

Privacy Notice for Investigators and Other Site Staff Participating in Pharmacyclics-Supported Investigator Initiated Study or Collaborative Research

Introduction

Pharmacyclics LLC, an AbbVie Company, with its registered address at 995 East Arques Avenue, Sunnyvale, CA, 94085-4521, United States, is a biopharma company which is part of a global group of companies focused on developing leading treatments and innovations worldwide (hereinafter collectively referred to as “Pharmacyclics” or “we”). 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 the Pharmacyclics-supported research activities, we may collect personal data about you. Pharmacyclics 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 clinicaltrials.gov, and the United States FDA’s Debarment and Disqualified and Restricted Lists for clinical investigators).

Pharmacyclics 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 research experience, and participation in past or pending research studies with Pharmacyclics 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 confirming your qualifications to conduct the research, planning, organizing and reviewing the Pharmacyclics-supported research that you are performing and contacting you;
- helping ensure that we provide you with information about Pharmacyclics’ planned research activities that is relevant given your expertise, interests and preferences;
- complying with applicable laws and regulations (e.g., in connection with pharmacovigilance, public registration of the research in which you participate on websites designed for this purpose, such as www.clinicaltrials.gov if Pharmacyclics is responsible for registration, transparency reporting, and completing research reports).

You are not required by law or by a contract to provide your personal data to Pharmacyclics. However, in order to consider you for participation in Pharmacyclics-supported research 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 entities within the AbbVie group (e.g., in the case of shared regional or global databases) and companies, collaborators, 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 legal counsel, auditors, IT service suppliers, and research service providers;

- ethics committees and government authorities located both in the United States, where Pharmacyclics conducts its research activities, and in other countries;
- 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 or AbbVie businesses 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 United States, whose data protection and privacy laws may not be equivalent to, or as protective as, those that exist in the United States. 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 privacy agreements, if required under applicable law.

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 of the United States will be done in compliance with the international data transfer restrictions that apply.

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 it stores records about the Pharmacyclics-supported research in which you participate and for as long as we continue to collaborate with you on research related matters, unless a longer retention period is required or permitted by research related laws and regulations.

Your rights

You may contact Pharmacyclics to request access to personal data that we process about you and to request 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 by submitting your privacy inquiry at abbvie.com/privacy-inquiry.html or send an email to privacyoffice@abbvie.com.