Data Privacy Policy for Healthcare Professionals

Collection and Processing of your Personal Data – Information Notice

Otsuka Pharmaceutical Vietnam JSC (OPV), with Business License No. 3600627535, issued by Dong Nai Department of Planning and Investment on the first issued on 27/01/2003, address at PLot 512, No. 13 Street, Amata Industrial Zone, Long Binh Ward, Dong Nai Province, Vietnam ("**Otsuka**", "**Otsuka VN**", "**OPV**"), and other Otsuka companies, subsidiaries, associates, representative office, divisions and affiliates (referred to collectively as the "**Otsuka Group**") respect your rights to privacy.

With respect to the your personal data, Otsuka is the data controller cum processor.

In this Policy, when we refer to Personal Data, we mean any informationin the form of symbols, letters, numbers, images, sounds or similar forms on the electronic environment that relates to an identified or identifiable person – in this case, you. Your Personal Data will be processed according to applicable legislation. You should read this Policy, so that you know what Personal Data we collect from you, what we do with it and how you can exercise your rights in connection with it. You should also read any other Notices or Policies that we give you, that might apply to our use of your Personal Data in specific circumstances from time to time.

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1. Your Personal Data collected and processed by us

We may collect and process Personal Data about you from a variety of sources, including directly from you: documents or forms that you provide to participate in Otsuka sponsored or supported initiatives, such as clinical research or development activities, or in other contexts;

third parties; publicly available sources; CVs and resumes; and online or other databases and websites.

Otsuka may collect and use some or all of the following categories of Personal Data for the purpose(s) described below:

- **Personal details**, such as your name, age, gender, nationality and preferred language, pictures of you, audio-visual recordings of your voice, appearance and statements, if a presentation of yours is recorded;

- **Contact details:** such as your business or personal email, mailing address, telephone and profile on a social media platform, permanent residence, temporary residence, current residence, and contact address;

- **Professional details,** such as your resume or CV, previous or relevant work experience or other experience, education, transcripts, or other information you provide to Otsuka in support of the formation of contract with Otsuka, your place of practice, job title, the medical field in which you are active, your professional qualifications and scientific activities (such as previous clinical trial experience), professional registration number, medical practitioner number, and participation in past or pending research studies with Otsuka or other companies, publication of academic or scientific research and articles, and membership of relevant associations and boards, all contracts between you and Otsuka;

- **Financial details** such as payment-related information, including but not limited to, payments and other benefits granted to you, bank account number and tax identification number.

- **Travel related and associated identification information** such as passport number, driving license number, national ID number and travel preferences;

- **Conflicts** – circumstances which may create a conflict of interest such as whether you or a family member hold a public office or a position in government; and

- **Details of interactions with us**, such as meetings we have held, topics discussed, your knowledge of and questions you have had on our business and products, what kind of material we have displayed to you, any feedback that you have provided, your opinions and routines on prescribing, preferred communication with us, routines regarding your patients and diagnosis, and similar information. In some circumstances, it will also be necessary to collect your signature.

Some of the Financial details, such as payments and other benefits granted to you, bank account number is sensitive Personal Data. We collect this information provided that your

consent is obtained and processing of this information strictly in compliance with applicable laws.

2. Purpose and legal basis for the Processing of your Personal Data

We process the Personal Data listed above for the following purposes and legal bases, which may vary depending on where you live and where we operate:

Purpose	Legal basis
Managing our relationship with you, including planning our (potential) collaboration, arranging visits, meetings and other activities (in-person and virtual), and contacting and communicating with you for any such purpose. Maintaining a database of HCPs with whom Otsuka already collaborated and/or may collaborate in the future. This includes the processing of your Personal Data in our customer relationship management system, to build a profile about you and better understand your expertise, interests and preferences. Otsuka will not make any decisions about your profile based solely on automated processing and will ensure appropriate safeguards are maintained, in order to preserve your rights and interests.	To develop our business and relationship with you. In some cases, this processing is conditional on you having provided your prior consent.
Ensuring that we provide you with information that is relevant given your expertise, interests and preferences. Best practice sharing. Assessing and categorizing which specific business needs match best with your abilities (e.g. when Otsuka looks for a key opinion leader in a certain field or for specific products, the extent you belong to the group of scientific input providers, based on scientific or professional experience)	To manage our business efficiently where we have engaged with you in the past. In some cases processing is conditional on you having provided your prior consent, for example receiving information relating to promotional and/or non-promotional materials according to therapeutic areas through electronic means.

Purpose	Legal basis
Conducting business and market research, to better understand Otsuka products, disease or therapeutic areas and generally improve our understanding of the pharmaceutical landscape.	To better understand our products and the area we both operate in. In some cases, this processing is conditional on you having provided your prior consent.
Fulfilling our contractual relationship with you, including the completion of any required due diligence (such as anti-bribery or corruption checks), processing contracts, organizing travel and facilitating the payment of fees and expenses (where relevant).	To manage our contractual relationship where we have a contract or you have requested that we consider executing one with you. In some cases, this processing may be necessary for compliance with a legal obligation.
Complying with our regulatory, monitoring and reporting obligations, including but not limited to: • those related to adverse events, product complaints and patient safety. In some cases, Otsuka may be required to send you specific communications related to these topics; • detecting, preventing, or otherwise addressing fraud, security, or technical issues; • meeting or complying with internal policies of Otsuka; • for audit purposes.	To comply with a legal obligation. In some cases, this processing is conditional on you having provided your prior consent.
Seeking any professional advice (including but not limited to legal advice) in connection with any matter involving Otsuka and/or you.	To manage our contractual arrangement efficiently.
Otsuka may also offer mobile apps, provide access to websites, special programs, activities, events or promotions or may sponsor clinical trials (“Initiatives”) that may have unique or additional specific terms, Notices and/or consent forms that explain how any information you provide will be processed in connection with those Initiatives.	

Where we have entered into an agreement with you, or where we have a legal and/or regulatory reporting obligation, the provision of your Personal Data is mandatory. If your Personal Data is not provided we cannot interact with you.

3. Does the OPV share Personal Data with others?

We disclose your Personal Data to the following categories of recipients:

- our Otsuka Group companies, third party services providers and partners who provide data processing services to us, or who otherwise process personal information for purposes that are described in this Policy or notified to you when we collect your Personal Data;

- our legal consultants and any competent law enforcement body, regulatory, trade association, government agency, court or other third parties where we believe disclosure is necessary (i) as a matter of applicable law or regulation [(i.e., disclosure reporting)], (ii) to exercise, establish or defend our legal rights (on the basis of our interest in the defense of our rights), or (iii) to protect your vital interests or those of any other person;

- a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, partnership, restructuring, financing or any other business transactions, provided that we inform the buyer and/or partner that they must use your Personal Data only for the purposes disclosed in this Policy (on the legal basis of our legitimate interest in ensuring the business operation);

- any other person with your consent to the disclosure.

These recipients of your Personal Data may be acting as our data processor to process your data on our behalf or as data controllers, in their own right.

4. How is your Personal Data processed and secured ?

We use appropriate technical and organisational measures to protect the Personal Data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the categories of Personal Data processed. Otsuka restricts the right to access the Personal Data to a necessary and reasonable extent. Only personnel who are designated and/or authorized by Otsuka are permitted to access and process Personal Data, hence Personal Data is ensured its confidentiality.

5. Does OPV transfer your Personal Data to countries outside Vietnam?

We may transfer your Personal Data to other Otsuka Group companies, service providers and

partners located outside of Vietnam, for example in the USA or Japan.

Please note that countries outside of Vietnam may not provide the same level of protection for your Personal Data as within Vietnam. Where we transfer your Personal Data outside Vietnam, we ensure that appropriate safeguards are put in place and that all transfers of your Personal Data comply with applicable data protection laws.

To find out more about how we safeguard your information in relation to data transfers outside Vietnam, please contact us using the details in the "Contact details for questions and queries" section below.

6. Beginning and ending time of processing Personal Data

Otsuka performs the processing of your Personal Data from the time you agree to this Policy and provide us with your Personal Data. Processing of your Personal Data ends in accordance with the provision on the period for storing Personal Data in accordance with the "How long does OPV store your Personal Data" clause below.

7. How long does OPV store your Personal Data?

We retain Personal Data we collect from you for as long as necessary where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your Personal Data, we will either delete or anonymise it or, if this is not possible (for example, because your Personal Data has been stored in backup archives), then we will isolate it from any further processing until deletion is possible.

Where you have entered into a contract with Otsuka, we will retain your Personal Data for the duration of the contract and, beyond that, until both the periods for which (i) the applicable laws require the data to be kept and (ii) the statutes of limitation of any actions for which such data or the documents containing them may be relevant, have elapsed.

8. What are your rights toward your Personal Data under applicable data protection laws?

You have rights which apply to our use of your Personal Data. The availability of these rights depends upon our lawful basis for processing your Personal Data and your rights may also be subject to certain conditions and restrictions. These rights are:

Right	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable data about how your data is processed and your rights. This is provided in this Policy.
2. The right of consent	You have the right to agree or not allow Otsuka to collect or process your Personal Data.
3. The right of access	You have the right to obtain access to your data, request Otsuka to perform the update, amendment, revision, correction, or cancellation of your Personal Data that Otsuka has collected or stored.
4. The right to withdraw consent	You have the right to withdraw your consent unless otherwise provided for by law.
5. The right to erasure	This right enables you to request the deletion or removal of your information where there is no compelling reason for an organisation to keep using it. This is not a general right to erasure; there are exceptions. For example, where you have provided consent to processing, this applies only where you have withdrawn your consent, if we are processing in connection with performance of a contract or for compliance with law, this applies only where such data are no longer necessary.
6. The right to restrict processing	You have the right to request to restrict the processing of your Personal Data unless otherwise provided for by law.
7. The right to data provision	You have the right to request Otsuka to provide copies of your Personal Data.
8. The right to object to data processing	You have the right to object to the processing your Personal Data in order to prevent or restrict the disclosure of Personal Data or the use of it for advertising or marketing purposes unless otherwise provided for by law.
9. The right to complain, denounce, initiate lawsuits	You have the right to lodge complaints, denunciations or initiate lawsuits in accordance with law.

Right	What does this mean?
10. The right to claim damages	You have the right to claim damages in accordance with the law when a violation of the provisions on the protection of Personal Data occurs, unless otherwise agreed by the parties or otherwise provided for by law.
11. The right to self-protection	You have the right to self-protection in accordance with the provisions of the Civil Code, other relevant laws, or request competent agencies and organizations to take measures to protect civil rights under the law.

For your protection and to protect the privacy of others, we may ask you to verify your identity before we execute any requests in relation to the rights detailed above.

Where your Personal Data is processed on the basis of your consent, you have the right to withdraw your consent at any time. If exercised, this will not affect the lawfulness of processing prior to withdrawal.

9. What are your obligations toward your Personal Data under applicable data protection laws?

In relation to your Personal Data, you have the obligations to:

(i) Provide full and accurate Personal Data as requested by Otsuka when agreeing to allow Otsuka to process Personal Data;

(ii) Take necessary measures to self-protect your Personal Data. If your Personal Data is revealed because of negligence or any other security fault on the part of yourself, you must take the incurred risks and damages; and

(iii) Comply with regulations on the protection of Personal Data and participate in preventing and combating violations of regulations on the protection of Personal Data.

10. Unexpected/ Potential Consequences/Damages may incur

Otsuka would like to bring to your attention that information transmission through the Internet may not be fully secured at all times. Although Otsuka will try its best to protect your Personal Data, Otsuka is unable to guarantee the absolute security of your Personal Data when transmitted through online means, and thus Otsuka shall not be liable for risks of data transmission and damage incurred during the process of transmission, except in the case of faults or violations of the laws committed by Otsuka.

11. Contact Detail for questions and queries

Should you have any questions, concerns and complaints in regard to the protection of your Personal Data or if you wish to exercise your legal rights, please contact Otsuka via the following information:

OTSUKA PHARMACEUTICAL VIETNAM JSC

Department on Compliance

Person in Charge	:	NGUYEN THI NGOC BAO
Address	:	12th Floor, Agrex Tower, No. 58 Vo Van Tan, Xuan Hoa Ward, Ho Chi Minh City, Vietnam
Telephone	:	028 3930 0791
Email	:	nguyen.ngoc.bao@otsukavn.com.vn

12. Changes to this Policy

The business operations of Otsuka change continuously, and this Policy may therefore be amended. With respect to amendments, modifications, and supplementations in this Policy relating to the change of type of the processed Personal Data, Purposes of processing, organizations and individuals being entitled to process Personal Data, and your rights and obligations, Otsuka shall contact you via your phone number and/or email to obtain your consent to these changes.

Version 1.0	Issued on 01st November 2023
Version 2.0	Revised & Updated on 1st August 2025