

# HCP PRIVACY POLICY

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## INTRODUCTION AND SCOPE

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BeiGene is committed to respecting and protecting the privacy of your personal information. “Personal information” is information related to you that can potentially be linked back to you.

The **data controller of your personal information** (i.e., the entity determining how and why your personal information is used) under this Privacy Policy is BeiGene, Ltd., unless:

- Another privacy policy or notice mentioned a different entity, or
- You are dealing with or working for another BeiGene entity.

In such cases, the other entity mentioned or the one you are dealing with or working for will be the controller. If you have questions or complaints and want to reach the data controller or its data protection officer, please see the “**Exercising your rights**” section below.

This HCP Privacy Policy (herein referred to as “**Privacy Policy**”) is for health care professionals and other medical professionals (e.g., pharmacists, statisticians, staff and other representatives of medical offices, hospitals and academic and medical centers) altogether, (“**HCPs**”), who provide BeiGene, Ltd. and/or its subsidiary companies (“**BeiGene**”, “**we**”, “**us**”, “**our**”) with personal information and/or whose personal data we receive.

It describes **how we use personal information and how you can use your rights**.

Here are a few important points to keep in mind as you read this:

1. **Some parts of this Privacy Policy may not be applicable to you** based on where you live or the type of personal information we maintain about you. For example, if we are not making payments to you, we will not need your banking information.
2. **In certain circumstances, other privacy policies or notices may add to or replace this one.** If that happens, the other policy or notice will be the one that applies to how your personal information is handled.
3. Our websites, web portals, mobile applications, or other digital services (together, our “**websites**”) may contain links to websites that we do not run, control, or endorse. When you go to those websites, we are not responsible for the protection and privacy of any information you provide. **We suggest reading their privacy policies and reaching out to them directly for information about their privacy practices.**

## Information about children

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**Our websites are not meant for individuals under the age of 16 years old (“children”).** We do not knowingly collect personal information directly from children through our websites, so if you are a child, please **do not use our websites or provide any information to us through our**

**websites or otherwise**, unless we have first obtained a parent or guardian’s consent, where applicable.

## CHANGES TO THIS PRIVACY POLICY

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We aim to regularly update this Privacy Policy to reflect our practices. Therefore, **we recommend periodically reviewing this Privacy Policy**. In case of material changes, we may take steps to notify you before they become effective.

Effective date of last update: 10 November 2023

## CATEGORIES OF PERSONAL INFORMATION PROCESSED BY BEIGENE

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Depending on your interactions with BeiGene over the past twelve (12) months, we may have collected and used some of the following types of personal information about you:

Categories	Examples
<b>Identification information</b>	First name, last name, initials, age or date of birth, nationality, gender, photographs, videos, sound recordings, payment-related information, and government-issued identification (e.g., driver’s license, tax ID number, passport identification), office location, personal identification, National insurance number, social insurance number or language abilities
<b>Contact details</b>	Home or work postal address, email address and/ or phone number
<b>Professional information</b>	National Provider Identifier Standard (NPI), licensure information (e.g., medical license), department, job title, employment status, educational information, professional qualifications and licenses, work experience and areas of specialty, criminal records, debarment status, and/or history, membership of professional networks, conference attendance, affiliates, programs and activities, publications, or awards and influence rankings (we request that information on CVs or otherwise provided to us be relevant to our relationship or interactions)
<b>Commercial information</b>	Prescription data, travel booking details and/or travel history, sales and marketing information
<b>Relationship information</b>	Information related to your past collaborations with us, other companies and other researchers, and your interactions with our sales representatives or medical staff.
<b>Payment and financial information</b>	Information related to amounts invoiced and/or payments made, services provided, travel, lodging, meal and other expenses, tax-related information, financial disclosures, banking information, W9 information, billing address, and other information collected for regulatory and transparency reporting

	<p>purposes or to pay you for services or reimburse your expenses, compensation including equity and bonuses. Additionally, we may collect information related to payments to you made public by third parties and, if you may participate in a clinical trial, BeiGene stocks or other securities that you or certain family member may hold.</p>
<b>Assessment information</b>	<p>Internal assessments, evaluations, feedback, classifications or performance ratings of your professional activities and outcomes</p>
<b>Information about your use of the internet, electronic networks and our devices</b>	<p>We collect information about your use of BeiGene email accounts, the internet and our computers, phones, and other devices to which you may have access. We may also collect your information through security cameras if you visit one of our offices or attend our events.</p> <p>Used for the proper functioning of our websites and their services, as well as internal business analytics purposes such as audience measurement we may collect and use your: IP address, device type, browser type, language, browsing history, location data, tracking data, online identifiers, and other information about your interaction with our websites and social medial accounts and their services. Additionally, we may check your professional social media postings and activities.</p> <p>For more information on the cookies and other data collection technologies, please read the <a href="#">Cookies Policy</a> applicable to the website you are accessing.</p>
<b>Information related to your exchanges with BeiGene</b>	<p>Date and subject of your requests or exchanges with BeiGene’s services</p>
<b>Other</b>	<p>Additional information needed for our interactions with you, as well as information required by laws, our service providers or collaborators. This might include details you include in contracts and questions you ask us, as well as your preferences, and if shared, information about dietary preferences and other personal information.</p>

Certain information (such as health information) **may be considered more sensitive** under applicable laws. We do not routinely collect or otherwise use this information (except as part of our patient support programs), but where we do, we will:

- only collect this information when needed;
- take appropriate measures to protect and process your sensitive personal information; and,
- provide notices and/or obtain your explicit consent prior to processing your sensitive personal information where required by applicable laws.

## SOURCES OF INFORMATION

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In most cases, we collect your personal information **directly from you**, such as when you correspond with us or our representatives via phone, email or in person, complete a form or survey, provide services, participate in, or request to be considered for, our clinical trials, programs, advisory boards or consultancies, register for an account, attend a BeiGene-sponsored event or request to receive marketing materials and information.

Sometimes, we may also obtain personal information about you **from alternative sources** such as our research partners and collaborators, specialty pharmacies, health insurance companies or publicly accessible sources (e.g. websites, social media and other digital platforms, publication databases, journals, societies, editorial board websites, national registries, professional directories and third-party healthcare professional databases). We could also get information from third-party vendors and service providers so that we may contact you related to your professional expertise or to better understand treatment practices in your area of specialty.

If you use our websites, we may collect information from your computer or other device through our use of cookies and other data collection technologies. For more information, please see our Cookies Policy.

## WHY WE PROCESS YOUR PERSONAL INFORMATION

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How we handle your personal information depends on why we collected it, e.g., it is determined by your interactions with BeiGene, applicable laws and our own procedures and requirements, as outlined below:

Purposes	Examples of use of your personal data	Legal bases
<b>Creating and managing your account on the websites</b>	<ul style="list-style-type: none"><li>• Set up your account</li><li>• Help you log in (via single sign-on tools, using other website information)</li><li>• Provide you with account-related services</li><li>• Update your account</li></ul>	<b>Performance of the relevant agreement</b>
<b>Managing the personal and contractual</b>	<ul style="list-style-type: none"><li>• To maintain our relationship (e.g., when you participate in, or request to be considered for clinical trials, compassionate use programs,</li></ul>	<b>Depending on your relationship with BeiGene:</b>

<p><b>relationship with you</b></p>	<p>advisory boards or consultancies and other BeiGene-related activities)</p> <ul style="list-style-type: none"> <li>• to comply with our contractual and payment obligations</li> <li>• to handle requests or complaints</li> </ul>	<p><b>- to take steps prior to entering into an agreement</b></p> <p><u>or</u></p> <p><b>- performance of the relevant agreement</b></p> <p>or</p> <p><b>- comply with Legal and regulatory obligations to which BeiGene is subject</b></p>
<p><b>Improving the products, services and programs of BeiGene</b></p>	<ul style="list-style-type: none"> <li>• to determine eligibility for, facilitate supply, administration and management of, to track progress and outcomes regarding certain products, services and programs</li> <li>• to manage BeiGene’s research and development, collaboration and market research efforts</li> </ul>	<p><b>Legitimate interest</b> of BeiGene in improving its products, services and programs</p>
<p><b>Sending communications that might interest you</b></p>	<ul style="list-style-type: none"> <li>• to contact you based on the information provided from third party sources due to your professional expertise</li> <li>• to send marketing or scientific information about relevant products and services</li> <li>• to send you transactional, administrative and marketing communications regarding BeiGene business and medical activities (including products, services, programs and events of BeiGene)</li> </ul>	<p><b>Legitimate interest</b> of BeiGene to develop its business activities (with your <b>consent</b>, if required by applicable law)</p>
<p><b>Providing educational and awareness information</b></p>	<ul style="list-style-type: none"> <li>• to provide you educational information, including providing information about certain health conditions and disease states, our products, programs and services</li> </ul>	<p><b>Legitimate interest</b> of BeiGene to enhance the education and awareness about health conditions and disease states</p>

<p><b>Managing BeiGene' events or programs dedicated to health professionals</b></p>	<ul style="list-style-type: none"> <li>• to register you</li> <li>• to manage the event or program depending on the participants</li> <li>• to send you communications about the event or program</li> <li>• if applicable, to record BeiGene's events or program for publishing replays</li> </ul>	<p><b>Legitimate interest</b> of BeiGene to develop its business activities (with your <b>consent</b>, if required by applicable law)</p>
<p><b>Improving the websites and their services, as well as your user experience on the websites</b></p>	<ul style="list-style-type: none"> <li>• to evaluate and improve the websites and their services e.g., to track the analytics of pages on our websites, the success of our email notifications, traffic levels on the websites and other usage data</li> <li>• to take steps designed to protect and enhance the security of the websites</li> </ul>	<p><b>Legitimate interest</b> of BeiGene to improve the websites and their services, as well as your user experience on the websites</p>
<p><b>Pre-litigation or litigation management</b></p>	<ul style="list-style-type: none"> <li>• to take action against any identified breach</li> <li>• to manage any dispute or litigation</li> </ul>	<p><b>Legitimate interest</b> of BeiGene in defending its rights and interests</p>
<p><b>Compliance with legal and regulatory obligations</b></p>	<ul style="list-style-type: none"> <li>• to comply with legal and regulatory obligations, e.g., in connection with regulatory submissions or complying with regulatory obligations relating to drug development, safety and transparency reporting, and for monitoring, investigating and enforcing compliance with our policies and legal and regulatory requirements;</li> <li>• to process your requests to exercise your rights</li> </ul>	<p><b>Legal and regulatory obligations</b> to which BeiGene is subject</p>
<p><b>Other</b></p>	<ul style="list-style-type: none"> <li>• We use your information for other everyday business purposes (e.g., handling payments, managing accounts, product development, keeping our property safe, monitoring and enforcing compliance with BeiGene policies, handling contracts, running our websites, onboarding new patients</li> </ul>	<p><b>Legitimate interest</b> of BeiGene or <b>legal and regulatory obligations</b> to which BeiGene is subject</p>

	and or research subjects, preventing fraud, ensuring we follow the law and other similar everyday activity.	
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### Profiling and/or Automated Decision-Making

"Profiling" means analysing someone's interests, habits, behaviours and other characteristics to predict or make decisions about them. "Automated decision-making" is when a computer program, automated system or algorithm makes that prediction or decision. For example, in order to tailor our communications to the health care providers, we may, among other things, assess their specialty, years of experience, patients and diseases treated, drug prescribing habits, research and publications, and professional social media postings. However, no profiling, prediction or decision is made through fully automated means without human review.

### HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

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We keep your personal information for **as long as it is necessary** for the reasons explained in this Privacy Policy. Sometimes, we keep it for longer to comply with our legal obligations. To decide how long we keep it for, we consider the amount, type and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the information, why we need it, if we can do the same without it, and all applicable global legal, regulatory, and compliance requirements.

When you sign up for an email alert or newsletter, we will keep your information until you unsubscribe. If you make requests, we will keep that information until we complete the processing of your requests. If you ask to unsubscribe, we will keep a record of your request for as long as is necessary to demonstrate we complied with that request.

We will also keep your personal information for:

- **the relevant period in the statute of limitations**, if needed for **evidence purposes**;
- **Complying with periods set by law**, e.g. in relation to commercial, legal, compliance and regulatory matters.

### WHERE WE PROCESS YOUR INFORMATION AND HOW WE PROTECT IT

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**BeiGene operates in many countries around the world** and your personal information may be accessible to or shared with other BeiGene **companies** and third parties in different countries as explained in the **SHARING YOUR PERSONAL INFORMATION** section of this Privacy Policy. The laws in certain countries may not provide the same level of protection as the laws in your country

or region. When that is the case and as required by applicable laws, we take steps to make sure your information stays safe e.g., entering into contracts with recipients of your information or implementing additional data safeguards.

Whilst we do our best to protect your information, we cannot guarantee its absolute security. Be vigilant in deciding what information you share with us when you send information online.

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## SHARING YOUR PERSONAL INFORMATION

We may share your personal information within the BeiGene group and with the third parties described below. What we share, why we share it and the safeguards we implement depend on who these third parties are and where they are located. **We do not, however, sell the personal information that we collect.**

Recipients	Purposes
<p><b>Companies of the BeiGene group</b> (e.g., BeiGene, Ltd. and/or its subsidiary companies) <b>and its employees</b></p>	<p>We may share your personal information within the BeiGene Group for our global administrative, operational, technical and/or marketing purposes as part of our worldwide and/or global business and medical activities.</p>
<p><b>BeiGene service providers</b> (e.g., payment vendors, contract research organizations, central labs, logistics providers, etc.)</p>	<p>We work with service providers to help us manage our business globally, handle operations and technical aspects (e.g., clinical trials or other research that BeiGene or our partners or collaborators sponsor).</p>
<p><b>BeiGene business partners and collaborators</b> (e.g., external scientists, healthcare providers, pharmacies and pharmaceutical partners, distribution agents, etc.)</p>	<p>We work with business partners and collaborators to help us manage our business globally, handle operations and technical aspects in the context of BeiGene’s global business and medical activities.</p>
<p><b>BeiGene technology and security providers</b> (e.g., software hosting providers, IT service providers, marketing service providers, etc.)</p>	<p>We work with technology and security providers to help us manage our technology and security operations, and the other administrative, operational, technical aspects of our global business and medical activities.</p>
<p><b>Administrative, regulatory or judicial authorities or agencies and other third parties</b></p>	<p>We may receive requests for the disclosure of personal data from administrative, regulatory or judicial (for example court) authorities or agencies and other third parties. We will share personal data exclusively to comply with any legal or regulatory obligation and/or in the cases of an express and justified request or in</p>



	case of an alleged violation of legal or regulatory provisions
<b>Advisors</b> (such as outside auditors, attorneys, and similar parties)	We work with advisors to assist us with the administrative, operational, and/or technical aspects of our global business and medical activities. Sometimes, we might share personal data with the advisors if it is needed for the services they provide, e.g., management disputes and other legal matters.
<b>Other third parties</b>	If there is a major change in how BeiGene is structured, e.g., a merger, transfer, sale of assets of BeiGene or bankruptcy, your personal data might be transferred to others as part of the deal subject to your consent, if applicable.

## YOUR CHOICES AND RIGHTS

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You have the choice not to give us your personal information; however, that might mean you cannot maintain your relationship or interactions with us or use certain services, e.g., patient support services.

Under certain laws such as the General Data Protection Regulation (GDPR), California Consumer Privacy Act of 2018 (CCPA), California Privacy Rights Act of 2020 (CPRA) or China's Cybersecurity Law (including its implementing regulations and national standards), you may have the following rights with respect to your personal information, depending on the law applicable to your location:

- *Right of access.* You can ask us for clear, transparent, and understandable information on how we handle your personal information, including information on where and who we share it with, and request copies of it.
- *Right to rectification.* You can ask us to rectify information you think is obsolete or inaccurate and or request that it be completed if incomplete.
- *Right to deletion.* You can also request we delete your personal information in certain circumstances.
- *Right to withdraw your consent.* If we process your personal information based on your consent, you have the right to withdraw your consent, and it will not affect the lawfulness of what we did before.
- *Right to opt out of future communications.* You can choose to opt out of (unsubscribe from) certain future communications, such as marketing emails.

- *Right to data portability.* You may have the right to ask that we transfer the information provided to us from one organization to another or give it to you.

Depending on where you live and where the BeiGene office handling your personal information is located, you may have additional rights related to your personal information. For further information, please see the relevant state-specific section.

### **Exercising your rights.**

If you want to exercise your rights, you can email us at [privacy@beigene.com](mailto:privacy@beigene.com).

We will respond to your requests within the time period prescribed by applicable laws. Sometimes, we might need to confirm your identity to make sure it is really you asking and to keep your information safe. We will let you know when your request is completed, if we deny your request (because, for example, an exemption applies), or if there is a fee associated with processing your request.

You can choose someone to act on your behalf, but we will also need to check their identity and make sure they have permission to act on your behalf. If we cannot verify them, we might not be able to fulfil the request.

### **Complaints**

If you believe that BeiGene has mishandled your personal information or has breached your rights, you may have the right to contact your local data protection authority to file a complaint. But you can also let us know by sending an email to [privacy@beigene.com](mailto:privacy@beigene.com). We take your concerns seriously.

We will not discriminate against you for exercising any data subject right you have under the law.

## **OUR COOKIE POLICY**

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Cookies, pixel tags, and other trackers (hereinafter “**Cookies**”) are small files that websites and applications use to store or retrieve information on your browser or your device (computer, tablet, mobile, etc.) when visiting our online services. They help websites remember your preferences and improve your browsing experience.

When you visit our websites for the first time (or after deleting Cookies), we will ask for your permission to use cookies. You may choose to accept all Cookies, select specific types of Cookies, or reject all Cookies (other than necessary Cookies). Cookies do not identify you personally; they identify the device you are using. They help us understand your browsing activities in order to recognize the device later on in order to improve the browsing experience, save your preferences and make your online experience better.

If you want to learn more about cookies and see which ones are on your device, you can visit websites e.g., [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

The exact cookies we use varies depending on the website or application you are viewing/using. We may use the following types of cookies:

- **Strictly Necessary Cookies**: These cookies make sure our websites work properly. They help with security, make browsing easier and display webpages correctly. You may disable these in your browser settings, but it might affect some website functions. You will still be able to navigate the websites, though.
- **Performance Cookies**: These cookies help us understand how visitors use our websites to improve them. They collect information about things like the number of visitors, where they came from and which pages they visited.
- **Social Media Cookies**: These cookies allow you to interact with social plugins on our websites and share content on social networks; and
- **Targeting (Advertising) Cookies**: These cookies help us show you specific advertisements, measure how effective the ads are and tailor content to your interests and browsing behaviour. Such Cookies may track you over time and across websites (such as if you visit our websites multiple times or visit multiple BeiGene websites).

In addition to choosing your own Cookies, most web browsers let you control Cookies through the browser settings. You can usually delete existing cookies and even set your browser to reject all cookies by default. Check your browser's home page for instructions. If you reject all Cookies, you may still use our websites but some features might not work properly.

While most Cookies do not log your Internet Protocol (IP) address (a number that identifies your computer by your Internet Service Provider), certain Cookies use this information to do a general geolocation check to ensure, for example, that you are directed to the version of the website that applies to your location. Additionally, our systems need your IP address in order to route information (such as the images on the website) back to you. We may also use IP addresses to communicate with or block visitors who fail to comply with our [Terms of Use](#).

For targeted (advertising) cookies, we respond to "Do Not Track" signals from your browser t. You can learn more about "Do Not Track" signals, here: <https://allaboutdnt.com/>.

## **CONTACTING US**

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If you have questions or concerns about this Privacy Policy or how we do things, do not hesitate to reach out to us by emailing [privacy@beigene.com](mailto:privacy@beigene.com).

We will endeavor to respond to your request as soon as reasonably possible in compliance with applicable laws.

To keep your information safe, we will check your identity before granting access or making changes. Keep in mind that even if we remove or change your information, there may be residual information in our records.

We are committed to being accessible to everyone including those with disabilities. If you need this document in a different format, please contact us at [privacy@beigene.com](mailto:privacy@beigene.com).