

Expert Consent for Disclosure of Transfer of Value

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Purpose and Scope

This document outlines, **by country**, the approach to collect –**where required** – Your consent for the disclosure of **Transfers of Value (ToV)** under Ipsen agreements. The applicable approach depends on (1) the **legal basis** governing the processing and public disclosure of Transfers of Value to healthcare professionals (HCPs); and (2) the **consequences of not obtaining consent**, where consent is required.

This reference supports the contractual clause “**Transfers of Value (ToV) disclosure**”, and the **Signature Page / Consent Module**.

How to Use This Document

1. Identify your **country** in the table below.
2. Apply the corresponding legal basis as *per applicable privacy legislation*:
 - **Legal obligation**: Disclosure is made **by operation of law**.
 - **Legitimate interest**: No consent is required.
 - **Consent**: Ensure the consent checkbox is ticked. If consent is not provided:
 - the Agreement **cannot be signed, and services cannot be performed** (countries marked “No consent, no contract”), or
 - the ToV will be disclosed **only in aggregate** (countries marked “No consent, no individualized disclosure”).

Rationale	Action	Countries
Legal obligation	No Expert action: Disclosure is due by law	Brazil (MG federal state), Belgium, Colombia, Denmark, France, Greece, Netherlands, Portugal, Romania, Slovakia, Saudia Arabia, South Korea
Legitimate interest	No Expert action: Disclosure is based on legitimate interest	Ireland, Latvia, Lithuania, Norway, Spain, United Kingdom, United States From January 2027 Austria, Iceland, Finland and Sweden
Expert consent in the contract	<u>Consent to be collected</u> on the Contract signature page => Go and tick the box “Consent” in “Disclosing payments and benefits”	<u>No consent = No individualized disclosure = Aggregate disclosure</u> Bosnia and Herzegovina, Bulgaria, Croatia, Cyprus, Czech Republic, Estonia, Iceland, Italy, Finland, Hungary, Luxemburg, North Macedonia, Mexico, Norway, Poland, Russia, Serbia, Slovenia, Sweden, Ukraine. <u>No consent = No contract</u> Other countries non-EFPIA : Australia, Japan, New Zealand, Turkey.
	General consent by signing the contract (without ticking the box)	Switzerland, Brazil (except for MG federal state)
Specific Expert consent	Consent to be collected out of the Contract	Austria, Colombia, Germany
No disclosure		Other Countries non EFPIA/non-US

*EFPIA: European Federation of Pharmaceutical Industries and Associations (main trade association representing the pharmaceutical industry in Europe, editing transparency rules)