

ROCHE - ONLINE PRIVACY STATEMENT

October 2019

Thank you for visiting a Roche (Malaysia) Sdn. Bhd. ("**Roche**", "**we**", "**our**", "**us**") website ("**Website(s)**") or interacting with us.

At Roche, we understand that protecting the privacy of individuals, including visitors to our Websites, is very important and that information about your health is particularly sensitive. That is why we have taken the necessary steps to meet data privacy requirements as set out by the Personal Data Protection Act 2010 ("**PDPA**") and other applicable laws, standards and codes of practice.

This Privacy Statement ("**Statement**") applies to personal information (as defined below) collected from Roche online resources and communications (such as Websites, e-mail, and other online tools) that display a link to this Statement.

This Statement does not apply to third-party online resources to which Roche Websites may link, where Roche does not own nor control the content or the privacy practices of such resources. We highly recommend communicating to them directly for information on their privacy policies and to read such third party privacy policies carefully before using the third party websites.

We only collect your personal information that you choose to provide to us in the course of our relationship and where we are providing our products and/or services to you. If you choose not to provide us with certain personal information, you would not be able to obtain and/or access such products and/or services. We do not share your personal information with third parties unless otherwise as contemplated within this Statement or if you explicitly give us permission to do so. Please review this Statement carefully to learn more about how we collect, use, share and protect your information.

Information Collected

1. Information We Collect From You

You can visit our Websites without providing any personal information. We may collect your personal information only when you choose to provide it to us in connection with a promotion, a survey, a patient assistance or support program, a clinical trial or any other programs carried out by us. Such personal information may include your name, address, contact number, e-mail address, health, insurance and/or financial information. Healthcare providers ("**HCP**") may choose to provide information in respect of their specialties and professional affiliations. However, if you choose not to provide the solicited information, you may not access and/or obtain some of our products and/or services.

2. Automatically Collected Information

We and some third party providers that we work with automatically receive certain types of information, such as your IP address and how you navigate our Websites, whenever you interact with us online, for example by visiting our Websites and corresponding with us via e-mails. Automatic technologies and services we use may include, for example, Web server logs/IP addresses, cookies, Web beacons and third party application and content tools ("**Tools**").

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Web Server Logs/IP Addresses. An IP address is a number assigned to your computer whenever you access the Internet. All computer identification on the Internet is conducted with IP addresses, which allow computers and servers to recognize and communicate with each other. Roche collects IP addresses to conduct system administration and report aggregate information to affiliates, business partners and/or vendors to conduct site analysis and Web site performance review.

Cookies. A cookie is a piece of information that is placed automatically on your computer's hard drive when you access certain Web sites. The cookie uniquely identifies your browser to the server. Cookies allow us to store information on the server to help make the Web experience better for you and to conduct site analysis and Website performance review. Most Web browsers are set up to accept cookies, although you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Note, however, that some portions of our sites may not work properly if you refuse cookies.

Web Beacons. On certain Websites or e-mails, Roche may utilize a common Internet technology called a "Web beacon" (also known as an "action tag" or "clear GIF technology"). Web beacons help analyze the effectiveness of Websites by measuring, for example, the number of visitors to a website or how many visitors clicked on key elements of a website.

Such Tools do not automatically obtain your personal information. Only if you voluntarily submit personal information, such as by registering or sending e-mails, can these automatic tracking technologies be used to provide further information about your use of the Websites and/or interactive e-mails to improve their usefulness to you.

We may also provide services based on third party applications and content tools on certain Roche Websites such as Google Maps or QUARTAL FLIFE. These third parties may automatically receive certain types of information whenever you interact with us on our Websites using such third party applications and tools.

3. Information From Third Parties

We may, from time to time, use or augment your personal information in our database with information obtained from third parties. Examples of when we use such third party information includes, but is not limited to, to confirm your contact or financial information; if you are a HCP, to verify your licensure; or to achieve greater understanding of your interest by associating demographic information with the information that you have provided.

Your Choices

You have several choices regarding your use of our Websites as follows:

1. You could decide not to submit any personal information at all by not entering it into any forms or data fields on our Websites and not using any available personalized services;
2. If you choose to submit personal data, you have the right to access, correct or remove your data at any time by contacting us via the our contact details below. [_____](#)

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3. Certain Websites may ask for your permission for certain uses of your information and you can either agree to or decline those uses or requests;
4. If you opt-in for particular services or communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in each communication. If you decide to unsubscribe from a service or communication, we will work to remove your information promptly, although we may require additional information before we can process your request; or
5. As described above, if you wish to prevent cookies from tracking you anonymously as you navigate our sites, you can reset your browser to refuse all cookies or to indicate when a cookie is being sent.

Security

Roche uses technological and security precautions, rules and other procedures to protect your personal information from unauthorized access, improper use, disclosure, loss or destruction ("**Unauthorised Events**"). To ensure the confidentiality of your information, Roche uses also industry standard firewalls and password protection. However we do not guarantee that your personal information will be completely secure from Unauthorised Events as no such measure is ever 100% effective. We also do not make any representations as to the reasonableness, efficacy or appropriateness of the measures we use to protect such information.

It is your personal responsibility to maintain the secrecy of your password(s) and to ensure that the computer you are using is adequately secured and protected against malicious software, such as trojans, computer viruses and worm programs. You are aware of the fact that without adequate security measures (e.g. secure web browser configuration, up-to-date antivirus software, personal firewall software, no usage of software from dubious sources) there is a risk that the data and passwords you use to protect access to your data, could be disclosed to unauthorized third parties. If you have reason to believe that your interaction with us is no longer secure (for example, if you suspect that the security of your account has been compromised), please notify us immediately.

Roche will retain personal information for as long as it is required to carry out the purpose such information was collected. The retention period of such information may be longer than our business relationship but it will only extend so far as to provide us with sufficient information to respond to any issues that may arise and to comply with any applicable legal requirements.

Roche will either destroy, erase or make anonymous any information that it is no longer required to retain in a manner that renders such information incapable of being traced to or associated with you.

Use of Data

Roche, including the subsidiaries, divisions and groups worldwide ("**Roche Group**") and/or the companies we hire to perform services on our behalf may use your personal information in the following manner:

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1. To respond to your enquires and to comply with your requests for our products and services;
2. To enable us to communicate with you from time to time about related products, brands, health topics and disease states and to personalize certain communications with you about services and promotions that you might find relevant or interesting;
3. To provide customer service and support;
4. To identify you when you arrive at a Roche Website via an external link;
5. To work with third parties to provide our products and/or services to you as Roche Websites offers various tools and functionality that are provided either by Roche or other third parties;
6. To enable you to share content of our Websites with a friend or colleague. Roche will only use your information and the information of your friend or colleague to the extent of fulfilling your request of sending such content to your friend or colleague and Roche, and related third parties, will not collect or use the aforementioned information for additional purposes;
7. For different Human Resource purposes (Performance Management, Succession decisions or Development actions) to help us better understand your needs and how we can improve our products and services;
8. To validate your eligibility to access or use certain restricted Roche products, services and information;
9. To enable us to provide our products and services in accordance with any special terms as stipulated in Roche's special programs, activities, clinical trials, events or promotions ("**Programs**") which we may offer on the Website from time to time. Please read such special terms carefully before participating in any of the Programs as it may involve, amongst others, the necessary disclosure and processing of personal information to other third parties;
10. To comply with legal or regulatory obligations or transparency requirements including those that apply to Roche's activities globally; and/or
11. To remove personal identifiers from the provided information and maintain it in an aggregated form for various business purposes, including developing and/or improving our products and services.

If you are a HCP, the following additional purposes may apply:

1. Your personal information may be used in relation to any sponsorship by Roche of your attendance and registration for any event organised by Roche and/or a third party;
2. Your personal information may be used –in relation to your potential or actual engagement as a speaker at any of event organised by Roche and/or a third party;

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3. Your personal information may be used -in relation to any adverse event reported by you or which you may otherwise be involved or concerned with;
4. Your personal information may be used in relation to Roche's evaluation, processing and/or approval of your application for or receipt of any grant for an investigator initiated research study and purposes related thereto; and/or
5. Your personal information may be used in relation to your participation as an investigator of Roche's past, ongoing or future clinical trials.

If you are a patient, the following additional purposes may apply:

1. Your personal information may be used for product safety and product complaint reporting, including the reporting of any drug adverse event;
2. Your personal information may be used to administer communications made by you, your doctor or someone else on your behalf to Roche;
3. Your personal information may be used to communicate information relating to health and nutrition;
4. Your personal information may be used to conduct patient assistant programs;
5. Your personal information may be used to conduct health educational programs; and/or
6. Your personal information may be used to provide any educational material.

Data Sharing and Transfer

Roche may disclose your personal information for the following purposes:

1. We may disclose your personal information to various third party companies or agents who provide services on our half and we may collaborate with other companies and agents in respect of particular products or services ("**Providers**"). Such Providers provide technological maintenance or work on our behalf to help fulfill business transactions, such as providing customer services, and sending marketing communications about our products, services and offers. Such Providers may also collect information on our behalf on our Websites. These Providers are required to comply with the terms of our privacy policies and may not use your personal information other than on our behalf and subject to contracts that protect the confidentiality of the information.
2. We may disclose your personal information to our company's subsidiaries and affiliates which are required to comply with the terms of our privacy policies.
3. We may disclose your personal information in connection with the sale, assignment or other transfer of the business of the Website to which the personal information relates;

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4. We may disclose your personal information to respond to appropriate requests of legitimate government agencies or where required by applicable laws, court orders, or government regulations
5. We may disclose your personal information where needed for corporate audits or to investigate or respond to a complaint or security threat; or
6. We may disclose your personal information in an aggregated or de-identified form to third parties.

No Third-Party Direct Marketing Use

We will not sell or otherwise transfer your personal information to any third parties for their own direct marketing use unless we provide clear notice to you and obtain your explicit consent for your data to be shared in this manner.

Transfer of Data outside Malaysia

Any of your personal information may be transferred, accessed, stored or processed in other jurisdictions, such as the United States, whose data protection laws may differ from Malaysia. In such cases, we will handle your personal information in accordance with this Privacy Policy and ensure that the data processor complies with applicable data privacy laws.

Google Analytics

Roche Websites may use Google Analytics, a web analytics service provided by Google, Inc. (“**Google**”). Google Analytics uses cookies to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States . Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, as mentioned above please note that if you do this you may not be able to use the full functionality of a Roche Website. By using a Roche Website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Links to Other Sites

Our Websites may contain links to a number of third party websites that may offer useful information to our visitors. We do not own or control such third party websites or content and as such, this Privacy Statement does not apply to those websites. We highly recommend communicating to them directly for information on their privacy policies and to read such third party privacy policies carefully before using the third party websites.

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Privacy Statement for Children

Our Websites are directed at an adult audience. We do not knowingly collect any personal information from anyone under the age of 13 without the prior, verifiable consent of his or her legal representative. Such legal representative has the right, upon request, to access the information provided by the child and/or to require that it be amended or deleted.

Additional Information on Web Sites

If a Website has particular provisions relating to privacy that differ from those stated here, those provisions will be disclosed to you on the page on which personal information is collected.

Note to Users of Business or Professional Websites

If you have a business or professional relationship with Roche, we may use information you submit on our Websites, including Websites intended specifically for business and professional users, to fulfill your requests and develop our business relationship with you and the entities you represent. We may also share such information with third parties acting on our behalf.

Updates

From time to time, Roche may revise this online Privacy Statement. Any such changes to this Privacy Statement will be effective immediately upon the posting of the amended Privacy Statement and will be promptly communicated on this page. Your continued use of our Websites after receiving our notice of change in our Privacy Statement indicates your consent to the use of newly submitted information in accordance with the amended Privacy Statement. We encourage you to periodically review this page for the latest information on our privacy practices. This Privacy Statement was last updated on and is effective as of 15 February, 2014.

Kindly click the links below for the PDPA Notice in dual languages:

[PDPA Notice in English](#)

[PDPA Notice in Bahasa](#)

Contact Us

For any questions, comments, requests or concerns relating to this Statement, the information practices of this Website or your personal information, or if you wish Roche to amend or delete your profile, or if you would like to opt out of future communications or otherwise limit the processing of your personal information, please contact us as follows:

Designation : Legal Counsel/Privacy Officer

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Fax no. : + 603 5036 7740

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