

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, 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
Expert consent in the contract	<i>Consent to be collected</i> 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> Italy, Luxemburg, Mexico, Poland, Russia, Ukraine. <u>No consent = No contract</u> Other EFPIA* countries : Bosnia and Herzegovina, Bulgaria, Croatia, Cyprus, Czech Republic, Estonia, Iceland, Finland, Hungary, North Macedonia, Norway, Romania, Serbia, Slovenia, Sweden. Other countries non-EFPIA : Australia, Japan, New Zealand, Turkey.
	General consent by signing the contract <i>(without ticking the box)</i>	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)