

UCB CHERISH Privacy Policy

1. WHO WE ARE AND HOW YOU CAN CONTACT US

“UCB” or “we” means *UCB Biopharma SPRL, a Belgian company with registered office at Allée de la Recherche 60, 1070 Brussels, Belgium.*

As the **controller**, i.e. the legal entity that decides on the why and how information relating to you (“**personal data**”) is collected and processed in the context of this UCB CHERISH application (the “**Application**”), we respect your right to privacy. We will only process your personal data as described in this UCB CHERISH Privacy Policy (the “**Policy**”) and in accordance with the relevant data protection legislation, including the *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC* (General Data Protection Regulation or “**GDPR**”).

At UCB we have a data protection officer (**DPO**), who can be contacted by any of the following means for any privacy-related questions, including regarding how we collect, store and use your personal data:

- E-mail: dataprivacy@ucb.com; or
- Regular mail:
UCB Biopharma SPRL
Attention: Data Protection Officer
Allée de la Recherche, 60
1070 Brussels
Belgium

2. THE REASON BEHIND THIS PRIVACY POLICY

The Policy governs the collection, use and retention by UCB of personal data relating to your use of the Website. This Policy applies to all Application users. *[In addition, more specific terms apply to different groups of users, such as e.g. healthcare professionals (**HCPs**) and patients. Please be sure to also read the specific terms relating to your Application user profile.]*

The Policy consists of five main components and informs you about:

1. Who we are and how you can contact us;
2. The reason behind this Policy
3. The purposes for which we process your personal data and the related legal basis under the GDPR;
4. What your rights are in relation to the personal data we hold about you and how you can exercise them; and
5. Further details on how we process (including share and retain) your personal data.

This Policy may be updated periodically to reflect changes in our personal data processing practices. In that case we will post a prominent notice on the Application to inform you of any significant changes.

3. THE PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA AND APPLICABLE LEGAL BASIS

The table below indicates per purpose the categories of personal data we collect and process about you, the source from whom we obtained such information, who we share your personal data with, on what legal basis and how long we retain your personal data.

APPLICATION USERS

1. In order to make the Application and its content available to you, UCB:

Collects the following personal data about you:	<ol style="list-style-type: none"> 1. *User's Name 2. * Email address 3. * App password 4. * Mobile phone number 5. * Year of birth <p><i>Failure to provide the personal data with an (*) may result in (some features of) the Application not being accessible.</i></p>
Receives this data from:	You (through the device you use to access the Application)
Relies on the following GDPR legal basis:	- Consent
Retains (**) your personal data for:	Personal information will be retained until as long as is reasonably necessary for the purposes listed above or as required by applicable law. Please contact us for further details of applicable retention periods.
Shares your personal data with:	- UCB subsidiaries/ affiliated companies and third-party processors (as detailed in Section 5.A)

2. In order to enable UCB to comply with applicable laws and regulations, including but not limited to pharmacovigilance (e.g adverse event reporting) related legislation and industry guidelines, UCB:

Collects the following personal data about you:	<ol style="list-style-type: none"> 1. *First name 2. * Last name 3. * Email address 4. * App password 5. * Mobile phone number 6. * Year of birth <p><i>Failure to provide the personal data with an (*) will prevent UCB from complying with its obligations in accordance with applicable laws.</i></p>
Receives this data from:	You (through the device you use to access the Application)
Relies on the following GDPR legal basis:	Compliance with our legal obligations. For more information on the processing of personal data by UCB within the framework of adverse event reporting, please check UCB's Patient Safety Reporting Privacy Notice.

Retains (**) your personal data for:	Personal information will be retained until as long as is reasonably necessary for the purposes listed above or as required by applicable law. Please contact us for further details of applicable retention periods.
Shares your personal data with:	- UCB subsidiaries/ affiliated companies and third-party processors (as detailed in Section 5.A)

*(**) We will retain your personal data in accordance with the retention periods set out in the above table. These retention periods included in our data retention policy are dictated by:*

- *Applicable statutory/legal requirements;*
- *Industry guidelines, and*
- *For those data categories for which no express statutory or legal requirements apply, certain other determining factors such as the need to prove or enforce a transaction or contract, enforce our policies, etc.*

We will delete your personal data once the abovementioned retention periods will have expired or if you object to or withdraw your consent to our processing of your personal data (to the extent such processing is based on your consent), except where we need to hold on to such data for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural or legal person or for compliance with a European or European Member State legal obligation which requires such further processing

4. YOUR RIGHTS AND HOW YOU CAN EXERCISE THEM

4.A. Your rights

Right to access

You have the right to obtain confirmation from us as to whether or not we process personal data concerning you, and if so, the right (as far as this does not adversely affects the rights and freedoms of others) to obtain a copy of your personal data from us. *For more information, please check section 4.B “How to exercise your rights”.*

Right to rectification

You have the right to ask us to rectify without undue delay any inaccurate personal data concerning you. You can also ask us to complete incomplete personal data regarding you by providing us with a supplementary statement containing such additional information. *For more information, please check section 4.B “How to exercise your rights”.*

Right to erasure

You have the right to ask us to erase without undue delay personal data concerning you, where one of the following grounds apply:

- Your personal data are no longer necessary in relation to the purposes for which they were processed;
- You have withdrawn your consent - for those processing activities based on your consent – and we have no other legal ground for such processing;
- You object to the processing of your personal data (*for more information on the right to object, see further below*) and there are no overriding legitimate grounds for such processing;
- Your personal data have been unlawfully processed;
- Your personal data must be erased for compliance with a European or European Member State legal obligation to which UCB is subject;

Please note that your right to erasure will not apply to the extent that processing is necessary for:

- exercising the right of freedom of expression and information;
- compliance with a European or European Member State Law to which UCB is subject;
- reasons of public interest in the area of public health in accordance with article 9(2)(h) and (i) GDPR as well as article 9(3) GDPR;
- archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the relevant provisions of the GDPR;
- the establishment, exercise or defense of legal claims.

For more information, please check section 4.B “How to exercise your rights”.

Right to restriction on processing

You have the right to obtain from UCB restriction of processing by UCB of your personal data where one of the following applies:

- You contest - in good faith - the accuracy of personal data regarding you and held by us, in that case the restriction of processing will apply for a period enabling us to verify the accuracy of your personal data;
- The processing is unlawful and you oppose the erasure of your personal data and request restriction of their use instead;
- We no longer need your personal data, but you require them for the establishment, exercise or defense of legal claims;
- You have objected to the processing of your personal data by UCB in accordance with the relevant GDPR provision, in that case the restriction of processing will apply for a period enabling us to verify if our legitimate grounds override yours.

Please note that notwithstanding the above, we are still allowed to continue storing your personal data (throughout the period of restriction) or to process your personal data for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person.

If you have requested restriction of processing, we will inform you before the restriction of processing is lifted. *For more information, please check section 4.B “How to exercise your rights”.*

Right to data portability

You have the right (insofar this does not adversely affects the rights and freedoms of others) to receive the personal data concerning you, that you have provided to UCB, in a structured, commonly used and machine-readable format and to transmit those data to another controller, without hindrance from UCB, where the processing is:

- based on your consent or on a contract; and
- carried out by automated means

For more information, please check section 4.B “How to exercise your rights”.

Right to objection to processing

You have the right to object at any time, on grounds relating to your specific situation, to the processing of your personal data by UCB which is based on UCB’s pursuit of its legitimate interests as a controller. In that case UCB will no longer process your personal data, unless:

- UCB demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms; or
- For the establishment, exercise or defense of legal claims.

You have the right to object at any time to the processing of your personal data for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing. *For more information, please check section 4.B “How to exercise your rights”.*

Right to withdraw consent

Where the processing is based on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. *For more information, please check section 4.B “How to exercise your rights”.*

4.B. How to exercise your rights

If you wish to exercise any of the rights mentioned above, please contact UCB's Data Protection Officer by e-mail at dataprivacy@ucb.com or otherwise reach out to us by postal mail at UCB Biopharma SPRL, to the attention of the Data Protection Officer, Allée de la Recherche 60, 1070 Brussels, Belgium. Please clearly identify the right(s) you wish to exercise and include your contact details (including a valid e-mail or postal address) so that we can respond to your request. Please note that you may be asked to provide proof of your identity so that we are able to verify it indeed regards you.

When you contact us to exercise any of the rights mentioned above, we will respond to your request within one month following receipt of the request. This period may be extended by two additional months where necessary, but in that case we will inform you of any such extension within one month of receipt of your initial request together with the reasons for the delay.

Right to lodge a complaint with supervisory authority

In accordance with article 77 GDPR you have the right to lodge a complaint with a supervisory authority, in particular in the European Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that UCB's processing of your personal data infringes the GDPR. Please visit the website of the relevant supervisory authority for more information on how to submit such a complaint.

5. MORE DETAILS ON HOW WE PROCESS YOUR PERSONAL DATA

5.A. Who we share your personal data with.

Principle

We will disclose your personal data only as described in this Policy (including any updates to this Policy).

Subsidiaries/affiliated companies and third party processors

UCB transfers or discloses your personal data to its subsidiaries/affiliated companies and to third party service providers processing personal data on UCB's behalf for the purposes set out above.

Third party service providers include PAREXEL International (IRL) Limited and PPD Development L.P. for analytical support as well as service providers that provide technical and administrative support for the Application and underlying IT systems (e.g., Amazon Web Services and Google Cloud Platform).

Other third parties include regulatory and government agencies (see further below in this Policy), and potentially, third parties with whom UCB may merge or which may be acquired by UCB (see further below in this Policy).

Compliance with laws and legal proceedings

UCB will disclose your personal data where:

- UCB is required to do so by applicable law, by a governmental body or by a law enforcement agency;
- To establish or exercise our legal rights or defend against legal claims;
- To investigate, prevent or take actions against illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our policies or as otherwise required by law.

Other

If a third party acquires all (or substantially all) of our business and/or assets, we will disclose your personal data to that third party in connection with the acquisition. However, such disclosure will occur subject to and in accordance with applicable data protection laws, including the GDPR.

5.B. International transfers

UCB will transfer your personal data to its affiliates, including our affiliates outside of the EEA. In that case UCB relies on [UCB's Binding Corporate Rules](#).

UCB will also transfer your personal data to certain third-party service providers both within the EEA (including Germany, Malta, UK and Ireland) and outside of the EEA (USA).

The transfer of your personal data to (other) third party service providers outside of the EU (as set out above under section 5B) occurs on the basis of Data Transfer Agreement with Standard Contractual Clauses that have been executed between UCB and the relevant third-party service provider. For more information on these Standard Contractual Clauses, please reach out to us as set out above under section 4.B (How to exercise your rights).

For more information on how Google processes your personal data within the framework of Google Analytics, please consult [How Google uses data when you use our partners' sites or apps](#).