

PRIVACY POLICY

Adveva[®] Patient Support Program

1. Scope

At EMD Serono, we respect your privacy and take seriously our duty to your Personal Data. This privacy policy provides information on the practices we take with your Personal Data for the adveva patient support program. This privacy policy does not cover other programs or services provided by EMD Serono including other websites or patient support programs for other products; those are governed by separate privacy policies. For the privacy policy that governs the adveva website, please visit adveva.ca. The adveva program is provided by EMD Serono, a division of EMD Inc. (the "Program"). The Program is administered by EMD Serono and a third-party service provider and their agents and affiliates (collectively, "Program Administrators").

2. Which Personal Data will be collected?

In order to enrol you in the Program, your healthcare professional ("HCP") has provided the Program with certain information about you, as outlined on the Enrolment Form, including your personal information (name, gender, age, address, telephone number, email) and personal health information (medical information as it affects your therapy and prescription reimbursement) (collectively, your "Personal Data").

3. How will your Personal Data be used?

The Program will keep your Personal Data confidential and will use it only for the purposes of providing you with Program Services and information about the Program. The Program will collect, use, disclose and store your Personal Data to provide you with the following services ("Program Services"):

- Monitoring of your progress on therapy
- Reporting on progress to your HCP team
- Nursing and pharmacist support
- Assistance in communicating with drug plan administrators, managers or insurance companies to aid in securing reimbursement coverage for your prescription
- Reporting on your insurance coverage to your HCP team
- Delivering materials directly to you such as brochures and medical supplies
- Opportunity to participate in market research involving people with multiple sclerosis or educational initiatives in your area
- Regular communications relating to your therapy, devices (if applicable) and support program offerings

The Program may de-identify your Personal Data for use such as performing research, education, business analytics and other commercial purposes, including by combining your Personal Data with other data for such analyses. In such circumstances, your Personal Data will not be shared outside of the Program in any way that allows you to be identified.

You also understand that the Program Administrators may contact you in connection with administration of the Program and provision of Program Services, and you agree to be contacted now and in the future by the Program Administrators regarding the Program, your condition and/or your prescription. We will never sell your Personal Data or use it for purposes not described in this Privacy Policy, without your permission.

4. Who will access to your data

We may disclose Your Data to our affiliates and subcontractors for the purposes described in this policy. This may include, for example, a dispensing pharmacist, reimbursement navigator, field nurse services or an insurer. The Program will limit the amount of Personal Data disclosed to only that Personal Data required in order to deliver the Program Services to you.

Your data can be accessed by your doctor, nurses, clinical staff, relevant EMD Serono employees and others within your circle of care, in accordance with the conditions set forth in this Privacy Policy. Your Personal Data may be accessed incidentally by EMD Serono or its contractors when maintaining IT systems containing such Personal Data.

5. Where do we store your data and how do we protect it?

Your Personal Data may be collected, used and disclosed and/or stored outside of your province/territory or country, and the privacy laws of those jurisdictions may be less stringent than the laws of Canada and/or your home province/territory, including the United States.

We protect your privacy by using a combination of administrative, physical, and technical safeguards. These measures include single sign-on, two factor authentication, firewalls, intrusion protection, perimeter security, encryption, logging and monitoring. All Personal Data you provide is stored on secure servers and we take all reasonable steps to protect it. We apply security safeguards in accordance with industry standards and applicable regulations, including encryption and secure https access, to protect Personal Data.

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6. Data retention period

We will retain your Personal Data for as long as you are enrolled in adveva and for the period of time that is required to provide treatment-related services to you. Your Personal Data may form part of your health record which is kept by your doctor. This means that your doctor decides how long your data will be stored according to the law.

7. Right to access, review, correct and object

You may request access to your Personal Data held by us and receive a copy of your personal data in a common electronic data format, for the purposes below. Please contact our data protection officer in these cases privacy@emdgroup.com. If you want to have all of your data deleted, please also contact your doctor.

- Right to access: The right to obtain further information on the processing of any Personal Data and to receive a copy of such data.
- Right to rectification: The right to request that we correct or complete any inadequate, incomplete or inaccurate Personal Data.
- Right to erasure: As previously mentioned, you may request for such Personal Data to be deleted.
- Right to stop processing: Under certain conditions, you may request us to stop or restrict the processing of such Personal Data, except where we are legally entitled or required to do so.
- Right to data portability: You may ask to receive a copy of such Personal Data in a structured, common and machine-readable format and/or request that such data is transferred to another data controller (and where reasonably feasible).
- Right to lodge a complaint with a supervisory authority: Where you feel that such Personal Data has been processed in a way that violates applicable privacy law, you may contact the applicable data privacy regulator for your location.

8. Consent

By authorizing the submission of the adveva Enrolment Form by your healthcare practitioner, you consent to the collection, use and disclosure of your Personal Data as set out in this policy.

In addition, you authorize the Program to obtain further information from your prescribing physician and health insurance company as deemed necessary to ensure the accuracy and completeness of your Personal Data and to administer the Program, and that such further information may include personal information and/or personal health information.

You understand that any financial assistance provided to you as a result of your enrolment in the Program may be reportable income to public or private payers or government agencies. You understand that you are solely responsible for any such reporting as well as ensuring compliance with accepting such financial assistance.

Your decision to participate in the Program is independent from your treatment and entirely voluntary. You are free to change your mind and withdraw your consent in whole or in part by informing your healthcare practitioner or adveva at any time. Please note that if you withdraw your consent, you may be ineligible for Program Services, including patient support and reimbursement assistance, from the date of withdrawal.

Verbal consent to the practices identified in this policy will be confirmed by your adveva nurse.

9. Contact

If you have questions regarding the use of your Personal Data in relation to the Program, please contact our Data Protection Officer: privacy@emdgroup.com, or at

Data Privacy Officer
EMD Serono
200-2695 North Sheridan Way
Mississauga, ON
L5K 2N6
Canada

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