

**ASPEN PHARMACARE HOLDINGS LIMITED
AND ITS SUBSIDIARIES**

(“ASPEN”, “THE GROUP” OR “ASPEN GROUP OF COMPANIES”)

**PHARMACOVIGILANCE, MEDICAL INFORMATION INQUIRIES, AND PRODUCT
COMPLAINTS PRIVACY NOTICE**

- [1. INTRODUCTION](#)
- [2. SCOPE](#)
- [3. PERSONAL DATA WE COLLECT](#)
- [4. HOW WE COLLECT YOUR PERSONAL DATA](#)
- [5. LEGAL BASES AND PURPOSES OF PROCESSING](#)
- [6. DISCLOSURES AND INTERNATIONAL TRANSFERS](#)
- [7. DATA RETENTION AND SECURITY](#)
- [8. YOUR RIGHTS](#)
- [9. HOW TO CONTACT US](#)

1. INTRODUCTION

- 1.1. This notice (“notice”) explains how Aspen collects, uses, discloses, stores, and secures your personal data in the context of:
 - 1.1.1. Pharmacovigilance (adverse event reporting)
 - 1.1.2. Medical information inquiries
 - 1.1.3. Product complaints

2. SCOPE

- 2.1. This notice applies to personal data we process for:
 - 2.1.1. Collecting and reporting adverse events and fulfilling other pharmacovigilance requirements.
 - 2.1.2. Responding to medical or product-related inquiries.
 - 2.1.3. Managing and investigating product complaints.

3. PERSONAL DATA WE COLLECT

- 3.1. For the purposes of this notice, we collect the following categories of information:
 - 3.1.1. Information about the individual who submits the report on an adverse event, complaint or enquiry which includes healthcare professionals, caregivers, and patients to enable us to respond to your query or report. This data includes your name and contact details. For healthcare professionals, we may also request the place of business and further information to confirm your practice as a healthcare professional, as required.

- 3.1.2. Patient details, which includes name, contact details, medical history and records, race, gender, height and weight and any other information required to respond or investigate the report submitted.
- 3.1.3. Dependant on the type of report being submitted, personal and family history, risk factors, current use of medication and therapies, relevant lifestyle information and any other information required to respond or investigate the report submitted.

4. HOW WE COLLECT YOUR PERSONAL DATA

4.1. We may collect personal data through:

- 4.1.1. **Direct interactions:** Phone calls, emails, letters, or face-to-face conversations.
- 4.1.2. **Website forms:** Forms on our website or online portals (e.g., adverse event reporting).
- 4.1.3. **Healthcare professionals:** Physicians, nurses, or pharmacists may submit data on your behalf.
- 4.1.4. **Regulatory bodies:** Authorities may share information in accordance with mandatory reporting obligations.
- 4.1.5. **Cross-department collaboration:** Various teams (e.g., HR, compliance, legal) may contribute relevant data to ensure accuracy.
- 4.1.6. **Our alliance partners:** Related to products we market and/or distribute on their behalf.

5. LEGAL BASES AND PURPOSES OF PROCESSING

5.1. We process data for the purposes below:

- 5.1.1. Monitoring the safety of medicines and medical devices, which includes detecting, assessing, following up on, and preventing adverse events, and reporting adverse events to relevant health authorities.
- 5.1.2. Compliance with legal obligations regarding the safety of medicines and medical devices and/or to ensure the safety of medicines.
- 5.1.3. Responding to medical information queries, for example in relation to availability of products, dosing and formulation.
- 5.1.4. Responding to quality complaints regarding our products, such as any fault of quality and/or effectiveness, performance, or usage.
- 5.1.5. Answering other questions or requests and improving our products and services.
- 5.1.6. Complying with our policies and legal, regulatory, and compliance requirements, conducting audits and defending litigation.
- 5.1.7. In some countries, personal data is processed based on your consent.

5.2. Consent procedures

Where consent is required, for instance, to process sensitive health information, we will do our best to ensure that consent is explicit and can be withdrawn at any time. Withdrawal does not affect the lawfulness of prior processing to the extent applicable data protection laws allow.

6. DISCLOSURES AND INTERNATIONAL TRANSFERS

6.1. We may share personal data with:

6.1.1. Internal departments and/or group affiliates

For combined pharmacovigilance databases, centralised medical information, or complaint management.

6.1.2. Third parties

Service providers, co-marketing partners, and other entities that assist us under written agreements meeting the requirements that processors provide sufficient guarantees for implementing data protection measures under relevant data protection laws.

6.1.3. Regulatory authorities

Adverse events and product complaints may be reported as required by law.

6.1.4. Change of ownership

Personal data may be transferred if our organisation or a product line is sold or acquired.

6.2. We may transfer personal data to jurisdictions with different data protection regimes. We rely on safeguards such as Binding Corporate Rules or Standard Contractual Clauses to protect cross-border transfers.

7. DATA RETENTION AND SECURITY

7.1. Retention policies. Our policies require us to retain personal data only as long as needed for pharmacovigilance, medical inquiries, and product complaints, following the provisions of relevant data protection laws. We may keep data for extended periods if litigation or regulatory investigations are foreseeable.

7.2. Security measures. Our policies require us to implement technical and organisational measures to protect personal data as required by relevant data protection laws.

8. YOUR RIGHTS

8.1. You have the right to:

8.1.1. To be informed about what data we hold about you.

8.1.2. Request access, rectification, or erasure of your personal data.

8.1.3. Restrict or object to specific processing activities.

8.1.4. Withdraw consent, where processing is based on consent.

8.1.5. Seek an explanation of automated decisions that significantly affect you in terms of relevant data protection laws.

8.1.6. To contact your local or national data protection authority if you believe we have processed your personal data unlawfully.

8.2. Exercising your rights

To exercise these rights, please contact us using the details provided below. We may require further information to verify your identity. We strive to respond within applicable legal deadlines, keeping you informed if an extension is necessary.

9. HOW TO CONTACT US

If you have any questions about this notice or wish to exercise your rights, please access our contact details [here](#).