

## ***Privacy Policy - navify© Portal (“DiaLog”) & navify© Marketplace (“Marketplace”)***

**Last updated 01.12.2022**

### **General privacy statement**

This privacy policy informs you on the data processing as part of DiaLog. DiaLog 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. DiaLog portal hosts a collection of specialized support solutions called eServices or Roche Applications (“Roche Applications”). Each Roche Application is purpose-built to assist with specific tasks.

Within DiaLog, a Marketplace is available. The guiding principle of the 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 globally applicable data protection requirements and complies accordingly with the provisions of the European Union and all other applicable standards and laws.

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 Norge AS, Brynsengfareet 6B, 0667 Oslo/Postboks 6610 Etterstad, 0607 Oslo** ("Roche") is data controller.

## **Contact details of the data protection officer**

Please direct any questions and requests related to this information to Roche Diagnostics Norge AS, email: [norway.personvernombud@roche.com](mailto:norway.personvernombud@roche.com).

## **How and why we process your personal data**

### 1. Registration and use of DiaLog & 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 DiaLog 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**

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**

Enabling secure access to the protected area and making available the content that can be accessed therein or personal content.

## **Legal Basis**

Enabling secure access to the protected area and making available the content that can be accessed therein or personal content. Safeguarding our legitimate interest in providing a secure, protected area (Article 6(1)(f) GDPR).

## **Storage period**

We process and store your data only for as long as is necessary to achieve the respective purpose and to fulfill 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**

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**

Roche needs to process your personal data to be able to connect the request to your organization and be able to offer you a quote.

## **Legal Basis**

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

## **Storage period**

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

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

With your consent, Roche would like to inform you about our products and exchange information with you about our services and events. To this end, we would like to send you in particular regular information about our product portfolio in diagnostics (systems, reagents, digital solutions, consulting and services) and invite you to Roche events, customer surveys and market research analyses.

## **Type of personal data**

First Name, Last Name, email address, occupation, area of interest, name of institution and country.

## **Purpose**

Roche uses your personal data to send you information, newsletter, etc. via email. In addition, Roche needs to store your consent. We use your first and last name to properly address you in our communication.

Furthermore, Roche processes your data within the scope of personalized tracking in order to provide you with an improved offer of our services. For this purpose, each contact receives an ID in the Marketo database, which makes it possible to assign the opening of e-mails 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 newsletter recipients and how we can further improve our newsletters.

## **Legal Basis**

Processing is based on your consent (Art. 6(1)(a) GDPR).

## **Storage period**

Your data will be stored for as long as you wish to receive information and you do not revoke your consent to the processing of your personal data for the above-mentioned purposes. In the footer of each newsletter you receive from us, you have the option of clicking on "Manage subscription" to change individual newsletters or areas of interest or to cancel your subscription.

## 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 anonymize personal data provided through surveys and combine with Roche's offline records and information to analyze the information and improve our products and services.

## **Type of personal data**

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

## **Purpose**

Conducting questionnaires and surveys to improve customer's experience as well as Roche's products and solutions.

## **Legal Basis**

Our legal basis for collecting and processing the personal data is in our legitimate interests to improve internal processes and customer satisfaction (Article 6(1)(f) GDPR).

## **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 DiaLog platform, please see the separate privacy policy 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 an 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 policy:  
<https://www.roche.com/privacy-notice-pv-mi>

### **Cookies**

Roche's websites use cookies and other technologies that enable various functionalities and allow pseudonymized 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 fulfill 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 content 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 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 fulfill 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 DiaLog 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 Policy. Furthermore, in individual cases, e.g. in connection with legal disputes,

your data may be passed on to specialized 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](http://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), 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 Policy.

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 fulfill 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**

If your Personal Data is covered by the GDPR, 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.

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, you are entitled to lodge a complaint with a competent the responsible data protection supervisory authority, e.g. the supervisory authority in the 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 (data processing on the basis of a balance of interests); this also applies to profiling based on this provision in accordance with Art. 4(4) GDPR.**

**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 Policy**

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