

**PRIVACY NOTICE FOR HEALTHCARE PROFESSIONALS
PARTICIPATION IN THE PRECEPTORSHIP PROGRAM ENTITLED
“Redefining HNSCC: from treatment to integrated care”**

The purpose of this notice (hereinafter: the “Notice”) is to explain how **MSD Pharma Hungary Kft.** (registered seat: 1095 Budapest, Lechner Ödön fasor 10/B.; company registration number: 01-09-903998; website: www.msd.hu ; hereinafter: “**MSD**” or the “**Controller**”) processes your personal data as a healthcare professional in connection with the preceptorship program entitled “Redefining HNSCC: from treatment to integrated care” organized by MSD (hereinafter: “**Event**”), and how it ensures the security of such personal data. In connection with the Event, MSD uses the services of **PR-ego Kft.** (registered seat: 1065 Budapest, Nagymező utca 3., 5th floor, door 8; company registration number: 01-09-983928; hereinafter: the “**Partner**”) for the operation of the registration platform, the sending of reminder emails, and the making of image and audio recordings at the Event. The Partner acts as a data processor.

The Controller processes personal data in accordance with the laws in force from time to time, including the provisions of the General Data Protection Regulation of the European Union (hereinafter: “**GDPR**”), as well as the Controller’s corporate policies and procedures. The Controller takes all measures reasonably expected to protect personal data, implements the necessary technical and organizational measures, and establishes procedural rules to prevent unauthorized access to, disclosure, unauthorized alteration and erasure of personal data.

1. PURPOSES OF PROCESSING

1.1. Ensuring that only healthcare professionals may participate in the Event

The purpose of the processing under this section is to enable MSD, in compliance with Act XCVIII of 2006 on the General Provisions Relating to the Safe and Economical Supply of Medicinal Products and Medical Aids and the Distribution of Medicinal Products (hereinafter: “**Drug Economy Act**”), as well as the applicable ethical rules, in particular the Code of Ethics for Pharmaceutical Communication (hereinafter: “**Code of Ethics**”), to verify your eligibility to participate in the Event, that is, to confirm that you are a physician or healthcare professional.

For the purpose of establishing your eligibility, MSD is entitled to compare the data provided by you in this context with data public on grounds of public interest available in the public database of the National Directorate General for Hospitals, and with any other database lawfully held by MSD or searchable by MSD.

1.2. Registration for and participation in the Event

The purpose of the processing under this section is to enable MSD to register you for the Event and, where necessary, to arrange accommodation for you and provide catering corresponding to any special dietary requirements you may have.

1.3. Making video recordings of the Event

Image and audio recordings will be made at the Event for the purpose of recording the professional content of the Event and using it for scientific purposes and for internal corporate information purposes. The persons appearing in these recordings will primarily be the speakers of the Event. As a participant of the Event, you will only be specifically recorded if you have given your separate express consent; however, you may appear as part of a crowd scene, in accordance with Section 2:48(2) of Act V of 2013 on the Civil Code.

1.4. Processing related to possible adverse event reporting

The purpose of the processing under this section is to enable the investigation of any adverse event report concerning medicinal product adverse reaction(s) that you may bring to MSD’s attention during your participation in the Event, for example in the form of a question. The following privacy notice applies to processing carried out in this context: [Privacy Notice For Adverse Events](#)

2. CATEGORIES OF PERSONAL DATA PROCESSED

2.1. Ensuring that only healthcare professionals may participate in the Event

In order to achieve the processing purpose detailed in Section 1.1 of this Notice, MSD intends to process the following personal data relating to you:

(a) name, that is, surname and first name; (b) registration number / medical stamp number.

2.2. Registration for and participation in the Event

In order to achieve the processing purpose detailed in Section 1.2 of this Notice, MSD intends to process the following personal data relating to you:

(a) name, that is, surname and first name; (b) registration number / medical stamp number; (c) your email address; (d) your need for accommodation; (e) your special dietary requirement, if any.

2.3. Making video recordings of the Event

In order to achieve the processing purpose detailed in Section 1.3 of this Notice, MSD intends to process the following personal data relating to you:

(a) your image as part of a crowd scene.

In exceptional cases, subject to your separate express consent, for example if you are invited to give a short interview and you agree, your image and audio recording may be used beyond the above, for the purpose set out in Section 1.3 above.

3. LEGAL BASIS FOR PROCESSING

3.1. Ensuring that only healthcare professionals may participate in the Event

With respect to the processing purpose set out in this section, the legal basis for processing is compliance with a legal obligation to which the Controller is subject, pursuant to Article 6(1)(c) of the GDPR, in particular compliance with Section 17(4) of the Pharmaceutical Economy Act and the provisions of the Code of Ethics.

3.2. Registration for and participation in the Event

With respect to the processing purpose set out in this section, the legal basis for processing is the legitimate interest of MSD and of the participants, pursuant to Article 6(1)(f) of the GDPR. The legitimate interest is as follows:

MSD has a legitimate interest in assessing the participants in advance so that it can prepare by ensuring appropriate accommodation and by arranging other needs arising in connection with the Event, such as seating, hygiene products, etc. In addition, the participants also have a legitimate interest in being able to participate in the Event if they intend to do so. Participation in the Event is, of course, entirely voluntary for the participants.

3.3. Making video recordings of the Event

With respect to the processing purpose set out in this section, the legal basis for processing is MSD's legitimate interest, pursuant to Article 6(1)(f) of the GDPR. The legitimate interest is as follows:

MSD has a legitimate interest in being able to use the scientific presentations delivered at the Event organized by it as widely as possible, on the one hand for scientific purposes and, on the other hand, within the company for internal purposes, such as informing employees. For this purpose, it is indispensable to record such presentations, in the course of which your image may also be recorded as part of a crowd scene. If your image or audio recording is used beyond this, such use may only take place on the basis of your separate express consent, in which case the legal basis for the processing is your consent, pursuant to Article 6(1)(a) of the GDPR.

4. DURATION OF PROCESSING

MSD processes your personal data until the expiry of the period strictly necessary for achieving the purposes specified in Section 1 of this Notice, that is, until the performance of the contract concluded with the Partner has been verified and thereafter, for example, during the period of use of the recordings made of the Event. Thereafter, the personal data will be erased without delay.

5. DATA PROCESSORS

The Controller reserves the right to amend or expand the above list of data processors as necessary, provided that you may at any time request information from the Controller concerning the identity and contact details of the data processors. The Controller undertakes to ensure that the data processors engaged by it fully comply with the applicable data protection rules in force from time to time.

6. TRANSFER OF DATA

The Controller may transfer the personal data collected by it in Hungary, in accordance with the purposes set out in this Privacy Notice, to Merck & Co., Inc. (126 East Lincoln Avenue, P.O. Box 2000, Rahway, NJ 07065, United States of America), its subsidiaries, and the Controller's other contractual partners, to countries within and outside the European Economic Area (hereinafter: the "EEA").

If your data are transferred to a country outside the EEA which the European Commission has not deemed to provide an adequate level of protection, we ensure that, in the event of a transfer to a third country, appropriate safeguards in accordance with the GDPR are in place for the processing and that effective legal remedies are available to data subjects. Intra-group transfers of personal data from the EEA to the United States of America may take place on the basis of binding corporate rules pursuant to Article 47 of the GDPR. In addition, the Controller also complies with the requirements of the so-called Data Privacy Framework Program and, where necessary, ensures the protection of personal data in all cases by appropriate contractual and other safeguards when such data are transferred to our affiliates or external partners located in other countries.

For detailed information on international data transfers, please review our Cross-Border Global Privacy Rules, available at: <https://www.msprivacy.com/hu/hun/cross-border-privacy-policy-rules/>

7. WHO MAY ACCESS YOUR DATA

Your personal data may be accessed only by the Controller's employees responsible for organizing the Event and carrying out the related compliance tasks, as well as by the data processors engaged by MSD in connection with the activity and the relevant employees of the Partner.

8. YOUR RIGHTS IN CONNECTION WITH PROCESSING

Under the applicable Hungarian and EU data protection rules, you are entitled to:

- receive confirmation/feedback as to whether your personal data are being processed and, where such processing is taking place, request access to your personal data. In this context, **you may receive information** on the following: the purposes of processing, the categories of personal data processed, and the recipients or categories of recipients to whom your personal data have been or will be disclosed (Article 15 GDPR);
- receive from the Controller a copy of your personal data;
- request the **rectification** of inaccurate personal data or the **completion** of incomplete personal data concerning you (Article 16 GDPR);
- request the **erasure** of your personal data in the cases specified in the GDPR, for example where you have withdrawn your consent to processing or the personal data are no longer necessary for achieving the processing purpose (Article 17 GDPR);
- **request the restriction** of the processing of your personal data in the cases specified in the GDPR. You may be entitled to restriction of processing if you contest the accuracy of your personal data held by MSD or object to the processing of your personal data, or if MSD processes your personal data unlawfully and you opt for restriction of processing instead of erasure. You are also entitled to request restriction of your data if MSD no longer needs your personal data, but you nevertheless require the personal data in question for the establishment, exercise or defence of legal claims. If you have requested restriction of your personal data as described above, further processing of the data concerned, beyond storage,

is only possible within the narrow scope specified in the GDPR, for example where the personal data subject to restriction are necessary for the establishment, exercise or defence of legal claims (Article 18 GDPR).

MSD may refuse your request for access or rectification if any of the following conditions applies:

- MSD does not process the data specified in the request.
- The applicant has not provided sufficient information for MSD to:
 - o verify the applicant's identity, for example if MSD only has access to pseudonymised or coded data. In this context, MSD may take all reasonable measures to establish the identity of the applicant as the data subject. MSD may forward the request and/or redirect the data subject to a person who can respond to the request;
 - o locate the personal data;
 - o determine that the personal data to which the rectification request relates are inaccurate, incomplete, misleading or not up to date.
- The burdens and costs associated with granting access are disproportionate to the risk of harm to the applicant's privacy.
- MSD cannot comply with the access request without disclosing personal data by which a person other than the applicant can also be identified.
- Another controller processes the data relating to the access request in a manner that prevents compliance with the access request.
- Granting access would:
 - o violate a court decision;
 - o result in the disclosure of confidential business information; or
 - o be subject to another law governing access to the personal data in question.

The Controller makes every effort to comply with requests relating to processing. However, under the GDPR, the Controller may be entitled to refuse the erasure of data that are strictly necessary for compliance with legal obligations incumbent on the Controller or for the enforcement of the Controller's legitimate interests.

9. RIGHT TO OBJECT

In addition to the rights set out in the previous section, under Article 21 of the GDPR you are also entitled, in the cases specified in the GDPR, for example where processing is carried out for direct marketing purposes or where the legal basis for processing is the legitimate interest of MSD and/or third parties, to object to the processing of your personal data. In the event of your objection, MSD may no longer process your personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms, or which are related to the establishment, exercise or defense of legal claims.

10. RIGHT TO LODGE A COMPLAINT AND TO SEEK JUDICIAL REMEDY

Please be informed that if you become aware of an infringement of your rights during processing, the following options are available to you:

- you may contact the Controller directly or the Controller's data protection officer at any of the contact details set out in Section 12;
- you may lodge a complaint with any supervisory authority, for example in Hungary with the Hungarian National Authority for Data Protection and Freedom of Information (hereinafter: "NAIH"). The contact details of the NAIH are as follows: registered seat: H-1055 Budapest, Falk Miksa utca 9–11.; mailing address: 1363 Budapest, P.O. Box 9; telephone: +36-1-391-1400; email: ugyfelszolgalat@naih.hu;
- you may bring court proceedings in the event of unlawful processing of your personal data or a breach of data security requirements. As provided by law, you may be entitled to compensation and to damages for non-material harm. Information on the jurisdiction and contact details of the courts is available at: www.birosag.hu .

In order to resolve any problems or comments concerning processing as quickly and efficiently as possible, we recommend that you first contact us with any enquiry relating to data processing.

11. SECURITY OF YOUR PERSONAL DATA

MSD takes all measures reasonably expected of it in order to ensure the protection of your personal data at the highest possible level, and in this context implements all necessary technical and organizational measures and establishes procedural rules to prevent unauthorized access to, disclosure, unauthorized alteration or erasure of personal data processed by MSD.

In connection with the above, throughout the entire processing process carried out by it, MSD:

- has established and applies data security procedures and control mechanisms proportionate to the security risk posed by the given processing operation and to the sensitivity of the personal data;
- when developing the above mechanisms, acted with regard to the current state of technology and “best practice”, including the costs of implementation; and
- in order to ensure data security safeguards, also applies the following procedures and related technical background:
 - o ensuring business continuity and recoverability of data;
 - o implementing appropriate encryption measures and measures restricting access to data;
 - o preventing and managing personal data breaches;
 - o guaranteeing the security of online access to data;
 - o guaranteeing the security of physical access to devices and documents containing data;
 - o continuous risk assessment and risk management relating to processing.

12. OUR CONTACT DETAILS

If you wish to exercise the above rights, or if you have any questions or comments regarding this Privacy Notice or the processing carried out by us in general, please visit the website of the MSD group of companies containing our privacy commitments towards you, available at <https://www.msdprivacy.com/hu/hun/index.html> , or contact us at one of the following contact details:

1. Controller

Name: MSD Pharma Hungary Kft.

Address: 1095 Budapest, Lechner Ödön fasor 10/B.

Email address: hungary_msd@msd.com

Telephone number: +36-1-888-5300

2. Data Protection Officer of the Controller

Email address: dpo_hungary@msd.com

Please be informed that the Controller can provide only general information by telephone. Please submit any further specific requests in writing or by email so that your identity can be verified if necessary. Accordingly, the Controller is entitled to request additional data from you in order to verify your identity.