

Your Data

Gain Connect Privacy Notice

SCOPE OF THIS NOTICE

Please read this Privacy Notice (“**Notice**”) carefully to understand our policies and practices regarding your Personal Data and how we will treat it. This Notice applies to individuals who interact with the Galderma Gain Connect Platform (“**Gain Connect**”) as set out below (“**you**”). This Notice explains how your Personal Data is collected, used, and disclosed by Galderma SA and its affiliated entities (“**Galderma**”, “**We**”, **Us**”). It also tells you how you can access and update your Personal Data and make certain choices about how your Personal Data is used. Where affiliates have their own privacy notice that governs, this Notice will not apply.

If you interact with us outside of Gain Connect, please refer to our Galderma Privacy Notice for information about our other online and offline data collection activities, including Personal Data that We collect through other channels such as websites, third party social networks and through our vigilance activities.

If you participate in events and webinars hosted through Gain Connect, please refer to our [GAIN CONNECT Events Privacy Notice](#) for information about how we collect, use and disclose your Personal Data in connection with such events.

If you do not wish to provide necessary Personal Data to us (We will indicate to you when this is the case, for example, by making this information clear in our registration forms), We may not be able to provide you with access to Gain Connect or other goods and/or services. This Notice may change from time to time (see Section 10).

This Notice provides important information in the following areas:

- 1. SOURCES OF PERSONAL DATA**
- 2. PERSONAL DATA THAT WE COLLECT ABOUT YOU AND HOW WE COLLECT IT**
- 3. COOKIES/SIMILAR TECHNOLOGIES**
- 4. USES MADE OF YOUR PERSONAL DATA**
- 5. SHARING OF YOUR PERSONAL DATA**
- 6. RETENTION OF YOUR PERSONAL DATA**
- 7. SAFEGUARDING, STORAGE AND/OR TRANSFER OF YOUR PERSONAL DATA**
- 8. YOUR RIGHTS**
- 9. CHANGES TO THIS NOTICE**
- 10. DATA CONTROLLERS & CONTACT**

1. SOURCES OF PERSONAL DATA

This Notice applies to Personal Data that We collect from or about you. “**Personal Data**” means information about an identifiable natural person, as described under applicable privacy laws. Generally, Personal Data does not include business contact information that is solely used to communicate with you in relation to your employment, business or profession, such as your name, position name or title, work address, work telephone number, or work e-mail address.

We may collect Personal Data through the methods described below (see Section 2), from the following sources:

Galderma Online Registration form. To be able to use the services provided by Gain Connect, you need to complete a registration form to provide us with specific Personal Data to create an account and have access to our services.

IQVIA OneKey Web Authentication. We use IQVIA’s OneKey authentication service to ensure that everyone who accesses Gain Connect is an authorised healthcare professional in their relevant jurisdiction. Use of IQVIA’s OneKey Web Authentication service (www.owa-secure.com) is subject to the OneKey Web Authentication Terms of Use available here: https://www.owa-secure.com/sso/login?_flowId=cgu-webflow provided by IQVIA (www.iqvia.com). The verification of your username and password is done directly on IQVIA’s servers. Galderma does not have access to your username or password. We only receive a random string of characters, which serves to record repeat visits to Gain Connect. The character string does not provide Us with any Personal Data about you.

E-mail, text and other electronic messages. Interactions with electronic communications between you and Galderma.

Data We create. In the course of our interactions with you, We may create Personal Data about you (e.g. records of your interactions with Gain Connect).

Data from other sources. Third party social networks (e.g. such as Facebook, Google), market research (if feedback is not provided on an anonymous basis), events, public sources and data received when We acquire other companies.

2. PERSONAL DATA THAT WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

Depending on how you interact with Galderma and Gain Connect, We collect various types of Personal Data from you, as described below.

- **Personal contact information.** This includes any information you provide to us that would allow us to contact you, such as your name, postal address, e-mail address, phone number or fax number.

- **Professional information.** This includes any information you provide to us relating to your profession and/or qualifications, but also information found in your curriculum vitae, information about your current and past interactions with Galderma and about your participation in events, conferences and scientific studies, and other Personal Data that you may provide about yourself and your professional activities.
- **Information from computer/mobile device.** Any information about the computer system or other technological device that you use to access Gain Connect, such as the Internet protocol (IP) address used to connect your computer or device to the Internet, operating system type, and web browser type and version. If you access Gain Connect via a mobile device such as a smartphone, the collected information will also include, where permitted, your phone's unique device ID, advertising ID, geo-location, and other similar mobile device data.
- **Communication usage information.** As you navigate through and interact with Gain Connect or newsletters, We use automatic data collection technologies to collect certain information about your actions. This includes information such as which links you click on, which pages or content you view and for how long, and other similar information and statistics about your interactions, such as content response times, download errors and length of visits to certain pages. This information is captured using automated technologies such as cookies and web beacons, and is also collected through the use of third party tracking for analytics and advertising purposes. You have the right to object to the use of such technologies, for further information please see Section 4 .
- **Consumer-generated content.** Any content that you create and then share with Us on third party social networks or by uploading it to Gain Connect, including the use of third party social network apps such as Twitter. Examples include photos, videos, personal stories, or other similar media or content. Where permitted, We collect and publish consumer-generated content in connection with a variety of activities, including contests and other promotions, website community features, consumer engagement, and third party social networking.

Personal Data collected by IQVIA's OneKey Web Authentication Service:

- Identification information and contact details such as name, title, date of birth, email address and phone number;
- Professional data, such as your profession, professional registration number, the organization/institution you belong to and your business address; and
- User credentials, such as your username and password.

This Personal Data is collected directly by IQVIA's OneKey Web Authentication service (www.owa-secure.com) and is subject to the OneKey Web Authentication Terms of Use available here: https://www.owa-secure.com/sso/login?_flowId=cgu-webflow provided by IQVIA (www.iqvia.com). Galderma does not have access to this Personal Data.

3. COOKIES/SIMILAR TECHNOLOGIES

Cookies/Similar Technologies. Please see our [Cookie Policy](#) to learn how you can manage your cookie settings and for detailed information on the cookies We use and the purposes for which We use them.

We also use Google Fonts, which is a web font service provided by Google that enables the optimization of Gain Connect providing the correct fonts. We host Google Fonts locally without ever having to connect to a Google Server and thus collect IP addresses.

4. USES MADE OF YOUR PERSONAL DATA

The following paragraphs describe the various purposes for which We collect and use your Personal Data, and the different types of Personal Data that are collected for each purpose. Please note that not all of the uses below will be relevant to every individual.

<i>What We use your Personal Data for</i>	<i>Our reasons</i>	<i>Our legitimate interests</i>
<i>Consumer service and e-commerce functionalities.</i> We use your Personal Data for consumer service purposes, including responding to your inquiries, processing your orders and arranging for delivery. We collect information about how Gain Connect is used to be able to provide you with certain content and improve it based on the feedback We receive. Responding to your inquiries typically requires the use of certain personal contact information and information regarding the reason for your inquiry (e.g. responding to any questions or concerns you may have concerning your use of our products, order status, technical issue, product question/complaint, general question, etc.).	• Fulfilling contractual obligations • Legal obligations • Our legitimate interests	• Operating our online store • Improving and developing new products and services • Being more efficient
<i>Establishing and maintaining our relationship with Healthcare Professionals.</i> We use your Personal Data to verify whether	• Legitimate interest • Your consent	• Maintaining a relationship with you

there is a potential business opportunity, reach out to you and inform you about our products and services, invite you to events and maintain a relationship with you. We also use your Personal Data to comply with our transparency related obligations regarding any Transfer of Values (ToVs) made to Healthcare Professionals	(where required) • Legal obligation (e.g., data collected in safety reports)	• Assessing your interests and expertise • Consider future collaboration with you and reaching out to you in relation to such opportunities • Disclose publicly any transfers of value made to Health Care Professional, as required by law or in order to comply with applicable industry standards
Contacting you and conducting advertising on third party social networks: We use your Personal Data when you interact with third party social networking features, such as “Like” functions, to serve you with advertisements and engage with you on third party social networks. You can learn more about how these features work, the profile data that We obtain about you, and find out how to opt out by reviewing the privacy notices of the relevant third party social networks.	• With your consent (where required) • Our legitimate interests	• Working out which of our products and services may interest you and telling you about them • Defining types of consumers for new products or services
Legal reasons or merger/acquisition. In the event of a business transaction, for example where Galderma or its assets are acquired by, or merged with, another company including through bankruptcy, We may share your	• Legal obligations • Our legitimate interests	• Compliance with legal obligations • Protect our assets and staff

Personal Data with any of our legal successors. We may also use your Personal Data to comply with our legal obligations (e.g., tax law and product safety obligations). We may disclose your Personal Data to third parties (i) when required by applicable law; (ii) to establish or respond to legal proceedings; (iii) in response to a request from a competent law enforcement agency; (iv) to protect our rights, privacy, safety or property, or the public; or (v) to enforce the terms of any agreement or the terms of Gain Connect.		
<i>For platform usage analytics.</i> We may also collect and process information about your visit to Gain Connect, such as the pages you visit, the website you came from and the searches you perform. We may use such information to help improve the contents of the site and to compile aggregate statistics about people using our site for our internal usage statistics and market research purposes. In doing this, We may install "cookies" that collect the domain name of the user, your internet service provider, your operating system, and the date and time of access.	• With your consent (where required) • Our legitimate interests	• Improve the efficacy of Gain Connect
<i>For account registration purposes:</i> In order to use some of the services offered through the online portal, you need to register for an account. We will use your Personal Data from various categories outlined above	• Fulfilling contractual obligations • With your consent (where required)	• Creation and management of user accounts in the web portal

(e.g. identification information, contact and professional data) as applicable, to personalize your browsing experience and offer you our products, services, healthcare insights and training materials.	• Our legitimate interests	
<i>For sharing our newsletters and promotional materials:</i> In the context of promoting the latest developments in our products, services and company news – as well as the different ways our users can make the best out of GAIN Connect, We conduct direct marketing by sending newsletters to users who have signed up for them and to our consumers with whom We have an ongoing contractual relationship.	• With your consent • Our legitimate interests	• Promoting our services and products • Maintaining a relationship with you •

In case We want to use your Personal Data for purposes unrelated to those described in this Notice, We will first notify you and, where required, offer you a choice as to whether or not We may use your Personal Data in this manner.

If you are using Gain Connect in a jurisdiction governed by privacy laws under which “consent” is the only or most appropriate legal basis for the processing of Personal Data as described in this Notice, the legal bases described above do not apply to our processing of your Personal Data.

Instead, We will process your Personal Data with your consent or as permitted or required by law. How We obtain your consent, including whether it is express or implied, will depend on the circumstances and the sensitivity of the Personal Data in question. Generally, We will seek your consent at the time We collect your Personal Data, either orally, electronically, or in writing.

If you wish to withdraw your consent to our processing of your Personal Data, please contact Us. We will accommodate your request to withdraw consent, subject to legal or contractual restrictions. Withdrawal of your consent may mean that We will no longer be able to provide you with certain services, including access to Gain Connect.

5. SHARING OF YOUR PERSONAL DATA

We may share your Personal Data with the following types of organisations:

Other Galderma subsidiaries and affiliates worldwide. Galderma and its subsidiary companies may share your Personal Data amongst and between each other for the purposes set forth in this Privacy Notice.

Service providers. These are external companies that We use to help Us run our business (e.g. website operation, support services, website development, data analysis, CRC, etc.). Service providers, and their selected staff, are only allowed to access and use your Personal Data on our behalf for the specific tasks that they have been requested to carry out, based on our instructions, and are required to keep your Personal Data confidential and secure. Where required by applicable law, you can obtain a list of the providers processing your Personal Data (see Section 11 to contact Us).

Third party recipients using Personal Data for legal reasons or due to merger/acquisition. We may disclose your Personal Data to third parties for reasons that are permitted or required by law or in the context of a business transaction, such as an acquisition or a merger and We will require such third parties to use and protect your Personal Data in a manner that is consistent with this Notice. As permitted by law, We may also share your Personal Data with third parties that were formerly wholly or partly included in the Galderma family of companies to whom We provide services during a transition period following separation.

6. RETENTION OF YOUR PERSONAL DATA

Galderma takes reasonable steps to ensure that your Personal Data is only processed for the minimum period necessary for the purposes set out in this Notice. The criteria for determining the retention period for your Personal Data are:

- (a) Galderma will retain copies of your Personal Data in a form that allows for identification only for as long as: (i) We maintain an ongoing relationship with you; or (ii) your Personal Data are necessary in connection with the purposes set out in this Notice and We have a valid legal basis,
- (b) if you are a healthcare professional, your Personal Data will be retained for 2 years after your last interaction with us, unless applicable laws or sectoral regulations impose longer retention periods,
- (c) in the remaining cases, your Personal Data is kept for the duration of: (i) any applicable limitation period (i.e. any period during which a person could bring a legal claim against us), and (ii) an additional 2 months following the end of the applicable limitation period (so We are able to identify any Personal Data of a person who may bring a claim at the end of the applicable period), and
- (d) in addition, if any relevant legal claims are brought, We may continue to process your Personal Data for such additional time necessary in connection with that claim.

During the periods noted in paragraphs c (i) and c (ii) above, We will restrict our processing of your Personal Data to storage of, and maintaining the security of, that data, except to the extent the data must be reviewed in connection with any claim, or any obligation under applicable law.

Once the periods in paragraphs (a), (b), (c) and (d) above, each to the extent applicable, have concluded, We will either (i) permanently delete or destroy the relevant Personal Data or (ii) anonymise the relevant Personal Data.

7. SAFEGUARDING, STORAGE AND/OR INTERNATIONAL TRANSFER OF YOUR PERSONAL DATA

We use appropriate physical, organizational and technological security measures in an effort to keep your Personal Data confidential and secure and to protect Personal Data from loss, theft or unauthorized processing. Despite these measures, we cannot guarantee that our safeguards will always be effective. A breach of security safeguards can result in such risks as phishing and identity theft. In such cases, we will act promptly to mitigate the risks and to inform you where there is a real risk of significant harm, or as otherwise required by law.

People who can access your Personal Data. Your Personal Data will be processed by our authorised staff or agents, on a need to know basis, depending on the specific purposes for which your Personal Data have been collected.

Measures taken in operating environments. We store your Personal Data in operating environments that use reasonable security measures to prevent unauthorised access. We follow reasonable standards to protect Personal Data. The transmission of information via the Internet is, unfortunately, not completely secure and although We will do our best to protect your Personal Data, We cannot guarantee the security of the data during transmission through Gain Connect.

International transfer of your Personal Data. The storage as well as the processing of your Personal Data as described above may require that your Personal Data are ultimately transferred/transmitted to, and/or stored at, a destination outside of your country of residence, notably in Switzerland, UK and the USA. When We share your Personal Data with an entity located outside of your country of residence, including to countries which have different data protection standards to those which apply in the European Economic Area (“EEA”), We will put in place, in line with applicable legal requirements, appropriate safeguards to ensure that your Personal Data is appropriately protected. In the absence of an adequacy decision and/or any other data protection related certifications, these measures may include (i) entering into appropriate standard contractual clauses to protect your Personal Data, as well as any supplementary measures required by law or deemed necessary, to provide an adequate level of data protection (and you may have a right to ask Us for a copy of these clauses by contacting us as set out below) and/or (ii) relying on your consent (where permitted by law).

8. YOUR RIGHTS

Depending on your jurisdiction, you may have the following rights, in accordance with the applicable data protection laws:

- (a) To withdraw consent at any time, if We are processing your Personal Data on the basis of consent,
- (b) To access and/or update the Personal Data that Galderma holds about you,
- (c) To request that Galderma rectify or erase your Personal Data,
- (d) To request that Galderma restrict the way it processes your Personal Data,
- (e) To object to the way Galderma processes your Personal Data,
- (f) To transfer your Personal Data either back to you or to another individual or entity, and
- (g) To express your point of view in the event of any individual decision having a significant impact on you being made by automated means about you and to request that such automated decision be reviewed by a human.

If you wish to exercise one of these rights, you may send an email at privacy.office@galderma.com, or write at the Galderma entity that processes your Personal Data or at the Galderma Headquarters, at Galderma SA, Zählerweg 10, 6300 Zug, Switzerland.

We will require appropriate evidence of your identity or to be provided with additional relevant Personal Data based on your relationship with us before We are able to act on your request in circumstances where the Personal Data, We have in our systems is insufficient detail to identify you or reply to your request. If you are submitting a request on behalf of someone else, it may be necessary that We verify your authority to submit such a request. You may therefore be asked to provide signed confirmation that you are permitted by the data subject or by law to submit such request.

If We do not satisfy your request, depending on your jurisdiction, you may also have the right to lodge a complaint with a data protection authority in your country of residence. If you are based in the EU/EEA, the competent Data Protection Authority's contact details may be found [here](#). If you are based in the UK, you may contact ICO [here](#). If you are based in Switzerland, you may contact FDPIC [here](#). If you are based in Canada, you may contact the Office of the Privacy Commissioner of Canada [here](#) or the applicable provincial privacy commissioner.

We will be processing your Personal Data, as provided directly from you or your authorized representative while exercising your right for the purpose of receiving, processing, responding, and managing in general your request. Particularly, all Personal Data collected while exercising your right will be collected, processed, and held by OneTrust LLC - 1200 Abernathy Rd NE, Atlanta, GA 30328, U.S.A., as data processor, for and on behalf and under the instructions of Galderma, as data controller.

If you are based in the US, please visit our [US Privacy Notice](#) to learn how to exercise your privacy rights.

9. CHANGES TO THIS NOTICE

If We change the way We handle your Personal Data, We will update this Notice. We reserve the right to make changes to our practices and this Notice at any time, please check back frequently to see any updates or changes to our Notice.

10. DATA CONTROLLERS & CONTACT

To ask questions or make comments on this Notice and our privacy practices or to make a complaint about our compliance with applicable privacy laws, please contact our Group Data Protection Officer at: privacy.office@galderma.com or in writing to Galderma SA, Rue d'Entre-deux-Villes 10, 1814 La Tour-de-Peilz Switzerland or write to the relevant Galderma entity in your country of residence.

Please also note that We have designated as our EU Representative pursuant to Article 27 of the GDPR the Swedish Company named Q-MED AB, whose contact details are the following:

Q-MED AB

Seminariegaten 21, 75228, Uppsala, Sweden

Email: DataProtection.SEUPP@galderma.com

We will acknowledge and investigate any complaint about the way We manage Personal Data (including a complaint that We have breached your rights under applicable privacy laws).

Last updated: December 12, 2023