

Privacy Notice - navify[®] Portal (“nPortal”) & navify[®] Marketplace (“Marketplace”)

Last updated 27.02.2024

General privacy statement

This privacy notice tells you how we process your personal data when you use nPortal. nPortal is the digital portal, providing customers access and usage to a range of services, insights and recommendations all in one place to empower labs and manage daily routines, in the laboratory, more efficiently. nPortal portal hosts a collection of specialised support solutions called eServices or Roche Applications (“Roche Applications”). Each Roche Application is purpose-built to assist with specific tasks. Within nPortal, a Marketplace is available. The guiding principle of Marketplace is to provide a way for users to purchase different Roche Applications or Third Party Applications (“Third Party Applications”). We do this by offering Marketplace, where every Roche Application or Third Party Application is reviewed by experts and an editorial team helps users discover new applications every day. Marketplace is the One Central Point for you to Discover, Review, Learn More and Acquire the Roche Applications or Third Party Applications. Application Owners, Third Parties, and partners have the means to monitor and manage the lifecycle of their applications and configure target markets and user groups on the Marketplace. The Marketplace also delivers the capabilities to advertise and provide early access of new digital solutions or versions to users for supporting the exploration and validation of new concepts or releases.

Roche is aware that the protection of privacy and thus also the protection of personal data of patients, customers and business partners is very important and attaches considerable importance to this. Roche has therefore taken the necessary precautions to meet the requirements of the Data Protection Act 2018, the UK GDPR and the EU GDPR.

Your personal data will only be processed to the extent permitted by law and in compliance with applicable laws, in particular the requirement of transparency. You can find out how Roche processes your data in different contexts in the following data protection information.

If you do not understand something or have questions, you can always contact the data controllers or our data protection officer (see below).

Identity and Contact Details of the Data Controller

Roche Diagnostics Limited, Charles Avenue, Burgess Hill, West Sussex RH15 9RY, United Kingdom (“Roche”) is the data controller.

In the event that your personal data is covered by the EU General Data Protection Regulation (EU) 2016/679 (“GDPR”): the EU representative of Roche Diagnostics Limited is Roche Privacy GmbH, Emil-Barell-Str. 1, D-79639 Grenzach-Wyhlen.

Contact details of the data protection officer

Please direct any questions and requests related to this privacy notice to Roche Diagnostics Limited, Data Protection Officer, Charles Avenue, Burgess Hill, West Sussex RH15 9RY, United Kingdom, email: burgesshill.dataprivacy@roche.com.

How and why we process your personal data

1. Registration and use of nPortal & Marketplace

You have the option of registering on our platform, which is accessible via the Roche website, to gain access to protected areas. There you can access various eServices, such as information and training materials made available globally by the Roche Group and get information on new eServices.

The data you provide in the course of registering and using nPortal and Marketplace will be added to the data stored in our customer database. We collect and process various personal data provided by you (hereinafter also referred to as "data"), in particular:

Type of personal data processed

We will process the data you provide in the registration process (in particular first and last name, name of institution, country/region, language, e-mail address, password), the settings made, information provided in the protected area, and metadata (connection and terminal-related information, e.g. IP address, device used, access to content).

Purpose

Personal data is processed for the purposes of enabling secure access to the protected area and making available the content that can be accessed therein or personal content.

Lawful basis for processing

The processing is based on our legitimate interest in providing a secure, protected area (Article 6(1)(f) GDPR, Article 6(1)(f) UK Data Protection Act 2018 ("DPA")).

Storage period

We process and store your data only for as long as is necessary to achieve the respective purpose and to fulfil our contractual, legal or official obligations. This is usually the duration for which you have a registered account with us. We reserve the right to delete it after permanent inactivity. However, you can re-register at any time.

2. Requesting a quote on Marketplace

You have the option to request quotes on eServices over the Marketplace. Roche will receive and process your request and get in touch with you over the regular communication channels. The data you provide will be added to the data stored in our customer database.

Type of personal data processed

We will process contact information (in particular first and last name, name of institution, country/region, language, e-mail address, password), the settings made, information provided in the protected area, and metadata (connection and terminal-related information, e.g. IP address, device used, access to content).

Purpose

Personal data is processed for the purpose of connecting the request to your organisation and to be able to offer you a quote.

Lawful basis for processing

Processing is necessary in order to take steps at your request prior to entering into a contract (Article 6(1)(b) GDPR, Article 6(1)(b) DPA).

Storage period

We process and store your data only for as long as is necessary to achieve the respective purpose and to fulfil our contractual, legal or official obligations. The information is usually stored for three years.

3. Marketing communication (information letters, newsletters, etc.)

We will use your business contact information to send you marketing emails from Roche Diagnostics Limited about our products, services, events and news. If you don't want to receive these you can unsubscribe from the emails at any time.

Type of personal data processed

We will process your First Name, Last Name, email address, occupation, area of interest, name of institution and country.

Purpose

Personal data is processed for the purpose of sending you email marketing communications.

Furthermore, Roche processes your data within the scope of personalised tracking in order to provide you with an improved offer of our services. For this purpose, each contact receives an ID in our database, which makes it possible to assign the opening of emails to a contact.

Furthermore, e-mails contain a so-called message ID. This makes it possible to record clicks on links, images or download documents in newsletters. We use this data primarily in aggregate form to find out which topics are of interest to our email communication recipients and how we can further improve our communications with you.

Lawful basis for processing

The processing is based on our legitimate interests (Article 6(1)(f) GDPR, Article 6(1)(f) DPA).

Storage period

Your data will be stored for as long as you wish to receive email marketing communications. In the footer of each marketing email you receive from us, you have the option of clicking on 'Unsubscribe' to stop receiving these emails.

4. Questionnaires and Surveys

We may collect your personal data directly from you through questionnaires and surveys to understand the experience of Roche's customer or users to improve customer's experience as well as Roche's products and solutions.

Furthermore, we may anonymise personal data provided through surveys and combine this with Roche's offline records and information to analyse the information and improve our products and services.

Type of personal data processed

We will process your First name, Last Name, email address, job title, phone number, IP address and survey response.

Purpose

Personal data is processed for the purpose of conducting questionnaires and surveys to improve customer's experience as well as Roche's products and solutions.

Lawful basis for processing

The processing is based on our legitimate interests to improve internal processes and customer satisfaction (Article 6(1)(f) GDPR, Article 6(1)(f) DPA).

Storage period

We process and store your data only for as long as is necessary to achieve the respective purpose. The information is usually stored for three years.

5. eServices

For the data processing as part of individual eServices provided via the nPortal platform, please see the separate privacy notice of the respective eService.

6. Reporting and follow-up of suspected adverse drug reactions (pharmacovigilance), medical inquiries, and product complaints

We would like to inform you that Roche has the legal obligation to collect and, if necessary, report to the health authorities adverse events of which it becomes aware in connection with the use of a Roche drug (pharmacovigilance) or in connection with Roche medical devices and to answer medical questions. In this context, personal data are processed by Roche and, if necessary, passed on to other Roche companies as well as third parties such as authorities.

For more information, please see the following privacy notice:

<https://www.roche.com/privacy-notice-pv-mi>

Cookies

Roche's websites use cookies and other technologies that enable various functionalities and allow pseudonymised tracking of website visitors. A cookie is an entry that is automatically made on your computer's hard drive. With the help of the cookie, the server can uniquely identify your browser. Cookies may obtain information that identifies your computer or browser, including a device ID, your IP address and/or an ad ID, and information about your browsing history. The information we obtain through the use of cookies may be combined with other personal information relating to you.

To give you control over the cookies and other technologies used on our websites, we use a consent management tool (so-called cookie consent management tool). This appears when you visit our websites for the first time in a so-called cookie banner. It allows you to make individual settings and gives you specific information about the cookies used, including further details about the provider and the purposes pursued.

If the use of cookies and other technologies is necessary, our websites use them even without consent. For all other cookies and comparable tracking technologies, we ask for your consent. You can use the cookie consent management tool to individually configure the purpose for which you consent to the use of cookies and other technologies and also revoke your consent.

Information about the providers and the purposes pursued by them can be obtained via the cookie consent management tool.

Withdrawal

You can withdraw your consent by configuring the cookie consent management tool accordingly and restricting it to the cookies you would like to use.

Storage period

We process and store your data only for as long as is necessary to achieve the respective purpose and to fulfil our contractual, legal or regulatory obligations. The storage period of cookies varies. Details on this (in particular the storage period) can be found in the cookie consent management tool used.

Recipients

Some cookies are used exclusively by Roche (so-called first-party cookies). Others are used by third-party providers (so-called third-party cookies). In this process, the above-mentioned personal data is transferred to the third-party providers. A list of the names of the third-party providers can be found in the cookie consent management tool.

Data recipient

Your data may be passed on to third parties for specific purposes if this is necessary to carry out or fulfil the above-mentioned purposes. This applies in particular to the transfer to other companies of the Roche group, for example if experts from another Roche company provide support or if you are forwarded to websites of other Roche companies via Roche nPortal or access content of other Roche companies via the support functions. All of these companies are required to comply with the terms of our Privacy Notice. Furthermore, in individual cases, e.g. in connection with legal disputes, your data may be passed on to specialised service providers (such as consultancies and law firms) and, if required by law or by court or official order, to authorities or other third parties.

Roche's latest annual report, which can be found in the Investors section of our website www.roche.com, contains a list of all Roche companies.

We also use various service providers who process your data as part of so-called data processing (Article 28 GDPR, Article 28 DPA), i.e. on our behalf and solely in accordance with our instructions. These are, in particular, technical service providers who perform IT-related maintenance and services for us, as well as cloud service providers or agents who assist us in processing business transactions, for example by providing customer services, sending marketing information about our products, services and offers. Please also note that some of the recipients are named in the relevant context in this Privacy Notice.

If you register directly with one of our service providers or create a user account, these service providers may collect and process additional data. Roche has no influence on this,

as it is data processing by the respective service provider itself. You can obtain more detailed information on data protection from the respective providers.

Data transfers

In order to fulfil the above purposes, your data may be transferred to countries within and outside the EU or the European Economic Area, in particular Switzerland and the United States. For some of these countries, an adequate level of data protection has been established by an adequacy decision of the EU Commission (e.g. Switzerland). For countries for which such an adequacy decision does not exist (e.g. the United States), compliance with an adequate level of data protection is ensured by appropriate safeguards, in particular EU standard contractual clauses, and additional measures if required. For more information on the safeguards, please contact the Data Protection Officer or visit the website of the EU Commission.

Information about your rights if your data is covered by GDPR or DPA

If your Personal Data is covered by the GDPR or DPA, you have the following rights with respect to your Personal Data:

- The right to request access to the Personal Data that Roche has about you;
- The right to rectify or correct any Personal Data that is inaccurate or incomplete;
- The right to request a copy of your Personal Data in electronic format so that you can transmit the data to third parties, or to request that Roche directly transfer your Personal Data to one more third parties;
- The right to object to the processing of your Personal Data for marketing and other purposes;
- The right to erasure of your Personal Data when it is no longer needed for the purposes for which you provided it, as well as the right to restriction of processing of your Personal Data to certain limited purposes where erasure is not possible.
- The right to be informed about automated decision making and profiling where this takes place.

To exercise any of these rights, please contact us using the information provided above.

In the event that you believe or have the impression that our data processing does not comply with the GDPR or DPA, you are entitled to lodge a complaint with a competent the responsible data protection supervisory authority, e.g. the supervisory authority in the UK or EU Member State of your habitual residence, place of work or place of the alleged infringement.

If data processing is based on consent, note that you have the right to withdraw your consent at any time by contacting the data controllers or our data protection officer (see above). However, the withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal.

Right to object

You have the right at any time, for reasons that arise from your particular situation, to object to the processing of personal data pertaining to you, which occurs pursuant to 6(1)(f) GDPR and 6(1)(f) DPA (data processing on the basis of a balance of interests); this also applies to profiling based on this provision in accordance with Article 4(4) GDPR and Article 4(4) DPA.

If you file an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or if the processing is for the purpose of enforcing, carrying out or defending legal claims.

Updates to this Privacy Notice

From time to time, we may revise this Privacy Notice. Any such changes to this Privacy Notice will be reflected on this page. Roche recommends that you review this Privacy Notice regularly for any changes. The date on which this Notice was last revised is located at the top of this Notice.