

Privacy Policy

This Privacy Policy describes how Lundbeck Pakistan (Pvt) Limited and its related group companies and representative offices (“**Lundbeck**”, “**we**” or “**us**”) collect, process, use and disclose personal data.

You are required to read and understand the terms of this policy and give your consent n before you provide your personal data. You understand that, upon giving us your consent, you authorize us to collect, use and process your personal data for the purpose(s) as set out in this policy that you have opted in. If you provide us with any Personal Data relating to a third party (e.g., information of patients, and/or employees), by submitting such information to us, you represent and warrant to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.

Processing of Personal Data

Lundbeck is firmly committed to protecting personal data. In processing personal data, Lundbeck (as data controller) will comply with applicable data protection legislations, including but not limited to the Prevention of Electronic Crimes Act, 2016.

Collection of Personal Data

Lundbeck collects your personal data including your name, contact details, IP address, medical registration number, national identification numbers, travel document details, information on your preferences, your use of our electronic marketing communications (e.g. whether you opened such electronic communication and which links you clicked on), and etc.

Personal data may, for the purpose of this Privacy Policy, include sensitive personal data including information relating to the physical or mental health or condition of a data subject, his political opinions, religious beliefs or other beliefs of a similar nature, etc.

Source of Personal Data

Lundbeck collects your personal data when you provide it to us with your authorization or consent. For example, when you register on our digital platforms including our affiliates’ digital platforms (collectively, “**Platform**”), sign on or subscribe to receive our products and services, when you communicate with us through our Platform, our website, mobile application or other related digital services, when you interact with our employees such as sales and marketing

representatives, or when you contact us through email, phone, or in-person at our premises. We may also collect your personal data through other sources, such as through your participation in events organised by us, external sources of healthcare provider information (including publicly available sources), or any other sources with your authorisation or consent.

Use and Disclosure of Personal Data

We may collect and use your personal data for any or all of the following purposes:

- a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
- b) verifying your identity;
- c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
- d) managing your relationship with us;
- e) administration of your account;
- f) sending you information and notifications which you have opted in for;
- g) profiling you to analyse or predict your expectations towards us to continuously improve your experience with our products and services;
- h) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- i) any other purposes for which you have provided the information;
- j) transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Pakistan or abroad, for the aforementioned purposes, with due observance of provisions of applicable laws; and
- k) any other incidental business purposes related to or in connection with the above.

We may disclose your personal data:

- a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods or services requested by you; or
- b) to any company within the Lundbeck group of companies, our business and strategic partners, third party service providers, agents and other organisations and third parties we have engaged to perform any of the functions for us (including but not limited to the purpose of marketing of our goods and/or services).

The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

Except as otherwise stated, we may also use your personal data to analyse and improve the content of our Platforms (as defined below) or the content we send to you, for product development, to communicate information requested by you for other purposes, including, but not limited to those specified in this Privacy Policy and for any other purposes reasonably determined by us based on your given consent to us.

Except as otherwise stated, it is necessary for you to provide personal data requested by us under this Privacy Policy for us to process your personal data for any of the purposes stated in this Privacy Policy that you have opted in. Without your personal data, we may not be in the position to perform certain obligations in the course of or in connection with our provision of the goods and/or services requested by you.

Use of Cookies

A "cookie" is a small text file that may be used to collect information about your activity on our Platform. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser when you use our Platform, but if you do, you may not be able to take advantage of the personalized features enjoyed by other users to our Platform.

Withdrawing Your Consent

The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

Access to and Correction of Personal Data

If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, (b) a correction request to correct or update any of your personal data which we hold about you, (c) a request to limit the processing of your personal data, or (d) queries or complaints in respect of your personal data, you may submit your request in writing or via email at the contact details provided below.

Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within twenty-one (21) days after receiving your request, we will inform you in writing before the expiration of such period along with the reasons why we are unable to do so (except where we are not required to do so under the applicable law). We will however endeavour to comply with your request to the extent we are able to do so.

Security

We use various systems and services to safeguard the personal information we store, as part of our business systems and processes. We take reasonable steps to protect your personal data from loss, misuse, and unauthorized access, disclosure, alteration or destruction. While security cannot be fully guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures. When using third-party providers, these third-party providers will be obligated by Lundbeck to safeguard the confidentiality of your data and to take adequate technical and organizational measures to protect your data.

Retention of Personal Data

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

Transfers

Lundbeck may transfer your personal data to our related companies, or third parties who act on our behalf, located outside of Pakistan. Lundbeck is committed to ensuring that the recipient of such personal data has adequate safeguards in place to protect the personal data in accordance with applicable laws, including but not limited to European privacy requirements, to the extent that it is collected by, or shared with, Lundbeck's parent company.

Other rights

Lundbeck has taken necessary and adequate steps in order to protect your personal data and ensure your rights as a data subject. Please note that certain limitations may apply to your ability to exercise these rights. Subject to these limitations, you have the following rights:

- Right of access

You have the right to request access to the personal data Lundbeck processes about you.

- Right to rectification

You have the right to rectification of inaccurate personal data concerning you, including completion of incomplete personal data.

- Right to erasure (right to be forgotten)

You have the right to the erasure of the personal data concerning you or the right to cease disseminating your personal data.

- Right to restriction

You have the right to restrict Lundbeck's processing of personal data concerning you.

- Right to data portability

Where processing is based on a consent or a contract and the processing is carried out by automated means, you have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format. You have the right to transmit this personal data to a third party without hindrance from Lundbeck, if technically possible.

- Automated individual decision-making, including profiling

As a general rule you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or affects you significantly. This does not apply if, among other things, automated decision-making and profiling is necessary for entering into, or performing, a contract between you and Lundbeck.

Contacting us

If you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, please contact us in the following manner:

Lundbeck Pakistan (Pvt) Limited

Address: 40 T/4 Blessing St Block 6 PECHS, Kerachi 75400 Pakistan

Email: COMMRES1443@lundbeck.com

Contact Number: +9221 34392570-72

We may update this Privacy Policy from time to time. Any changes we make to this Privacy Policy in the future will be reflected on this page and material changes will be notified to you. If permitted under local laws, your continued use of our services constitutes your acknowledgement and acceptance of such changes. You agree that you are responsible for reviewing and checking the Privacy Policy regularly to find out if any updates or changes have been made to this Privacy Policy by referring to the date on which this policy was last updated.

Effective Date: 1 Jan 2024

Last Updated: 1 Jan 2024