Privacy Policy

Last Updated: 04/11/2021

Please read this Privacy Policy (“Policy”) carefully. It applies to information you will be sharing with Sanofi Aventis Israel Ltd (“Company”, “we”, or “us”) and information we will collect about HCP.

This Policy outlines the types of Personal Information that we gather about HCPs, how we collect and make use of such data, including saving, processing and sharing the data with third parties (including those located outside the State of Israel), etc and all as described in this Policy.

You are aware that your Personal Information, will be stored on Company’s database and you are not under any statutory or contractual obligation to provide us with your Personal Information and that the information is provided on your own free will.

By providing your Personal Information, you expressly acknowledge and agree to the terms of this Policy and that we will collect, use and share your Personal Information with third parties including, third parties located outside the State of Israel, in accordance with the provisions of this Policy. You further acknowledge and agree that we will process and use your Personal Information in Israel and we will transfer the information to other countries outside of Israel. Please be aware that the privacy laws and standards in certain countries may differ from those that apply in Israel. Please read this Policy to learn more about how we protect Personal Information, including when we transfer Personal Information outside the State of Israel. If you do not want us to collect, use, or share your Personal Information in the ways described in this Policy, you should not provide us with your Personal Information and access or use our services, websites, apps, etc.

1. **What is Personal Information?**

   “Personal Information” means any information that specifically identifies an individual such as a name, address, telephone number, mobile number, or e-mail address, or information about an individual that could be directly linked to such identifying information such as device IP address.

2. **How do we collect Personal Information?**

   2.1 Directly from you and/or interactions that you have with us including our sales representatives (for example answer a request you address, helpline to HCP, etc)

   2.2 Through our websites, apps, platforms, social media, including information collected by automated means on our platforms, , digital communications including emails (for example if you open an email, if you click on contents in the email, etc), view of our contents, etc.

   2.3 From third-party service providers as detailed in this privacy policy.
3. **Personal Information we collect**

3.1 Contact information and contact preferences (such as name, email address, mailing address, phone number).

3.2 Professional credentials, educational and professional history, institutional and government affiliations, license information, and information included on a resume (such as work experience, education, etc).

3.3 Information about our programs, products and activities with which you have engaged.

3.4 Publicly available information such as biographical data, publications, characteristics of clinical trials HCP has been involved in, research grants, attendance to advisory boards, academic positions, honours and awards, etc.

3.5 Information on your interaction with us including thought our websites, apps, services, email and materials.

3.6 Details about our interactions with you, your perception on Therapeutic Areas, our products and treatments, your participation to events. Where you register or you participate to an event organized by the Company or anyone on its behalf, your personal data will be processed to allow you to receive the invitation or information related to this event and to ensure the participation and attendance to such event.

3.7 Information collected by automated means on our digital communications in any means including emails (for example if you open an email, if you click on contents in the email, etc), view of our contents, etc.

3.8 Please note that our websites and apps may collect information that could be potentially personally identifiable about your visits and your actively submitting such information. Unidentified information may be collected using various technologies, such as cookies and web beacons. Before using our websites and apps, please read carefully the terms of use and privacy policy in the websites and the apps.

4. **How We Use your Personal Information**

We collect, use, share, and otherwise process your Personal Information as described in this Policy. We will use Personal Information and other information we collect for the purposes as detailed in this Policy below:

4.1 Establish and maintain communications with you;

4.2 Send promotional, commercial or medical information and communications including personalized content and services. Without derogating from the above, we may use social media to send the abovementioned communications.

4.3 Provide medical information or get your feedbacks on specific disease, your specialty and needs.
4.4 Where you have requested a service from us, assisting you in the completion of your application, the processing and maintenance of the service.

4.5 Respond to your inquiries.

4.6 Meet legal, security, processing, and regulatory requirements.

4.7 Create profiles according to your interests, scopes, preferences and specialty.

4.8 Protect against fraud, or suspicious or other illegal activities.

4.9 Conduct statistical analysis, surveys, market research, analysis of our websites, apps and business.

5. **What Personal Information do we share with third parties?**

We may share your Personal Information with third parties in the following circumstances:

5.1 Sanofi and its affiliates.

Sanofi is a multinational organization with affiliates located in countries around the world. For that reason, we may share your Personal Data within Sanofi and its affiliates located in other jurisdictions, including outside the State of Israel.

5.2 Third Parties Providing Services on Our Behalf

We may share your Personal Information with third parties that perform services on our behalf, such as companies that host or operate our websites, apps, services and business; provide IT service, market research services, legal advisers, social media platforms, data analysis and any other service providers.

5.3 Legal Disclosure

We may transfer and disclose information, including your Personal Information, to third parties to comply with any legal obligation; at the request of governmental authorities conducting an investigation or otherwise requiring disclosure (including without limitation to meet law enforcement requirements and for the purposes of national security); to protect the rights, property, safety, or security of us, the public and/or our users and visitors of our services.

5.4 Business Transfers

We may also share your Personal Information with our affiliates and shareholders, and such entities may use your information in accordance with this Privacy Policy. As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all or a portion of our assets, Personal Information may be disclosed to such entity as part of the due diligence process and will be transferred to such entity as one of the transferred assets.
6. **Your Rights as Data Subject**

Your rights to review and amend your Personal Information will be in accordance with applicable Israeli law, including the provisions of the Protection of Privacy Law, 5741-1981.

If you want to review and/or amend the information we maintain about you or have additional questions, please contact us in accordance with the “Contact Us” section below.

7. **Retention**

The amount of time we will retain your Personal Information depends on why we collected it and how we use it. We won't retain your Personal Information for longer than we are allowed under applicable law, and otherwise, will not generally retain your Personal Information for longer than is necessary to accomplish our business purposes and protect our legal rights.

8. **How We Protect Personal Information**

We maintain certain administrative and technical safeguards to help protect Personal Information against loss or unauthorized access. Please keep in mind that no method of transmission over the Internet, or method of electronic storage, is 100% secure. As a result, we cannot promise or guarantee that such information will be immune from any wrongdoing, malfunction, unlawful interception or access, or other kinds of abuse and misuse. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contact Us” section below.

9. **International Operations; Transfers of Personal Information Outside the State of Israel**

Please be aware that information we collect will be stored and processed in Israel and will be transferred the information to other countries outside of Israel. By providing us with any Personal Information, you hereby agree to the collection, processing, maintenance and transfer of such information to third parties outside the State of Israel including to territories in which the privacy laws may not be equivalent to those in Israel.

10. **Updates to Our Policy**

This Policy may be updated periodically and without prior notice to you, and any changes will be effective immediately upon the posting of the revised Policy. We will indicate at the top of this Policy when it was most recently updated. We recommend that you periodically check and review this Policy. It is your responsibility to check this Policy frequently to view any amendments (if any).

11. **Contact Us**

If you have any concerns or questions about this Policy, about how we process your Personal Information, please contact us at dataprivacy@sanofi.com.
12. **Governing Laws**

Processing your Personal Information, your interaction with us, and this Policy, is subject to the laws of Israel. The sole jurisdiction for any matter and/or dispute relating to issues of privacy and this Policy will be exclusively subject to the jurisdiction of the competent courts in Tel Aviv, Israel.