



Privacy Notice – Working with Healthcare professionals

Ipsen Pharma SAS, based 65, quai Georges Gorse – 92100 Boulogne-Billancourt, France and Ipsen Ltd, 190 Bath Road, Slough, SL1 3XE, UK; Ipsen Pharmaceuticals, Blanchardstown Industrial Park, Snugborough Rd, Blanchardstown, Dublin, Ireland; Ipsen Biopharm, Ash Road, Wrexham Industrial Estate, Wrexham, LL13 9UF, UK and Ipsen Bioinnovation, 102 Park Drive, Milton Park, Abingdon, Oxfordshire, OX14 4RY, UK (together “Ipsen/we/us”) process data relating to Healthcare Professionals (“HCPs”) with whom we have professional interactions. Ipsen is the data controller with respect to the data processing described in this privacy notice.

Data collected

Ipsen processes information about HCPs for a range of purposes. We will only process information about that is relevant to our work and that we have a lawful basis to process. Depending on our interaction with you, we may process the following information:

Contact information	Basic contact details including your first, last name, title, email address, postal address, telephone/mobile numbers, place of work and job title
Professional information	Information about your medical field, specialities, professional qualifications and your CV. Information about your scientific experience, such as participation in past or current studies and trials, events, publication of academic or scientific research and articles. Your membership in associations and boards, links to universities, education, awards, editorial boards and other related activity.
Information to arrange events and visiting us	Information relating to arranging attendance at professional events, including, as needed, your passport, visa information, residency, nationality, travel, special diet and accommodation requirements. Professional information you share for an event, and any presentations or papers that relate to you. We may also capture photographs or film of you at events (with your consent as appropriate). At some meetings, where we use online tools, we may ask to record meeting contents. If you visit our site, we will collect basic information to manage access to the building and we may also capture images on our CCTV cameras.
Contracting, payments and transfers of value	Information we need to contract with you and to pay you, including bank account details and VAT or other tax details. Details of our interactions with you in relation to any grants, donations or sponsorship activities.

	Details of all direct or indirect transfers of value, whether in cash, in kind or otherwise, provided to you.
Information about our interactions with you and your views and opinions	Information relating to your interactions with members of the Ipsen group, such as meetings we have had with you, topics of interest. Your views and insights related to particular therapy areas or treatments. Information about your views and opinions collected during an event, through surveys, polls or Q&A sessions. This information would normally be anonymised. Information about the promotional, scientific and medical activities/interactions you have with us.
Medical enquiries	Medical enquiries you submit to any member of the Ipsen group.
Accessing products or services	Identification information to deliver products or services, such as access to particular websites for example, login details, passwords, online identifiers or cookies.
Consent to receive electronic promotional materials	Whether you have consented to receive electronic messages of a promotional nature from Ipsen (unsolicited).

Data sources

We collect basic information about you from a range of sources, including directly from you, or your employer, the OneKey HCP database run by IQVIA, from publicly available sources, third party providers of HCP communication services and other suppliers or partners that work with us.

When we collect professional information about you, we will usually get this directly from you, although sometimes we will obtain information from publicly available sources, such as websites or publication databases, journals and other sources.

We may also receive some data about you from our third-party event organisers, or from other third parties working with us to fulfil other services.

Purpose and legal bases for data processing

Ipsen processes data about HCPs for a range of purposes and related to those purposes we rely on a number of different legal bases for that processing, as detailed in the table below.

Legal bases	Purposes
Article 6 1 (f) Legitimate interests	We collect and use personal data for the purposes of the legitimate interests of Ipsen to manage our relationship with you in terms of professional and scientific activities and promoting and providing information and support about our products and services. This includes:

	<ul style="list-style-type: none">• Our field teams keeping in touch with you, recording their interactions and sharing information about our products and therapy areas.• At some meetings we may record online meeting content, but we will inform you of this in advance and ask for your agreement. We will use this content for the purpose of training and support.• Providing you with literature required to decide on treatment, and other commercial activities such as the provision of scientific information.• To provide you with promotional materials and access to support tools and services and to respond to your requests for information. Providing your information to third parties sending promotional materials on our behalf.• Communicating with you about safety issues.• Gathering your views and opinions on our products or therapy areas through discussion, meetings, events or surveys or other activities. Inviting you to be part of advisory boards or to undertake other activities related to your specialism.• Gathering information about you to understand your professional expertise in order to target our interaction with you, develop databases of thought leaders and specialists in different therapy areas and set fair payment rates for particular activities.• Managing arrangements for events. Including inviting you to speak or participate and sharing data with event organisers.• Taking film or take photographs at events. If you do not wish to be filmed or photographed as part of the audience, please inform your contact person at Ipsen before the event. Where appropriate, we will ask for your consent to use videos or photos that focus on you as an individual.• Inviting you to participate and managing participation in other activities, including clinical trials, grants and donations or sponsorship activities and engaging you in other specialist services.• We may need to share data related to audit and compliance activities.
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<p>Article 6 1 (b) Contract</p>	<p>We collect and use personal data for the purposes of contracting with you for your professional inputs, including:</p> <ul style="list-style-type: none"> • Engaging your services as a speaker • Asking you to take part in expert groups • Asking you to provide inputs to particular projects or initiatives • Paying you fees and or expenses where applicable • Keeping administrative records about your contract activities with us
<p>Article 6 1 (a) Consent Or where appropriate, Article 6 1 (f) Legitimate interests Or Article 6 1 (c) Legal Obligation</p>	<p>We collect and use personal data for the purposes of meeting our obligations to evidence transactions and ensure transparency on transfers of value under the Association of the British Pharmaceutical Industry (“ABPI”) Code of Practice or the Irish Pharmaceutical Healthcare Association (IPHA) Code of Practice for the Pharmaceutical Industry, as relevant. This involves disclosing details about payments made to you to Disclosure UK and IPHA in Ireland.</p> <p>We currently rely on your consent to disclose transfers of value information.</p> <p>We may also be required to disclose certain information about payments to you and our financial relationship with you to auditors, and other government agencies or auditors relating to our regulatory activities, in response to authorised information requests, or as otherwise required by laws, regulations, or industry codes. We may do this for legitimate interests or because there is a legal obligation to do so.</p> <p>Relying our legitimate interests, we will use your information to inform you prior to the publication of a transfer of value, your principal practice address and the amount of the Transfer of Value.</p>
<p>Article 6 1 (a) Consent</p>	<p>We ask for your consent for processing your personal data in some circumstances, including:</p> <ul style="list-style-type: none"> • To send you promotional materials by email (unless you have specifically asked us to send materials to you) • In some cases, where we provide Apps or Services that operate based on your consent • To use individual photographs or film or testimonials from you, where appropriate. • Where necessary, to provide your details to third parties to make arrangements for events.

Article 6 1 (c) Legal obligation	We process personal information in order to meet our legal obligation undertake adverse event or product quality investigations. A separate detailed privacy notice is available for these activities.
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Data recipients

Information related to you will only be accessed by authorised employees at Ipsen, with a relevant and tangible need to access your information.

Information related to you may also be made available to employees of other entities within the Ipsen group of companies, for the purpose of better managing our interaction with HCPs from a global perspective, to help harmonise Ipsen’s key business processes, hereby facilitating a more consistent approach across all markets.

Moreover, Ipsen engages service providers to process your personal data on behalf of Ipsen, including for the purpose of storage, analysis and to comply with its obligations. Such service providers may only process your personal data in accordance with the Ipsen's express instructions and may not use your data for their own purposes. Examples of these providers include HCP database suppliers, fulfilment and communications providers, suppliers supporting payments and accounting services and event organisers.

Term of retention

We will only retain your information in order to meet our operational needs and to comply with legislative requirements for retention in line with Ipsen’s Retention and Archiving guidance.

International transfers of data

Your personal data may be processed by service providers or companies affiliated with Ipsen in non-UK or non-EU countries which do not ensure an adequate level of protection for personal data. In order to ensure that your personal data are protected, Ipsen will, where necessary, ensure that the recipient has entered into data transfer agreements which include the appropriate standard contractual clauses, or will adopt Binding Corporate Rules (BCRs) for transfers of personal data within the group of companies. Such contract or BCRs can be made available to you upon request.

Your rights

You have the following rights regarding your information that may apply depending on the circumstances:

Right	What does this mean?
1. The right of access	You have the right to obtain access to the information processed by Ipsen.
2. The right to rectification	You are entitled to have your information corrected if it is inaccurate or incomplete.
3. The right to erasure	This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for Ipsen to

	keep using it. This is not a general right to erasure; there are exceptions.
4. The right to restrict processing	You have rights to ‘block’ or suppress further use of your information in certain circumstances. When processing is restricted, Ipsen can still store your information, but may not use it further.
5. The right to data portability	You have rights to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances.
6. The right to object	You have the right to object to certain types of processing, in certain circumstances.

How to contact us

For more information on your rights, if you would like to exercise any of these rights, or if you are unhappy with how your information has been handled, please contact dataprivacyUKI@ipsen.com.

If you have any questions or comments about this Privacy Notice, please feel free to email Ipsen’s Data Privacy Officer at dataprivacy@ipsen.com.

If you are not satisfied with the response to your queries, or you wish to make a complaint or believe the processing of your information does not comply with data protection law, you can make a complaint to the relevant data supervisory authority, this is the Information Commissioner’s Office for the UK and the Data Protection Commission for Ireland.