

# Privacy Notice for Investigators and Other Site Staff Participating in AbbVie-Supported Investigator Initiated Study or Collaborative Research

## Introduction

AbbVie Belgium SA/NV, with its registered address at Avenue Einstein 14 – 1300 Wavre - Belgium, and AbbVie Inc., with its registered address at 1 North Waukegan Road, North Chicago, Illinois 60064 United States, are biopharma companies that are part of a global group of companies focused on developing leading treatments and innovations worldwide (hereinafter collectively referred to as “AbbVie” or “we”). At AbbVie, we take great care in processing personal data in compliance with applicable laws. We only collect and use the information necessary to achieve the purposes described below. Within the meaning of applicable data protection law, AbbVie Belgium SA/NV and AbbVie Inc. are data controllers. AbbVie Inc.’s data protection representative within the EU is AbbVie Deutschland GmbH & Co. KG, Knollstraße, 67061 Ludwigshafen, Germany.

## Personal data that we collect about you and why

In anticipation and as part of your participation in the AbbVie-supported research activities, we may collect personal data about you. AbbVie may collect such personal data from a variety of sources, including directly from you (e.g., in your CVs, resumes or other documents or forms provided by you to AbbVie) and indirectly (e.g., from the research center where you work or conduct/support research activities, or from publicly available sources, including those available online which may include websites such as [clinicaltrials.gov](http://clinicaltrials.gov), [www.clinicaltrialsregister.eu](http://www.clinicaltrialsregister.eu), and the United States FDA’s Debarment and Disqualified and Restricted Lists for clinical investigators).

AbbVie may collect and use some or all of the following categories of personal data:

- **personal details**, such as your name, age, gender and contact details;
- **professional details**, such as your place of practice, job title, the medical field in which you are active, your professional qualifications and scientific activities (such as previous research experience, and participation in past or pending research studies with AbbVie and other companies), publication of academic or scientific research and articles, and membership in associations and boards;
- **financial details**, such as payment-related information, including tax identification number and amounts of payments we make to you; and
- **details of interactions with us**, such as what kind of meetings we have held, topics discussed, your knowledge of and questions you have had on our research activities and products.

Your personal data will be processed by AbbVie for the following purposes:

- managing our relationship with you, including confirming your qualifications to conduct the research, planning, organizing and reviewing the AbbVie-supported research that you are performing and contacting you;
- helping ensure that we provide you with information about AbbVie’s planned research activities that is relevant given your expertise, interests and preferences;
- complying with applicable laws and regulations (e.g., in connection with pharmacovigilance, public registration of the research in which you participate on web sites designed for this purpose, such as [www.clinicaltrials.gov](http://www.clinicaltrials.gov) or [www.clinicaltrialsregister.eu](http://www.clinicaltrialsregister.eu) if AbbVie is responsible for registration, transparency reporting, and completing research reports).

The legal basis for this processing is our legitimate interest in maintaining and optimizing a relationship or connection with you with regard to our research activities and compliance with legal and regulatory obligations. You are not required by law or by a contract to provide your personal data to AbbVie. However, in order to consider you for participation in AbbVie-supported research and maintain our relationship with you, AbbVie needs to process your personal data.

## Sharing your personal data

AbbVie may share your personal data with others, from time to time, in connection with the purposes described in this notice. In particular, we may make your personal data available to:

- all entities within the AbbVie group (e.g., in the case of shared regional or global databases) and companies and individuals with whom we may partner in connection with proposed or actual research initiatives;
- third party companies that supply goods or services to AbbVie, such as legal counsel, auditors, IT service suppliers, and research service providers;
- ethics committees and government authorities located both in your country and in other countries, including in the United States, where AbbVie conducts its research activities;
- other third parties pursuant to a court order, to protect the interests of AbbVie, or where otherwise required by law or legal process; and
- actual or prospective purchasers of AbbVie businesses in the event of a sale, merger, or acquisition.

Sharing your personal data as described above may involve transferring it to countries, including countries outside of the EU/EEA, whose data protection and privacy laws may not be equivalent to, or as protective as, those that exist in your home country. To ensure an adequate level of data protection is provided, personal data transferred within the AbbVie group of companies, including to AbbVie Inc. in the United States, is done under internal agreements, which incorporate the EU model contract for data transfers to controllers. A copy of the agreement can be obtained by sending an email to [privacyoffice@abbvie.com](mailto:privacyoffice@abbvie.com).

Where AbbVie uses service providers or collaborates with its research partners that have access to personal data, it requires such service providers and research partners to protect your data and to process your personal data in accordance with this data protection notice and for no other purpose. Any transfers of personal data to third parties outside the EU will be done in compliance with the international data transfer restrictions that apply under EU data protection laws, including, where appropriate, through the use of EU model contracts for data transfers to processors.

#### **Securing and retaining your personal data**

AbbVie will take appropriate technical and organizational security measures to protect your personal data consistent with applicable privacy and data security laws. When AbbVie retains a third-party service provider to process personal data, that provider will be carefully selected and required to use appropriate measures to protect the confidentiality and security of personal data. AbbVie retains your personal data only for as long as it stores records about the AbbVie-supported research in which you participate and for as long as we continue to collaborate with you on research related matters, unless a longer retention period is required or permitted by research related laws and regulations.

#### **Your rights**

You may contact AbbVie to request access to personal data that we process about you and that we correct inaccurate data and complete any incomplete data. In accordance with the conditions and requirements of applicable law, you may object to our processing your personal data and request that we erase personal data about you, restrict processing of such data, and transmit your personal data to you or another data controller.

To exercise your rights, contact AbbVie's EU Data Protection Officer by submitting your privacy inquiry at [abbvie.com/privacy-inquiry.html](http://abbvie.com/privacy-inquiry.html) or via postal letter to AbbVie Deutschland GmbH & Co. KG, Knollstraße, 67061 Ludwigshafen, Germany (attention: EU DPO). If AbbVie is not able to provide the requested data or fulfil your request, you will be provided with reasons for such decision. In addition, you are entitled to lodge a complaint with your local data protection authority.