



INCYTE PRIVACY NOTICE HEALTHCARE PROFESSIONALS (HCP) AND INSTITUTIONAL OR PHARMACY BUSINESS CONTACTS CANADA

We use this Privacy Notice to tell you what personal information we collect from you and what we do with it, as an HCP or business contact interacting with us, including informally, as part of an Incyte pharmaceutical research activity, as part of a consulting relationship, or as part of Incyte's obligation to report safety information to various regulatory agencies.

When we collect your personal information:

- We take or require appropriate technical, physical, and organisational measures (such as multifactor password authentication, encryption, access restriction, etc.) to protect your personal information from misuse or unauthorized alteration, loss, or access;
- We collect and use your personal information only for the purpose(s) outlined below or as authorized or required by law;
- We only collect the personal information that we need; and
- We keep your personal information up to date and endeavor to ensure that it is accurate, however in some instances we rely on you to notify us if you've made a change.

This Privacy Notice was amended on May 8, 2020.

What personal information do we collect and use and how long is it stored?

1. Healthcare Professional Business Contacts

- We collect and use the following personal information:
 - Your name, business contact details, and professional qualifications, (sources: public sources such as websites or third party data providers like IQVIA/IMS/Veeva);
 - Information specific to our professional interactions, e.g. meeting visit notes, (source: directly from you);
 - The scheduling of meetings with you, (source: directly from you or from your employer or place of business);
 - Information relevant to your professional interests such as promotional, medical, and educational information (source: directly from you or from a third party provider); and
 - Your potential or actual involvement in our clinical development programs (source: directly from you; our clinical research records; or public sources such as scientific and medical publications, national registries, and the Internet).
- We collect this personal information in order to:



- Schedule meetings with you;
 - Determine your interest in receiving information relating to Incyte products;
 - Provide Information relevant to your professional interests such as promotional, medical and educational information;
 - Initiate or follow-up for clinical development programs; and
 - Comply with voluntary or regulatory transparency reporting disclosures or other regulatory obligations.
- We collect and use this personal information as necessary based on our legitimate interest as a drug manufacturer or based on your opt-in or consent. Where applicable, we also collect and use this personal information as necessary based on our regulatory transparency reporting or other regulatory requirements.
 - We keep and use your information for as long as necessary for the administration of our relationship but for history of our interactions, no longer than three years after the last contact with you unless you ask us to delete your data prior to that date or unless otherwise required under transparency reporting disclosures or other regulatory obligations.

2. Research Investigators & Research Staff

- We collect and use the following data:
 - Your name, business contact details, professional qualifications and interests, (source: third party data provider like IQVIA/IMS/Veeva or a CRO or directly from you or your employer);
 - Information specific to our professional interactions, e.g. meeting visit notes), (source: directly from you); and,
 - The scheduling of meetings with you, (source: directly from you).
- We collect this personal information in order to:
 - Coordinate your involvement in an Incyte sponsored research in order to contact you, contract with you, provide you with information about the research, and schedule meetings and appointments with you;
 - Comply with Incyte's legal obligations in its conduct of research; and,
 - Comply with voluntary or regulatory transparency reporting disclosures where applicable.
- We collect and use your personal information (1) as necessary based our legitimate interest as a drug manufacturer in developing new drugs; (2) based on Incyte's legal obligations under applicable laws; (3) in performance of a contract with Incyte; and/or (4) based on your consent.
- We keep and use your information for as long as necessary for the administration of our business relationship but no longer than thirty years after the conclusion of the research as necessary to comply with legal or regulatory obligations.

3. Adverse Event/Special Situation/Product Complaint Reporters

- We collect and use the following personal information:
 - Your name, business contact details, credentials, and employer (source: directly from you or one of your patients or patients' caregiver).
- We collect this personal information in order to:
 - Understand the safety and efficacy of Incyte's study drugs or products in the market place; and
 - Comply with Incyte's legal obligations in the conduct of research or manufacturing and distribution of a marketed product for reporting safety and product complaints.



- We collect and use this personal information based on Incyte's legal obligations under applicable laws.
- We keep and use your information for as long as necessary to comply with Incyte's legal obligations under applicable laws but no longer than thirty years after the conclusion of the research or after the life of the product as necessary to comply with legal or regulatory obligations.

4. Medical Information Requestors

- We collect and use the following personal information:
 - Your name, business contact details, credentials, and employer (source: directly from you); and
 - We collect this personal information in order to answer your unsolicited questions related to Incyte products or studies or related disease state information.
- We collect and use this personal information as necessary based on our legitimate interest as a drug manufacturer in supporting the development of new drugs and use of approved drugs.
- We keep and use your information for as long as necessary to comply with Incyte's legal obligations under applicable laws but no longer than thirty years after the end of the life of the marketed product as necessary to comply with legal or regulatory obligations.

5. Consultants

- We collect and use the following personal information:
 - Your name, business contact details, education, professional experience, qualifications, licenses, photo, and national identifiers such as social security number or tax number (source: third party data provider like IQVIA/IMS/Veeva ,directly from you, or from public sources such as scientific and medical publications, national registries, and the Internet);
 - Information specific to our professional interactions such as meetings, meeting notes, and audio or video recordings (source: directly from you);
 - Payment and/or bank details; and
 - Other details necessary to comply with voluntary or regulatory transparency reporting disclosures
- Automated Decision Making: Incyte uses an automated process to determine applicable payment rates for consulting activities according to your qualifications and professional experience. This process is conducted in order to enter into a contract with you at rates that are likely to be considered fair market value for compliance purposes. You have the right to (1) ask for intervention by an Incyte representative in this process; (2) express your point of view regarding the outcome; and (3) contest the decision. You can engage with your Incyte contact to do any of these or you can contact Incyte's Data Protection Officer as noted below.
- We collect and use your personal information (1) in performance of a contract with Incyte; (2) based on Incyte's legal obligations under applicable laws; and (3) for legal proceedings, investigations and questions from competent authorities.
- We keep and use your information for as long as necessary for the administration of this relationship but no longer than three years after the last contact with you, unless you ask us to delete your personal information prior to that date or unless otherwise required under transparency reporting disclosures.

6. Business Contacts at Institutions or Pharmacies

- We collect and use the following personal information:



- Your name and business contact details (source: third party data provider like IQVIA/IMS/Veeva or directly from you); and,
- Information specific to our professional interactions such as meetings and meeting notes (source: directly from you).
- We collect and use your personal information (1) in performance of a contract with Incyte; (2) based on Incyte's legal obligations under applicable laws; and (3) for legal proceedings, investigations and questions from competent authorities.
- We keep and use your information for as long as necessary for the administration of our business relationship but no longer than three years after the last contact with you, unless you ask us to delete your personal information prior to that date.

Do you need to provide us with your personal information?

In certain instances you need to provide us with your personal information in order for Incyte to meet regulatory or legal obligations or where it is necessary for us to enter into a contract with you. In all other instances, you are not obliged to provide us with any personal information.

Who do we share your personal information with?

Consistent with the purposes named above, your personal information is shared by Incyte with:

- Other companies in the worldwide Incyte Group, wherever located (a list of all Incyte companies is available under: <http://www.incyte.com/contact-us/headquarters.aspx>);
- Third party consultants, service providers, partner companies contracted by or on behalf of Incyte or its affiliates, wherever located;
- Healthcare professional boards, authorities, wherever located;
- Government agencies, regulators, or public authorities, but only when they require us to. In some instances, these government agencies may make your personal information public in accordance with applicable laws or guidelines;
- Publicly online as part of voluntary transparency disclosures; and
- Where required by institutional policy or government entity, to your employer.

Where is your personal information used or stored?

We transfer your personal information to other countries outside of your country of residence. Your personal information is transferred:



1. To Europe, Switzerland, and Japan who are considered as providing adequate data protection standards.
2. To countries where data protection standards have not been determined to be adequate: these countries include the United States (where not made under Privacy Shield), United Kingdom, India, and China. In these cases we will ensure that any recipients of your personal information are bound by contract to data protection standards.

What are your rights?

You have a number of rights that apply to our use of your personal information. The availability of some of these rights depends upon our lawful basis for processing your personal information and your rights may also be subject to certain conditions and restrictions. You may have the right:

- to obtain access to your personal information together with information about how and on what basis that personal information is processed;
- to rectify inaccurate personal information (including the right to have incomplete personal information completed);
- to erase your personal information in limited circumstances where it is no longer necessary in relation to the purposes for which it was collected or processed or where you object to or withdraw your consent. This right may also apply where the processing was unlawful;
- to restrict processing of your personal information where:
 - the accuracy of the personal information is contested;
 - the processing is unlawful but you object to the erasure of the personal information;
 - we no longer require the personal information for the purposes for which it was collected, but it is required for the establishment, exercise, or defense of a legal claim;
- to challenge processing which we have justified on the basis of a legitimate interest;
- to object to decisions which are based solely on automated processing (to the extent that these are taken);
- to withdraw your consent for processing where the legal basis relied on is consent;
- to obtain more information as to safeguards under which your personal information is transferred outside of Canada (if relevant); or
- to lodge a complaint with the data protection/supervisory authority noted below.

We may ask you for additional information to confirm your identity and for security purposes before processing your request.

Who can you contact regarding your rights?

Data Controller: The entity that determines why and how your personal information is processed is called a Controller. The Controller for the processing of your personal information is the Incyte organisation or affiliate listed below, depending on our relationship with you.



- **Healthcare Professional Business Contacts:** the Incyte affiliate where you are located or that serves the area where you are located, in this case, Incyte Biosciences Canada.
- **Research Investigators & Research Staff:** the sponsor of the research for which you are an investigator.
- **Adverse Event/Special Situation/Product Compliant Reporters:** For clinical study products, the sponsor of the research for which you are reporting. For marketed products, Incyte Biosciences Canada.
- **Consultants:** the Incyte affiliate who you have a contract with.
- **Business Contacts at Institutions or Pharmacies:** Incyte Biosciences Canada

A list of all Incyte companies is available under: <http://www.incyte.com/contact-us/headquarters.aspx> .

Data Protection Officer Incyte: privacy@incyte.com or toll free at 833-919-0687.

Data Protection Authority/Supervisory Authority: The Data Protection Authority/Supervisory Authority for the processing of your personal information is the authority located in the country or province where you live or work, or where your personal information is processed. More information about your Data Protection Authority can be found on the Office of the Privacy Commissioner of Canada website: <https://www.priv.gc.ca/en/>.