

# **Privacy Notice for HCP**

We take your data protection rights and our legal obligations seriously. Your personal data (as defined below) will be treated in a secure and confidential manner and only as set out below or otherwise notified to you in writing.

Bausch & Lomb U.K. Limited respects your privacy and is committed to protecting your personal data. This privacy policy will tell you about how we look after and use your personal data provided to us, and your privacy rights under data protection regulations, including the General Data Protection Regulation ("GDPR"; and data protection law made under GDPR) and how those regulations protect you.

Information that Bausch & Lomb U.K. Limited as the Data Controller (hereafter: "Bausch+Lomb" or "Data Controller") may have about you, may, either be directly provided by you, by our business partners (i.e., the legal entity for whom you work), by third parties (e.g., external vendors or medical agencies) or be obtained through trusted publicly available sources.

We may collect various types of personal data about you, including:

- your general and identification information (e.g., name, first name, last name, gender, email and/or postal address, fixed and/or mobile phone number);
- your function (e.g., title, position, name of company, as well as, for healthcare professionals, first specialty, second specialty, year of graduation from medical school, publications, congress activities, awards, biography, education, links to universities, expertise and participation in/contribution to clinical trials, guidelines, editorial boards and organizations);
- payment information (e.g., credit card details, bank account details, VAT or other tax identification number);
- information regarding your utilization, responses and/or preferences including in terms of types of messages discussed, channels of communication and frequency;
- data you provide to us, for example when you fill in forms or during events you attend, or when you answer questions during a conversation or in a survey;
- data which relate to our products and services; and
- information about the scientific and medical activities/interactions you have with us, including potential future interactions.

### Purposes and legal basis

Bausch+Lomb will only process your personal data if:

- we have obtained your prior consent;
- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- the processing is necessary to comply with our legal or regulatory obligations; or

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• the processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms.

Please note that, when processing your personal data on this last basis, we always seek to maintain a balance between our legitimate interests and your privacy.

Examples of such 'legitimate interests' are data processing activities performed:

- to develop a proximity and trustful professional relationship with health care professionals;
- to provide knowledge to the health care professionals about Bausch+Lomb medicines and scientific developments;
- to offer our products and services to our customers;
- to prevent fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks;
- to sell any part of our business or its assets or to enable the acquisition of all or part of our business or assets by a third party;
- to manage human and financial resources and optimize the interactions with health care professionals and
- to meet our corporate and social responsibility objectives.

### **Purposes of the processing**

We process the personal data we may have about you for the following purposes:

- manage our relationship with you (e.g. through our databases);
- implement tasks in preparation of or to perform existing contracts;
- evidence transactions and ensuring transparency on transfer of value;
- transferring and collecting professional data and information related to drug safety, collecting and evaluating of experiences with our products, advertising and promotion in terms of medicines regulations,
- product testing, analysis and surveying
- provide you with appropriate, adequate and updated information about diseases, drugs as well as our products and services;
- improve the quality of our interactions and services by adapting our offering to your specific needs;
- answer your requests and provide you with efficient support;
- send you communications and information regarding products, therapeutic areas or services that we promote;
- manage, plan and execute communications and interactions with you

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- keeping records of our activities and payments (e.g. measuring interactions or sales, number of appointments/calls, visits, clinical studies, speaker programs, etc.);
- keeping records of free drug samples in line with corporate procedure and local regulations
- invite you to events or promotional meetings sponsored by us such as medical events, speaker events, conferences);
- preserve the company's economic interests and ensure compliance and reporting (such as complying with our policies and local legal requirements, tax deductions, managing alleged cases of misconduct or fraud; conducting audits and defending litigation);
- manage mergers and acquisitions involving our company;
- any other purposes imposed by law and authorities.

## Access to personal data and transfer

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal data may be accessed by or transferred to the following categories of recipients, on a need to know basis to achieve such purposes:

- our personnel (including personnel, departments or other companies of the Bausch+Lomb group);
- our suppliers and services providers that provide services and products to us;
- our IT systems providers, cloud service providers, database providers and consultants;
- our business partners who offer products or services jointly with us or with our subsidiaries or affiliates;
- any third party to whom we assign any of our rights or obligations.

The above third parties are contractually obliged to protect the confidentiality and security of your personal data, in compliance with applicable law.

Your personal data can also be accessed by or transferred to any national and/or international regulatory, enforcement, public body or court, where we are required to do so by applicable law or regulation or at their request.

The personal data we collect from you may also be processed, accessed or stored in a country outside the country where Bausch+Lomb is located, which may not offer the same level of protection of personal data.

If we transfer your personal data to external companies in other jurisdictions, we will make sure to protect your personal data in line with applicable legislations.

### Protecting your personal data

We have implemented appropriate technical and organizational measures to provide an adequate level of security and confidentiality to your personal data.



# **Data Retention**

We will only retain personal data we may have about you for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

### **Data Subjects rights**

You may exercise the following rights under the conditions and within the limits set forth in the applicable regulations:

- the right to access your personal data as processed by us and, if you believe that any information relating to you is incorrect, obsolete or incomplete, to request its correction or updating;
- the right to request the erasure of your personal data or the restriction thereof to specific categories of processing;
- the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal;
- the right to object, in whole or in part, to the processing of your personal data;
- the right to object to a channel of communication used for direct marketing purposes; and
- the right to request its portability, i.e. that the personal data you have provided to us be returned to you or transferred to the person of your choice, in a structured, commonly used and machine-readable format without hindrance from us and subject to your confidentiality obligations.

If you have a question or want to exercise the above rights, you may send an email to dpo@bausch.com . You also have a right to lodge a complaint with the Supervisory Authority for data protection.

You also have a right to oppose our collection and use of your personal information as explained in this form. If you wish to do so, please contact us at: <u>privacyuk@bausch.com</u>.