

PRIVACY NOTICE HEALTHCARE PROFESSIONALS

Indivior respects your privacy and is committed to protecting the confidentiality and security of your personal data. This Privacy Notice describes how Indivior ("Indivior", "we", "us") collects and processes personal data of healthcare professionals (referred to as "you" in this Privacy Notice) during and after our relationship with you and your rights in relation to your personal data.

We advise you to read this notice carefully, as well as any other information notice that we may provide on certain occasions when we collect or process personal data about you, so that you are aware of the reasons why your personal data are collected and the manner in which they are processed.

Who is the controller of your personal information?

Indivior UK Limited (Priory Park, Henry Boot Way, Hull HU4 7DY, United Kingdom), together with the local Indivior company which has a relationship with you, are the controllers of your personal information. To find more information on the relevant local Indivior company and find the contact details of the Data Protection Officer (if applicable) for your country, click [here](#).

Contact information and your privacy point of contact

If you want to exercise your rights, have any questions about this privacy notice, need more information or would like to raise a concern, please contact:

privacy@indivior.com

Global Toll-Free Number: +1 804 379 1090

Global Data Protection Officer

Indivior's Global Data Protection Officer can be contacted via dpo@indivior.com

German Data Protection Officer

Indivior's German Data Protection Officer can be contacted via datenschutzbeauftragter_DE@indivior.com.

THE PERSONAL DATA WE COLLECT AND USE

Personal data is any information that identifies or could identify you directly (e.g., your name) or indirectly (e.g. a unique ID number). This does not include anonymised data.

We may process the following categories of personal data about you:

- general contact information such as name, profession, date of birth, address, telephone numbers and e-mail addresses;
- information required to make payments or refunds such as your bank details;
- professional information about your educational background and your professional qualifications, medical practitioner number and professional registration number;
- information about your professional biography and other related information – including your CV/resume, academic information and your interests (such as any specific health care topics about which you request information from Indivior);
- information relating to our interactions with you, such as reports on our exchanges;
- information about your use of our products
- information relating to your attendance to professional events – including travel related information such as your national ID number, passport number, or similar;
- information concerning potential conflicts of interest – including whether you or a close family member are an officer or employee of a political party, candidate for public office or hold a position in government;
- information relating to your preferences for receiving communications from us;
- automatically collected data, such as your IP address, type of browser and operating system, application version and geographical location. We also collect and generate data based on your use of our electronic platforms. We collect these data by placing cookies. For more information regarding the cookies we use, please refer to our [general privacy](#) and [cookie notice](#) available at Indivior.com.

WHAT SOURCES DO WE RELY ON?

Data directly from you:

We collect your personal data directly from you, for instance when you:

- Attend offline meetings, such as conferences and symposia.
- Share or use your social media profile to contact Indivior;
- Use Indivior.com or other Indivior websites, apps and systems;
- Sign up to receive promotional material from us;
- Engage with one of our call centres or sales representatives;
- Contact us for support or to provide feedback;
- Attend an online event such as a webcast;
- Respond to any surveys that you may choose to participate in; and
- Share adverse events or medical information enquiries with us.



Data from other sources:

We also collect personal data indirectly from companies that specialise in providing information services in the healthcare sector, like Veeva Systems Inc, and IQVIA. These organisations operate their own privacy policies and collect data directly from you or from publicly available sources, such as professional registers. We have appropriate contractual arrangements in place to ensure that these organisations collect and share your personal data with us in compliance with applicable laws.

We may also collect information from that is available in the public domain including healthcare provider directories, and professional social media platforms such as LinkedIn.

We may also combine information about you from various sources, including the information you provide to us and personal information, which is collected during your relationship with us.

Some of our products have their own websites that operate their own privacy notices. Please refer to the privacy notices on those websites for further information.

FOR WHAT PURPOSES DO WE USE YOUR PERSONAL DATA?

We use your personal data for the following purposes:

- to manage our working relationship with you;
- to provide you with adequate and up-to-date information about medications as well as our products and services;
- to manage invitations to conferences, PR and other professional events of a medical or scientific nature;
- to manage the reports on the visits made by our employees;
- to manage financial relations (payment for services rendered, reimbursement of expenses, etc.);
- for market research purposes;
- for data segmentation and classification purposes, including to help identify communication and activities of most relevance to you;
- to assist you in accessing any relevant website with scientific and medical content and to provide you with electronic information and services including:
 - online events, such as webcast events;
 - access to online engagement tools, for example Veeva Engage;
 - our press releases;
 - financial results; and
 - information and marketing communications about our products and services.
- to contact and interact with you, including to:
 - respond to your requests (for instance in case you contacted us in relation to a specific medical query or regarding an event); and
 - provide important notices and updates, such as changes to our terms and policies, security alerts and administrative messages;



- to operate our business, including to:
 - respond to reports you make of a possible side effect associated with one of our products and to monitor the safety of our products.
 - comply with applicable laws, regulations, self-regulation, and guidance. For instance, we may publicly disclose your personal data as necessary to fulfil our transparency obligations following from applicable local laws or self-regulatory requirements in relation to contracts with or benefits granted to healthcare professionals and healthcare organizations;
 - comply with demands or requests made by regulators, governments, courts and law enforcement authorities;
- to improve our day-to-day operations, including:
 - for internal purposes such as if needed to help us deliver and improve our digital platforms, content and services only if relevant to you;
 - where you use any of our electronic platforms to monitor and analyse trends, usage and activities in connection with our products and services;
 - to understand which parts of any digital platforms and services we roll out to you are of the most interest and to improve the design and content of our platforms;
 - to improve our products and services and our communications to you; and
 - to ensure we have up-to-date contact information for you;
- to exercise our rights; and
- where it is necessary to use your personal data to defend our business interests, for example to detect, prevent and respond to fraud claims or undesired activities. We can also use your personal data to protect or exercise our rights or the rights of third parties.

We will always obtain consent for marketing where required by applicable law. Whether or not your consent is required by applicable law, you may at any time opt-out of receiving communications by unsubscribing by means of the unsubscribe link included in each communication sent or by contacting us as stated below. Individior does not use your personal data for automated decision-making.

Legal basis of processing

We only use your personal data when permitted to do so by applicable law. We rely on the following legal bases for the processing of your personal data:

- The performance or negotiation of a contract that we are negotiating or have concluded with you, for instance to pay you for services rendered or reimburse you for expenses made;
- Compliance with a legal and / or regulatory obligation, for instance to comply with demands or requests made by regulators, governments, courts and law enforcement authorities or for the publication of the benefits and agreements concluded with you on an official basis only;
- Our legitimate interests (or that of a third party, such as a service provider) in using your personal data, for instance to:
 - Sending direct marketing materials to you (you will always have the right to opt out of marketing and promotional communications);
 - Meeting our transparency obligations;
 - Managing our IT and communications systems and networks;
 - Planning and improving our business activities;
 - Conducting training and gathering feedback for ensuring quality control;



- Protecting our rights, privacy, safety or property, and/or that of our affiliates, you or others;
- Targeted advertising;
- Verifying your eligibility to access certain products, services and data that may be provided only to licensed healthcare professionals or otherwise conducting background checks to ensure we are not precluded from working with you;
- Analysing or predicting your preferences to identify aggregated trends to develop, improve or modify our products, services and business activities;
- Interacting with you through online digital advisory forums and allowing you to send messages to another person if you choose to do so;
- Responding to and handling your queries or requests, including requests for samples;
- Sending administrative information to you, such as changes to our terms, conditions and policies;
- Completing your transactions and providing you with related customer service;
- Creating and maintaining a database in order to identify and engage with you based on your professional expertise and opinions, and where applicable, our past interactions; and
- Reaching out to you to provide information about our products or request input on surveys relating to our products or services;
- We will always balance your rights with our or third party's interests and take appropriate measures to ensure that the processing is necessary and that your interests or fundamental rights and freedoms are respected;

When you have specifically given us your permission when such permission is obligatory (the law calls it “consent”). You can withdraw your consent at any time. We will normally need your consent in the following circumstances:

- To place cookies on your device to find out how you use our websites so we can personalise what you see by tailoring content and notifications to the things you are interested in;
- In certain situations where you share sensitive information about yourself, such as your health;
- Before we send you certain electronic marketing communications; and
- In any other situations where personal information processing relies upon your consent.
- For the establishment, exercise or defence of legal claims or proceedings and exercise our and third parties' rights.

More rarely, the processing of your personal data may be founded on the following legal bases:

- When we need to protect your vital interests (or the interests of someone else); and
- When the public interest commands it, for instance for purposes of pharmacovigilance, drug safety and protection of public health.

In the event applicable law requires us to obtain your consent for the processing of your personal data, we will specifically ask for your consent before we start processing your data.



Change of purpose

We only use your personal data for the purposes as set out in this Privacy Notice. In the event we will process your personal data for new purposes which are incompatible with the original purposes for which we collected your personal data, we will inform you thereof and set out the legal basis that will allow us to do so or ask for your consent.

WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We only share your personal data on a need-to-know basis, and to the extent that it is necessary to follow laws and regulations, and in the context of managing our relationship with you.

We share your personal information only with teams in our Indivior companies and affiliates who need to see it to do their jobs.

In some countries, our relationship with you is managed for us by specialised service providers. We will share your personal information with their people and teams who need to see it as part of their job.

We will also share your personal information with other entities when it is necessary and lawful to do so, for example:

Service providers: we require our service providers to process personal data to the extent that is necessary and relevant for their services, for example, to:

- manage events;
- provide IT services;
- manage accounts and handle payments;
- investigate and prevent fraud;
- manage adverse event reports;
- conduct due diligence;
- target advertising and distribute marketing communications;
- optimise our services, to analyse data, or conduct market research.

Legal consultants and insurers: If data processing is necessary for establishment, exercise, or defence of legal claims we may also transfer your personal data to our legal consultants and insurers.

Authorities and regulators: we share your personal data with authorities or regulators to the extent this is relevant and required by applicable laws, regulations, or codes of practice. For example, with supervisory or regulatory authorities, national medicines agencies, courts, and public bodies, to the extent this is necessary to fulfil a legal obligation or to prosecute criminal offences and fraud. We may also transfer personal data to authorities to protect our rights and property, or the rights and property of third parties.

Industry trade associations.



The following Indivior approved categories of trusted recipients may process your personal data when it is necessary and lawful to do so. These parties are required to respect the security and confidentiality of your personal data and to process personal data in accordance with applicable laws:

DATA TRANSFERS

Transfer of personal data outside your home country

As a global company, we may need to transfer your personal data to third parties located outside of the country where the data was collected. This may include group companies within the Indivior Group, service providers, regulatory agencies, authorities, or other third parties with whom we work. Personal data may be transferred to the United States, United Kingdom, Canada, Australia, and countries within the European Union; as well as some countries that have data protection laws that may not be the same as in your home country.

We ensure that all international transfers of personal data are carried out in compliance with applicable data protection laws and regulations. For data transfers within the Indivior Group we have an intra-group agreement in place to ensure that your personal data is adequately protected. We also carry out due diligence on any third parties involved in international transfers of personal data, to ensure that they have appropriate data protection measures in place.

If you are located in the EU or UK

The European Commission has recognised several countries outside of the European Economic Area (EEA) as having an adequate level of protection. The list can be viewed [here](#).

If you are located in the UK, the Information Commissioner's Office has also recognised several countries as having an adequate level of protection. The list can be viewed [here](#).

If we transfer your personal data to a country that is not on any of the lists mentioned above, we will ensure that appropriate safeguards are in place such as the EU Standard Contractual Clauses (SCCs) and the UK's International Data Transfer Agreement (IDTA) or addendum.

If you have questions about the international transfer of your personal data or the appropriate safeguards that Indivior has taken to protect your personal data, please send an email to Privacy@Indivior.com.

DATA SECURITY

We have put in place appropriate physical, technical and organisational security measures to protect your personal data against accidental loss, use or unauthorised access, alteration, damage, or destruction. These measures are aimed at ensuring the on-going integrity and confidentiality of your personal data, for instance by ensuring that only authorised employees, agents, or subcontractors with a strict need to know have access to your personal data. We evaluate and update these measures on a regular basis. We also have sound procedures in place to deal with any alleged data security breach and, if required by law, we will notify you thereof as well as any competent regulatory agency.





DATA RETENTION

We will retain your personal data as long as we have a relationship with you. When deciding on how long to keep your personal data after our relationship with you has ended, we take into account our legal obligations and regulators' expectations, as well as how long we need or are obliged to retain information and to retain appropriate business records for accounting, audit and reporting purposes. We may also retain records to investigate or defend potential legal claims. We have appropriate archiving and deletion policies in place to ensure all documents and information are retained in accordance with applicable laws.

Cookies

When you use or visit our websites, we collect information about your usage and activity using cookies, web beacons, and other technologies. We use some cookies and tracking technologies for purposes which are strictly necessary for your use of our Digital Services. These may include, for example, cookies which remember your preferences and settings; which remember information that you may enter online (so that it does not have to be re-entered every time you move to another page); or to keep you logged in to portals that we may offer where you wish to remain logged-in.

Some of our websites use Google Analytics, a web analytics service provided by Google, Inc. (“Google”), to collect statistical information about how our Digital Services are used. Google Analytics services involve the use of cookies that collect information such as your IP address or other identifiers, browser information, and information about the content you view and interact with, to record how you use our Digital Services. These analytics services help us understand how many users we have, which parts of our sites are most popular, what browsers are used (so we can maximize compatibility), the country or region where our users are located, and the demographics and interests of our users. This enables us to better understand who is using our Digital Services and improve our Digital Services over time. More information on Google Analytics can be found [here](#). If you would like to opt-out of having your data used by Google Analytics, you can opt out [here](#).

Third parties may also view, edit, or set their own cookies. We and our third-party service providers, affiliates, and other business partners may also place web beacons for these third parties. The use of these technologies by third parties is subject to their own privacy policies and is not covered by this Notice, except as required by law. See our [Cookies Policy](#) for more details.

We may also use remarketing services offered by our advertising partners to personalise advertisements for visitors to sites of their advertising networks (i.e., websites other than Indivior’s).

We may use the data you share with us to make decisions about your interests and preferences so we can make the marketing materials we send you more relevant. We may also combine the information we hold about you with data about your interests or demographics that third parties have collected from you online and offline, to make your experience more personalised and further tailor our marketing materials. You have certain rights in relation to this – please see ‘YOUR RIGHTS’ below for further information.

[View or change your preferences](#)



YOUR RIGHTS

Your role

It is important that the personal data we hold about you are accurate and up to date. During your working relationship with us, you are invited to notify us of any changes to your personal data by sending an email to Privacy@Indivior.com.

Your rights

You have different rights in relation to your personal data, subject to certain exceptions under applicable law. In certain circumstances and in accordance with applicable law, you have the right to:

- request access to any personal data we hold about you;
- request that your personal data is corrected or completed;
- request that we delete personal data we hold about you;
- object to the processing of your personal data for a particular purpose;
- request that we block or restrict the processing of your personal data;
- furnish instructions on what happens to your personal data after your death;
- opt-out of targeted advertising;
- sharing of your personal data;
- limit the use or disclosure of your sensitive personal data;
- limit the sharing of your personal data for cross-context behavioural advertising;
- receive your personal data you have provided to us in a structured, commonly used and machine-readable format and ask us to send these personal data to a third party (right of data portability);
- withdraw your consent to the processing of your personal data at any time, to the extent consent was required and provided by you; and
- lodge a complaint with the relevant data protection authority.

If you wish to exercise any of these rights, you can send an email to the following address: Privacy@Indivior.com.

You can also contact us at any time if you have questions or complaints about this Privacy Notice or about the processing of your personal data. We are committed to handling your queries and complaints as best as we can. If you are of the opinion that we have been unable to help you with your complaint, you have the right to file a complaint with your local data protection authority.

No fees normally required

You will not have to pay any fees to access your personal data or exercise any of the other rights mentioned above. Please note however that in case your request is clearly unfounded or excessive, we may charge you a reasonable fee or we may refuse to respond to the request.



CONTACT

Privacy@Indivior.com.

Global Toll-Free Number: +1 804 379 1090

CONCERNS

You can send an email to our Data Protection Officer through the following address should you have any queries or concerns: DPO@Indivior.com.

CHANGES TO THIS PRIVACY NOTICE

We may update our Privacy Notice from time to time to provide you with more information about how and why we process your personal data or in response to changes in our data processing activities or policies. If we make any material changes that have an impact on you, we will notify you of these changes before they take effect, for instance by sending an email, by means of a notice on our website or by using other appropriate methods. We encourage you to periodically review this Privacy Notice to learn how Indivior processes and protects your personal information. You will be able to see when we last updated the Privacy Notice by checking the "last updated" date at the top of the notice.

Our responsibility regarding websites that we do not own or control

Our Indivior websites may contain links to websites or mobile applications we do not own or control. This privacy notice does not cover them. Please read the privacy notices on those websites and mobile applications if you would like to find out how they collect, use and share your personal information.

