

# Privacy Notice for Investigators and Other Site Staff Participating in Pharmacyclics Research

## Introduction

**Pharmacyclics LLC**, an AbbVie Company, with its registered address at 995 East Arques Avenue, Sunnyvale, CA, U.S.A. 94085-4521, and **Pharmacyclics Switzerland GmbH**, an AbbVie Company, with its registered address at Muhlenalstrasse 36, Schaffhausen, 8200, Switzerland, are biopharma companies which are part of a global group of companies focused on developing leading treatments and innovations worldwide. (Hereinafter, "Pharmacyclics" or "we" refers to the Pharmacyclics entity set forth above that is the study sponsor of your specific study.) At Pharmacyclics, we take great care in processing personal data in compliance with applicable laws. We only collect and use the information necessary to achieve the purposes described below. Within the meaning of applicable data protection law, Pharmacyclics is the data controller.

## Personal data that we collect about you and why

In anticipation and as part of your participation in Pharmacyclics' research and development activities, we may collect personal data about you. Pharmacyclics and/or its designated Contract Research Organization ("CRO") may collect such personal data from a variety of sources, including directly from you (e.g., in your CVs, resumes or other documents or forms provided by you to Pharmacyclics) and indirectly (e.g., from the research center where you work or conduct/support research activities, or from publicly available sources, including those available online which may include websites such as [www.clinicaltrials.gov](http://www.clinicaltrials.gov), [www.clinicaltrialsregister.eu](http://www.clinicaltrialsregister.eu), and the United States FDA's Debarment and Disqualified and Restricted Lists for clinical investigators).

Pharmacyclics and/or its designated CRO may collect and use some or all of the following categories of personal data:

- **personal details**, such as your name, age, gender and contact details;
- **professional details**, such as your place of practice, job title, the medical field in which you are active, your professional qualifications and scientific activities (such as previous clinical trial experience, and participation in past or pending research studies with Pharmacyclics, AbbVie, and other companies), publication of academic or scientific research and articles, and membership in associations and boards;
- **financial details**, such as payment-related information, including tax identification number and amounts of payments we make to you; and
- **details of interactions with us**, such as what kind of meetings we have held, topics discussed, your knowledge of and questions you have had on our research activities and products.

Your personal data will be processed by Pharmacyclics for the following purposes:

- managing our relationship with you, including planning, organizing and reviewing the research we perform with you and contacting you;
- helping ensure that we provide you with information about Pharmacyclics' and/or AbbVie's planned research activities that is relevant given your expertise, interests and preferences; and
- complying with applicable laws and regulations (e.g., in connection with pharmacovigilance, public registration of the clinical studies in which you participate on web sites designed for this purpose, such as [www.clinicaltrials.gov](http://www.clinicaltrials.gov) or [www.clinicaltrialsregister.eu](http://www.clinicaltrialsregister.eu), transparency reporting, and completing clinical study reports).

The legal basis for this processing is our legitimate interest in maintaining and optimizing a relationship or connection with you with regard to our research activities, performance of a contract with you or involving you, and compliance with legal and regulatory obligations. You are not required by law or by a contract to provide your personal data to Pharmacyclics, and/or its CRO. However, in order to consider you for participation in Pharmacyclics' research studies and maintain our relationship with you, Pharmacyclics needs to process your personal data.

## Sharing your personal data

Pharmacyclics may share your personal data with others, from time to time, in connection with the purposes described in this notice. In particular, we may make your personal data available to:

- all affiliates within the AbbVie group, including AbbVie Inc. located in U.S. as our parent company, and companies and individuals with whom we may partner in connection with proposed or actual research initiatives;
- third party companies that supply goods or services to Pharmacyclics, such as the designated CRO for the study, legal counsel, auditors, IT service suppliers, and clinical trial service providers;
- ethics committees and government authorities located both in your country and in other countries, including in the United States, where Pharmacyclics conducts its research activities;
- other third parties pursuant to a court order, to protect the interests of Pharmacyclics, or where otherwise required by law or legal process; and
- actual or prospective purchasers of Pharmacyclics business in the event of a sale, merger, or acquisition.

Sharing your personal data as described above may involve transferring it to countries, including countries outside of the EU/EEA, whose data protection and privacy laws may not be equivalent to, or as protective as, those that exist in your country of residence. To ensure an adequate level of data protection is provided, personal data transferred within the AbbVie group of companies, including to AbbVie Inc. in the United States, is done under internal agreements, which incorporate the EU model contract for data transfers to controllers. A copy of the agreement can be obtained by sending an email to [privacyoffice@abbvie.com](mailto:privacyoffice@abbvie.com).

Where Pharmacyclics uses service providers or collaborates with its research partners that have access to personal data, it requires such service providers and research partners to protect your data and to process your personal data in accordance with this data protection notice and for no other purpose. Any transfers of personal data to third parties outside the EU will be done in compliance with the international data transfer restrictions that apply under EU data protection laws, including, where appropriate, through the use of EU model contracts for data transfers to processors.

#### **Securing and retaining your personal data**

Pharmacyclics will take appropriate technical and organizational security measures to protect your personal data consistent with applicable privacy and data security laws. When Pharmacyclics retains a third-party service provider to process personal data, that provider will be carefully selected and required to use appropriate measures to protect the confidentiality and security of personal data. Pharmacyclics retains your personal data only for as long as we continue to collaborate with you on research related matters, unless a longer retention period is required or permitted by Good Clinical Practices (GCP) and clinical trial related laws and regulations.

#### **Your rights**

You may contact Pharmacyclics to request access to personal data that we process about you and that we correct inaccurate data and complete any incomplete data. In accordance with the conditions and requirements of applicable law, you may object to our processing your personal data and request that we erase personal data about you, restrict processing of such data, and transmit your personal data to you or another data controller.

To exercise your rights, contact Pharmacyclics' EU Data Protection Representative, AbbVie Deutschland GmbH & Co. KG, or Pharmacyclics' EU Data Protection Officer by submitting your privacy inquiry at [abbvie.com/privacy-inquiry.html](http://abbvie.com/privacy-inquiry.html) or via postal letter to AbbVie Deutschland GmbH & Co. KG, Knollstrasse 67061 Ludwigshafen, Germany (attention: EU DPO). If Pharmacyclics is not able to provide the requested data or fulfil your request, you will be provided with reasons for such decision. In addition, you are entitled to lodge a complaint with your local data protection authority.