

# Astellas Pharma Australia's Privacy Policy

Respecting your privacy

What kind of personal information does Astellas collect and hold?

How and why does Astellas collect and hold your personal information?

How does Astellas use your personal information?

In what circumstances will Astellas disclose your personal information?

Who may we disclose your personal information to?

Direct marketing

Does Astellas disclose your personal information to overseas recipients?

Use of Government Identifiers

Information security and website usage

How you can access or correct your personal information

How you can notify us of a privacy concern or contact our Privacy Officer

## Respecting your privacy

This Privacy Policy applies to Astellas Pharma Australia Pty Ltd (Astellas) and its related entities. Astellas is bound by the *Privacy Act 1988* (Cth) and will only collect and use personal information in accordance with the Act and this Policy. 'Personal information' means information which identifies you as an individual or from which you can reasonably be identified.

This policy outlines our personal information management practices. It relates to the personal information that we collect from customers, suppliers, health professionals, employees, contractors, visitors to our website, any apps we may use, social media and any other digital services or collection methods that we may employ. By providing your personal information to Astellas, you consent to and acknowledge our personal information handling practices as outlined in this Privacy Policy, unless you tell us to the contrary by contacting our Privacy Contact Officer.

There may be additional privacy notices and terms that are relevant to you depending on the nature of your dealings with us (e.g. use of our online sites, involvement in clinical trials etc).

Where we can, we will allow you to deal with us anonymously or by using a pseudonym. However, in some circumstances, this may not allow us to be able to provide you with a service (such as deliveries, travel arrangements etc). We will inform you if it is possible for an interaction to occur on an anonymous basis and, where it is, it will be optional for you to provide personal information.

If you have any questions regarding Astellas's Privacy Policy, please call our Privacy Officer in Australia on (02) 98141100, email us at [privacyofficer-au@astellas.com](mailto:privacyofficer-au@astellas.com) or send a letter to the Privacy Officer, Astellas Pharma Australia Pty Ltd, Level 3, 6 Eden Park Drive, Macquarie Park NSW 2113. If you would like Astellas to send you a copy of this policy, please contact us and we will do so.

## **What kind of personal information does Astellas collect and hold?**

Astellas collects the personal information of its customers, medical and allied healthcare professionals (e.g. doctors, nurses, pharmacists etc), members of the public, staff and other individuals who have dealings with AAU for administrative needs, to conduct its business, for legislative compliance or for research purposes. Any personal information that you provide via our websites or directly is collected and managed by Astellas. The personal information that we collect and hold (including sensitive health information) is what is reasonably necessary for our business functions and activities. The nature and amount of information we collect will depend on the purpose for which it is being collected.

The types of personal information Astellas may collect includes (but is not limited to):

- name;
- date of birth;
- gender;
- marital status and family details (next of kin);
- residential address;
- email address;
- contact telephone numbers;
- identification details (e.g. student, pensioner card);
- Tax File Numbers;
- Passport details;
- testimonials or opinions;
- photos of individuals;
- financial information, such as credit card details;
- records of written or verbal contact with Astellas, including voice recordings of telephone conversations you have had with us;
- your health information, details about your medical conditions or medical treatment you have received or that are recorded if you register for particular patient support program;
- details about an inquiry or adverse event report;
- CV details and work experience if you have applied for an employment position;
- records of injuries;
- criminal checks;
- qualifications;
- details about your activities, including but not limited to sporting and other lifestyle interests;
- psychometric assessments;
- health care provider professional details (e.g. qualifications, speciality, areas of interest), details on your practice/business (e.g. size, use of products, prescribing practices) and details of your dealings with us; and/or

- information related to use of our online services such as device identifiers (IP address), location data, dates, times, file metadata, referring website, data entered and user activity (such as links clicked).

The nature and amount of information collected will depend on the purpose for which it is being collected.

If you provide your personal information to a third party via a link from the Astellas website (such as when you enter a competition or register for another type of promotion), that information is collected and managed by those third parties. You should familiarise yourself with their privacy policy prior to deciding whether you wish to provide them with your information. If you provide us with information about any third party, you must obtain that person's permission to give us the information and inform them that you have given the information to us.

## How and why does Astellas collect and hold your personal information?

Astellas will only collect personal information about you by lawful and fair means, and not in an unreasonably intrusive manner. Astellas only collects personal information for purposes that are directly related to our business activities, and only when it is necessary for or directly related to such purposes.

It is our usual practice to collect personal information about you (and possibly about your family) directly from you (or from your authorised representative e.g. your guardian or health professional). This is done when we make a record of the personal information that is provided to us when you (or your representatives):

- visit one of our websites;
- fill out a hard copy or digital form;
- make a medical enquiry or provide a report;
- give information to our sales representatives;
- attend conferences, appear on expert panels, attend educational seminars, or are involved in disease awareness and management programs;
- make a purchase or place an order;
- provide details for information in relation to adverse events or product safety;
- provide a testimonial, survey response or are part of a focus group;
- participate in clinical trials, expert panels or educational events;
- apply for or receive research grants;
- are involved in disease management programs;
- apply for membership to or sign on for any service that we provide;
- order or purchase goods or services from us;
- post a review or comment on one of our websites or social media pages or post a rating or review or other user generated content on one of our websites or apps;
- enter one of our competitions (or competitions run by our partners or associates);
- provide services to us;
- participate in non-prescription product promotional activities;
- click on one of our advertisements or offers (by using technology such as 'cookies');
- interact with us in relation to employment services, human resource management, and other corporate service functions;

- provide us with your professional and other contact/ identification details to allow us to arrange attendance and/or travel to a conference, workshop or similar event in Australia or overseas;
- communicate with us (including e-mail and telephone) for security, dispute resolution and training purposes and when we operate video and audio surveillance devices in our premises;
- make a complaint or legal/ liability claims against us; and/or
- contact us by telephone, mail, email, online or by any digital form or social media.

Most of the personal information that we hold about you will be from your direct dealings with us, But we may also collect your personal information (including your sensitive health information) from a third party (such as your health service provider), anyone authorised to act on your behalf, or a publicly available source (such as information service providers). We will only do this if you have consented to the collection of your personal information, or if you would reasonably expect us to collect your personal information in that way.

We may collect personal information from our business or related entities and affiliates which collected your information in a different country (e.g. Japan).

We may also collect information about you by accessing data from other sources and then analysing that data with the information that we already hold about you in order to learn more about your preferences and interests.

If we receive information about you from a third party and it is not information we need in respect of our business activities, we will destroy or de-identify that information (provided it is lawful to do so).

Minors are not allowed to provide any personal information to Astellas without the consent of a parent or guardian.

## **How does Astellas use your personal information?**

We use your personal information for a variety of reasons including to:

- maintain a record of medical queries, complaints and adverse event or adverse reaction reports relating to our products and reporting these to relevant regulatory bodies (such as the Therapeutic Goods Administration);
- to provide health products or services (including advice) that have been requested (including by pharmacies);
- manage your requests for products and services including delivery, processing payments, providing refunds, discounts and incentives;
- managing, planning and arranging meetings between healthcare practitioners and our sales representatives;
- sending you material on our activities and products or developments in pharmaceutical treatments that Astellas (or our affiliates) believe may be of interest to you and tailoring marketing services to suit your needs (including direct marketing);
- administer conferences, expert panels, educational seminars, disease awareness and management programs;
- to involve health professionals/investigators (and people who assist them) in clinical trials;

- maintain and improve customer services, including conducting product and market research and analysis;
- to improve our operational processes, enhance your customer experience and to monitor and review our compliance with relevant regulations and codes of conduct in our dealings with you;
- to monitor the quality, safety and efficacy of our products;
- administer programs or events that are sponsored by Astellas;
- gain insights in to how Astellas' products are prescribed and used in practice;
- generate customer lists for the purposes of market research;
- facilitate your interaction with us on our website;
- consider any application for employment made by you;
- meet our legal obligations and to notify you of matters that we are required to do so by law (such as product recalls);
- interact with Regulators or other Government agencies;
- manage and resolve any legal or commercial complaints and issues;
- investigate fraud and to carry out loss prevention activities;
- as part of buying or selling our businesses; and/or
- carry out internal functions including training.

De-identified personal information may be used to comply with Astellas' reporting obligations under the *Therapeutics Goods Act 1989* (Cth) and other legal obligations. It may also be used to allow corporate reporting within our business and with our affiliates.

Whilst you may opt to not to provide us with your personal information, you should be aware that without this personal information, we may not be able to provide you with some of the services and/or products you are seeking.

### **In what circumstances will Astellas disclose your personal information?**

In the course of conducting our business and providing our products and services to you, we may disclose your personal information.

We only disclose personal information for the purposes for which it was given to us, or for purposes which are directly related to one of our functions or activities. We do not give it to anyone else unless one of the following applies:

- you have consented to the disclosure;
- you would reasonably expect, or have been told (for example, by means of this Privacy Policy), that your information will be passes on to those individuals/ entities/Astellas affiliates bodies or agencies; and/or
- it is otherwise required or authorised by law.

If we engage third party agents or contractors, we will take all reasonable steps to ensure that they do not breach privacy requirements in relation to the information, before we share your personal information with them.

## Who may we disclose your personal information to?

We may disclose your personal information to:

- our business affiliates or related entities;
- an overseas Astellas affiliate (such as insurers or superannuation administrators) and other organisations engaged to assist Astellas in human resource administration or to provide employee benefits;
- professional advisers (such as lawyers, accountants or auditors) to the extent that is reasonably required;
- payment systems operators and financial institutions;
- third party service providers that provide us with communication (e-mail) or data storage services;
- technology services including application, development and technical support, processing, storing, hosting and data analysis;
- travel agents and other travel/ event related service providers involved in the organisation of conferences and similar events;
- administrative services, including mailing services, printing, archival and contact management services;
- third party agents or contractors with whom we contract in the ordinary course of business;
- organisations authorised by Astellas to conduct promotional, research or marketing activities;
- upon lawful request from law enforcement agencies or government authorities; and/or
- any persons acting on your behalf including those persons nominated by you, executors, trustees and legal representatives.

In all circumstances where your personal information is disclosed, we will take all steps reasonable to ensure that those third parties undertake to protect your privacy.

## Direct marketing

We are committed to compliance with all laws and requirements relating to the use of your personal information for direct marketing.

When you provide your personal details, you may consent to us using your personal information for direct marketing purposes (for an indefinite period). From time to time, we may contact you with information about products and services offered by us and our related entities and our business partners or affiliates, which we think may be of interest to you. When we contact you it may be by mail, telephone, email, SMS or via social media. These communications may relate to products and services that we and our affiliates provide, and other products that may be of interest to you.

Astellas also hopes to deliver to you advertising for products and services that you need or want. For example, Astellas partners with websites with whom you have shared your interests, condition and concerns directly and asks that they serve our ads to users who have expressed an interest in Astellas products or health conditions that our products treat. We may also partner with advertising companies to serve you ads based on your web browsing activity, purchases and/or interests. Some techniques for delivering content based on your interests are referred to as online behavioural advertising.

If you do not wish to be contacted by Astellas, email us at [privacyofficer-au@astellas.com](mailto:privacyofficer-au@astellas.com) or send a letter to the Privacy Officer, Astellas Pharma Australia Pty Ltd, Level 3, 6 Eden Park Drive, Macquarie Park NSW 2113.

## **Does Astellas disclose your personal information to overseas recipients?**

In some circumstances, Astellas may disclose your personal information to overseas recipients. If this occurs, we take steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the relevant privacy laws in relation to that information.

We share information between our businesses and affiliates, located in Albania, Algeria, Armenia, Bahrain, Belarus, Bosnia and Herzegovina, Brazil, Canada, China, Egypt, Germany, Hong Kong, India, Indonesia, Iran, Iraq, Israel and Palestinian Territory, Japan, Jordan, Kazakhstan, Korea, Kuwait, Kyrgyzstan, Lebanon, Libya, Libyan Arab Jamahiriya, Malaysia, Moldova, Montenegro, Morocco, New Caledonia, Oman, Palestinian Territory, Occupied, Qatar, Russia, Saudi Arabia, Serbia, Spain, Syrian Arab Republic, Taiwan, Tunisia, UAE, Ukraine, United Arab Emirates, United Kingdom, US, Uzbekistan, Yemen.

Our service providers are mainly located in Australia and Japan, however from time to time we may need to engage a service provider in a country not identified here. We may also be required to report to regulatory authorities, within or outside of Australia, as required by law.

We may also disclose your personal information to regulatory authorities, within or outside of Australia, and ethics committees as part of a clinical trial evaluation, monitoring or inspection process.

Your personal information may be stored in a secure and/or encrypted form overseas (e.g. in data storage and cloud computing facilities operated by us or by third parties on Astellas' behalf). By providing us with your personal information, you are agreeing to the disclosure of your personal information to third parties operating outside of Australia. Astellas will take all reasonable steps to ensure that any personal information we disclose overseas is handled in accordance with the law.

Sometimes we make the business decision to use third party platforms and services to process sales, provide web support, send marketing messages, deliver products or otherwise provide data storage and processing services. These services are hosted and managed by organisations other than ourselves, and some of these services are hosted overseas. These services may also involve geographic locations which change from time to time which include data protection and processing efficiency. Where these services are used by us, it may not be practicable for us to notify you of which country your personal information may be located in.

## **Use of Government Identifiers**

Astellas will not use Government Identifiers, such as Medicare numbers, or a driver's licence number as its own identifier of individuals.

## **Information security and website usage**

We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers. We have a number of security controls in place and we take all reasonable steps to ensure that your personal information is stored securely and is protected from misuse and loss and from unauthorised access, modification or disclosure.

Our computer systems may be operated by us or by our service providers. In all cases, we have rigorous information security requirements aimed at eliminating risks of unauthorised access to, and loss, misuse or wrongful alteration of, the personal information that we handle. Examples of these measures include:

- control of access to personal information through access and identity management systems (such as passwords); and
- Astellas personnel are bound by and trained on internal information security policies and are required to keep personal information secure at all times.

Astellas also has policies in place for data retention across all key areas. We keep your personal information for as long as it is required to provide you with the products you requested from us and to comply with legal requirements. If we no longer require your personal information for any purpose, including legal purposes, we will take reasonable steps to securely destroy or de-identify your personal information.

Our websites are professionally hosted and operate in a secure environment. You should however be aware that there is always an inherent risk in transmitting your personal information via the Internet.

Cookies are pieces of information that a website transfers to your computer for record-keeping purposes. Cookies help provide additional functionality to the web site or to help us analyse site usage more accurately. We use information collected from cookies to better understand, customise and improve user experience with our websites, services and offerings, as well as to manage our advertising. For instance, our server may set a cookie that keeps you from having to enter a password more than once during a visit to one of our sites. Also, we may use web analytics services that leverage cookies to help us to understand how visitors engage with and navigate our site (e.g. how and when pages in a site are visited and by how many visitors).

We are also able to offer our visitors a more customised, relevant experience on our sites using cookies by delivering content and functionality based on your preferences and interests. If you have provided us with personal information (e.g. through a registration or a request for certain materials), we may associate this personal information with information gathered through cookies. This allows us to offer increased personalisation and functionality.

In all cases in which cookies are used, the cookie will not collect personal information except with your explicit permission. Your web browser can be set to allow you to control whether you will accept cookies, reject cookies or to notify you each time a cookie is sent to your browser. If your browser is set to reject cookies, websites that are cookie-enabled will not recognise you when you return to the website, and some website functionality may be lost. The Help section of your browser may tell you how to prevent your browser from accepting cookies.

Whilst links to third party websites are provided on our website, we are not responsible for the content or practices of these third party websites. These links are provided for your convenience and do not

represent Astellas' endorsement of any linked third party website. We recommend that you check the privacy policies of these third parties prior to providing them with your personal information.

## How you can access or correct your personal information

You can request access to the personal information we hold about you at any time, and we will provide you with that information unless we are prevented by law from giving it to you. If we are unable to give you access to the information you have requested, we will give you reasons for this decision when we respond to your request.

You will not be charged for accessing your information, although we might have to charge the reasonable cost of processing your request, including photocopying, administration and postage. We will advise you of any fee payable before we process your request.

If you believe that your personal information is not accurate, complete or up to date, please contact to [privacyofficer-au@astellas.com](mailto:privacyofficer-au@astellas.com) or send a letter to the Privacy Officer, Astellas Pharma Australia Pty Ltd, Level 3, 6 Eden Park Drive, Macquarie Park NSW 2113.

## How you can notify us of a privacy concern or contact our Privacy Officer

If you:

- have queries, concerns or complaints about the manner in which your personal information has been collected or handled by Astellas; or
- would like to request access to or correction of the personal information we hold about you;

**please write to:**

Privacy Officer  
Astellas Pharma Australia Pty Ltd  
Level 3, Eden Park Drive, Macquarie Park NSW 2113

**Email:** [privacyofficer-au@astellas.com](mailto:privacyofficer-au@astellas.com)

We may ask you to put your request or complaint in writing, and to provide further details about it. Our Privacy Officer will investigate the matter and attempt to resolve it in a timely way.

If you consider your privacy concerns have not been resolved satisfactorily by us, or you wish to obtain more information on privacy requirements, you can contact the Office of the Australian Information Commissioner on 1300 363 992 or visit their website at [www.oaic.gov.au](http://www.oaic.gov.au).

*This privacy policy is effective from July 2018. From time to time, our privacy policies and procedures will be reviewed and, if appropriate, updated. If any changes are made to this policy, these will be posted on our website. We are constantly developing and enhancing our use of online technologies and make reasonable efforts to ensure that we keep this Policy and related documents up to date in this regard. Please check back on a regular basis to ensure you are familiar with our current practices.*