

Privacy Notice for Health Care Professionals Merck Sharp and Dohme IDEA Middle East

FACTS	<p>This Notice provides a comprehensive overview of the practices of Merck Sharp & Dohme IDEA Middle East and its affiliates ("MSD", "Company", or "we") with respect to the collection, use and disclosure of personal information about health care professionals in the United Arab Emirates, Bahrain, Oman, Qatar and Kuwait.</p> <p>This Notice is not intended to replace other notices or consent requests provided by MSD to health care professionals from time to time, including in relation to specific programs. Such other notices and consent requests should be read in conjunction with this Notice.</p>
Our Approach	<p>Our approach to privacy begins with our values. Consistent with our tradition of upholding high ethical standards across our business practices, we have demonstrated our commitment to privacy by establishing a global privacy program to support compliance with applicable privacy laws and standards for protecting personal information around the world.</p>
Why?	<p>We collect, receive, use and share identifiable information ("personal information") about physicians, pharmacists, investigators, researchers and other health care professionals in accordance with and as permitted by applicable laws in connection with our everyday business operations, including for the purposes of:</p> <ul style="list-style-type: none"> • clinical, epidemiology and outcomes research study management • adverse experience and product complaint reporting • patient assistance, prescription discount and reimbursement support programs • communicating information about our products through our professional representatives, our web sites, via e- mail, call centers, postal mail and other channels, including promotional and other marketing communications • symposia, conferences, virtual meetings and other scientific and educational programs or Sponsorship to MSD sponsored events • requests for product samples and orders for our products, where permitted by law • financial disclosure reporting and Anti-Bribery checking • business research and marketing research • auditing our programs and resources for compliance and security purposes • identifying and engaging scientific experts and leaders • providing access to our resources and keeping track of our interactions with you both offline and online (our online practices are governed by our Internet Privacy Policy) • tracking payments made to health care professionals for services performed on behalf of MSD • development of sales and marketing programs • delivery of programs and materials to your patients • determining the appropriateness, given the requirements of laws applicable to our business, of engaging health care professionals for certain of the business purposes described above • to make travel reservations related to sponsorship and sponsorship registration • analyzing and understanding your behavior, preferences and interests, in order to provide you with a better experience and improve our products and services, through Artificial Intelligence based automated decision making. Segment and

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	<p>analyze your preferences for tailored communication.</p> <ul style="list-style-type: none"> • Social media insights on public policy and public affairs topics, social media listening related to our products and services • as required or expressly authorized by laws applicable to our business globally <p>Depending on the location in which you live, local laws may require that you provide specific consent for the collection, use and disclosure of personal information for some of the programs we operate. Where required, you may be asked to provide your consent by filling out a paper form, an online form, in a telephone discussion, by a text message or by other appropriate and permitted means. Except where we are required by law or regulation to use or disclose personal information for certain purposes, and except in cases where we may be required to work with or refer you to a third party, you also may opt-out of specific programs by contacting us as described in the "Contact Us" section of this form.</p>
What?	<p>The types of personal information we collect (directly from you or from public or third-party information sources), use and share depends on the nature of the relationship you have with MSD and the requirements of applicable laws. This information may include, among other things:</p> <ul style="list-style-type: none"> • contact information • email address and mobile phone numbers • professional credentials, publications, patents and other scientific and medical achievements • roles or positions held with governmental bodies or hospital or payor organizations • date or birth, day or year of birth, or age • organizational and institutional affiliations • programs and activities in which you participated • information about your prescribing of our products • agreements you have executed with MSD • payment-related information, including tax identification number • your communications preferences • information about your scientific and medical colleagues and leaders in your specialty area • Passport and visa details • details including dates and types of interactions we have had with you, including any details of information you have requested from us • records of any payment made to meet our regulatory obligations • information about your medical practice and your areas of professional interest • personal photograph (e.g., Biographic image) that you have provided to MSD, or is publicly available • browsing history, purchase history, and preferences when you interact with our website, products, and services.
Where?	<p>MSD collects your personal information from a variety of sources, but mainly directly from you. For example, you will provide personal information to MSD for example when you respond to a survey, participation to a meeting we organize, during event registration and post virtual event, MConnect website.</p> <p>We will also collect some personal information from third party sources. These third-party sources include Virtual events service providers and Creative agencies.</p>

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	<p>We may sometimes ask you to provide personal information to us on a mandatory basis. Where this is the case, we will inform you of this at the time of collection. Failure to provide any mandatory information that we request may mean that we are unable to pursue or continue our arrangement with you. For example, if you do not provide us with certain financial information that we request, we may not be able to contract with you.</p>
How?	<p>We may only use your information when we have a “lawful basis” to do so. We use different lawful basis depending on why we use your information (in other words, the “purpose” of our processing). The lawful basis for data processing encompasses various scenarios. Firstly, processing may be necessary to protect the public interest, which could include activities related to public safety, national security, or crime prevention. Second, if personal data has become publicly available through the actions of the data subject, processing of that data may be permissible. Third, data processing may be necessary for initiating or defending legal claims, protecting rights, or participating in legal or security proceedings. Moreover, processing may be necessary to safeguard public health, ensure the safety and quality of healthcare and medical products, or for archival, scientific, historical, or statistical purposes. Data processing can also be justified when protecting the interests of the data subject, or when performing contractual obligations. Furthermore, processing may be necessary to comply with other legal requirements imposed on controllers. Finally, any additional cases specified by the Executive Regulations of the respective Decree Law may also serve as a lawful basis for data processing.</p> <p>Your personal data will be retained for as long as necessary to fulfill the purposes outlined in this privacy notice or as required by law. Information may be retained for longer if we have a legal or regulatory obligation.</p> <p>In the table below, we list the reasons that pharmaceutical companies like MSD typically may share personal information about health care professionals with third parties, the reasons that we share this information, and whether you can limit this sharing. We implement reasonable and appropriate security measures to protect personal information in accordance with its sensitivity from loss, misuse and unauthorized access, disclosure, alteration or destruction.</p> <p>[In addition, where we share your personal information with a third party in another jurisdiction, we ensure that the laws of the jurisdiction in which the third party is established provides an adequate level of protection for personal information; or we otherwise seek to implement appropriate measures to ensure that your personal information receives an adequate level of protection (e.g., we may put in place a contract with the third party that obliges them to provide the same level of protection as MSD is obliged to provide). Where the jurisdiction in which the third party is established does not provide an adequate level of protection and we are not able to implement measures to ensure your personal information receives an adequate level of protection, we will only transfer your personal information to the third party where we have obtained your express consent or another lawful basis allowing the transfer applies.</p>

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Reasons personal information about you could be shared	Do we share?	Can you limit this sharing?
To companies we collaborate with: to use for their own products and services	No, unless you provide your express (opt-in) permission for this sharing.	Yes
To companies that we do not collaborate with: to use to market to you	No, unless you provide your express (opt-in) permission.	Yes
Reporting to government authorities (such as the [Dubai Health Authority])	Yes, for example, to report safety information about our products or transfers of value (where required by law).	No
To parties in relevant legal proceedings and otherwise to the extent required or explicitly authorized by applicable law	Yes	No
In the event that for business reasons we decide to divest part or all of our business through sale, merger or acquisition, to actual or prospective purchasers	Yes, based on written agreements that personal information will be protected appropriately in these circumstances.	Generally, no, except where local law permits you to opt-out or requires your express consent.
With companies globally that provide services on our behalf and in accordance with our instructions (for example, to deliver specific information you have requested)	Yes, if the business operation is supported by another company. As a global company, we may work with companies around the world to provide services for or on our behalf, and we will require those companies to protect personal information in accordance with applicable laws, rules and regulations and MSD's privacy policies.	<p>Generally, no. We have instituted policy, contractual and administrative mechanisms requiring protection of personal information by other companies that process personal information on our behalf globally. However, where local law provides a right for you to limit this sharing, we will comply with such requirements.</p> <p>In circumstances where our business operations are supported by other companies, such as a company that we contract with to mail the materials you request, you will not be able to limit this sharing and still receive the service.</p>
<p>To affiliates* within the Merck & Co., Inc. (Rahway, NJ, USA) family of companies globally for everyday business purposes as described in this Notice</p> <p>*Affiliates are companies related by common ownership or control.</p> <p>Outside of the United States and Canada, affiliates of Merck & Co., Inc. (Rahway, NJ, USA)</p>	Yes, as a global company, we generally share personal information across our offices globally for the purposes described in this Notice, however, only those individuals with a legitimate business need to access personal information for these purposes are granted such access. For example, payment information generally will be available only to local company office in your country and the USA group responsible for payments.	<p>Generally, no. We have instituted policy, contractual and administrative mechanisms requiring protection of personal information across our business globally. However, where local law provides a right for you to limit this sharing, we will comply with such requirements.</p> <p>You may request that we not transfer personal information outside of your country, however, in most cases this will substantially limit the services we can</p>

Effective Date: 1st November 2024

Merck Sharp and Dohme IDEA Middle East reserves the right to modify, add or remove portions of this privacy statement at any time. If we decide to change this notice, we will post the updated notice on our web site at <https://www.msdprivacy.com/>.

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Reasons personal information about you could be shared	Do we share?	Can you limit this sharing?
generally operate under the names "MSD" or "Merck Sharp & Dohme"	We may share your information among MSD affiliates and will do so in accordance with our Global Privacy Statement, Global Cross Border Privacy Policy, and our Binding Corporate Rules (which have been approved in the European Union). A copy of our Global Privacy Statement and Global Cross Border Privacy Policy can be found by visiting the following site: www.msdprivacy.com	provide to you. Where our computer servers, databases or processes are located in another country, in most cases we will be unable to fulfill such a request and still provide the service to you.
To the public, annual reports on the transfers of value provided to HCP's directly related to the provision of services or indirectly through medical education or attendance at congresses	No, unless you provide your express (opt-in) permission for this sharing.	Yes. Note, in some countries, such disclosure is deemed to be in the public interest and may be shared even without your permission.
To other companies we collaborate with solely for activities related to products or services jointly offered or developed by us and that company	Yes, based on written agreements in place between us and those companies, which require those companies to protect confidential information provided to them by us.	Yes, if you specifically request to opt-out.
With third-party service providers who assist us with profiling and analysis.	Yes, these third parties are subject to strict confidentiality agreements and are only allowed to use your personal information for the purposes outlined in this Notice. We may also share your personal information if required by law or as part of a legal proceeding.	Yes, if you specifically request to opt-out
With third-party or HCO sponsored by MSD	Yes, these third parties are subject to strict confidentiality agreements and are only allowed to use your personal information for the purposes outlined in this Notice.	Yes, if you specifically request to opt-out

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<h3>Your Rights</h3>	<p>You have certain rights in relation to your personal information. These rights include the right to:</p> <ol style="list-style-type: none">1. request confirmation of whether or not we hold personal information about you;2. request access to the personal information we hold about you; and3. request the correction of personal information we hold about you where it is inaccurate or incomplete. <p>Please note that these rights are not absolute rights. The rights only apply in certain circumstances, and we have rights to refuse your requests in certain circumstances.</p> <p>If you wish to make a request to exercise your rights, please contact us using the contact details below.</p> <p>You have a right to lodge a complaint regarding how your information has been managed by us to relevant regulatory authorities. Which authority is relevant may depend upon where you are based, or where your medical information is sourced from. We will assist you in determining which is the relevant authority and their contact details. Please see the next section in this regard.</p>
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<h3>Contact Us</h3>	<p><u>General Communications:</u></p> <p>If you have any questions regarding this Notice or the personal information MSD collects, uses, and shares about you, or if you would like to change your communications preferences (such as to opt- out of receiving e-mail or direct marketing communications), please contact us using the contact details below.</p> <p>Data Controller: Merck Sharp and Dohme IDEA Middle East</p> <p>Address: 4th floor, Al Faris Building No. 39, Dubai Healthcare City PO Box 2096, Dubai, UAE</p> <p>Or email us at: msdgulfprivacy@msd.com</p> <p>To make a request to exercise any right you have in relation to your personal information, please contact us by:</p> <ul style="list-style-type: none">• Completing this online form (preferred method); or• Calling us at +97144269100 or• Emailing us at msdgulfprivacy@msd.com
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