

GlaxoSmithKline Nigeria Privacy Policy & Notice

Last updated April 24, 2019

We value our ability to provide you with information through our interactions with you, whether they are face to face interactions, through our digital platforms (like our mobile applications and websites) or one of the other ways you can choose to interact with us.

This Privacy Policy and Notice (Privacy Notice) explains how GlaxoSmithKline and its group of companies (“GSK,” “we,” “us” and “our”) collect, use, and share personal information that you provide to us, or that we may otherwise obtain or generate, which relates to you. Please take a moment to review this Privacy Notice and, if you have any questions, feel free to get in touch via one of the methods set out under the header “GSK Contact Information” below.

This Privacy Notice is applicable to all GSK entities in Nigeria and made subject to the Nigeria Data Protection Regulation 2019. We may change this Privacy Notice from time to time. We encourage you to review the Privacy Notice periodically.

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1. What personal information do we collect, and where do we obtain it from?

Healthcare Professionals

If you are a healthcare professional interacting with us in your professional capacity, the personal information that we collect about you may include:

- your name;
- email and mailing address;
- phone number;
- date of birth, age;
- gender;
- contact preferences;
- language;
- your professional details (such as your education, occupation/position/role, hospital, medical specialty, and medical practitioner number or government issued ID);
- certain information from your social media account where you have chosen to connect your social media account with your GSK account;
- activity data, such as whether an email we sent you was opened, or if you accepted an invitation to a webinar;
- information from your visits to our websites, including the type of browser and operating system you use, access times, pages viewed, URLs clicked on, your IP address and the page you visited before navigating to our websites;
- device information, including the unique device identifier, hardware model, operating system and version, and mobile network information; and
- your responses to any surveys that you may choose to participate in, including disease or practice-related survey responses (such as an estimate of the number of patients you see who have a certain condition).

Members of the Public

If you are a member of the public, the personal information that we collect about you may include:

- your name;
- email and mailing address;
- phone number;
- date of birth, age;
- gender;
- zip/area code;
- activity data, such as whether an email we sent you was opened;
- information from your visits to our websites, including the type of browser and operating system you use, access times, pages viewed, URLs clicked on, your IP address and the page you visited before navigating to our websites;

- device information, including the unique device identifier, hardware model, operating system and version, and mobile network information; and
- your responses to any surveys that you may choose to participate in.

We may also process information about you which reveals information about your health status. For example, where you tell us about a health condition you are experiencing, where we receive a report that you have experienced a side effect associated with one of our products, or where health information can be inferred from information that you have provided to us when you get in touch with us for any reason. Where we process this type of information about you we will, if required by law, take appropriate steps to get your consent to our use of this information.

How do we obtain personal information about you?

Healthcare professionals

We may collect your personal information in the course of monitoring our technology tools and services, including email communications sent to and from GSK. Otherwise, we gather and generate information about you when you provide it to us or interact with us directly. For example, when you register on one of our digital platforms, engage with one of our sales representatives, attend events hosted by or attended by us, and when you get in touch for customer support or to provide feedback. We may also receive professional information about you from other sources, such as external sources of healthcare provider information (including publicly available sources), social media companies (in accordance with their authorisation procedures) where you have linked your GSK account with your social media account, and your patients (e.g., where they have told us that you are their healthcare provider). We may combine information that we have about you from various sources, including the information that you have provided to us.

Members of the public

We may collect your personal information in the course of monitoring our technology tools and services, including email communications sent to and from GSK. Otherwise, we gather and generate information about you when you provide it to us, e.g. via registration or feedback forms on our digital platforms. We may also receive information about you from our suppliers, for example, to help us to identify if you have redeemed any coupons on our products or services. We may combine information that we have about you from various sources.

2. How we use your personal information

We may use your personal information to:

- A. Provide you with services, including to:
 - personalise the content on our digital platforms to match your user profile or likes and dislikes, and improve our services;

- provide you with information, including marketing communications, through the channels you choose, for example by email or webinar; and
 - if you are an HCP, learn about your professional practice and your interests.
- B. Contact and interact with you, including to:**
- answer your questions and request for services, and solicit your feedback
 - send important notices, such as changes to our terms, conditions and policies; and
 - send you technical notices, updates, security alerts and support and administrative messages.
- C. Manage our day-to-day operations, including:**
- to comply with applicable laws, rules, regulations, guidance, codes, and industry/ professional rules and regulations;
 - to comply with demands or requests made by local and foreign regulators, governments, courts and law enforcement authorities, and complying with a court process, or in connection with any litigation; and
 - to investigate and take action against users who violate our rules or who engage in behaviour that is illegal or harmful to others or to others' property.
- D. Improve our day-to-day operations, including:**
- for internal purposes such as auditing, data analysis and research to help us deliver and improve our GSK digital platforms, content and services;
 - to monitor and analyse trends, usage and activities in connection with our products and services to understand which parts of our digital platforms and services are of the most interest and to improve the design and content of our platforms; and
 - to ensure we have up-to-date contact information for you.

On what basis do we use your personal information?

- *For legitimate business purposes:* Using your personal information helps us to operate and improve our business and minimize any disruption to the services that we may offer to you. It also allows us to make our communications with you more relevant and personalized to you, and to make your experience of our products and services an efficient and effective one.
- *To comply with our legal obligations and other demands for information:* Compliance with laws, regulations, rules, codes and guidance are important to us, and we would want to be able to comply with these, as well as the other requests or demands for data as set out here. They affect the way in which we run our business, and they help us to make our products and services as safe as we can. Where we use your personal information for this purpose, rest assured that we will take measures to protect your personal information.
- *Your consent:* At times we may need to get your consent to allow us to use your personal information for one or more of the purposes set out above. You have various rights where we are processing your information on the basis of your consent. For example, if you don't want to

be on one of our mailing lists, you can choose to opt out at any time by following the “unsubscribe” instructions at the bottom of our promotional emails. If you have an account with us, you can also opt out by updating your preferences.

3. We sometimes share your personal information

We may share your personal information with any of the following:

- our agents and suppliers;
- our professional advisors and auditors;
- our affiliates and business partners;
- regulators, governments and law enforcement authorities;
- courts, tribunals, arbitrators or other judicial committees; and
- other third parties in connection with our selling, merging, buying, or reorganising all or any part of our business, or carrying out any similar change of our business (including any potential or actual purchaser of that business or that purchaser’s advisors).

Transfers outside your home country

We may transfer your personal information outside of your home country. The countries to which your personal information is transferred may not offer an equivalent level of protection for personal information to the laws of your home country. Where appropriate, we will take steps to ensure your information is transferred subject to appropriate safeguards, such as by entering into data transfer agreements. Where we have put data transfer agreements or similar safeguards in place, we may be able to make a copy of this available to you if you contact us via one of the methods set out under the header “*GSK Contact Information*” below.

The transfer of your personal information outside the country shall be subject to the provisions of paragraph 2:11 and 2:12 of the Nigerian Data Protection Regulation 2019, where applicable.

Websites that we do not own or control

From time to time we may provide links to websites or mobile applications that are not owned or controlled by us. This Privacy Notice does not apply to those websites. If you choose to use those websites, please make sure that you check the legal and privacy statements posted on each website or mobile application you access to understand their privacy practices.

4. How Long Will We Keep Your Personal Information?

We have a data retention policy that sets out how long we keep your information. This policy is based on the type of information, the purpose of collection, and the system within our digital platforms in which the information is held. As a general rule, we keep your personal information for as long as we need to. For example, to provide you with access you have requested to digital channels (like our websites) our products and our services.

5. How Secure is Your Personal Information?

We use a variety of security technologies and procedures to help protect your personal information from unauthorised access, use or disclosure. Our suppliers are carefully selected and required to use appropriate measures to protect the confidentiality and security of your information. Unfortunately, the transmission to us of information via the internet or a mobile phone network connection may not be completely secure; any transmission is at your own risk.

6. Exercise Your Rights under this Privacy Notice

You may have the right:

- to withdraw your consent to the processing of your information at any time, where we process your personal information based on having your consent;
- to ask GSK about the processing of your personal information, including to be provided with a copy of your personal information held by GSK;
- to request the correction and/or deletion of your personal information, or restrict or object to the processing of your personal information;
- to request to obtain and reuse your personal information for your own purposes across different services; and
- to complain to a competent supervisory authority, or to a court of law, if your data protection rights are violated or you have suffered as a result of unlawful processing of your personal information.

If you would like access to the information that we hold about you, if any of the information that we hold about you is inaccurate or out of date, or if you wish to restrict or object to us processing it, please let us know by getting in touch via one of the methods set out under the header “*GSK Contact Information*” below.

What if you do not want to provide us with your personal information?

Where you are given the option to share your personal information with us, you can always choose not to do so.

If you object to our processing of your personal information, we will respect such requests in accordance with our legal obligations. Your objection may mean that we may not be able to perform the actions necessary to achieve the purposes set out above. It may also mean that you may not be able to make use of the services and products offered by us if you do not provide us with your personal information or if, having provided us with your information, you object to our processing of it.

GSK may be required or entitled to retain your information to comply with legal and regulatory obligations and to protect and exercise our legal rights and interests.

7. Cookies and Other Technologies

GSK’s websites, online services, interactive applications, email messages, and advertisements may use cookies and other technologies such as device identifiers to improve user experience, help us understand how our platforms are being used – for example, which parts of our websites have been visited and which emails opened – and to measure the effectiveness of advertisements and services.

We generally treat information collected by cookies and other technologies as non-personal information. However, to the extent Internet Protocol (IP) or similar identifiers are considered personal information by local law, we also treat these identifiers and information collected by cookies and other technologies, which can be linked to such identifiers, as personal information.

More information about cookies

To enhance your experience of our websites, we may use “cookies.” A cookie is a unique numeric code that is transferred to your computer’s browser to track your interests and preferences and to recognize you as a return visitor. Information may be collected automatically by cookies and other technologies. To learn how to prevent information from being collected automatically, please see the “*Putting you in control of your personal information*” section below. Please note that certain features of our websites will not be available if cookies are disabled.

We use cookies for different purposes:

- **Essential Operations**

These cookies are necessary to allow us to operate the GSK websites.

- **Functional**

We use cookies and other technologies to honor choices you have made on how you would like GSK platforms to function when you access them. For example, we use functional cookies to remember personal information when you visit our websites to make your experience more convenient and personal.

- **Performance/Analytics**

We use cookies to analyse the performance of our sites, to maintain, operate, and continually improve them. We use cookies to analyse the use of our sites and digital communication channels. For example, we may obtain information from communications you request, including whether you opened or forwarded an email or clicked on any of its content. This tells us about our communications’ effectiveness and helps us deliver information that you find interesting.

- **Third-Party**

We may allow our business partners to use cookies on the GSK sites for the purposes listed above – see below for more information.

Third-Party Advertising and Online Behavioral Advertising

You may be provided with advertisements for GSK products and services on third-party websites and mobile services based on online user behaviors. In addition, our advertising network partners may place and use cookies on GSK sites and on other third-party websites to collect information about your activities in order to provide you with online advertisements that are based on your interests. This is known as online behavioral advertising, or “OBA”. [If these business partners will be allowed to use the personal information for their own purposes they should identify themselves to you and let you know about how they are using your personal information.]

Please see above for more information about cookies. To opt out of OBA, please see the “*Putting you in control of your personal information*” section below.

8. Putting you in control of your personal information

Once you have given us your personal information, there are various ways in which you can control how it is processed even without having to exercise any of the rights described in this Privacy Notice.

Manage Your Account Settings

Where you have registered for an account with GSK, you can manage certain personal information held by GSK through your account settings.

Manage Promotional Email

If you don't want to receive promotional e-mail from us, you can unsubscribe using the link at the bottom of our promotional email. Where you have registered for an account with GSK, you can manage your email preferences via your account settings.

Manage Your Cookie and Other Preferences

Many web browsers allow you to manage your preferences. You can set your browser to refuse cookies or to delete certain cookies. You may be able to manage other tracking technologies in the same way that you manage cookies using your browser's preferences.

If you do choose to refuse or delete cookies, please note that not all elements of the GSK digital platforms may function as intended, so your experience on our websites may be affected.

Opt Out of Online Behavioral Advertising

When a GSK online behavioral advertisement is delivered to you, you will see an “Ad Choices” icon. Clicking on the icon or link will take you to a website where you can manage or opt out of the use of data about your browsing history that is used for the delivery of online behavioural advertising. On your mobile device, you may also have a “Limit Ad Tracking” setting (in iOS devices) or a setting to “Opt out of Interest-Based Ads” (on Android), which allows you to limit the use of information about your use of apps for purposes of serving ads targeted to your interests.

If you opt out, you may still see advertisements online, including advertisements from GSK that are based on other information (e.g., based on the content of the page being viewed rather than your prior web-browsing activity). In some cases, data may still be collected about your browsing activity by these third-party advertisers, but they will not use this data to deliver advertisements that are based on your past online browsing behavior.

To learn more about the choices that advertisers provide generally for individuals to influence how information about their online activities over time and across third-party websites or online services is collected and used, visit the Network Advertising Initiative at http://www.networkadvertising.org/managing/opt_out.asp, the Digital Advertising Alliance at

<http://www.aboutads.info/>, or the European Digital Advertising Alliance at <http://youronlinechoices.eu/>.

9. Contact Us

Data Controller and Data Protection Officer

GlaxoSmithKline Pharmaceutical Nigeria Limited of No. 1, Industrial Avenue, Ilupeju, Lagos is the controller of your personal information. Fredrick Ichekwai is the data protection officer.

GSK Contact Information

Please address any questions, comments and requests regarding this Privacy Statement to Data Protection Officer, GlaxoSmithKline Pharmaceutical Nigeria Limited, of No. 1, Industrial Avenue, Ilupeju, Lagos. If you contact us, please note the name of the websites you have visited, as well as how we may contact you.

Call +234 (01) 2711000 extension 4985 (during office hours)

10. PRIVACY PRINCIPLES

We process your Personal Information taking into consideration the privacy principles establish on the Data Protection Regulation 2019 ("Regulation") issued by The Nigerian National Information Technology Development Agency ("NITDA") which can be consulted here <https://nitda.gov.ng/wp-content/uploads/2019/01/NigeriaDataProtectionRegulation.pdf>