Privacy Notice for Study Staff in Clinical Trials

1. Scope of this Privacy Notice

At Teva, we are committed to collecting, using, retaining, and sharing your personal data in a fair, transparent, and secure manner.

This Notice describes how Teva entity sponsoring the clinical trial, detailed in the "*Teva Controller and How to Contact Us*" section below, and its affiliates, collect and use your personal data for the purposes of assessing your suitability for conducting studies, conduct the particular study in respect of which you have agreed to be engaged ("**Study**"), and invite you to participate in future studies Teva sponsors.

2. Teva Controller and How to Contact Us

The "**Controller**", "**Business**", "**Data Fiduciary**" responsible for your personal data ("**we**", "**us**", "**Teva**", "**our**") is Teva Branded Pharmaceuticals Products R&D LLC of 145 Brandywine Parkway, West Chester, PA 19380, USA.

Where you are resident in the European Union, our EU Representative for data privacy only, is Teva Pharmaceuticals Europe B.V., Attn: Legal – Data Privacy Counsel, Busweg 1, 2031 Da Haarlem, Netherlands, Tel: +31202193000

Query Type	Location	Contact Details
All enquiries relating to the Study	ALL	TevaGlobalClinicalOperations@tevapharm.com
Data Privacy	US	USPrivacy@tevapharm.com US Privacy Web Form
Data Privacy	Europe including the UK and Switzerland	EUPrivacy@tevaeu.com. European Privacy Web Form
Data Privacy	Israel, Canada and Rest of World	IMPrivacy@tevapharm.com

3. Personal Data We Collect

We collect, receive, generate and use your personal data and information that concerns you, in connection with the assessment, planning, conduct and administration of the Study. For each type of information, we will ensure applicable data protection law requirements regarding the collection and processing are complied with. See the "*How we use your Information*" section below for more information.

We obtain this data from different sources. This includes data you provide to us directly; data provided to us by or on behalf of the study site, institution, CRO or other study-related parties; data obtained from third-party or publicly accessible professional sources, where relevant and permitted by applicable law; and data that we generate or process ourselves in connection with the assessment, planning, conduct and administration of the Study, such as transfer of value records, study administration records, compliance-related records or internal notes. The personal data we collect, receive, generate, use and process about you includes:

Identification Information	Name, title, contact information.
Professional Information	Training and qualification information. Previous and current employment and education information. Experience in clinical research, including participation in Teva studies.
Financial Information	Details of any payments or other transfers of value or transfers of remuneration that we make to you.
Additional Information	Personal data collected and generated when you are involved in a study sponsored by Teva, including conflict of interest information, additional qualification forms.

Providing the above personal data is not a legal obligation, so you may refuse to provide your personal data or to give your consent to their processing, but if you do not permit us to collect such data or you refuse your consent, Teva may not be able to assess your suitability for conducting studies, conduct the Study and invite you to participate in studies in future.

4. Why We Collect Your Personal Data and How We Use It

In some countries, we collect, use and transfer your personal data on the basis of a legal ground of processing and in other countries we required your consent(s). For each processing purpose set out below, we describe the applicable legal basis for processing. If you choose not to give your consent, you will not be able to support the Study nor be considered for future clinical trials and studies sponsored by Teva.
We collect and use your personal data as described above for the following purposes.

Purpose of Processing	Categories of Personal Data and Legal Basis
Planning, implementing and administering clinical trials and studies including internal record keeping and management, and in particular, ensuring appropriate staffing of the Study and undertaking scientific research.	Identification Information, Professional Information, Financial Information, Additional Information For the pursuit of our legitimate interests in undertaking clinical trials and studies in an effective, efficient and safe manner, and where required by applicable law, with your consent.
Making disclosures with the authorities as well as pharmaceutical industries and associations and their successors or local equivalents (where relevant), including in accordance with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code of Practice and its successors or local equivalents (where relevant).	Identification Information, Professional Information, Financial Information We must process your personal data to comply with our legal obligations in relation to trials or studies and otherwise for our legitimate interest in managing our business. Where required by applicable law, with your consent.
To communicate with you as necessary over the course of the clinical trial or Study.	Identification Information For the pursuit of our legitimate interests to be able to administer clinical trials and studies.
To publish information and articles, for example on www.clinicaltrials.gov, www.euclinicaltrials.eu, and other websites and/or databases that serve a comparable purpose.	Identification Information, Professional Information, Additional Information To comply with our legal obligations relating to publication of information and otherwise for the pursuit of our legitimate interest in undertaking clinical trials and studies for the purpose of developing new therapies and medicines and in managing our business. Where required by applicable law, with your consent.
Making reports in accordance with legal, regulatory and industry association requirements, in particular complying with pharmacovigilance obligations.	Identification Information, Professional Information, Financial Information To comply with our legal obligations and otherwise for our legitimate interest in managing our business. Where required by applicable law, with your consent.
For compliance with applicable laws and for the protection of our legitimate business interests and legal rights, including, but not limited to, use in connection with legal claims, compliance, regulatory, investigative and disciplinary purposes (including disclosure of such information in connection with a legal process or	Identification Information, Professional Information, Financial Information, Additional Information To comply with our legal obligations and otherwise for our legitimate interest in managing our business. Where required by applicable law, with your consent.

litigation) and other ethics and compliance reporting tools.	
Assessing feasibility and suitability for future clinical trials and studies, including maintaining records to support future study planning and investigator/site selection.	Identification Information, Professional Information, Financial Information, Additional Information For the pursuit of our legitimate interests in planning and undertaking clinical trials and studies in an effective, efficient and safe manner, including identifying suitable investigators and sites for future studies. Where required by applicable law, with your consent.

We will use your personal data only for the purposes for which it was collected, unless we reasonably consider that we need it for another purpose that is compatible with the original purpose. If we need to use your personal data for an unrelated but compatible purpose, we will notify you in advance of our use of your personal data and explain the legal basis for this. Note that we may process your personal data without your knowledge or consent where this is required or permitted by applicable law.

5. Your Privacy Rights

You may exercise certain privacy rights in relation to your personal data that we process. Depending on the applicable law in your country, you may have the right to: (i) receive information about our processing of your personal data; (ii) review or access the personal data we process about you; (iii) to rectify your personal data; (iv) to erasure; (v) to object; (vi) to restrict the processing of your personal data; (vii) to request that your personal data is ported to another organization (viii) compensation for any damage arising from unlawful personal data processing; and (ix) where we have relied on your consent to process your personal data, to withdraw any consent initially provided (but withdrawal does not affect the validity of the processing of your personal data carried out with your consent before the withdrawal). In some countries, decisions based solely on automated processing can be queried by you where that decision produces a legal effect that impacts you.

In case of any questions or concerns about how we process your personal data or to exercise your rights, please use the contact details provided on page one of this privacy notice.

We may require you to provide proper identification before we comply with any request to share or disclose personal data.

Please note that your rights may be limited in some situations – for example, where we can demonstrate we have a legal requirement to process your personal data. If you feel your concerns have not been resolved, you have also the right in some countries to lodge complaints with the relevant data protection authority; and/or other specific governmental agencies responsible for access to public information or with legal powers to attend to complaints and claims.

6. Sharing Your Personal Data

We may need to transfer or disclose your personal data to Teva affiliates globally within the Teva group for reasons of scientific research including future research, operational necessity, business continuity and legal necessity. This means that your personal data may need to be shared with our R&D teams, Medical Affairs, internal support teams, Legal & Compliance, Internal Audit, Corporate Security and IT Security, as the circumstances require.

We also share your personal data with the following:

- individuals taking part in the performance of the Study;
- our third-party service providers including:
    - third party service providers which process your personal data on our behalf who are bound by contractual obligations to keep your personal data confidential and appropriately secure, such as Contract Research Organisations, vendors providing services related to clinical trials etc.

- third parties who collate and generate (non-identifying) statistics about transfers of value/transfers of remuneration to healthcare professionals;
- our business partners;
- Institutional Review Boards and Independent Ethics Committees which are reviewing the appropriateness of the clinical trial protocols as well as the risks and benefits to Study participants;
- purchasers, or potential purchasers, of all or part of our business (and their professional advisors);
- Legal & Compliance (consultants, agents and advisers including audit, legal, tax, accounting or consultancy firms; and Government and regulatory authorities and law enforcement officials if required for the purposes specified above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws

7. Security

Teva takes measures to secure your personal data from accidental loss and from unauthorized access, use, alteration or disclosure. Data is transferred securely using SSL encryption and stored on secure servers. Additionally, we take further information security measures including access controls, stringent physical security and robust information collection, storage & processing practices. However, the internet is an open system and Teva cannot guarantee that unauthorized third parties will never be able to defeat those measures or use your personal data for improper purposes.
We will maintain the strict confidentiality of all personal data collected and will only disclose such information on a confidential basis to employees and third-party contractors from whom require such information for the purposes set out above.

8. How We Store Your Information

We will keep your personal data for the period during which you undertake work on clinical trials or studies sponsored by us and, to the extent permitted, after the conclusion of the trial or study or otherwise permitted by laws and regulations. Laws may require us to hold certain personal data for specific periods (such period is 25 years in many countries). In other cases, we may retain personal data for an appropriate period after the arrangement ends to protect ourselves from legal claims, or to administer our business (including to invite you to participate in future trials or studies).

9. International Transfers

Teva operates internationally and will transfer your information to the recipients set out in the "*Sharing Your Personal Data*" section. When transferring information outside your country Teva follows local privacy legislation.

For Europe (including UK and Switzerland): When transferring personal information outside Europe, Teva generally relies on the European Commission's (or local equivalent) adequacy decisions. Where an adequacy decision is not available, Teva relies on a variety of transfer mechanisms available under applicable European data protection laws including, the EU Commission approved standard contractual clauses and in limited, specific circumstances, consent. Information on the relevant mechanism can be provided upon request. Please use the "*Teva Controller and How to Contact Us*" section above to do so.

For other countries: Transfers abroad (including to countries that provide a lower level of privacy protection) are based on a relevant mechanism to safeguard transfers, or appropriate agreements.

For more information on the relevant mechanism, please contact our Teva Data Protection Officers using the "*Teva Controller and How to Contact Us*" section above.

10. Changes To This Notice

This notice may change from time to time. Where we make notifiable changes, we will provide you with an updated copy.