



# Privacy Notice

**Effective Date: 20, March 2020**

This Privacy Notice ("Privacy Notice") provides you with information on how Baxter Oy together with its affiliates, successors, assignors and subcontractors ("Baxter," "we," "our" or "us") processes your personal data.

## A. Active Collection of Personal Data

### **What Personal Data Baxter Collects About You**

**Personal Data collected directly from you:** Baxter will collect the following personal data directly from you: first and last name, email, hospital or institution of your affiliation, city, state/province, postal code, country, mobile, fixed phone, fax, professional specialty, professional position, product area interest, interest in programs/activities and channels.

**Personal Data collected from third parties:** Baxter obtains the following types of personal data about you from third parties: your first and last name, hospital or institution of your affiliation, city, state/province, postal code, country of the hospital or institution with which you are affiliated and your professional specialty. Baxter obtains this personal data from third party companies that gather these details from publicly available sources, such as the website of your hospital or institution with which are affiliated.

Additional Data collected either from you or third parties: type of professional qualification/credentials (e.g. MD etc.) practicing status (active or not), publications, areas of international recognition (e.g. countries or regions where you are recognized), areas of specific competence or experience and expertise (e.g. speaking engagements, research activities, advisory boards etc.), memberships or participation in scientific associations, your experience with Baxter products or therapies, your participation in Baxter initiatives, your language capabilities, your CV, the IP address of your biographical or professional website. Finally, we may import a link to your LinkedIn profile, please note that LinkedIn falls under their respective privacy policy.

### **Why we collect your personal data**

When Baxter collects your personal data directly from you or from third parties we may use the data for purposes of contacting you by phone and/or sending you, including via email, marketing communications to promote our products, therapies and services, providing you with other information about our products/therapies, including scientific information and research study papers and news, newsletters, as well as sharing information about events and educational opportunities in the areas of your interests. In addition to that we may use your personal data in order to reach out to you directly or through third parties to conduct Market Research Projects that aim to gather information from you on our products or therapies including your experience with them as well as information related to specific diseases that fall under Baxter's area of activity or interest. We may also store such data to further communicate with you on specific Market Research Projects or other activities you have participated. We do so on the basis on your consent. In the consent form, Baxter will ask you to provide information about your areas of interests and selected preferences. Providing us your personal data for the purposes described in the previous phrases is voluntary. If you do not consent to Baxter processing your personal data, we will not send you any of the above-mentioned communications or information. Please note that if you provide your consent, you may always withdraw it or change your preferences by following the instructions for unsubscribing available in the consent form. You can also withdraw your consent by contacting us using the contact details in the "How to contact us" section below. Note that withdrawal of your consent does not affect the lawfulness of processing of your personal data before your consent's withdrawal.

We may also process your personal data directly from you or from third parties or publicly available data bases in order to better understand your scientific background and the areas of your expertise as well as your professional preferences, interests, professional recognition and participation in scientific fora or associations, as well as your professional activities of choice, including research activities, publications, speaking activities, advisory boards, based also on Baxter's interaction with you, if it is the case. We do that in order to identify areas of collaboration with Baxter that would allow us to create opportunities to advance scientific exchange and medical care. We may also process your personal data in order to email you a survey about our collaboration. We do so on the basis of our legitimate interests in managing our relationship with you and understanding your preferences and needs.

In certain instances, we may conduct automated processing of your data for the purposes of assessing your characteristics as a healthcare professional in relation to clinical preferences, scientific and educational activities of

choice. We do so on the basis on your consent. Providing us your personal data for the purposes described in the previous phrases is voluntary. Please note that if you provide your consent, you may always withdraw it by contacting us using the contact details in the “How to contact us” section below. Note that withdrawal of your consent does not affect the lawfulness of processing of your personal data before your consent’s withdrawal.

We also collect your personal data from you or third parties in order to directly communicate with you, keep accurate our databases and comply with legal obligations such as without limitation adverse events reporting. We do so on the basis of our legitimate interests to manage our relationship with us, or because we have a legal obligation.

In the event that we use your personal data for other purposes, not mentioned above, we will inform you about the specific purposes and, when required, on what basis we do so, at the time we collect the personal data from you to the extent required by law.

### **With whom we may share your personal data and international data transfers**

Baxter is a global company and for the purposes outlined above, Baxter may transfer your personal data to other Baxter group companies and Baxter’s service providers acting on behalf of Baxter, such as providers of IT system administration and user support services, and providers of IT tools for consent management and mailing services. These third parties are restricted from using your personal data in any way other than to provide services for us and we require them to provide an adequate level of protection for your personal data. For more information about Baxter’s service providers, please contact us at [privacy\\_nordic@baxter.com](mailto:privacy_nordic@baxter.com) or [privacy@baxter.com](mailto:privacy@baxter.com).

Some of the recipients referred to above will be located or may have relevant operations outside of your country, such as in the United States (the list of Baxter Group entities and the places of their establishment is set out at <https://www.baxter.com/location-selector>), where the data protection laws may not provide a level of protection equivalent to the laws in your country. Baxter employs measures to provide an adequate level of data protection, ensure that all data recipients will provide an adequate level of protection for the personal data, and that appropriate technical and organizational security measures are in place to protect your personal data. Any onward transfer (including to our affiliates outside the EEA) is subject to appropriate onward transfer requirements, as provided in the applicable law.

You can request information about Baxter’s affiliates and subsidiaries and third party service providers as well as access copies copy of the safeguards which we have put in place to protect your personal data and privacy rights by writing to [privacy\\_nordic@baxter.com](mailto:privacy_nordic@baxter.com) or [privacy@baxter.com](mailto:privacy@baxter.com) or contacting us as at the contact details in the “How to contact us” section.

Baxter International Inc. and Baxter Healthcare Corporation each complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the EU/EEA and Switzerland to the United States. Baxter International Inc. and Baxter Health Care Corporation each has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Notice and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view the Privacy Shield certification of Baxter International Inc. or Baxter Healthcare Corporation, please visit <https://www.privacyshield.gov/>. Please visit [www.baxter.com](http://www.baxter.com) for Baxter International Inc.’s and Baxter Healthcare Corporation’s Privacy Shield notice.

If we are involved in a sale or transfer of all or some of our business assets or operations via a share or asset deal, your personal data may be transferred to the acquiring organization who shall take at least the same or higher standards of care in the treatment of your personal data. Should such a sale or transfer occur, you will be informed about this and may withdraw your consent to or - as applicable - object to the transfer of your personal data to, and processing and use of your personal data by the transferee.

### **How long we keep your personal data**

Your personal data will be kept for the following time periods:

- If you have given us your consent to send you marketing, commercial and related types of communications, we will keep your data until you withdraw your consent to receive these communications or until we no longer send these types of communications;
- If we have collected your personal data solely to send you the surveys mentioned herein, we will keep your contact details until you opt-out of receiving them or until we no longer need to send you such surveys, whichever happens first. As part of those surveys, we will retain your survey data for as long as you remain a customer of Baxter and we need the information to help us understand how we are performing.
- If we have collected your data indirectly, i.e. from third parties, we will keep your data until our first contact with you and further retention would be subject to your receipt of this privacy notice and/or your consent as applicable. If such contact cannot be performed within a reasonable period of time from the collection day of your data, the data will be deleted.

## Your rights

In certain circumstances, local data protection laws and certain local laws (including the GDPR) give you rights with respect to your personal data. These rights differ by country/region. You can request:

- Access to or copies of your personal data, including knowing whether we hold personal data about you, and, if so, what kind and for what purposes. You can also request information about who has received your personal data.
- That we correct of your personal data if you think it is inaccurate or incomplete or request that we erase or delete your personal data, unless we have a legal obligation to hold it or are otherwise permitted by applicable law to retain it.
- Us to restrict the processing of your personal data and not to delete it.
- That we provide you with your personal data that we obtained from you so that you can store and re-use it for your personal use, and you can ask us to provide this personal data to another entity.

You can exercise your rights by contacting your local Baxter entity using the contact details provided in the “How to contact us” section.

As described above you also have the right to withdraw your consent or object to our using and disclosing your personal data for purposes of direct marketing or if based on our legitimate interests. You can do so at any time “opting-out” of the marketing or other types of communications described above that you receive based upon your consent, as well as the surveys in accordance with the unsubscribe instructions included in the specific communications. If you are unable to object by opting-out in this manner, please contact us using the contact details provided below. If you believe we are using, disclosing or otherwise processing your personal data in a way that is not in accordance with the law you can lodge a complaint with a data protection authority in your country.

We will handle any request to exercise your rights in accordance with applicable law. Please note that depending on the circumstances, some of the above rights may not apply.

## How to contact us

Please address your requests or questions concerning the processing of your personal data to:

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Baxter Oy

NTC Nina, 2. krs

Tammasaarenkatu 1, PL 119, 00181 Helsinki

[privacy\\_nordic@baxter.com](mailto:privacy_nordic@baxter.com), +358 9862 111

You can also exercise any or your rights or get additional information about your rights, this Notice, or how we process your personal data, by contacting Baxter’s Data Protection Officer by email to: [privacy@baxter.com](mailto:privacy@baxter.com);

## B. Passive Collection of Personal Data

### Information collected through your usage of your Local Baxter Websites

Your Information may be derived, generated or automatically collected through your Interactions with the Baxter Websites, which contain various technologies and functionalities in order to provide you with our services. These technologies and functionalities may include unique identifiers and preference information such as your username, password, marketing preferences, internet protocol (“IP”) address or cookie, which may contain information that may be considered personal data, as well as information that does not directly identify you, but which corresponds to your device, browser type, operating system, computer or mobile device, your navigation and clickstream behaviour from actions that you take on our website, “*Tracking Technologies We Use*”.

#### Tracking Technologies We Use

Your Local Baxter Website utilizes various technologies as part of our legitimate interests in order to provide you with certain services and functionalities as follows.

#### Cookies

Like many websites Baxter Websites uses “cookies.” A cookie is a small file that is transferred to your computer’s hard drive to help us improve content (e.g., it helps us determine which parts of the site are popular and which are less popular, so we may improve these areas in the future) and customize website content for our visitors. You may set your browser to reject cookies and to let you know when a cookie is being placed on your computer.

Use of cookies may vary with the unique features of Baxter websites. Therefore, please review the cookies policy included in the bottom of the Local Baxter Website for any additional information on the use of cookies.

Generally, we use cookies (and the other technologies identified below) for the following purposes:

- To provide a service: A cookie may be used to provide you with a specific service. For instance, if you are logging into an access-controlled section of our site, we set a temporary session cookie to establish that you have been authenticated. The information contained in these cookies consists of random data that is used by the server to authenticate the browser requests to the server for that particular session. If you choose not to accept a temporary cookie, you will not be able to navigate in these online applications. We also use a cookie when you visit the Baxter Website and request documentation or a response from us. When you are filling out a form, you may be given the option of having the Baxter Website deliver a cookie to your local hard drive. You might choose to receive this type of cookie in order to save time in filling out forms and/or revisiting our website. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.
- To facilitate website use: If a cookie is used, the Baxter Website will be able to remember information about your preferences and movement, either until you exit your current browser window (if the cookie is temporary) or until you disable or delete the cookie. Many users prefer to use cookies in order to help them navigate a website as seamlessly as possible. You should be aware that cookies are not able to "invade" your hard drive and return to the sender personal data from your computer.
- To understand our visitors: When you visit the Baxter Website, our computers may automatically collect statistics in aggregate about visitor behaviour. We may monitor statistics and other data such as how many people visit our site, the user's IP address, which pages people visit, from which domains our visitors come, which browsers people use and how they move about our website. We use this data about your visit for aggregation purposes only. These statistics are used to help us to understand our visitors' interests and improve the content and performance of our website.
- To serve ads: We may also engage third party service providers to place pixels or other tracking technology on our
- Site on behalf of Baxter to personalize the content of, as well as to serve you ads on third party websites regarding Baxter goods or services that may be of interest to you based upon your interaction with the Baxter Sites. Please see the section on Advertising, below for additional information, including how to adjust your browser settings to not accept these cookies or other tracking technology.

### **Web Beacons**

Beacons are electronic images (called a "single-pixel gif" or "web beacon") that allow us to count page views or to access our cookies. In general, any electronic image viewed as part of a web page, including an ad banner, can act as a web beacon. Web beacons are typically very small, 1 by 1-pixel size, banner-like files, but their presence can be easily seen within Internet Explorer by clicking on "View" and then on "Source." Web beacons are so small in order not to use valuable space on the computer screen that is better used to display helpful content. We also may include web beacons in HTML-formatted newsletters containing graphics that we send to opt-in subscribers in order to count how many newsletters have been read. In addition, some advertising networks that serve ads on our websites may use web beacons within their clearly visible banner advertisements.

### **Internet Protocol (IP) Addresses**

Internet protocol (IP) addresses are unique identifiers automatically assigned to each computer when logging onto the Internet. We collect IP address information from any visitor to our Websites and log them for system administrative purposes only. IP addresses are not used for identification. This information helps us prepare aggregate demographic information and other information regarding the use of this site and improve its functions. We do not link IP addresses to any information that is personally identifiable. In some cases, we may also use IP addresses to serve you ads on third party websites regarding Baxter goods or services that may be of interest to you based upon your interaction with the Baxter Sites. As described below in the "Advertising" section, you may opt out of such technology by adjusting your browser settings to not accept cookies.

### **Analytics Tools**

Analytics Tools and technologies are an element of Baxter Websites. By using cookies, Analytics Tools collect and store data such as time of visit, pages visited, time spent on each page of the Baxter Sites, the IP address, and the type of operating system used in the devices used to access a Baxter Website. Please review the cookies policy included in the bottom of the Baxter Website for any additional information on the use of cookies.

**Advertising:** We may also engage third party service providers to use the information gathered through the use of the technologies described above on behalf of Baxter to personalize the content of, as well as to serve you ads on third party websites regarding Baxter goods or services that may be of interest to you based upon your interaction with the Baxter Sites. Some of the ads on third party websites may be personalized, meaning that they are intended to be relevant to you based on what we, or the third-party service provider serving the ad, know about you or your computer's browsing activity on both the Baxter Sites and third-party sites. As required by law, in certain jurisdictions we will only do so with your opt-in consent. You may also opt-out of receiving personalized ads from our third-party service providers by adjusting your browser settings to not accept cookies. Please see the "help" section of your browser for instructions on managing security preferences. To opt-out of interest-based advertising by participating companies in the following consumer choice mechanisms, please visit:

-Digital Advertising Alliance (DAA)'s self-regulatory opt-out page (<http://optout.aboutads.info/>) and mobile application-based "AppChoices" download page (<https://youradchoices.com/appchoices>)

-European Interactive Digital Advertising Alliance (EDAA)'s consumer opt-out page (<http://youonlinechoices.eu>)

-Network Advertising Initiative (NAI)'s self-regulatory opt-out page (<http://optout.networkadvertising.org/>).

In the mobile environment, most mobile operating systems offer device-based opt-out choices that are transmitted to companies providing interest-based advertising. To set an opt-out preference for a mobile device identifier (such as Apple's IDFA or Android's GAID), visit the device manufacturer's current choice instructions pages, or read more about sending signals to limit ad tracking for your operating system here: <http://www.networkadvertising.org/mobile-choices>.

Please note that these settings must be performed on each device (including each web browser on each device) for which you wish to opt-out, and if you clear your cookies or if you use a different browser or device, you will need to renew your opt-out preferences.

## **Security**

We have reasonable and appropriate security measures in place to protect against the loss, misuse, and alteration of any personal data we receive about you through the Local Baxter Websites. We maintain reasonable security standards to protect the personal data that we maintain. If you have any questions about the security of your personal data, you can contact us by using the other contact details in the "*How to contact us*" section above.