

# Novartis US privacy policy center

**Effective Date: March 15<sup>th</sup>, 2024**

Welcome to the **Novartis US Privacy Policy Center**. Novartis Pharmaceuticals Corporation (“Novartis”, “we”, “our”, or “us”) is a United States-based affiliate of the [Novartis global group](#), a world leader in healthcare.

Our Privacy Policy Center includes our [General Privacy Policy](#), which describes how we use and disclose the personal information we collect from you through our websites, surveys, mobile applications, social media forums, and other services, both offline and online, that link to, incorporate, or for which you are provided a copy of our Privacy Policy (collectively, the “Services”).

Our Privacy Policy Center also addresses:

- The rights or choices you have about your personal information, and how you can exercise those rights or choices
- [State-specific](#) privacy rights and disclosures, for residents of California and other states
- For Washington and Nevada consumers, please visit our separate [Consumer Health Privacy Policy](#).
- Privacy notices specific to our [business customers](#), including Healthcare Professionals (“HCPs”)

“**Personal information**” (or “personal data”) means information that can reasonably be linked to an identifiable individual, such as a patient, a healthcare provider, a job applicant, and others. It may also include information about a browser or device used by such an individual.

To learn about the Novartis AG Global Privacy Program, or to find privacy information for other jurisdictions, please visit the [Novartis AG Privacy Hub](#).

## ► I. General Privacy Policy

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## ► II. Targeted Advertising

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## ► III. Additional Notice for Healthcare Professionals

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## ▼ IV. Supplemental State Privacy Notice

Depending on your state of residency (including California, Virginia, and others), you may be entitled to further information about our practices and have additional privacy rights, which are described below.

For Washington and Nevada residents, please visit our separate [Consumer Health Privacy Policy](#).

For the section below, “You” refers to the general public, patients, customers, healthcare professionals (HCPs), employees of our business-to-business partners or service providers, job applicants, or former employees, or external contractors.

## 1. Collection, Disclosure, Sale, and Sharing of Personal Information

The following chart details which categories of Personal Information we collect and process, as well as which categories of Personal Information we disclose to third parties for our operational business purposes, including within the 12 months preceding the date this Privacy Policy was last updated. The chart also details the categories of Personal Information that we “share” for purposes of cross-context behavioral or targeted advertising, including within the 12 months preceding the date this Privacy Policy was last updated. We do not “sell” your personal information under California law, including for payment or similar consideration, and we have not sold your personal information within the 12 months preceding the date of this Privacy Policy.

<b>Categories of Personal Information</b>	<b>Disclosed to Which Categories of Third Parties for Operational Business Purposes</b>	<b>Sold to Which Categories of Third Parties</b>	<b>Shared with Which Categories of Third Parties for Cross-Context Behavioral or Targeted Advertising</b>
<b>Identifiers</b> , such as name, email address, IP address, government-issued identifier (e.g., Social Security number), and online and device identifiers	Affiliates; service providers; social networks; business partners; legal authorities	None	Ad networks and other third parties in the online advertising ecosystem
<b>Personal information as defined in the California customer records law</b> , such as contact and financial information	Affiliates; service providers; social networks; business partners; legal authorities	None	None
<b>Protected class information</b> , such as characteristics of protected classifications under California or federal law, such as age, gender, medical conditions, and marital status	Affiliates; service providers; social networks; business partners; legal authorities	None	none
<b>Commercial</b>	Affiliates; service	None	None

<b>information</b> , such as transaction information and purchase history	providers; social networks; business partners; legal authorities	<b>Sold to Which Categories of Third Parties</b>	<b>Shared with Which Categories of Third Parties for Cross-Context Behavioral or Targeted</b>
<b>Categories of Personal Information</b>	<b>Disclosed to Which Categories of Third Parties for Operational Purposes</b>		
<b>Biometric information</b> , such as fingerprints and voiceprints	Affiliates; service providers; social networks; business partners; legal authorities	None	<b>Advertising</b> None
<b>Internet or network activity information</b> , such as browsing history and interactions with our online properties	Affiliates; service providers; social networks; business partners; legal authorities	None	Ad networks and other third parties in the online advertising ecosystem
<b>Geolocation data</b> , such as device location	Affiliates; service providers; social networks; business partners; legal authorities	None	None
<b>Audio, electronic, visual, and similar information</b> , such as call and video recordings	Affiliates; service providers; social networks; business partners; legal authorities	None	None
<b>Employment or professional information</b> , such as personnel file, work history, prior employer, and professional license number	Affiliates; service providers; social networks; business partners; legal authorities	None	<u>HCP personal data only</u> ; ad networks and other third parties in the online advertising ecosystem
<b>Inferences</b> drawn from any of the Personal Information listed above to create a profile about,	Affiliates; service providers; social networks; business	None	None

for example, an individual's preferences and characteristics	partners; legal authorities	Sold to Which Categories of Third Parties	Shared with Which Categories of Third Parties for Cross-Context Behavioral
<b>Sensitive Personal Information</b> , including: <ul style="list-style-type: none"> <li>Government-issued identifier (e.g., Social Security number); precise geolocation information;</li> <li>Information concerning an individual's health, including mental or physical health conditions, medical history, and medical treatment or diagnosis by a health care professional; and</li> <li>Biometric information used to uniquely identify an individual.</li> <li>Genetic data</li> <li>Racial or ethnic origin; religious or philosophical beliefs; citizenship; immigration status; labor union membership.</li> <li>Account log-in credentials</li> <li>Financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an</li> </ul>	<b>Disclosed to Which Categories of Third Parties</b> <b>for Operational Business Purposes</b> Affiliates; service providers; social networks;	<b>Parties</b> None	<b>or Targeted Advertising</b> None

account			
<b>Categories of Personal Information</b>	<b>Disclosed to Which Categories of Third Parties for Operational Business Purposes</b>	<b>Sold to Which Categories of Third Parties</b>	<b>Shared with Which Categories of Third Parties for Cross-Context Behavioral or Targeted Advertising</b>
We may knowingly sell or share the Personal Information of persons under 16 years of age. We may disclose your Personal Information to one or more third parties in connection with any reorganization, financing transaction, merger, sale, joint venture, partnership, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).			

## 2. Sources of Personal Information

We collect Personal Information directly from you, as well as from joint marketing partners, public databases, providers of demographic data, publications, professional organizations, social media platforms, people with whom you are connected on social media platforms, caregivers, companies and other third parties that help us screen and onboard individuals for hiring purposes, and other third parties.

## 3. Purposes for the Collection, Use, Sharing, or Other Disclosure of Personal Information

We may collect, use, share, or otherwise disclose Personal Information to operate, manage, and maintain our business, to provide our products and services, for our employment purposes, and to otherwise accomplish our business purposes and objectives.

Our business purposes and objectives include, for example, developing, improving, repairing, and maintaining our products and services; personalizing, advertising, and marketing our products and services; facilitating social sharing; conducting research, analytics, and data analysis; maintaining our facilities and infrastructure; hiring; undertaking quality and safety assurance measures; conducting risk and security controls and monitoring; detecting and preventing fraud; performing identity verification; performing accounting, audit, and other internal functions, such as internal investigations; entering into, tracking, and performing agreements with customers and suppliers; processing payments; providing customer support and responding to requests for information; managing customer and supplier relationships; complying with law, legal process, and internal policies; maintaining records; exercising and defending legal claims; and protecting the safety of our customers, business contacts, job applicants, and others, and other purposes and objectives mentioned in our General Privacy Policy above.

## 4. Use of Sensitive Personal Information

Novartis uses and discloses sensitive personal information solely for the purposes of: (i) performing the services or provide the goods you request and which an average consumer would reasonably expect to receive; (ii) preventing, detecting and investigating security incidents involving personal data, (iii) ensuring the physical safety of natural persons (including reporting adverse events), or (iv) other permitted purposes, as specified under applicable state privacy laws or regulations.

## 5. Retention Period

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was collected. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you (for example, for as long as you have an account with us or keep using our services) and the length of time thereafter during which we may have a

legitimate need to reference your Personal Information to address issues that may arise;

- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

## **6. Individual Requests**

You may, subject to applicable law, make the following requests. We will respond to your request consistent with our obligations under applicable law.

1. You may request to know whether we process your Personal Information.
  - a. If you are a California consumer, you may request that we disclose to you the following information covering the 12 months preceding your request:
    - I. The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
    - II. The business or commercial purpose for collecting or sharing Personal Information about you;
    - III. The categories of Personal Information about you that we sold or shared (as defined by the CCPA) and the categories of third parties to whom we sold or shared such Personal Information; and
    - IV. The categories of Personal Information about you that we otherwise disclosed, and the categories of third parties to whom we disclosed such Personal Information.
2. You may request to correct inaccuracies in your Personal Information.
3. You may request to have your Personal Information deleted.
4. You may request to receive a copy of your Personal Information, including, where applicable, a copy in a portable, readily usable format.
5. You may request to opt out of Targeted Advertising or the sharing of your Personal Information for cross-context behavioral advertising (see Section II above).
6. You may request to opt out of the processing of your Personal Information for purposes of profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

We will not unlawfully discriminate or retaliate against you for exercising your rights under applicable law. To make a privacy request, please Contact Us as specified above. We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. In some instances, we may decline to honor your request where the law or right you are invoking does not apply or where an exception applies. We may need to request additional Personal Information from you in order to verify your identity and protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your Personal Information. You may make a request on behalf of a child who is under 13 years old if you are the child's parent or legal guardian. If you make a request to delete, we may ask you to confirm your request before we delete your Personal Information.

### **Appeal Process**

If we refuse to take action on your request, you may have the right under applicable law to appeal the refusal within a reasonable period after you have received notice of the refusal. You may file an appeal by [contacting us online](#) or calling 1-800-NOW-NOVA.

### **Authorized Agents**

If an agent would like to make a request on your behalf as permitted under applicable law, the agent may use the submission methods noted in the section entitled “Individual Requests.” Not all kinds of requests can be made by authorized agents in all states. As part of our verification process, we may request that the agent provide, as applicable, proof concerning their status as an authorized agent. In addition, we may require that you verify your identity as described in the section entitled “Individual Requests” or confirm that you provided the agent permission to submit the request.

## 7. De-Identified Information

Where we maintain or use de-identified information, we will continue to maintain and use the de-identified information only in a de-identified fashion and will not attempt to re-identify it.

## 8. Other State-Specific Privacy Disclosures

For Washington and Nevada residents, please visit our separate [Consumer Health Privacy Policy](#).

**California Residents Under Age 18:** If you are a resident of California under age 18 and a registered user of the Services, you may ask us to remove content or data that you have posted to the Services by writing to [novartis.email@novartis.com](mailto:novartis.email@novartis.com). Please note that your request does not ensure complete or comprehensive removal of the content or data, as, for example, some of your content or data may have been reposted by another user

**Nevada Residents as Covered by Nevada Privacy Law:** We do not sell Covered Information as defined under Nevada law. If you would like to make a further inquiry regarding the selling of your Covered Information, as defined under Nevada law, please contact [Nevada-Privacy.Request@novartis.com](mailto:Nevada-Privacy.Request@novartis.com)

**Texas Residents:** Pursuant to the Texas Health and Safety Code, Sec. 181.154, please be advised that if we receive any data that identifies you and relates to your past, present or future physical or mental health, healthcare or payment for your healthcare, such data may be subject to electronic disclosure by such means as file transfers or email.

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