REGENERON®

Regeneron Privacy Notice for Health Care Professionals, Investigators, Institution Staff and Other Relevant Decision Makers

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This Privacy Notice for Healthcare Professionals, Investigators, Institution Staff and Other Relevant Decision Makers **("HCP Privacy Notice**") in combination with the Regeneron Privacy Notice ("**Privacy Notice**") explains the Personal Data handling practices of Regeneron (as defined in the Privacy Notice) with respect to Personal Data we collect about health care professionals ("**HCPs**"), investigators, institution staff and Other Relevant Decision Makers ("**ORDMs**"). For the purpose of this HCP Privacy Notice an ORDM means a person with a National Health Service ("**NHS**") role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale supply or use of any medicine but who is not an HCP. "Personal Data" means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual. It explains what Personal Data we collect about you, how it's used, and with whom we may disclose it. This Notice also explains your rights about your Personal Data. This HCP Privacy Notice applies to all Personal Data about you that we process.

Regeneron Pharmaceuticals, Inc., is the data controller of your Personal Data. For the purposes of this HCP Notice, Regeneron means Regeneron Pharmaceuticals, Inc. and its affiliates and subsidiaries, acting as data controllers either independently or jointly. Please note that in order to exercise your rights or ask any question, you should reach out to the Affiliate in your country or contact Regeneron's Data Protection Office.

Last Updated: August 2024

If you have questions about this HCP Notice, please contact us directly. You can find our contact details in the “How to Reach Us” section below.

This HCP Notice may be modified from time to time, in particular to reflect changes in applicable legislations and / or in Regeneron’s personal data processing practices. This HCP Notice explains Regeneron’s processing activities. It is subject to local adaptations and translations in order to comply with any applicable law.

Personal Data That We Collect

The Personal Data that Regeneron collects and processes about you may come directly from you, our alliance and co-promotion partners, collaborators, from your interaction with our digital properties, or from public or third-party information sources where duly authorized.

Personal Data about you includes all data that identifies you or can be used to identify you. The types of Personal Data that we collect depend on your relationship with Regeneron, as well as applicable laws. We collect and have collected in the past 12 months the following categories of Personal Data about HCPs, investigators, institution staff, and ORDMs:

- **Personal Identification**: Name, sex, gender, age, date of birth, nationality, place of birth, citizenship, passport number
- **Contact Information**: Address, telephone and fax numbers, mobile number, email address, online identifier, internet protocol (“IP”) address, account login credentials and passwords, or other similar identifiers
- **Professional Qualification Information**: Academic and professional information (e.g., practice/specialty, license number, board certification, academic degree and appointments, IRB background, curriculum vitae)
- **Sensitive Personal Data:** Ethnicity, race, disability
- **Usage Data:** Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an internet website, application, or advertisement
- **Audio/Visual Information**: Professional photographs, your image and voice for both online and recorded events
- **Transparency Information**: Payment and transfer of value-related information
- **Financial and Travel Information**: Hotel rewards and/or frequent flyer numbers
- **Other Professional Details**: Training and qualifications, organizational or institutional affiliations programs, and activities in which you participated
- **Location Information**: Geographical data included in communication and content submitted in emails and received from our Digital property

interactions; online behaviour -- we may track which emails are opened and which links are clicked by recipients
- **Inferences**: Inferences drawn to create a profile reflecting your preferences, interests, scope, specialty, preferences and interactions with Regeneron

How We Use Your Personal Data

Regeneron interacts with HCPs, investigators, institution staff, and ORDMs and collects their Personal Data for many different purposes. We collect and process Personal Data about HCPs, investigators, institution staff, and ORDMs for the following purposes:

Clinical Trial Management (Operations/ Development)

- Communication regarding studies being undertaken by Regeneron and its collaborators
- Study management, including monitoring of study activities
- Identifying and evaluating investigators, sites, and supporting personnel for potential study participation
- Exploring potential collaborations and studies
- Responding to audits and for GCP compliance
- Investigating and reporting adverse event information and product complaints

Scientific Expertise

- Training or scientific and educational programs
- Evaluating professional history for compliance purposes
- Determine level of renumeration/payment
- Medical tiering to determine fair market value
- Engaging, maintaining, and/or ranking of key scientific and medical experts and leaders profiles
- Identification of professional expertise for commercial activities

Business Operations

- Customer and business relationship management
- Organize travel and hotel accommodations
- Communicating information about our studies or products (direct marketing, including social media and other third-party websites)
- Obtaining feedback about Regeneron products and services
- Providing access to our resources and tracking interactions
- Provide assistance and information related to our products or service
- Fulfilling our contractual obligations
- Disclosures of transfers of value to regulators and trade associations
- Background, anti-bribery & corruption and conflicts of interests checks
- Fulfilling regulatory requirements

- Engagement or interaction with Regeneron or our products and services; opinions concerning Regeneron or our products and services; prescription history; communication preferences.
- Research and analysis of demand and interest in pharmaceuticals and medical devices, etc., and formulation of marketing strategies
- Conduct market research
- Use of various tracking technologies such as cookies, web beacons and AIM
- Legal and Regulatory Compliance: to respond to legal requests from administrative or judicial authorities
- Process sponsorship, grants, and donations
- Processing in artificial intelligence tools or solutions
- Manage patient support programs
- Compliance and security purposes
- Contribute to investigator databank/registry (where only member companies have access); investigation of possible misconduct or failure to comply with Regeneron's policies and procedures

Regeneron collects this Personal Data about HCPs, investigators, institution staff and/or ORDMs for these based on legitimate interest, consent or to meet contractual obligations. We also use your Personal Data to comply with our legal obligations including clinical trial regulations and financial disclosure reporting.

Table 1: Summary of categories of Personal Data collected by Regeneron and the associated purposes for which Regeneron collects and uses Personal Data.

CATEGORY OF PERSONAL DATA COLLECTED	PURPOSES FOR WHICH WE COLLECT PERSONAL DATA
Personal Identification	• Clinical trial management • Scientific expertise • Business operations • Legal and regulatory compliance
Contact Information	• Clinical trial management • Scientific expertise • Business operations • Legal and regulatory compliance
Professional Qualification Information	• Scientific expertise • Legal and regulatory compliance
Sensitive Personal Data	• Business operations • Legal and regulatory compliance
Usage Data	• Clinical trial management • Business operations • Legal and regulatory compliance

Audio/Visual Information	• Clinical trial management • Scientific expertise • Business operations • Legal and regulatory compliance •
Transparency Information	• Business operations • Legal and regulatory compliance
Financial and Travel Information	• Business operations • Legal and regulatory compliance
Other Professional Details	• Scientific expertise
Location Information	• Clinical trial management • Scientific expertise • Business operations • Legal and regulatory compliance
Inferences	• Clinical trial management • Scientific expertise • Business operations • Legal and regulatory compliance

We may also deidentify any Personal Data we collect about you. When we deidentify Personal Data, we take reasonable measures to ensure that it cannot be associated with a consumer or household, and we maintain and use the information in deidentified form. We will not attempt to reidentify the information, except that we may attempt to reidentify it solely to determine whether our deidentification processes satisfy applicable legal requirements. After it has been deidentified, the information is no longer Personal Data and is not subject to this HCP Privacy Notice.

For California residents, we do not use Sensitive Personal Data about HCPs, investigators, institution staffs, or ORDMs for purposes other than those permitted by the CCPA regulations.

Additional Uses of Personal Data – Transfers of Value Disclosures

Regeneron and its affiliates are required to make public disclosures of the payments and benefits, that you receive from Regeneron in order to meet transparency obligations under applicable local law, regulations/regulatory guidance, including any pharmaceutical industry code of conduct to which Regeneron is subject.

We will only disclose the information required, and such information could include your identity, location of professional practice, national identifier, and or license number, as well as the date, nature and amount of value that was provided. This information may be published on government websites, industry websites, and/or our websites, to meet

legal requirements. We have an obligation to process your personal data with an applicable legal basis, which can vary depending on the country of origin. The legal basis could be one of the following: consent, legal requirement, contract or legitimate interest.

Where processing of HCP and/or ORDM's personal data is based on legitimate interests, HCP and/or ORDM's may exercise their right to object to such processing at any time. Regeneron will comply with your request unless Regeneron has compelling legitimate grounds for the disclosure which override your interests and rights, or if Regeneron must continue to disclose the data for the establishment, exercise or defence of a legal claim.

Sales & Sharing of Personal Data

We generally do not sell HCPs', investigators', institution staffs', or ORDMs' Personal Data for monetary or other valuable consideration, or "share" Personal Data pertaining to HCPs, investigators, institution staffs, or ORDMs, as the term "share" is defined by the California Consumer Privacy Act ("CCPA"). However, we do sell and share and have sold and shared in the past 12 months online identifiers and internet activity information we collect from visitors to our websites to our advertising cookie partners for marketing purposes, which may include Personal Data about HCPs, investigators, institution staffs, and ORDMs. To opt out of the sale and sharing of your Personal Data, please click here.

We do not have actual knowledge that we sell or share Personal Data of individuals who are under 16 years of age.

Retention of Personal Data

Depending on the region in which you reside, the Personal Data we collect about you may be stored for as long as we have an ongoing legitimate business need or a legal obligation to do so. Where your Personal Data was collected pursuant to a consent, we honour the stated retention statement.

We will only retain your Personal Data where there is a legal basis to do so. Once it is determined that there is no legal basis to retain your Personal Data it is deleted or anonymized (where it can no longer be used to identify you directly or indirectly).

Disclosures of Personal Data

We disclose and have disclosed in the past 12 months the categories of Personal Data listed in the "Personal Data That We Collect" section, above, for the purposes described in this HCP Privacy Notice, to our affiliates, subsidiaries, and service providers, as well as to third parties, such as collaborators, alliance partners and co-promotional partners (distributors and other members of the healthcare and

pharmaceutical industry), selected suppliers, contest or similar promotion sponsors, and marketing and analytics providers. We may also disclose such categories of Personal Data to legal or administrative authorities as appropriate or where required by law.

Regeneron contracts with service providers to perform activities or functions related to the purposes specified above on behalf of Regeneron that involve the use of Personal Data about you. In such cases, Regeneron will require these service providers to protect the privacy, confidentiality and security of the Personal Data that is disclosed to them and that they may collect on our behalf. These service providers will be required to agree they will not use or disclose Personal Data about you except as necessary to provide services to us or perform services on our behalf, or as necessary to comply with applicable laws or regulations.

If you participate as a clinical investigator in any studies conducted by Regeneron, we may publicly disclose your name and work contact information, and your association with us. This data may be posted online on Regeneron's website, the European Clinical Trials Database, ClinicalTrials.gov, and similar sites; this data may also be included in printed material.

In addition, we may provide your name, contact information, and other information about your site such as enrolment numbers to our collaborators. Such collaborators may contact you about potential participation in future studies.

Regeneron may disclose Personal Data about you, including your financial relationship with Regeneron and any amounts you have been paid by Regeneron, to government authorities in connection with Regeneron's drug regulatory activities, in response to authorized information requests, or as otherwise required by laws, regulations, or industry codes to which Regeneron or any of its affiliates is subject.

There may be scenarios where we would be required to provide your Personal Data in response to a court order, subpoena, or search warrant. Although we will be diligent in protecting your Personal Data, we will cooperate with such requests. We will also cooperate with law enforcement authorities where they are investigating HCPs, investigators, institution staff and/or ORDMs who violate the law or engage in behaviour that is illegal or harmful to individuals.

We may also disclose your Personal Data as reasonably necessary to facilitate a merger, sale, joint venture or collaboration, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

International Data Transfers

Regeneron is a global organization with affiliates, partners and service providers located in many countries around the world. Your Personal Data may be accessed from or transferred to countries outside of where your Personal Data was collected. This includes the United States and other countries where Regeneron is located, has a collaborator who is conducting research, or where Regeneron seeks to market its products. Although these countries may not have the same level of Personal Data protection as the country where you live, Regeneron has implemented technical and organizational safeguards to protect your Personal Data and is ultimately responsible for protecting your privacy. While security measures implemented by Regeneron reduce the risk of your Personal Data being misused or accessed by unauthorized individuals, such risks cannot be eliminated entirely.

If you are located in the EEA, be advised that Regeneron has implemented the European Commission's Standard Contractual Clauses for transfers of Personal Data between our affiliates, partners and collaborators, which require parties to protect Personal Data they process from Europe in accordance with local data protection laws. A copy can be obtained by requesting directly from the Data Privacy Office, see the "How to Reach Us" section below.

Your Rights

Depending on the region in which you reside, under applicable law, you may have the following rights in relation to your Personal Data:

- **Right to Know.** Obtain confirmation Regeneron has collected your Personal Data and information about how we use your Personal Data, Including:
    - The categories of Personal Data we have collected about you
    - The categories of sources from which we have collected Personal Data about you
    - The business or commercial purpose for collecting, selling, or sharing your Personal Data
    - The categories of third parties to whom we disclose Personal Data
    - The specific pieces of Personal Data we have collected about you
    - The categories of Personal Data that we have disclosed about you for a business purpose

- **Right of Access.** You have the right to request that we disclose or provide you with access to or a copy of the Personal Data we have collected about you.

- **Right to Rectification.** You have the right to request the rectification of inaccurate Personal Data concerning you and have incomplete Personal Data completed.

- **Right to Deletion**. You have the right to request we delete the Personal Data we collect from you.

- **Right to Restricted Processing**. You have the right to request a restriction to the processing and object to the processing of Personal Data about you.

- **Right to Data Portability:** You have the right to receive the Personal Data provided by you in a structured, commonly used and machine-readable format and to transfer this Personal Data to another controller or, if technically feasible, to have it transferred by us if the legal requirements are met.

- **Right to Object:** You have the right to object to the processing of Personal Data, which is necessary for the purpose of our legitimate interests, on grounds relating to your particular situation.

  You have the right to object to the disclosure on the individual HCP level of value-related information under the Association of the British Pharmaceutical Industry (ABPI) code of conduct to which Regeneron and any of its affiliates are subject to. If you object, Regeneron and any of its affiliates must disclose transfers of values on an aggregate basis.

- **Right to Withdraw:** If the data processing is based on consent you can withdraw the consent at any time. The withdrawal of your consent does not affect the lawfulness of the processing of your Personal Data until withdrawal.

- **Right to Opt-Out of the Sale & Sharing of Personal Data**. You have the right to opt out of sale and sharing of your Personal Data. A “sale” is disclosure of Personal Data to a third party for monetary or other consideration, and a “share” is disclosure of Personal Data to a third party for cross-context behavioural advertising, whether or not for monetary consideration. To opt out of the sale and sharing of your Personal Data, please click here.

- **Right Not to Be Subject to Discrimination**. You have the right to be free from discrimination or retaliation for exercising any of your data subject rights.

These rights may be limited to jurisdictions that require them by law. Limitations also apply where regulatory requirements may prevent us from fulfilling the request. In some instances, this may occur in order to preserve scientific integrity, as your Personal Data must be managed in specific ways in order for the information to be reliable and accurate and to meet regulatory obligations of Regeneron and its affiliates. In addition, such rights may be limited, where the rights of other persons would be violated, where any other legal exemptions to data subject requests may apply, where your request is not legitimate or applicable, where it is required to

conduct company business to the extent allowed by applicable data protection laws, or where another exemption applies under applicable data protection laws.

You can exercise the rights applicable to you by emailing DataProtection@Regeneron.com, by calling 844-835-4137, or by clicking here[1]. Depending on the type of request you submit, we may be required to verify that you are who you say you are. We verify such requests carefully, and you may be requested to provide additional Personal Data for the verification process.

In some jurisdictions, you may also authorize an agent to make data subject requests on your behalf. In such instances, authorized agents may use the same methods as an individual to subject data subject rights on your behalf.

Opt-Out Preference Signals – We recognize opt-out preference signals that we are required to recognize for compliance with applicable law. Where required by law, we treat such opt-out preference signals as a valid request to opt-out of sale and sharing for the browser or device through which the signal is sent and any consumer profile we have associated with that browser or device, including pseudonymous profiles. Further, if we know the identity of the consumer from the opt-out preference signal, we will also treat the opt-out preference signal as a valid request to opt out of sale and sharing for such consumer. Consumers may use opt-out preference signals by downloading or otherwise activating them for use on supported browsers and setting them to send opt-out preference signals to websites they visit. Please note that we while we recognize opt-out preference signals we are required to recognize by law, we do not currently recognize “Do Not Track” signals.

Information Security

Regeneron is committed to protecting Personal Data from loss, misuse, disclosure, alteration, unauthorized access, and destruction and takes all reasonable precautions to safeguard the confidentiality of Personal Data. Although we make reasonable efforts to protect the Personal Data which you provide to us, no information security system is impenetrable.

As such, you acknowledge and accept we cannot guarantee the security of your Personal Data, although we use strict procedures and security features to prevent unauthorized access.

Where we have given you (or where you have chosen) a password which enables you to access an account with us, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. We have put in place

procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

[1]Users who click on embedded external URLs will leave Regeneron.co.uk. We encourage you to read the privacy notice of every website you visit.

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Other Disclosures

California Residents Under Age 18. If you are a resident of California under the age of 18 and a registered user of the Regeneron Sites, you may ask us to remove content or data that you have posted to the Regeneron Sites by writing to DataProtection@Regeneron.com. Please note that your request does not ensure complete or comprehensive removal of the content or data as, for example, some of your content or data may have been reposted by another user. Please note that your request does not ensure complete or comprehensive removal of the content or data as, for example, some of your content or data may have been reposted by another user.

Disclosure About Direct Marketing for California Residents. California Civil Code § 1798.83 permits California residents to annually request certain information regarding our disclosure of Personal Information to other entities for their direct marketing purposes in the preceding calendar year. To make such a request, please send an email to DataProtection@Regeneron.com with the subject "Shine the Light Request."

Financial Incentives for California Consumers. We do not provide financial incentives to California Consumers who allow us to collect, retain, sell, or share their Personal Information. We will describe such programs to you if and when we offer them to you.

How to Reach Us

We may amend this Privacy Notice at any time. Any changes to this Privacy Notice will be posted on the Regeneron Sites. Should these amendments materially relate to any consents you may have given, Regeneron will post an updated Privacy Notice on the Regeneron Sites, list the effective date of such updates, and in situations where legally required for the processing of your Personal Data, we will contact you in order to obtain your consent to any change in the use of your Personal Data.

If you need further assistance regarding exercising your rights, please send your request to the Data Privacy Office by emailing us at DataProtection@Regeneron.com, by visiting the Data Subject Rights webportal at https://secure.ethicspoint.com/domain/media/en/gui/70931/index.html[1] for a list of phone numbers or to submit a request online, or by post mail at:

Regeneron Pharmaceuticals, Inc.
Chief Privacy Officer
777 Old Saw Mill River Rd.
Tarrytown, NY 10591-6707

[1]Users who click on embedded external URLs will leave Regeneron.co.uk. We encourage you to read the privacy notice of every website you visit.

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You can also contact Regeneron's Data Protection Officer by email DataProtection@Regeneron.com, or write to Data Protection Officer, Regeneron UK Ltd, 3rd Floor, The Charter Building, Vine Street, Uxbridge, UB8 1JG.

You may have the right to lodge a complaint directly with the relevant data protection authority or supervisory authority if you believe that we have processed information in a manner that is unlawful or breaches your rights under applicable data privacy law. If you are in the European Union you can find a listing of each EU country's Data Protection Authority here: https://ec.europa.eu/newsroom/article29/items/612080[1].

Without limiting any rights to complain directly to an authority, we are committed to protecting personal information, and complaints may be made directly with us.

Status of This Notice

We may amend this Notice from time to time, should it become necessary to do so, Regeneron will inform you on its public facing website of new revisions of this HCP Privacy Notice. This Notice may also be supplemented by other statements as needed to comply with local requirements in the country where you live.

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