

This policy was last updated on 15th December 2021

1. Data Controller

Kyowa Kirin International, plc and Kyowa Kirin Services Ltd are the “data controllers” of the personal data we collect about you through this website (“KKI”, “KKHub”, “we” or “us”).

We are part of the Kyowa Kirin Group which is made up of different legal entities, details of which can be found [here](#) and which may be updated from time to time. Personal data is also collected by our affiliate entities, who act as data controllers when you directly interact or have a contractual relationship with them.

2. Scope of this Privacy Notice

This Privacy Notice is designed to help you understand how we manage your personal information when you visit our Websites and in our digital interactions.

There are certain circumstances where different terms regarding how we handle your personal information may apply. If a data collection undertaken by us has its own terms, those terms - not this Privacy Notice – applies. For example, we provide you with a separate privacy notice when we request your consent, or in the context of clinical trials and recruitment activities.

3. Contact information

If you have any questions regarding this privacy notice or wish to exercise any of your rights, please contact us. You can also contact our Data Protection Officer:

Kyowa Kirin International

Att. Legal Department

Galabank Business Park

Galashiels TD1 1QH

Telephone: +44 1896 664 0000

Email: kki-privacy@kyowakirin.com

DPO contact information: KKIDPOoffice@kyowakirin.com

DPO contact information (Germany): dpoDE@kyowakirin.com

4. Personal data we collect

Personal data means all information that can directly or indirectly identify you or other individuals. We collect different types of personal data depending on the context of your interactions with us.

We collect the following types of information:

- **Personal data provided directly by you**

We collect your contact / professional details, preferences and other data you share with us, when you interact or have a contractual or professional relationship with us.

- **Personal data collected automatically**

When you visit our websites some usage data is collected automatically using cookies. Usage data includes information about your browser type, device model, IP address, pages viewed and liked, or session duration. See our [Cookies Notice](#) for more detailed information.

- **Accessing to private areas of the website**

Some of our website pages are gated behind a registration page where you can access more content. In these cases, we will request some additional information and login details to facilitate access to this content.

- **Information from other sources**

We also obtain information from other sources, including:

- Analytics and technology providers
- IQVIA (e.g. professional specialization and background)
- Public sources, such as professional registration databases or credit reference agencies

- We occasionally purchase contact information. We always check the vendor obtained the data in a lawful manner
- Publicly accessible social media content or posts

- **Analytics, Profiling and Marketing**

In some cases, we combine personal data stored in our CRM system or collected online with information obtained offline from surveys and other sources described in the previous section, to understand your preferences and interests.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes.

5. How we use your personal data

We use information held about you for different purposes depending on the type of relationship we have with you.

We use your information in the following ways:

- **For the establishment, exercise or defense of legal claims and to defend our rights**
- **Comply with our contractual obligations**
- **Comply with laws, regulations**
- **Security and troubleshooting**
- **Quality Assurance**
- **Conduct our day-to-day businesses and manage our relationship with you**

For example, to respond to your requests, deliver our products and services, sponsor clinical trials, recruitment activities, manage events, webinars and media communication projects

- **Analytics, Profiling and Marketing**

We analyse usage data to learn how website visitors interact with our online platforms and compile statistics on the most liked and viewed pages. This information assists us in improving our websites and content.

In some cases, we combine personal data we have about you with information obtained online or offline. We use the data to anticipate your needs and market trends, improve the way we interact with you, and tailor the content of our website and email communications to your interests.

For example, if we send you an email with certain content or an upcoming webinar, we can see whether you viewed that content on our websites or joined the webinar. This information helps us understand your interests for further communications.

6. Legal basis for using your information

There are a number of lawful reasons for us to process your personal data. We usually rely on consent, performance of a contract, compliance with laws and legitimate interest.

We use the following legal basis:

- **Performance of a contract:** when we have a contractual relationship with you
- **Compliance with legal obligations:** including tax, employment, drug safety and pharmacovigilance, or to prevent and detect crimes, such as fraud.
- **Consent**
 - for non-essential cookies and certain types of email communications
 - for participating in certain events or media communication projects
 - for obtaining your contact or professional information when accessing the website's private areas.
- **Legitimate interest:** For the rest of purposes, if none other legal basis apply, we use legitimate interest.

7. Children

This website is not directed to children.

This Website does not seek to collect personal information from individuals under the age of 18. Individuals under the age of 18 should receive permission from their

parent or legal guardian before providing any personal information to us via this Website.

As a parent or guardian, if you have knowledge that we have collected information from your child through this website, please contact us at the Contact information above to request removal.

8. Data retention periods

We will hold your personal data on our systems for as long as is necessary to fulfil the purposes that we collected it for, including for the purposes of satisfying any legal, accounting or other reporting requirements.

By law, we are required to retain certain information for a prescribed period of time. In circumstances where there are no such legal requirements, to determine the appropriate retention period, we will consider the nature of the personal data, the purposes for which we are processing your personal data and the potential risk of harm from unauthorised use or disclosure of your personal data.

Therefore, some information may be kept for more or less time according to our retention policy and applicable laws.

9. Who we might share your information with

We will NOT sell your personal data to any third parties. We may disclose your personal information with any member of our group or with selected third parties where we have a legal basis for doing so.

We may share your information with selected third parties including:

- **Kyowa Kirin group** – Information collected through this website is shared with our Kyowa Kirin group and affiliates to fulfill the defined purposes.
- **Service providers** - When we use other companies to provide services on our behalf, e.g. technology and cloud providers, marketing and communication agencies, auditors or other professional advisors, advertising networks and analytics providers, search engine providers, processing of payments, delivery and other support services.

- **Business transfers** - If we merge with another organisation or form a new entity.
- **Business partners** - for the performance of any contract we enter into with them or you or when we run an event in partnership with other named organization.
- **Healthcare Professionals and Clinical Research Organisations.**

We may disclose your personal information to **public authorities, regulators or other third parties:**

- To comply with any court order or legal obligation
- When data is requested by our regulators, government agencies or law enforcement agencies or is required by any stock exchange rules;
- To protect the rights, terms of use, property, or safety of us, our employees or others (e.g. fraud protection and credit risk reduction).

10. International transfers of personal data

As KKI is an international enterprise that consists of numerous entities worldwide, the data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”), or the United Kingdom (“UK”) for the purposes described in this notice.

Your data may be transferred to our parent company Kyowa Kirin in Japan or other entities in the Kyowa Kirin group when we have a legal basis to do so. Details of our company group can be found [here](#).

It may also be processed by service providers operating outside the EEA, or the UK, including the United States. They work for us, among other things, to process your payment details, the provision of technology, and cloud services, marketing and communication agencies, advertising networks and analytics providers, search engine providers, specialty advisory services, or lawyers.

If we do this, your personal information will continue to be subject to an adequate level of protection or appropriate standard contractual clauses and/or other safeguards approved by the regulators. A copy of the relevant transfer mechanism can be provided for your review on request to the contact details above.

11. Your data protection rights

We are committed to facilitate the exercise of your rights granted by the data protection laws.

Right to withdraw consent: In circumstances where consent has been used to process your personal data, you have the right to withdraw your consent at any time.

Right to opt-out: you also have the right to opt-out of analytics, marketing communications and profiling activities.

GDPR rights: in addition to these rights, if you reside or otherwise find yourself in the territory of the EEA, or the UK , or we process any of the above personal data through our European/UK offices we are committed to facilitate the exercise of rights granted by the data protection laws of these territories, including access, rectification, deletion, objection, restriction of processing, and portability. You also have the right to lodge a complaint with the supervisory authority in the country of your habitual residence.

How to exercise your rights: If you would like to exercise any of these rights, please contact us using the details set out in the '**Contact Us**' section. We may ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal information.

12. Security

We have implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

13. Changes to this privacy notice

We may change this Privacy policy from time to time in response to technical, legal or business developments.

You can check the "effective date" posted to see when the Privacy Notice was last updated. If we make any material changes we will take appropriate measures to inform you according to applicable laws.

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