

# Supplementary Privacy Policy for Australia

---

## Application

This document ("**Supplementary Privacy Policy for Australia**"), together with the IQVIA Privacy Policy at [www.iqvia.com/about-us/privacy/privacy-policy](http://www.iqvia.com/about-us/privacy/privacy-policy) ("**Global Policy**"), explains how IQVIA Solutions Australia Pty Limited ABN 19 000 967 859 and its related bodies corporate in Australia ("**IQVIA Australia**", "**we**", "**us**") collect, hold, use and disclose personal information of individuals in Australia ("**Australian Data Handling**").

**Together, the Global Policy and this Supplementary Privacy Policy for Australia constitute IQVIA Australia's APP privacy policy for the purposes of the *Privacy Act 1988 (Cth)* ("**Privacy Policy**").**

The Privacy Policy applies to all Australian Data Handling. However, please note that the Global Policy refers to some European- and US-specific requirements and initiatives, which are generally not relevant to Australian Data Handling.

If you have any questions relating to this document or Australian Data Handling, please contact us (see "Requests and contacting us" below).

---

## Collection of personal information

### Kinds of information collected

IQVIA Australia collects all the kinds of personal information mentioned in the Global Policy, about the types of individual referred to in the Global Policy. More specific examples of kinds of personal information we collect are:

- contact details, professional details, contact preferences and other relevant details of our business and professional contacts, including our customers;
- information about healthcare professionals ("**HCPs**") about whom we conduct research, analysis and database creation, e.g. regarding industry profile, publications, areas of specialty, years of graduation / experience, gender, and practice information such as patient load and - subject to applicable law and mindful of industry standards and ethical considerations - diagnostic and prescribing pattern;
- information about patients or other individuals who participate in or are the subject of our own research, study or other healthcare-focused initiatives (subject to applicable law, this may include sensitive information such as health information and Medicare numbers);
- information about our customers' business contacts, where those customers have engaged us to manage that information on their behalf; and
- CVs, references, professional details, qualifications and other relevant background information about job applicants.

We will obtain your consent to collect any sensitive information from you, unless we are required, authorised or permitted by law to collect it without your consent.

## How we collect information

IQVIA Australia collects personal information directly from individuals (e.g. when you provide information to us on a form or in communications to us, or when we provide services to you). Also, where direct collection is not practicable and we are permitted to do so, we may collect personal information from third parties such as HCPs' practices, our data suppliers, our affiliates, publicly or commercially available directories, regulatory bodies, and referees for prospective job applicants. IQVIA Australia also sometimes uses cookies or similar technology to collect personal information when an individual interacts with websites which we or our service providers operate.

## How we hold information

Personal information we collect may be held electronically (e.g. as part of customer or supplier records stored on our information technology systems) or in hard copy (e.g. in questionnaire responses or correspondence).

## Consequences if we don't collect your personal information

If we are unable to collect your personal information, we may be unable to assist you with requests or queries you submit to us and/or do business with you. If you disable cookies, you may be unable to enjoy the full functionality of our websites. In addition, if you are an HCP, if you do not provide personal information when requested, we may be unable to include you in our research or list you in our databases.

---

## Use and disclosure of information

### Purpose of collection

IQVIA Australia collects, holds, uses and discloses personal information for the purposes of use and disclosure mentioned in the Global Policy. In addition, subject to the requirements of applicable law and mindful of industry standards and ethical considerations, IQVIA Australia may use or disclose personal information:

- to prepare products, services and insights for our customers and to enable our customers to contact individuals for relevant business purposes, including in relation to current and future research, sales and marketing opportunities, legal compliance matters and medical communications. (Unless an individual has consented to be identified, our practice is to de-identify and, where appropriate, aggregate personal information of HCPs and patients prior to including such data in customer products or providing it to a customer);
- for our other business purposes, such as communicating with individuals, recruiting personnel, reviewing and improving our products and services, conducting sales and marketing activities, and undertaking risk assessments or vendor due diligence;
- to protect our interests and enforce or obtain advice about our legal rights, or to investigate complaints, suspicions or allegations of misconduct;
- in accordance with any consent that has been provided; and
- as required, authorised or permitted by applicable law.

### Recipients of disclosed information

Personal information we hold may be disclosed to our affiliates, third party service providers and business

contacts, professional advisors, regulatory bodies, persons you have authorised to receive it, and other persons required, authorised or permitted by applicable law. We may also disclose personal information of job applicants to referees and former employers.

Some of these recipients of personal information may be located outside of Australia, including in countries where IQVIA Australia's affiliates operate (listed on the [Locations](http://www.iqvia.com) page of <http://www.iqvia.com>).

---

## Requests and contacting us

### Access, correction and complaints

The Global Policy sets out how you may request to access or correct personal information that we hold about you, or complain about our handling of your personal information, and how we will deal with your requests and complaints.

### Contact details

You may contact IQVIA's central privacy team at the details set out in the Global Policy ([PrivacyOfficer@IQVIA.com](mailto:PrivacyOfficer@IQVIA.com)), and they will direct your complaint or request as appropriate.

You can alternatively contact IQVIA Australia's local team directly by writing to:

Australia Privacy Officer  
IQVIA Solutions Australia Pty. Ltd.  
PO Box 940  
Crows Nest NSW 2065

Alternatively, you may email us at:

For OneKey (Healthcare Professionals database), [privacyau@au.imshealth.com](mailto:privacyau@au.imshealth.com)  
For online research and surveys, [researchsupport@au.imshealth.com](mailto:researchsupport@au.imshealth.com)  
For medical data (GP EMR database), [productionmedical@imshealth.com](mailto:productionmedical@imshealth.com)  
For Ascott Sales services, [teams@ascottsales.com.au](mailto:teams@ascottsales.com.au)  
For Nuevo Health services, [info@nuevohealth.com.au](mailto:info@nuevohealth.com.au)  
For any other general privacy enquiries, [privacyofficerau@iqvia.com](mailto:privacyofficerau@iqvia.com)

Please include your full name and address, and full details of your request or complaint in your message to enable us to better assist you.

If you are dissatisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner ("**OAIC**"). Details of how to contact the OAIC are located at [www.oaic.gov.au](http://www.oaic.gov.au).

Last updated: 30 May 2018

© 2018 IQVIA Australia and its affiliates.

All rights reserved. Trademarks are registered in the United States and in various other countries

# IQVIA Global Privacy Policy (The "Policy")

IQVIA (also referred to as "Company", "we" or "our") respects the relationships we have with our customers and respects the privacy of all individuals whose Personal Information may be processed by IQVIA in the performance of our services and our business operations. This Privacy Policy supplements our Privacy Shield policy (available here and discussed below), to apply around the world. This Policy explains how IQVIA collects, holds, uses and discloses Personal Information, including Personal Information of our personnel, consumers, healthcare professionals, patients, medical research subjects, clinical investigators, customers, suppliers, vendors, business partners and investors. IQVIA intends that this corporate privacy policy and our implementing standard practices and procedures will support timely compliance with all international privacy laws and regulations around the world.

To demonstrate our commitment to the protection of Personal Information, including Personal Information transferred out of the European Economic Area ("EEA") and Switzerland for the performance of our services and business operations, we adhere to the Privacy Shield Principles and are certified to the EU-U.S. Privacy Shield Framework ("Privacy Shield"), as set forth by the U.S. Department of Commerce and the Federal Trade Commission. Further details of the Privacy Shield and the Privacy Shield Principles can be found on the website at <https://www.privacyshield.gov>. We also use model contractual clauses and other mechanisms approved by the European Union and Switzerland, respectively, for transfers of Personal Information from the EEA and Switzerland.

\* \* \*

**SCOPE:** This Policy applies to all Personal Information of Individuals, either in electronic or paper format, received by IQVIA, including Personal Information of Company Personnel, consumers, healthcare professionals, patients, medical research subjects, clinical investigators, customers, suppliers, vendors, business partners and investors.

**DEFINITIONS:** For purposes of this Policy, the following definitions shall apply:

- "Agent" means any third party that uses Personal Information provided to it by IQVIA to perform tasks on behalf of and/or under the instructions of IQVIA or to which IQVIA discloses Personal Information for use on its behalf.
- "European Economic Area" (EEA) means for the purposes of this Policy all countries within the European Union (EU) and Iceland, Liechtenstein, Norway.
- "Individual" means any natural person.
- "Personal Information" means any information or set of information about an identified or identifiable individual, including, but not limited to: (a) first name or initial and last name; (b) home or other physical address; (c) telephone number; (d) email address or online identifier associated with the individual; (e) Social Security number or other similar identifier; or (f) any other information relating to an individual that is combined with any of the above. The term "Personal Information" does not include non-identified information or information that is reported in the aggregate (provided that such aggregated information is not identifiable to a natural person).
- "Personnel" includes, but is not limited to, any employee (permanent or temporary), director, officer, contractor, worker, temporary worker, job applicant, retiree of IQVIA and any and all of their respective dependents.
- "Privacy Shield Principles" collectively means the seven (7) privacy principles, as well as the supplemental privacy principles and the associated guidance details of which can be found at <https://www.privacyshield.gov>.
- "IQVIA" means any entity that directly or indirectly, through one or more intermediaries, controls, is controlled by, or is under common control with IQVIA, Inc. For purposes of this definition, "control" means the possession, directly or indirectly, of the power to direct or cause the direction of the management and policies of such entity, whether through the ownership of voting securities, by contract or otherwise.

"Sensitive Personal Information" means Personal Information that reveals or is processed to uniquely identify a person:

- All government-issued identification numbers (including US Social Security numbers, EU Social Security numbers, Canadian Social Insurance numbers, driver's license numbers, and passport numbers);
- All financial account numbers (bank account numbers, credit card numbers, and other information if that information would permit access to a financial account);

- Individual medical records, biomedical specimens, and biometric information, including any information on any worker or consumer's health, disability, disease or product interests;
- Reports of individual background checks;
- Data elements revealing race, ethnicity, national origin, political opinion, religious or philosophical beliefs, trade union membership, genetic data, biometric data where processed to uniquely identify a person, any information that concerns medical or health conditions or sex life, or information relating to the commission of a criminal offense sex life or sexual orientation, and information relating to the commission of a criminal offense.

## NOTICE

Where IQVIA collects Personal Information directly from Individuals, it will explain the purposes for which it collects and uses Personal Information about the Individuals, the types of third parties to which IQVIA discloses that information, and the choices and means, if any, IQVIA offers Individuals options for limiting the use and disclosure of Personal Information about them. This explanation will be provided as soon as practicable and, in any event, before IQVIA discloses the Personal Information or uses such information for a purpose materially different than that for which it was originally collected or processed. IQVIA also will provide any additional information required by law for a specific context, product or service. In general, with exceptions and other lawful bases that may be relevant for any specific product or service notice, IQVIA processes personal data for its legitimate interests consistent with applicable law. Where an IQVIA entity receives Personal Information from another IQVIA entity or other entities, including when acting as a CRO processing Personal Information under the direction of a customer, it will use such information in accordance with the notices provided by such entities and the choices made by the Individuals to whom such Personal Information relates.

### Types of Personal Information collected, Purposes of Collection and Uses of Personal Information:

- **Research Studies-Related Information.** For Individuals participating in research studies being managed by IQVIA as a CRO, including patients, their spouses/partners, care givers, and relatives, clinical investigators or other study personnel, and other consultants, contractors, managers, and agents (who are natural persons) of the study sponsor and its corporate affiliates, business partners and third-party service providers, Personal Information may be used in order to carry out the applicable studies and other study-related services and/or pharmacovigilance. This may include the transfer of such Personal Information to the applicable study sponsor, its corporate affiliates, business partners and third-party service providers performing services related to the study (e.g., study data management, clinical research monitoring services, safety monitoring, etc.).
- **Human Resources-Related Information.** For Individuals who are Personnel, we will process Personal Information to carry out and support our human resources functions and activities, including but not limited to, employment opportunities, Personnel recruitment and onboarding, administration of Personnel participation in benefits, compensation and human resources plans and programs, management of Personnel performance, and implementation, investigation and reporting on compliance and discipline procedures and matters. IQVIA may provide Personal Information to Agents to support IQVIA in performance of these human resources-related activities.
- **Customers and Program Participant Information.** For Individuals sharing Personal Information with IQVIA in order to inquire about or otherwise make use of our services or purchase, receive or seek information, including about any health care products and services, opportunities to participate in clinical research, health care education and patient support programs which may be available through IQVIA, we will use such Personal Information in order to provide the requested information, products, and/or services. Such uses may include processing requested transactions, improving the quality of our services, sending communications about the products and services available through IQVIA, and enabling our business partners and Agents to perform certain activities on our behalf.

IQVIA may also use the Personal Information collected above to comply with our legal and regulatory obligations, policies and procedures, and for internal administrative purposes.

## CHOICE

IQVIA may offer Individuals the opportunity to choose whether their Personal Information is (a) to be disclosed to a third party, or (b) to be used for a purpose materially different from the purpose for which it was originally collected or subsequently authorized by the Individual.

IQVIA will not process Sensitive Personal Information about Individuals for purposes other than those for which the

information was originally obtained or subsequently authorized by the Individual unless the Individual explicitly consents to the processing (“opt-in”), or as required or permitted, or where not prohibited by law or regulation.

In some cases, even if an Individual opts-out of disclosures of their Personal Information, IQVIA may still disclose such Personal Information (i) if required to do so by law, (ii) if disclosure is required to be made to law enforcement authorities, or (iii) if we believe disclosure is necessary or appropriate to prevent physical harm to an individual or financial loss or in connection with an investigation of suspected or actual illegal activity. IQVIA also may transfer Personal Information when a material event concerning its business operation(s), assets or shares, such as purchase, disposal, merger, joint venture or acquisition, is proposed or occurs. In such an event, IQVIA will endeavor to direct the transferee to use Personal Information in a manner that is consistent with this Policy. IQVIA will provide Individuals with reasonable mechanisms to exercise their choices to the extent required by applicable law.

### **ACCOUNTABILITY FOR ONWARD TRANSFER**

In the performance of our services and business operations, Personal Information we collect or receive may be stored or transferred internationally throughout our worldwide organization and to our service providers or agents, including for hosting our databases or provision of data processing services, in accordance with applicable data privacy laws. Transfers to third parties are covered by the provisions in this Policy regarding notice and choice.

IQVIA may also share an Individual's Personal Information with Agents in connection with services that these individuals or entities perform for, or with, IQVIA. IQVIA may, for example, provide an Individual's Personal Information to Agents for hosting our databases, for data processing services, or to send to that Individual the information that he or she requested.

IQVIA may transfer Personal Information for specified, limited purposes, to an Agent and will endeavor to obtain assurances that such Agent provides at least the same level of privacy protection as is required by the Privacy Shield Principles (where applicable) and this Policy and will notify IQVIA if it makes a determination it can no longer meet this obligation.

Where IQVIA knows that any third party to whom it has provided Personal Information is using or disclosing Personal Information in a manner contrary to this Policy, IQVIA will take reasonable steps to prevent or stop the use or disclosure. With respect to such onward transfers to Agents, and to the extent IQVIA is responsible for the event, IQVIA shall remain liable should its Agents process Personal Information in a manner inconsistent with the Privacy Shield Principles (where applicable) and this Policy.

### **SECURITY**

IQVIA will employ reasonable and appropriate technical, administrative and physical safeguards designed to protect Personal Information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the Personal Information IQVIA is processing. We have a privacy incident response program designed to promptly respond to and escalate all privacy-related questions, complaints, concerns, including any potential privacy or security incident.

### **DATA INTEGRITY AND PURPOSE LIMITATION**

IQVIA endeavors to use Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the Individual. IQVIA will take reasonable steps designed to ensure that only Personal Information that is relevant to its intended use, accurate, complete, current, and otherwise reliable in relation to the purposes for which the information was obtained is used by IQVIA for as long as IQVIA retains possession of such information. IQVIA's Personnel have a responsibility to assist IQVIA in maintaining accurate, complete and current Personal Information. When acting as a CRO, IQVIA endeavors only to process Personal Information that is relevant to the services it provides, and for purposes compatible with those for which the Personal Information was collected; wherever possible, such Personal Information is non-identified. Where IQVIA processes Personal Information as a CRO under the direction of its customers, IQVIA works with such customers so that the customers can provide a way for Individuals to correct or update their Personal Information to the extent required by law.

### **ACCESS/CORRECTION**

Under laws in certain countries in which we operate, individuals have a right to access Personal Information about themselves, and to amend, correct or delete Personal Information that is inaccurate, incomplete or outdated. IQVIA will, on request, provide an Individual with confirmation regarding whether IQVIA is processing Personal Information about them, consistent with applicable law. In addition, upon request of an Individual, IQVIA may take reasonable steps to correct, amend,

or delete their Personal Information that is found to be inaccurate, incomplete or processed in a manner non-compliant with this Policy or applicable law, except where the burden or expense of providing access would be disproportionate to the risks to that Individual's privacy, where the rights of persons other than the Individual would be violated or where doing so is otherwise consistent with applicable law. Unless prohibited by applicable law, IQVIA reserves the right to charge a reasonable fee to cover costs for providing copies of Personal Information requested by Individuals. IQVIA, when acting as a CRO, has no direct relationship with medical research subjects participating in a clinical trial and any such Individuals who seek access, or who seek to correct, amend, or delete their inaccurate Personal Information should direct his or her query to the relevant study sponsor or investigator which has transferred such Personal Information to IQVIA for processing.

Although IQVIA makes good faith efforts to provide Individuals with access to their Personal Information, there may be circumstances in which IQVIA is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others' privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the Individual's privacy in the case in question or where it is commercially proprietary. If IQVIA determines that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, IQVIA will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

Where otherwise permitted by applicable law, you may send an e-mail to [PrivacyOfficer@IQVIA.com](mailto:PrivacyOfficer@IQVIA.com) or use any of the methods set out in this Policy to request access to, receive (port), seek rectification, or request erasure of Personal Information held about you by IQVIA. Such requests will be processed in line with local laws.

#### **RECOURSE, ENFORCEMENT AND LIABILITY**

IQVIA encourages Individuals covered by this Policy to raise questions about the processing of Personal Information about them by contacting IQVIA through the contact information provided below. Any Personnel that IQVIA determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment, where applicable.

Any questions or concerns regarding the use or disclosure of Personal Information should also be directed to IQVIA through the contact information given below. IQVIA will undertake reasonable efforts to investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles contained in this Policy.

If you are an EU or Swiss citizen and feel that IQVIA is not abiding by the terms of this Policy, please contact IQVIA at the contact information provided below. If any request remains unresolved, you may contact the national data protection authority for your EU Member State.

In certain circumstances, IQVIA has agreed to cooperate with the American Arbitration Association ("AAA") with respect to complaints of Individuals that are not Personnel of the Company and with the local data protection authorities with respect to Personnel and human resources related information consistent with applicable law. For more information and to submit a complaint to AAA, visit <http://go.adr.org/privacysield.html>. Such independent dispute resolution mechanisms are available to Individuals free of charge.

**CONTACT INFORMATION:** Questions, comments, concerns or complaints regarding this Policy or IQVIA's processing of Personal Information should be submitted to the IQVIA Chief Privacy Officer at [PrivacyOfficer@IQVIA.com](mailto:PrivacyOfficer@IQVIA.com).

**RESERVATION OF RIGHTS:** IQVIA reserves the right to share an Individual's Personal Information and contracts with Agents as required or authorized by law or regulation or in response to duly authorized information requests of government authorities.

**CHANGES TO THE PRIVACY POLICY:** This Policy may be reviewed and amended from time to time, without advance notice, to ensure that an appropriate level of protection for Personal Information is maintained. All amendments will be posted on this website. Please check back periodically at <https://www.iqvia.com/about-us/privacy/privacy-policy> for updates to this Policy.

**IQVIA PRIVACY POLICY EFFECTIVE DATE:** May 25, 2018