

## Privacy Policy Relating to Financial Disclosures

Kyowa Kirin Limited (**We**) take the privacy of the Healthcare Professionals (**HCPs**) and Other Relevant Decision Makers (**ORDMs**) with whom we work seriously. We hold certain personal data about HCPs and ORDMs as a result of having entered into a contract with them or their employer in terms of which they or their employer has received a transfer of value.

In accordance with pharmaceutical industry regulations we are now required to disclose full details about transfers of value made by us to HCPs/ORDMs. Accordingly this data has been collated and disclosed on our company website. Our Disclosure Database is hosted on the Kyowa Kirin website (**the Database**). HCP/ORDM data has been line listed where permission has been granted to do so. Where consent was not given or where the individual's wishes were not clearly stated they have been included in the aggregated figures provided.

This privacy policy explains our data processing practices in relation to our Database.

### Data Controller

For the purpose of the Data Protection Act 1998 (**the DPA**), the data controller is Kyowa Kirin Limited, a company registered in England and Wales under company number 3504711 and having its registered office at 235 Old Marylebone Road, London NW1 5QT.

### Who is an 'HCP' or 'ORDM' for the purposes of this privacy policy?

An HCP is a member of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine and may also include appropriate administrative staff. An ORDM is an individual with an NHS (or healthcare) role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not healthcare professionals. We define HCPs and ORDMs in the same way for the purposes of this privacy policy.

### What is a 'transfer of value'?

A 'transfer of value' means any payment or benefit in kind transferred from us to an HCP/ORDM, or to an HCP/ORDM's employer or other third parties on their behalf, for certain services such as chairing and speaking at meetings, assistance with training, participation in advisory boards, etc.

## **Purpose of the Database**

The disclosure of information about payments made to HCPs and ORDMs is intended to bring about further transparency to the relationship between the pharmaceutical industry and the people it works with. This relationship is critical to the future of medical innovation and patient care and as such, it is the intention that the information published on the Database will meet the high expectations of patients and wider stakeholders with regards to the transparency initiative.

## **Personal information disclosed on the Database**

The Database currently provides information as to all the transfers of value that have been made by us to HCPs and ORDMs over the twelve month period from 1 January 2015 to 31 December 2015. The Database will be updated in June of each year to include information on all transfers of value made by us to HCPs and ORDMs in the preceding calendar year.

Where an HCP/ORDM has given his/her express consent to the disclosure of their personal data in connection with any transfers of value made by us to him/her, which consent can be withdrawn at any time by the relevant HCP, the Database will provide the following details in connection with each transfer of value:

- the name of the individual HCP/ORDM;
- the HCP/ORDM's city and country of principal practice;
- their professional address (as defined by the contract or agreement with Kyowa Kirin);
- the value or amount of financial support provided in connection with that HCP; and
- an indication of the purpose to which this support was put (as defined by industry regulations).

Where an HCP/ORDM:

- a) has declined to give his/her express consent to the disclosure of their personal data in connection with transfers of value made by us to him/her; or
- b) has withdrawn his/her express consent to the disclosure of their personal data in connection with transfers of value made by us to him/her,

we will publish information about such transfers of value on an aggregated and anonymised basis.

Information regarding transfers of value made by us to HCPs and ORDMs within a particular calendar year will remain on the Database for such period of time as we determine is appropriate from time to time. In making this determination, we will take into consideration any determination that industry regulators make as regards the appropriate length of time for the publication of transfers of value. Currently we are required to publish this data for three years.

## **Who may access the Database**

The Database is published on our website, which is a public website and it may therefore be accessed by any person from any location for any purpose.

## **Updating account information**

You have the right to request a copy of the information we hold about you, including information that we hold about you that is not contained in the Database. To obtain a copy of this personal information please email or write to us at the address set out below. We may make a small charge for this service.

We want to make sure that your personal information is accurate and up-to-date. You may ask us to correct or remove information you think is inaccurate.

## **Changes to this privacy policy**

We keep our privacy policy under regular review and we will place any updates on this webpage. This privacy policy was last updated on 28<sup>th</sup> June 2016.

## **How to contact us**

Please contact us if you have any questions about our privacy policy or information we hold about you:

- by email at [medicalaffairs@Kyowa Kirin.com](mailto:medicalaffairs@Kyowa Kirin.com); or
- write to us at Kyowa Kirin Limited, Galabank Business Park, Galashiels TD1 1QH, United Kingdom.