

Eisai Privacy Statement

Eisai B.V (“Eisai” or “we”) is located at Strawinskylaan 1141, Toren C, 11e, 1077 XX Amsterdam, The Netherlands.

This privacy statement is an important document which explains how we collect and use any personal data. Please select the relevant option from the list below to read the applicable privacy statement which will explain how we will use your personal data.

- [I am applying for a job at Eisai](#)
- [I am a healthcare professional \(“HCP”\)](#)
- [I am a supplier of goods or services to Eisai](#)
- [I am using this website](#)
- [I work for Eisai](#)
- [I am a patient in an Eisai sponsored clinical study](#)
- [I am a patient or other member of the public contacting Eisai about an Eisai product](#)
- [I am a patient speaker or have been invited to speak at an Eisai event or am participating in an Eisai video](#)
- [I am in contact with Eisai about a volunteering activity \(*hhc* activity\)](#)

If you have any queries about how Eisai handles your personal data which are not covered by this privacy statement please contact Data_Protection_EMEA@Eisai.net.

1.1 I am applying for a job at Eisai

This section applies if you are applying for a job at Eisai.

1.1.1 When do we collect information about you?

We collect information about you when you provide your contact details to us or send us your CV or you apply via a recruitment agency or an existing staff member refers you for a position. We may sometimes collect additional information from third parties including former employers, or other background check agencies.

1.1.2 What information do we collect about you?

We only collect information that is relevant for recruitment purposes and this may include:

- Home address, postcode, contact number(s) and email address
- Work contact number(s) and email address
- Date of birth
- Work history of current and previous employers, job titles, job duties, dates of employment, reason for leaving previous employment
- Academic qualifications and professional memberships
- Passport and work permit and/or visa information
- Photograph(s)
- Current salary, current employment benefits and notice period
- Your professional training history and training plans
- Notes from our face-to-face, video or telephone interviews with you
- Results from any psychometric and other tests undertaken as part of the recruitment process
- Results from checks performed as part of the recruitment process,
- Employment or character references
- Driving licence details
- Information about your visits to our website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths)(please see 'I am using this website')
- Any other data that you provide in connection with the recruitment process

If you do not want to provide any of the information we are requesting, please inform the recruitment agency or Eisai contact you are working with. Alternatively please contact the Eisai Data Protection Officer and Eisai Data Protection Team by using the contact details given below.

1.1.3 How do we use your personal data?

The information we collect from you will only be used to consider your application and ascertain your suitability for the role you are applying for. It will also be used to comply with relevant laws. It may also be used to manage and administer an offer of employment or a contract.

The legal bases we rely on to process your personal data are to comply with our obligations under relevant laws (such as making any reasonable adjustments to enable you to attend an interview) and the legitimate interests of Eisai; specifically, Eisai's legitimate interest in recruiting staff for its business and reviewing and improving usage of this website. Please inform us if there is any reason why you are unable to provide certain information that is requested from during the recruitment process. Please

note that it may not be possible to progress your application if you do not agree to provide certain information,

1.1.4 How long we keep your data

If you are applying for a specific role, we will keep your data for 12 months after the end of the financial year that you applied (the Eisai financial year ends on 31st March). For example, if you applied for a role in May 2019, we will keep your data for 12 months from 1 April 2020.

If you submit a job application or make a general career inquiry through this website please see 1.4 below for information regarding how long we keep your information about your visits to our website.

If you are offered employment or a contract role, we will keep your personal data in line with the privacy policy applicable for employees and other Eisai staff (which can be viewed by selecting the hyperlink above).

[Please click this link to read about your rights, sharing your data, changes to this privacy statement and how to contact us.](#)

1.2 I am a healthcare professional (“HCP”)

This section applies if you are an HCP.

1.2.1 When do we collect information about you?

We collect information about you if you:

- Interact with Eisai staff members or our representatives;
- Register your interest in, and/or participate in, events organised or sponsored by Eisai such as advisory boards, symposia and conferences;
- Provide consultancy services to Eisai;
- Participate in clinical trials sponsored by Eisai; and/or
- Contact us to request medical information, or to report potential safety or quality issues, relating to any Eisai product.

1.2.2 What information do we collect about you?

We only collect information that is relevant for the purposes given in 1.2.1 and this may include:

- Your name;
- Your contact information such as your address, email or telephone number;
- Your curriculum vitae and professional information such as areas of medical specialisation, presentations given, events attended and publications produced;
- Your past collaboration(s) with Eisai;
- Information you provide us with (eg about how you use and your experience of using Eisai products in your medical work/ practise with patients, or when making a medical information enquiry);
- Dates and brief summary of your interactions with Eisai’s sales representatives or medical staff; and
- Financial and banking information, but only if necessary to pay you for services provided to Eisai or to reimburse your agreed expenses incurred in providing services on Eisai’s behalf.

If you do not want to provide any of the information we are requesting, please inform the relevant Eisai contact you are working with, or contact the Eisai Data Protection Officer and Eisai Data Protection Team by using the contact details given below.

1.2.3 How do we use your personal data?

The information we collect from you will only be used to:

- Provide you with the information you have requested or to otherwise respond to your enquiry;
 - Comply with Eisai’s obligations under the applicable law or code of practice covering transparency disclosure and which implements the EFPIA disclosure code, such as disclosing any payment or other transfer of value made to you;
 - Comply with Eisai’s legal obligations in relation to the reporting of safety and/ or quality issues relating to Eisai products;
 - To discuss the use of Eisai products on your patients;
 - Perform any contract with you, including to pay you any agreed consultancy service fee or honorarium and reimburse any agreed expenses, and book any required travel and accommodation;
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- Inform our business development strategies and improve how Eisai communicates with you;
- Consider your potential involvement in Eisai's future activities; and/or
- Contact you to invite you to and/ or seek your involvement in events organised or sponsored by Eisai that may be of interest to you.

The legal bases we rely on to process your personal data are, as applicable, compliance with a legal obligation (in relation to the reporting of safety and quality issues), performance of a contract (in relation to any contract that you have with Eisai), any consents you have provided (such as for disclosing any transfer of value made to you) and the legitimate business interests of Eisai (to determine your potential involvement in future activities, to inform Eisai's business strategy, and to communicate with you in relation to relevant Eisai activities).

1.2.4 How long we keep your data

If you are presenting in an event organised by Eisai, we will keep your data for the longer of the prescribed retention period given in the applicable law or code of practice covering transparency disclosure or the prescribed retention period given in the applicable financial legislation governing how long Eisai is required to retain financial records for tax purposes. If you have been involved in a clinical trial sponsored by Eisai, we will keep your data for 25 years after the clinical trial has ended to comply with Eisai's obligations under clinical trials legislation. If you contact us to request medical information, a copy of your request and Eisai's response will be retained for 15 years from the date of your request. If you contacted us about a medical or safety issue about an Eisai product we will keep your data for 15 years after any marketing authorisation for the product has lapsed as required by applicable laws.

[Please click this link to read about your rights, sharing your data, changes to this privacy statement and how to contact us.](#)

1.3 I am a supplier of goods or services to Eisai

This section applies if you are or your company is, offering to supply, will supply or are/is supplying, goods and / or services to Eisai.

1.3.1 When do we collect information about you?

We collect information about you when:

- You contact us to offer to supply goods or services to Eisai;
- We request you to supply goods or services to Eisai; or
- You contact us to supply goods or services to Eisai.

1.3.2 What information do we collect about you?

We only collect data that is relevant for purposes given in 1.3.1 and this may include:

- Your name and names of any staff working for you or your company;
- Your contact information such as address, email or telephone number;
- Background checks;
- Your past contacts with Eisai; and
- Financial and banking information.

If you do not want to provide any of the information we are requesting, please inform the relevant Eisai contact you are working with, or contact the Eisai Data Protection Officer and Eisai Data Protection Team by using the contact details given below.

1.3.3 How do we use your personal data?

The information we collect from you will only be used to:

- Evaluate your suitability to supply goods or services for Eisai;
- To comply with our legal obligations, including obligations under anti-bribery legislation and any other applicable laws;
- To comply with Eisai's commitments under international programmes such as the United Nations General Compact;
- To make payments to you for the goods and/ or services provided in accordance with the contract you have with Eisai; and/or
- To perform the contract we have with you for the goods and/ or services.

The legal bases we rely on to process your personal data are, as applicable, compliance with legal obligations, and performance of the contract we have with you (to assess your suitability in relation to goods or services offered, prior to entering into the contract, and to perform the contract, including to make payment for goods or services provided under the contract), and the legitimate business interests of Eisai (to assess your suitability for the provision of goods or services in relation to future business needs).

1.3.4 How long we keep your data

If you have supplied goods and/ or services to Eisai, we will retain your data for 7 years from the date of the last communication under the contract. If you have contacted Eisai for any other reason in connection with the provision of goods and/ or services, we will retain your data for 7 years from the date of the last contact. Details of any payments made to you by Eisai in connection with goods and /or

services that you have supplied to Eisai will be kept for 15 years after the year end of the financial year in which the last payment of/ for those goods and/ or services was made, in order to meet Eisai's legal obligations across the EMEA region for accounting purposes.

[Please click this link to read about your rights, sharing your data, changes to this privacy statement and how to contact us.](#)

1.4 I am using this website

This section applies if you are using this website.

1.4.1 When do we collect information about you?

We collect information about you when:

- You access this website;
- You complete an online job application or make a general career enquiry (please also see 1.1 above);
- You contact us or provide information via this website.

1.4.2 What information do we collect about you?

We only collect data that is relevant for purposes given in 1.4.1 above and this may include:

- Your name;
- Your contact information such as address, email or telephone number;
- Your current salary, notice period and current location;
- Information about your visits to our website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths); and
- Any other information that you may provide when contacting us through this website.

1.4.3 Cookies

This website uses cookies. A cookie is a small file of letters and numbers which is downloaded onto your computer when you access and proceed to use this website. The cookies used on this website are “analytical” cookies.

The analytical cookies collect information from our website visitors to enable us to count the number of visitors to this website and to see how visitors use the website; this helps us to improve the way that our website works. The analytical cookies used on this website are non-intrusive and collect only anonymous information.

1.4.4 How do we use your personal data?

The information we collect from you will only be used to:

- Count the number of visitors to this website, to see how visitors use the website and to help us to improve our website;
- Provide you with the information you requested; and
- Progress a job application or general career enquiry made by you (If you submit a job application or make a general career inquiry please see 1.1.3 above).

The legal bases we rely on to process your personal data are the legitimate interests of Eisai; specifically, Eisai’s legitimate interests in reviewing and improving usage of this website, and responding to contacts made by website users.

1.4.5 How long we keep your data

If you submit a job application or make a general career inquiry please see 0 above. Information about your visit and general enquiries will be retained for 6 years from the date of your visit or request. Information in any analytical cookies will be retained for 14 months.

[Please click this link to read about your rights, sharing your data, changes to this privacy statement and how to contact us.](#)

1.5 I work for Eisai

This section applies if you are employed by, or working for Eisai, including permanent and fixed term employees, contractors, consultants or agency workers.

1.5.1 When do we collect information about you?

We collect information about you when:

- You are employed by Eisai as a permanent or fixed term employee; or
- You have agreed to provide services to Eisai as a contractor, consultant or agency worker.

1.5.2 What information do we collect about you?

We only collect data that is relevant for employment purposes and may include:

- Name, home address, postcode, contact number(s) and email address
- Date and place of birth
- Work history of current and previous employers, job titles, job duties, dates of employment
- Academic qualifications and professional memberships
- Passport and work visa information (including birth certificate in absence of passport)
- Photograph(s)
- Current salary, current employment benefits and notice period
- Your professional training history and training plans
- Notes from our face-to-face, video or telephone interviews with you
- Results from any psychometric tests undertaken as part of the recruitment process
- Results from checks performed as part of the recruitment process,
- Employment or character references
- Driving licence details (depending on band or role type)
- Marital Status
- Next of kin and dependents
- Vehicle registration number (s)
- CCTV images and details of your visits to Eisai building(s)
- Bank account details
- Business travel details
- Records from internal investigations, disciplinary and grievance processes
- Performance and Appraisal information
- Gender
- Any other data that you provide

We may also collect data related to your attendance and/ or assistance at Eisai events, including photographs of you at these events, and related to your work at Eisai.

1.5.3 How do we use your personal data?

The information we collect from you will be used to comply with relevant laws. It may also be used to manage, facilitate and administer staff employment contacts and business operations at Eisai.

Personal data related to your attendance and/ or assistance at Eisai events, including photographs of you at these events, and related to your work at Eisai may also be used for internal communications within Eisai.

The legal bases we rely on to process your personal data is to comply with our legal obligations (including our legal obligations as an employer under employment laws), to perform your employment contract, in connection with assessments of the working capacity of employees, with your consent in connection with optional employment related benefits and the legitimate interest of Eisai; specifically, Eisai's legitimate interest in administering and managing its workforce.

1.5.4 How long we keep your data

All data held by HR in HR files will be kept for a period of 7 years following termination of employment / engagement.

[Please click this link to read about your rights, sharing your data, changes to this privacy statement and how to contact us.](#)

1.6 I am a patient in an Eisai sponsored clinical study

This section applies if you are a patient in an Eisai sponsored clinical study. You will also be provided detailed information in an Informed Consent Form/ Patient Information Sheet (ICF), which you should sign before you participate in a clinical study.

1.6.1 When do we collect information about you?

We collect information about you when you participate in an Eisai sponsored clinical study.

1.6.2 What information do we collect about you?

We only collect information that is relevant to the Eisai sponsored clinical study. The investigator site (hospital/clinic) conducting the clinical study may collect the following on Eisai's behalf:

- Name, address, contact number(s) and email address
- Gender
- Date of birth (if permitted in your country) and age
- Ethnic origin
- Health conditions
- Height and weight
- Medical history, procedures, test results, and other health data collected about your taking part in the study

To ensure privacy and the scientific integrity of the clinical study, your name and address will not be disclosed outside the clinic/hospital and you will only be identified by a code. This code will be attached to records or samples released to the Sponsor and the service providers associated with the clinical study. Only the study doctor and authorised persons will be able to connect this code to your name by means of a list.

1.6.3 How do we use your personal data?

The information we collect from you will only be used for the clinical study purposes and will be explained to you in detailed in the ICF.

Any of your medical records and the data collected for the clinical study may be looked at by:

- Authorised persons from the Sponsor and/or the company organising the research and/or their associated companies; and/or
- Monitors, auditors, representatives from laboratories, and other legitimate third party contractors or consultants who are helping the Sponsor; and/or
- Representatives from health/regulatory authorities such as the United States Food and Drug Administration (FDA); and/or
- Ethics committees to check that the study is being carried out correctly.

The legal basis we rely on to process your personal data is either:

- Consent from you
 - Eisai's legitimate interests (to conduct scientific research into the efficacy and safety of pharmaceutical products/ study drugs);
 - Compliance with a legal obligation (under Clinical Trial laws and in relation to the reporting of safety and quality issues);
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- Necessary for reasons of public interest in the area of public health such as ensuring the high standards of quality and safety of medicinal products (in relation to the reporting of safety and quality issues);and
- Scientific research.

1.6.4 How long we keep your data

All personal data collected about you during this study (other than samples) will be stored for at least 25 years. Samples may be stored for testing for up to 15 years after the completion of the study, or until the sample is gone (if before).

[Please click this link to read about your rights, sharing your data, changes to this privacy statement and how to contact us.](#)

1.7 I am a patient or other member of the public contacting Eisai about an Eisai product

This section applies if you are a patient or other member of the public. If you are a healthcare professional, please see [I am a healthcare professional \(“HCP”\)](#) section.

1.7.1 When do we collect information about you?

We collect information about you if you:

- contact us to request medical information, or to report potential safety or quality issues, relating to any Eisai product.

Please note that Eisai cannot provide medical advice to members of the public and we will direct you to your healthcare professional for medical advice and guidance. Medical Information can provide factual information that is available in the Patient Information Leaflet (PIL) to members of the public if this is relevant to your question.

1.7.2 What information do we collect about you?

We only collect information that is relevant for purposes given in 1.9.1 and this may include:

- Your name;
- Your contact information such as your address, email or telephone number;
- Details of your request for medical information about an Eisai product;
- Details of the potential safety or quality issue about an Eisai product that you are reporting;
- Information about you or the other person who has taken the product (if reporting a potential safety issue), including age, sex, health condition, and the contact details of the healthcare professional who prescribed the product.

1.7.3 How do we use your personal data?

The information we collect from you will only be used to:

- Respond to your request for medical advice by directing you to contact your healthcare professional;
- Respond to your request for medical information by providing factual information that is available in the PIL if this is relevant to your question;
- Comply with Eisai’s legal obligations in relation to the reporting of safety or quality issues relating to Eisai products.

The legal bases we rely on to process your personal data are, as applicable, the legitimate business interests of Eisai (in relation to responding to requests for medical information), compliance with a legal obligation (in relation to the reporting of safety and quality issues) and [necessary for reasons of public interest in the area of public health such as ensuring the high standards of quality and safety of medicinal products](#) (in relation to the reporting of safety and quality issues).

1.7.4 How long we keep your data

If you contact us to request medical information, a copy of your request and Eisai’s response will be retained for 15 years from the date of your request. If you contacted us about a medical or safety issue about an Eisai product we will keep your data for 15 years after any marketing authorisation for the product has lapsed as required by applicable laws.

[Please click this link to read about your rights, sharing your data, changes to this privacy statement and how to contact us.](#)

1.8 I am a patient speaker or have been invited to speak at an Eisai event or am participating in an Eisai video

This section applies if you are a patient speaker or have been invited to speak at an Eisai event or are participating in an Eisai video.

1.8.1 When do we collect information about you?

We collect information about you if you:

- Interact with Eisai staff members or our representatives;
- Register your interest in, and/or participate in, events organised or sponsored by Eisai;
- Are a patient speaker who shares your experience and your condition at an Eisai organised event such as an *hbc* event;
- Agree to speak at an Eisai organised event such as employee benefit fair;
- Participate in an Eisai video or any other material.

1.8.2 What information do we collect about you?

We only collect information that is relevant for purposes given in 1.8.1 and this may include:

- Your name;
- Your contact information such as your address, email or telephone number;
- Details of your health, family members or any other information that you voluntarily share or make available to Eisai.

1.8.3 How do we use your personal data?

The information we collect from you will only be used to:

- Facilitate your visit and access to the Eisai event and assist you with giving your presentation;
- Facilitate the recording of a video that you are participating in;
- Facilitate the production of materials in relation to the event that you are participating in (e.g. by taking photographs).

The legal bases we rely on to process your personal data are consent, to perform any contract with you and for the purposes of the legitimate interest of Eisai; specifically, Eisai's legitimate interest in administering its *hbc* programme.

1.8.4 How long we keep your data

We will keep your information for 2 years from the date you give your presentation. If you participate in an Eisai video or other material, we will keep this information for 6 years from the date of publication or any other time that we agree with you.

[Please click this link to read about your rights, sharing your data, changes to this privacy statement and how to contact us](#)

1.9 I am in contact with Eisai about a volunteering activity (*hhc* activity)

This section applies if you are in contact with Eisai for any *hhc* activity in connection with Eisai's human healthcare (*hhc*) mission.

1.9.1 When do we collect information about you?

We collect information about you when we are in contact with you in relation to an *hhc* activity.

1.9.2 What information do we collect about you?

We only collect information that is relevant for the purposes of the *hhc* activity and this may include:

- Name, address, contact number(s) and email address
- Date of contact
- Details of the requests
- Any other information necessary to run or consider the *hhc* activity, and any contract we have for the *hhc* activity

1.9.3 How do we use your personal data?

The information we collect from you will only be used to enable our employees to provide the *hhc* activity.

The legal bases we rely on to process your personal data are to perform any contract with you and for the purposes of the legitimate interest of Eisai; specifically, Eisai's legitimate interest in administering its *hhc* projects and compliance with Eisai's obligations under applicable pharmaceutical codes of practice (such as for disclosing any transfer of value made to you).

1.9.4 How long we keep your data

We will keep your information for 6 years from the date of the request.

[Please click this link to read about your rights, sharing your data, changes to this privacy statement and how to contact us.](#)

2 Rights, sharing your data, changes to this privacy statement and how to contact us

2.1 What are your rights?

In respect of the personal data that we have collected about you, you have the right, in certain circumstances, to:

1. Request access to this personal data,
2. Request the correction of this personal data,
3. Request the erasure of this personal data,
4. Request that we restrict how we process this personal data,
5. Object to how we process this personal data, and
6. Request a copy of the personal data you have provided to Eisai in an electronic format.

We will consider any such request made in accordance with applicable data protection laws. However, please note that there may be a legal or other valid reason why Eisai may not be able to process your request in whole or in part.

Where you have requested that we delete your personal data, we will either delete or anonymise this personal data. Where it is not possible for us to delete or anonymise your personal data we will take steps to put the personal data beyond use where it will be securely stored until such time as we are able to delete or anonymise it.

You can also withdraw your consent to the processing of your personal data at any time but this will not affect the lawfulness of the processing before that time.

You have a right to complain to the Dutch Data Protection Authority if you are not satisfied with the way we are handling your data. You can write, email or call the Dutch Data Protection Authority by visiting their “contact us” page via this link:

<https://autoriteitpersoonsgegevens.nl/en/contact-dutch-dpa/contact-us>

If you would like to make a request to access, correct or delete the personal data we have collected about you, please send an email to Data_Protection_EMEA@Eisai.net.

2.2 Who do we share your data with?

We may share your data with:

- Authorised teams and individuals within Eisai;
 - Other entities in the Eisai group (also see 2.3 below);
 - Third-party suppliers or potential suppliers who provide related services or business systems used by to Eisai to securely process your data;
 - Our regulators and/ or any other competent authority who have powers to request disclosure of personal information we hold;
 - the Vereniging Innovatieve Geneesmiddelen Nederland when disclosing any payment or other transfer of value made to a healthcare professional;
 - Professional advisors;
 - Pharmaceutical companies with whom Eisai has a co-promotion/ co-marketing relationship;
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- A purchaser or potential purchaser of any business or asset that we are selling (or are contemplating selling); and/or
- Third parties where required by law.

2.3 Sharing your data outside the European Economic Area (EEA)

Personal data we collect from you may be transferred to countries outside the EEA where Eisai has operations. As an international organisation Eisai operates in a number of countries including Japan and USA.

We also use third party suppliers to provide a number of business tools, including the tools that we use for recruitment, human resource management, procurement, finance, clinical trial service providers and we share your personal data with these third party service providers. Some of these providers may be outside the EEA.

Some countries outside the EEA may not have a data protection supervisory authority and/ or data processing principles and/ or data subject rights might not be provided for in that country, so you might not be able to enforce your rights in the same way, and recipient organisations may not be legally required to secure your data to EU standards. Eisai shall take all necessary steps to ensure that your personal data is protected in such circumstances.

We maintain processes to ensure that any third party we are using and who will process your data, including other Eisai entities, will comply with same standards to protect your data as in the EEA. This includes carrying out necessary due diligence on such third parties (for example, the security measures they have in place for protecting data), and entering into contracts which contain adequate contractual measures to protect data, which can include contracting on standard contractual clauses which have been approved by EU authorities as providing adequate protection for your personal data.

2.4 Changes to this privacy statement

This privacy statement may be updated by Eisai from time to time; please contact the Eisai Data Protection Officer and Eisai Data Protection Team by using the contact details given for the below to view the latest version.

2.5 How to contact us

You can contact Eisai's Data Protection Officer and Data Protection Team by using the email address Data_Protection_EMEA@Eisai.net or by writing to the address given above.
