

## **Website Privacy Policy**

Effective: April 2020

This Privacy Policy describes the ways in which PT.Novartis Indonesia and PT.Sandoz Indonesia (referred here as "**Novartis**", "**we**" or "**us**") collect, hold and use information about individual persons who visit this website.

We invite you to carefully read this Website Privacy Policy, which sets out in which context we collect and process information about individuals who visit this website ("Personal Data"), describes how we use your Personal Data and respect your privacy rights.

BY USING THIS WEBSITE, YOU CONSENT TO THE COLLECTION AND USE OF INFORMATION AS SET FORTH IN THIS PRIVACY POLICY. YOU ALSO ACKNOWLEDGE THAT NOVARTIS MAY PERIODICALLY CHANGE OR UPDATE THIS PRIVACY POLICY FROM TIME TO TIME BY POSTING A NEW PRIVACY POLICY ON THIS WEBSITE.

### 1. What Personal Data do we process and for which purposes?

Most of our services do not require any form of registration, allowing you to visit our site without telling us who you are. However, some services may require you to voluntarily provide us with Personal Data, which may include information, such as your name, birth date, email address or telephone number. We may collect and use this Personal Data to provide you with products or services, to provide customer support, to bill you for products and services you request, to market products and services which we think may be of interest to you, or to communicate with you for other purposes which are evident from the circumstances or about which we inform you when we collect Personal Data from you.

Personal Data used for website usage analytics:

We may also collect and process information about your visit to this website, such as the pages you visit, the website you came from and some of the searches you perform. Such information is used by us to help improve the contents of the site and to compile aggregate statistics about people using our site for our internal, market research purposes. In doing this, we may install "cookies" that collect the domain name of the user, your internet service provider, your operating system, and the date and time of access. A "cookie" is a small piece of information, which is sent to your browser and stored on your computer's hard drive. Cookies do not damage your computer. You can set your browser to notify you when you receive a "cookie", this will enable you to decide if you want to accept it or not. You can also refuse cookies altogether. However, if you do not accept, you may not be able to use all functionalities of your browser software or our website.

Occasionally, we and our third-party advertising and service providers may use internet tags (also known as action tags, single-pixel GIFs, clear GIFs, invisible GIFs and 1-by-1 GIFs) and cookies at this site and may deploy these tags/cookies through a third-party advertising partner or a web analytical service partner which may be located and store the respective information (including your IP address) in a foreign country. These tags/cookies are placed on both online advertisements that bring users to this site and on different pages of

this site. We use this technology to measure the visitors' responses to our sites and the effectiveness of our advertising campaigns (including how many times a page is opened and which information is consulted) as well as to evaluate your use of this website. The third-party partner or the web analytical service partner may be able to collect data about visitors to our and other sites because of these internet tags/cookies, may compose reports regarding the website's activity for us and may provide further services which are related to the use of the website and the internet. They may provide such information to other parties if there is a legal requirement that they do so, or if they hire other parties to process information on their behalf.

If you would like more information about web tags and cookies, please visit the Network Advertising Initiative website <a href="http://www.networkadvertising.org">http://www.networkadvertising.org</a>. [1]

We may use a number of technologies offered by different providers to support website analytics and user tracking, including technologies offered by the providers below. If you wish to prevent or control the use of these technologies, please follow the links mentioned with that particular third party:

Crazy Egg (Crazy Egg, Inc., 16220 E. Ridgeview Lane, La Mirada, CA, 90638, USA) Privacy Policy, Opt-out

**DoubleClick** (Google Inc.,1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) Privacy Policy, Optout [3]

**Facebook** (Facebook, Inc., 1601 S. California Avenue, Palo Alto, CA, 94304, USA) Privacy Policy, Plug-in, Opt-out [4]

**Google Analytics** (Goo(Google Inc.,1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) Privacy Policy, Opt-out [5]

LinkedIn (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Irland) Privacy Policy, Opt-out [6]

**Twitter** (Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA, 94103, USA) Privacy Policy, Plug-in, Opt-out [7]

We may combine, aggregate, or anonymize any of the data we collect from you with data we may collect from or about you from other sources, such as public databases, providers of demographic information, joint marketing partners, social media platforms, and other third parties.

We may use your data for our business purposes, including audits; monitoring and prevention of fraud, infringement, and other potential misuse of our products and services; and modifying our services. We may also use your data as we believe necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

# 2. Who has access to your Personal Data and to Whom are they transferred?

This Privacy Policy describes the circumstances in which we may share your Personal Data. We may share your Personal Data with other Novartis subsidiaries and affiliates worldwide. Personal Data may also be

transferred to third parties who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed, such as services delivery, evaluating the usefulness of this website, marketing, advertising, data management, or technical support.

These third parties have contracted with us to only use Personal Data for the agreed upon purpose, and not to sell your Personal Data to third parties, and not to disclose it to third parties except as may be permitted by us, as required by law, or as stated in this Privacy Policy.

Personal Data collected from you may also be transferred to a third party in the event that the business of this site or a part of it and the customer data connected with it is sold, assigned or transferred, in which case we would require the buyer, assignee or transferree to treat Personal Data in accordance with this Privacy Policy.

Also, Personal Data may be disclosed to a third party if we are required to do so because of an applicable law, court order, subpoena, or governmental regulation; when we believe in good faith that disclosure is necessary to protect legal rights, the security or integrity of this website; to protect your safety or the safety of others; as part of any criminal or other legal investigation or proceeding in your country or in other countries; or to third parties, advisors, and other entities to the extent reasonably necessary for development of or to proceed with the negotiation or completion of a corporate or commercial transaction.

The personal data we collect from you may also be processed, accessed, or stored in countries outside Indonesia. Such countries may offer a different 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 by applying the level of protection required under applicable data privacy laws.

For transfers of personal data among Novartis subsidiaries and affiliates, Novartis has adopted Binding Corporate Rules, a system of principles, rules, and tools, authorized by European law, to provide effective levels of data protection relating to transfers of personal data outside the EEA and Switzerland. Read more about the Novartis Binding Corporate Rules by clicking <a href="hete=181">hete=181</a>.

#### 3. How do we protect your Personal Data

We use appropriate technical, administrative, and physical safeguards to protect the information collected through this website. Unfortunately, no organization can guarantee the absolute security of information, especially information transmitted over the internet.

Information from individuals who is consider as minor:

Our website is not directed at minor. We do not knowingly collect Personal Information from minor as define in applicable local law.

## 4. How long do we store your Personal Data

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

#### 5. What are your rights and how can you exercise them?

You have the right to:

• access your personal data and, if you believe that it is incorrect, obsolete or incomplete, to request that it

is corrected or updated;

- if the processing is based on your consent, to withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal. In the case of electronic direct marketing, we will provide you with a method to opt out of receiving further marketing materials or with a method to opt in if required by law; and
- request the erasure of your personal data, without affecting our obligation to comply any applicable legal and ethical reporting or document filing or retention obligations imposed on us.

We do not currently respond to web browser "do not track" signals or other mechanisms that provide a method to opt out of the collection of information across websites or other online services.

#### 6. How you can contact us?

If you wish to contact us regarding how we use your personal data or you wish to exercise your data privacy rights, please email us at <a href="mailto:sea.cdpo@novartis.com">sea.cdpo@novartis.com</a> [9] or write us to the following address:

PT. Novartis Indonesia
AXA Tower 26th Floor - Kuningan City
Jl. Prof. Dr. Satrio Kav. 18
Kuningan, Setiabudi, South Jakarta
Post Code 12940
Indonesia

In order to facilitate the most efficient answer, please provide the following information:

- Name of the website you are referring to;
- Your relationship and interaction with us; and
- The description of the information you would like to receive from us.

If you are not satisfied with the processing of personal data, please address your request to our Data Protection Officer at global.privacy\_office@novartis.com [10]. Who will investigate your concern.

This Privacy Notice was last updated in April 2020. Changes or additions will be notified through our usual communication channels (e.g. via our website).

#### Links

- [1] <a href="http://www.networkadvertising.org">http://www.networkadvertising.org</a>.
- [2] https://www.crazyegg.com/opt-out
- [3] https://www.google.com/ads/preferences?hl=en
- [4] https://www.facebook.com/ads/preferences/edit/
- [5] https://tools.google.com/dlpage/gaoptout
- [6] https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out?trk=micrositesfrontend\_legal\_cookie-policy
- [7] <a href="https://twitter.com/personalization">https://twitter.com/personalization</a>
- [8] https://www.novartis.com/sites/www.novartis.com/files/bcr-individual-rights-2012.pdf
- [9] sea.cdpo@novartis.com
- [10] global.privacy\_office@novartis.com

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- https://www.crazyegg.com/opt-out
- https://www.google.com/ads/preferences?hl=en
- https://www.facebook.com/ads/preferences/edit/
- https://tools.google.com/dlpage/gaoptout
- https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out?
   trk=micrositesfrontend\_legal\_cookie-policy
- https://twitter.com/personalization
- https://www.novartis.com/sites/www.novartis.com/files/bcr-individual-rights-2012.pdf
- mailto:sea.cdpo@novartis.com
- mailto:global.privacy\_office@novartis.com