Privacy Notice

Healthcare Professionals (HCPs)

Collection and Processing of your Personal Information – Information Notice

Otsuka Australia Pharmaceutical Pty Ltd (ACN 601 768 754) and its affiliates ("Otsuka") respect your right to privacy. The data handler of your personal information is Otsuka Australia Pharmaceutical Pty Ltd.

In this Privacy Notice ("Notice"), references to "THE COMPANY", "we", "us" and "our" will mean Otsuka Australia Pharmaceutical Pty Ltd, Suite 2.03, Level 2 9 Help St, Chatswood NSW 2067. THE COMPANY and other Otsuka companies will be referred to collectively as "Otsuka".

In this Notice, when we refer to personal information, we mean any information or opinion, that relates to an identified or reasonably identifiable person – in this case, you. Your personal information will be processed according to applicable legislation. You should read this Notice, so that you know what personal information we collect about you, what we do with it and how you can exercise your rights in connection with it. You should also read any other Notices that we give you, that might apply to our use of your personal information in specific circumstances from time to time.

What personal information does Otsuka collect?

We may collect personal information about you from a variety of sources, including directly from you: documents or forms that you provide to participate in Otsuka sponsored or supported initiatives, such as clinical research or development activities, or in other contexts; third parties; publicly available sources; CVs and resumes; and online or other databases and websites.

The types of personal information Otsuka may collect depend on the circumstances of our interactions with you. This may include:

- **Personal details,** such as your name, age, date of birth, gender, and preferred language.
- **Contact details,** such as your business or personal email, mailing address, telephone number, profile on a social media platform, and other details.

- **Professional details,** such as your place of current work or employment, practice, job title, occupation, employer, work affiliations, the medical field in which you are active, your CV, work history, professional qualifications and scientific activities (such as previous clinical trial experience), professional registration number (such as an AHPRA number), medical practitioner number, location of work, education history, and participation in past or pending research studies with Otsuka or other companies, publication of academic or scientific research and articles, and membership of relevant associations and boards.

- **Photographs,** such as headshots if you are participating in an event we are holding.

- **Financial details,** such as payment-related information, bank account details, bank direct deposit details and other payment-related information.

- **Travel related and associated identification information,** such as passport number, driving license number, national ID number and travel preferences.

- **Products and services,** details we have provided to you or that you have enquired about, including any information necessary to deliver those products and services and respond to your enquiries.

- **Conflicts**, for example circumstances which may create a conflict of interest such as whether you or a family member hold a public office or a position in government.

- **Details of interactions with us**, such as information directly provided to us through using our website or indirectly through the use of our website or online presence or through other websites or accounts, and surveys from which we are permitted to collect information, meetings we have held, topics discussed, your knowledge of and questions you have had on our business and products, what kind of material we have displayed to you, any feedback that you have provided, your opinions and routines on prescribing, preferred communication with us, routines regarding your patients and diagnosis, and similar information. In some circumstances, it will also be necessary to collect your signature.

- **Any other personal information** that may be required to facilitate your dealings with us.

In some circumstances, we may also collect sensitive personal information about you. This will primarily occur where we collect health-related information (e.g., details of food allergies needed for a conference booking) or membership of a relevant professional association.

How do we collect personal information?

We collect personal information in a number of different ways, typically through:

- our interactions with you (such as through correspondence, telephone calls, messages, emails, in-person conversations, or when you share information with us from other applications, services or websites);
- your use of and interactions with our websites, services, content or advertising;
- orders for products or services;
- responses to surveys conducted by us or on our behalf;
- research and clinical trials;
- third party service providers; and
- requests for brochures, to join a mailing list or to be contacted for further information about our products or services.

If you do not provide us with the information we request, we may not be able to fulfill the relevant purpose of collection, such as to supply products, services or information you have requested.

Where practical, we collect personal information directly from the individual. In limited instances we may collect personal information about an individual from someone other than that individual. If we receive information about an individual from someone else (for example from a healthcare provider or someone who supplies goods or services to us), we will take reasonable steps to ensure the individual is aware that we have collected personal information about them and the circumstances of the collection.

For what purpose does Otsuka process personal information and what is the reasoning?

We may collect, hold, use and disclose the personal information listed above for the following purposes, which may vary depending on where you live and where we operate:

Purpose	Reasoning
Managing our relationship with you, including planning our (potential) collaboration, arranging visits, meetings, and other activities (in-person and virtual), and contacting you for any such purpose. Providing you with information on Otsuka products, services, and other information that you request from us, administering surveys, promotional activities, or events including scientific and educational symposia, conferences and programs sponsored or managed by us or our business partners. This includes the processing of your personal information in our customer relationship management system, to build a profile about you and better understand your expertise, interests and preferences.	To develop our business and relationship with you. In some cases, this processing is conditional on you having provided your prior consent.

Otsuka will not make any decisions about your profile based solely on automated processing.	
Enabling access and use of our websites, products and services.	To improve and manage the functionality of our business.
Responding to enquiries or other communications such as sending service, support and administrative messages, reminders, technical notices, updates, and security alerts, and other information requested by you.	To allow us to communicate with you and respond to complaints and enquiries.
Ensuring that we provide you with information that is relevant given your expertise, interests and preferences.	To manage our business efficiently where we have engaged with you in the past. In some cases processing is conditional on you having provided your prior consent, for example receiving information relating to promotional and/or non-promotional materials according to therapeutic areas through electronic means.
Sending you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners.	To provide updated information about the business. In some cases processing is conditional on you having provided your prior consent.
Conducting various types of research including clinical, epidemiology and outcome based research to better understand Otsuka's products, disease or therapeutic areas and generally improve our understanding of the pharmaceutical landscape.	To better understand our products and the area we both operate in. In some cases this processing is conditional on you having provided your prior consent.
Operating, protecting, improving, and optimising our websites, social media pages, services, and business and our customers' experiences, such as by performing analytics and conducting business and market research.	To improve the functionality of our services and the customer's experience. To better understand our products and the area we both operate in.
Fulfilling our contractual relationship with you, including providing products, product samples/starter packs, services, programs and materials, the completion of any required due diligence (such as anti-bribery or corruption checks), processing contracts, organizing travel and facilitating the payment of fees and expenses (where relevant).	To manage our contractual relationship where we have a contract or you have requested that we consider executing one with you. In some cases, this processing may be necessary for compliance with a legal obligation.
Complying with our regulatory, monitoring and reporting obligations, including those related to adverse events, product complaints and patient safety. In some cases, Otsuka may be required to send you specific communications related to these topics.	To comply with our legal and regulatory obligations.
Auditing our products and programs.	To improve the business, products and programs.

Personal information may be collected, used or disclosed by us in other circumstances where permitted or required by law including to:

- establish and enforce our legal rights and obligations and monitoring to identify and record fraudulent activity.
- comply with instructions from law enforcement agencies, any court or otherwise as required by law; or
- seek to resolve any complaints from or issue or disputes with you.

Moreover, Otsuka may also offer mobile apps, provide access to websites, special programs, activities, events or promotions or may sponsor clinical trials ("Initiatives") that may have unique or additional specific terms. Notices and/or consent forms that explain how any information you provide will be processed in connection with those Initiatives.

Cookies and similar technologies:

For more information regarding how we use cookies and similar technologies in connection with your use of our website, please read our Cookie Policy.

Our use of artificial intelligence

We use artificial intelligence (AI) tools, including generative AI, to help our staff work more efficiently and to support our business. Our staff use these tools in line with our internal AI guidelines, which sets out how AI may be used and the checks that apply before a new tool is approved.

Where AI tools handle personal information, we apply the same protections set out in this notice. In practice this means:

- we assess new AI and cloud tools before they are approved for use, including a review of privacy risks;
- our staff are not permitted to enter personal or sensitive information into AI tools except in line with our internal guideline; and
- some AI tools are provided by third parties, and where that happens we have agreements in place that limit how those providers can use personal information and require them to keep it secure.

Some of these providers, and some Otsuka group systems, are located outside Australia. Where personal information is handled by them, the arrangements set out in the "International data transfers" section below apply.

Consistent with our approach to automated processing set out above, we do not use AI to make decisions about you based solely on automated processing.

You can contact us using the details in this notice if you have any questions about how we use AI in connection with your personal information.

Do we use your information for direct marketing?

We, or a business partner acting on our behalf, may from time to time send you marketing communications and information about our products. We only do this in accordance with applicable laws and, where required, with your prior express consent. You may opt-out of receiving marketing materials from us by contacting us at OAPprivacyofficer@au.otsuka.com or by using the opt-out option provided in the relevant communication.

Who does Otsuka share my personal information with?

We disclose your personal information to the following categories of recipients:

- Our employees and other Otsuka companies, and business partners.
- Third party services providers and partners who provide data processing services to us, or who otherwise process personal information for purposes that are described in this Notice or notified to you when we collect your personal information. For example, these service providers may help us administer our services, manage our websites, or process credit card payments, invoicing and debt recovery, provide IT services, organise events and activities, or implement promotions.
- Our accountants, insurers, lawyers, auditors and other professional advisers.
- Any competent law enforcement body, regulatory body, trade association, government agency, court or other third parties as required, authorised, or permitted by law.
- Our existing or potential agents, business partners or partners.
- Our sponsors or promoters of any event or activity that we conduct.
- A potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business.
- Any other person with your consent to the disclosure.

These recipients of your personal information may be acting on our behalf or as data handlers, in their own right.

Additionally, we may disclose your personal information to another organisation if:

- We believe it is necessary to provide a person with a product or service.
- We believe it is necessary to protect the rights, property or personal safety of any of our customers, any member of the public or our interests.
- You have provided your consent.
- Required or authorised by law or court or tribunal order.

How does Otsuka keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the categories of personal information processed.

International data transfers

We may transfer your personal information to other Otsuka group companies, service providers and partners located outside of Australia, in particular but not limited to the United States of America, Japan, New Zealand, South Korea, Europe, India, Philippines and countries in Asia Pacific. We will only make the transfer if the relevant requirements under law are satisfied.

How long will your information be kept?

We retain personal information we collect from you for a limited period of time, and for no longer than is necessary for the purposes for which we are processing it. This will depend on a number of factors, including:

- whether the personal information relates to a contract we have entered into;
- any laws or regulations that we are required to follow;
- whether we are in a dispute with each other or any third party;
- the type of information that we hold about you; and
- whether we are asked by you or a regulatory authority to keep your personal information for a valid reason.

Where you have entered into a contract with Otsuka, we will retain your personal information for the duration of the contract and, beyond that, until both the periods for which (i) the applicable laws require the data to be kept and (ii) the statutes of limitation of any actions for which such data or the documents containing them may be relevant, have elapsed.

Links

We may from time to time have links to websites operated by third parties. These links are provided for your convenience only and may not remain current or be maintained. We are not responsible for the privacy practices or content on those linked websites and have no control over or rights in those linked websites. We encourage you to make your own enquiries about those other websites when you leave our website.

Your rights

You can make a request to (subject to certain limitations):

Request	What does this mean?
Access your personal information	You can request to obtain access to your personal information (if an organisation holds it). Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will let you know.
Correct your personal information	You can request to have your personal information corrected if you think that any personal information we hold about you is inaccurate. When the request is made, we will take reasonable steps to ensure that the personal information is corrected.
Withdraw your consent	Where our processing of your personal information is based on your consent, you may withdraw your consent at any time. If you do decide to withdraw your consent, we will stop processing your personal information for that purpose, unless there is another basis we can rely on.

There are certain exceptions where we may or are required to refuse to process an access or correction request. If we intend to rely on an exception, we will let you know.

Contact us at OAPprivacyofficer@au.otsuka.com if you would like to make a request about your personal information. For your protection and to protect the privacy of others, we may ask you to verify your identity before we execute any requests.

If you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below. Please include your name, email address and / or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you within a reasonable period of time. However, if you think that we have failed to resolve the complaint satisfactorily, you may have a right to make a complaint to Australia's privacy regulator, the Office of the Australian Information Commissioner (see https://www.oaic.gov.au/privacy)

How to contact us?

Should you have any questions in regards to the protection of your personal information or if you wish to make a request or a complaint, please contact Otsuka by emailing: OAPprivacyofficer@au.otsuka.com

Changes to this Notice

We may change this Notice from time to time and notify this by publishing an updated version on our website.