

@NovartisIreland Twitter Community Guidelines and Privacy Notice

Welcome to the @NovartisIreland Twitter Feed, we're glad you are here.

Novartis Ireland Pharmaceuticals Limited (Novartis Ireland) observes Twitter's **terms of service**. The content on our feed is for informational use only and is about the company and its initiatives. It is important to note that this page is not intended to be a substitute for professional medical advice, diagnosis, or treatment. For the latter, please contact your doctor or other qualified healthcare provider.

We welcome the opportunity to hear from you via @mentions and replies, however we would like to remind you that we work in a regulated industry with a unique legal situation and code of conduct. As such, we cannot engage in sensitive topics, or a discussion(s) about products - ours or other companies' - or treatment options on Twitter. We reserve the right to remove spam and content or posts that are off-topic, abusive, discriminatory, or harassing. Any content uploaded by anyone other than Novartis Ireland is not authorised.

We ask that you respect other members of our community by ensuring that you do not:

- Mention medicinal products
- Include profanity, defamatory, libelous, offensive, abusive, discriminatory or demeaning content (including images, videos and links) in your post;
- Include disparaging or threatening language or content, or condone or promote violence or illegal behaviour in your post;
- Go off-topic with your posts;
- Offer health or medical advice in your post;
- Include any Personal Information such as your email address or phone number in your post;
- Violate another's copyright or other intellectual property rights;
- Post to solicit business or share commercial information, e.g. sell products and/or services, or recruit fans and followers;
- Post material that is excessively repetitive and/or disruptive to the community or is spam;
- Post information containing proprietary, confidential, sensitive, or non-public information;
- Breach Twitter's terms of service.

If your post or comment does not comply with our Community Guidelines, it may be blocked or muted.

At this time, Novartis Ireland is only able to accept and monitor postings to this site in English or Irish and this account is intended for the Ireland audience only. Novartis Ireland may remove content from this site posted in languages other than English or Irish.

We will do our best to respond to any direct messages within 48 hours.

Twitter accounts that Novartis Ireland follows or is followed by are not an indication of Novartis Ireland's endorsement of these accounts or the content they produce. Any content that Novartis Ireland re-Tweets or reacts to is not an endorsement of the content itself, nor the producer of the content.

Reporting side effects related to Novartis products

It is preferable not to use Twitter to report side effects or product quality issues, but to use the mechanisms detailed below.

If you have experienced a side effect related to a Novartis product, please report it using the Novartis online system. Alternatively, you can contact drugsafety.dublin@novartis.com or telephone 01 2080612.

If you need to report a product technical complaint relating to a Novartis product, please email qa.cpoireland@novartis.com.

It is against our Community Guidelines for users to Tweet about medicines and we suggest sharing as little personal information as possible on Twitter. Sharing specific data concerning your personal health should be avoided. Should you, however, Tweet @NovartisIreland with details of any side effects that you experience, Novartis Ireland may need to contact you to find out more information.

Reporting side effects related to all other products

If you get side effects with any medication you are taking, talk to your doctor, pharmacist or nurse. This includes any possible side effects not listed in the information leaflet that comes in the pack. You can report side effects via the HPRA on <https://www.hpra.ie/>. By reporting side effects, you can help provide more information on the safety of your medication.

Privacy Notice

This Privacy Notice must be read in conjunction with [Twitter's Privacy Policy](#) and [Cookies Policy](#), which apply data processed by Twitter on its platform.

If you contact Novartis, for example by sending a message to this account, information about you ("personal data") may be collected and transferred to Novartis systems, but only where this is necessary the purposes described below. In such cases, and limited to such cases, Novartis is responsible for the processing of your personal data as it decides why and how it is processed, acting as a "controller". In this Privacy Notice, "we" or "us" refers to Novartis Ireland Limited.

What information do we collect?

As necessary for the purposes described below, we may collect personal data, including:

- your basic profile information (e.g. name, sex, country);
- personal data contained in your Tweets to this account; and
- personal data contained in messages sent to us.

For which purposes do we use personal data and why is this justified?

We will not process your personal data if we do not have a proper justification foreseen in law for that purpose, and this means we will only process your personal data on one or more of the following bases:

- we have obtained your prior consent;
- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- the processing is necessary to comply with our legal or regulatory obligations;
- the processing is necessary to protect your vital interests or those of another person; or
- the processing is necessary for our legitimate interests and does not unduly affect your interests or

fundamental rights and freedoms. In such cases, we always seek to maintain a balance between our legitimate interests and your privacy. Examples of such 'legitimate interests' include the purposes described below.

Personal data may be used by us for the following purposes:

- to manage and answer any questions, requests, or complaints you raise;
- to inform our communications activities, including the content and target audience of the posts from our social media accounts; and
- we ask you not to do so, but if you use Twitter to alert us to medicinal side effects, product quality complaints or other regulated situations, we may log your query and contact you for additional information. We may also be required to disclose your personal data to regulatory authorities. For more information about this, please refer to our Privacy Notice for Individuals Who Are Involved in Adverse Events, Medical Information Queries or Complaints.

In addition, we may also process your personal data for the following general purposes:

- improve our products and services;
- provide you with adequate and updated information about diseases;
- organise patient support or assistance programs (including connecting you with health resources and patients associations upon your request)
- manage our IT resources, including infrastructure management and business continuity;
- preserve the company's economic interests and ensure compliance and reporting (such as complying with our policies and local legal requirements, tax and deductions, managing alleged cases of misconduct or fraud, conducting audits and defending litigation);
- manage mergers, acquisitions, and divestments involving our company;
- archiving and record-keeping; and
- any other purposes imposed by law and authorities.

Who has access to personal data and to whom are they transferred?

We will not sell, share, or otherwise transfer your personal data to third parties other than those indicated in this Privacy Notice.

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal data can be accessed by, or transferred to the following categories of recipients, on a need to know basis to achieve such purposes:

- our personnel (including personnel, departments or other companies of the Novartis group);
- our suppliers and services providers that provide services and products to us;
- our IT systems providers, cloud service providers, database providers and consultants;
- any third party to whom we assign or novate any of our rights or obligations; and
- our advisors and external lawyers in the context of the sale or transfer of any part of our business or its assets

The above third parties are contractually obliged to protect the confidentiality and security of your personal data, in compliance with applicable law. Your personal data can also be accessed by or transferred to any national and/or international regulatory, enforcement, public body or court where we are required to do so by applicable law or regulation or at their request.

The personal data we collect from you may be processed, accessed, or stored in countries outside Ireland.

Such countries may offer a different level of protection of personal data. If we transfer your personal data to external companies in other jurisdictions, we will make sure to protect your personal data by applying the level of protection required under applicable data privacy laws. For intra-group transfers of personal data, Novartis has adopted Binding Corporate Rules, a system of principles, rules, and tools, provided by European law, that ensures effective levels of data protection relating to transfers of personal data outside the EEA and Switzerland. Read more about the Novartis Binding Corporate Rules at <https://www.novartis.com/privacy-policy>.

How long do we store Personal Data?

We will only retain your Personal Data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

What are your rights and how can you exercise them?

You may exercise the following rights under the conditions and within the limits set forth in the law:

- the right to access your personal data as processed by us and, if you believe that any information relating to you is incorrect, obsolete or incomplete, to request its correction or updating;
- the right to request the erasure of your personal data or the restriction thereof to specific categories of processing;
- the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal;
- the right to object, in whole or in part, to the processing of your personal data; and
- the right to request its portability, i.e. that the personal data you have provided to us be returned to you or transferred to the person of your choice, in a structured, commonly used and machine-readable format without hindrance from us and subject to your confidentiality obligations.

Contact us

If you wish to contact us regarding our use of your personal data or you wish to exercise your data privacy rights, please contact privacy_uk.ireland@novartis.com.

If you are not satisfied with how we process your Personal Data, please address your request to our Data Protection Officer at global.privacy_office@novartis.com, who will investigate your concern.

In any case, you also have the right to file a complaint with the competent data protection authorities, in addition to your rights above.

Additional information

Novartis will not be responsible for use of your comments outside of these intended purposes by you or any third party. No part of our responses to you may be published and should not be disseminated to third parties out of context of the original enquiry.

Thank you for reading and for following Novartis Ireland on Twitter.

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