number;
- passport details (such as passport number and validity dates);
- gender;
- date of birth;
- emergency contact details (such as name and phone number of next of kin);
- contact details (address, e-mail address, phone number or fax number); and
- academic and professional information (such as employment history, academic background, field of expertise and specialisation).



We require this information to:

- evaluate an HCP's professional history for our due diligence purposes as a responsible company (including compliance with anti-bribery and corruption laws);
- determine an HCP's level of remuneration based on their professional qualifications;
- organize any travel and accommodation on an HCP's behalf; and
- ultimately, enter into, or renew, a contract with the HCP.

Biogen collects most of this information directly from the HCP when they provide us with their curriculum vitae. We also collect information about HCPs from publicly-available sources to evaluate compliance with anti-bribery and corruption laws. This information is only processed where relevant and necessary to evaluate a HCP's background properly and to meet our commitment to deal only with valid and ethical business partners.

(e) Market research

Biogen collects and uses personal information about HCPs when they are invited to, and participate in, market research studies or surveys. The personal data that we collect about an HCP will depend on the market research study or survey that is being conducted, however, this typically includes:

- name;
- opinions and responses to studies, surveys or questionnaire forms;
- contact details (address, e-mail address, phone number or fax number); and
- academic and professional information (such as employment history, academic background, field of expertise and specialization, publications and public speeches, interest in Biogen products and treatment habits).

We require this information to:

- gather data about Biogen (such as feedback on a product or service);
- better understand a disease area; and
- improve our understanding of the pharmaceutical industry.

Biogen collects some of this information about HCPs from publicly-available sources like external lists or databases in order to select respondents to participate in market research.

(f) Grants, donations and sponsorship applications

Biogen collects and uses personal information about HCPs when they, or a healthcare organisation that they work for, make an application for a grant, donation or sponsorship. The personal data that we collect in this regard includes:

- name;
- professional title;
- contact details (such as postal address, e-mail address and telephone number); and
- academic and professional information (such as employment history, academic background, field of expertise and specialisation, publications and public speeches, interest in Biogen products and treatment habits).



We require this information to:

- consider a conflict of interest that has been disclosed or investigate a possible conflict of interest;
- evaluate the HCP's professional history for our due diligence purposes as a responsible company (including the HCP's compliance with anti-bribery and corruption laws); and
- determine the HCP's, or their employer healthcare organisation's, eligibility to receive the grant, donation or sponsorship.

Biogen collects most of this information directly from the HCP when we receive an application from the HCP, or the healthcare organisation that they work for, to receive a grant, donation or sponsorship. We may also collect information about an HCP from publicly-available sources to evaluate the HCP's compliance with anti-bribery and corruption laws or a conflict of interest. This information is only processed where relevant and necessary to evaluate the HCP's background properly and to meet our commitment to only award grants, donations and sponsorship to valid and ethical business partners.

(g) Legally-required communications

In certain cases, Biogen is legally required to send a specific communication to HCPs, for example as a condition of a licence for a product or because of identified safety issues. In this case, we may also engage external HCP database providers to provide us with accurate HCP contact details or send the communications on Biogen's behalf. In such cases, Biogen processes HCP personal information and sends such communications on the basis that processing is necessary for compliance with a legal obligation on Biogen.

(h) Medical Information

In the course of maximizing patient safety in using Biogen products, Biogen provides a medical information service to respond to enquiries from consumers, patients, and healthcare professionals relating to any aspect of use or information surrounding a Biogen product. The personal data that we will usually include:

- name;
- contact details, such as address, e-mail address and/or phone number;
- details of the enquiry; and
- additional physician professional information (for example, in order to verify that we are liaising with a qualified doctor).

We usually receive the data from someone directly (for example, when someone e-mails or phones us) or from a third party which passes this information on to us.

How we share personal information with others

Biogen may, from time-to-time and for the purposes listed above, also need to make the personal information of HCPs available to third parties. Such parties include:

(a) Affiliates

We may disclose personal data to our affiliated companies for the purposes described in this Privacy Notice. Affiliates are those companies that are under common control of our parent company Biogen, Inc., 225 Binney Street, Cambridge, MA 02142, USA and our international headquarters, Biogen International GmbH, Neuhofstrasse 30, 6340 Baar, Switzerland.



(b) Third parties

Biogen may use third parties to provide services to us which may require disclosure of HCP personal data to such third parties. These include service providers which: (a) assist Biogen with our data processing activities; (b) provide the technology system or solution to be used by Biogen; (c) host the system or solution in the cloud; and (d) provide Biogen with data storage facilities. If we allow a third party to process HCP personal data, they will only be permitted to do so for purposes that are consistent with this Privacy Notice and will be required to protect personal data in accordance with all applicable data protection laws.

(c) Law enforcement

In certain circumstances, we may be required to provide HCP personal data in response to a court order, subpoena, search warrant or to comply with a law or regulation. We plan to cooperate in responding to such requests, taking appropriate measures to ensure that the requester understands the sensitive nature of the personal data that they may receive. We also reserve the right to cooperate with law enforcement authorities in investigating and prosecuting users who violate our rules or engage in behaviour that is illegal or harmful to individuals or the personal data for which we are responsible.

(d) Corporate transactions

We may disclose HCP personal data to a third party in connection with a corporate reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock, including in connection with any bankruptcy or similar proceedings.

Such transfers may include transfers outside Canada, in which case Biogen takes appropriate steps to ensure personal information is adequately protected. **Your rights**

An HCP may contact Biogen at any time if they would like to access to their personal information or to request its correction. We may require an HCP to provide additional information necessary to confirm their identity before we comply with any request made.

Contact information

If you are an HCP you have questions or concerns about this Privacy Notice or the processing of your personal information or would like to exercise your rights as outlined above, you can contact Biogen's Data Privacy Officer by e-mailing: privacy@biogen.com.