



Sandoz HAcK – Healthcare Access Challenge

Leveraging digital technologies to solve healthcare access challenges

Privacy Policy

This Privacy Policy describes how we collect, store, use, disclose and otherwise process your Personal Data when you participate in the competition “Sandoz HAcK” (the “Competition”) hosted on the website: www.sandoz.com (the “Website”). For further information on the Competition please read the [Terms & Conditions](#) for the Competition (the “T & Cs”). Please read this Privacy Policy carefully, as it sets out how we process your Personal Data and further explains your rights as a data subject and our obligations.

1. Data controller, data protection office and contact data

1.1 For the purpose of this Privacy Policy, “Sandoz” refers to SANDOZ INTERNATIONAL GmbH, Industriestrasse 25, 83607 Holzkirchen, Germany. Sandoz is responsible for processing your Personal Data, thereby acting as the “controller” of your Personal Data. Sandoz is part of the worldwide Novartis group (hereinafter “Novartis”) and may exercise this responsibility alone or jointly with other companies in the Novartis group (acting as a “co-controller”). In this Privacy Policy, “we” or “us” refers to Sandoz.

1.2 Our data protection officer can be reached under the above mentioned address and under datenschutz@novartis.com.

2. What is personal data

Personal Data means any information relating to you, provided that you can be identified or are identifiable (directly or indirectly) with such information (the “Personal Data”). For example, Personal Data includes your name, address, phone, fax or mobile phone number as well as your e-mail address.

3. What types of personal data we process

When you register for the Competition, you are asked to provide information such as your name, personal email, private phone, country of residence and supporting assets regarding your idea, such as imagery. Some details are mandatory and marked as such otherwise they are optional. If you do not provide us with mandatory information, you may not be able to participate in this Competition.

4. Purpose and legal basis for processing

4.1 We process your Personal Data for marketing purposes and in order to manage your participation in the Competition in accordance with our T & Cs, in particular with regard to, (a) promoting this year’s competition and its outcomes, as well as future competitions on the Website and on Sandoz’s social channels (b) selecting the candidates, offering mentoring, judging and reviewing the proposals by internal representatives of the Novartis and external experts; (c) announcement of the winners on the Website; (d) communicating with you regarding the Competition; and (e) – in case of you being one of the finalists’ – organization of the accelerator program, as defined in the T & Cs.

4.2 The legal basis for such processing is Art. 6 para. 1 sent. 1 lit. b GDPR.

5. Transfer of personal data, safeguards

5.1 We will not sell, share, or otherwise distribute your Personal Data to third parties except as provided in this Privacy Policy.

Within the course of your participation in the Competition, Sandoz may also transfer your Personal Data to its affiliates and the worldwide Novartis Group of companies for the purposes of selecting the candidates, offering mentoring and judging the proposals. A list of our offices is available here: <https://www.novartis.com/our-company/contact-us/office-locations>.

Personal Data may also be transferred to third parties who act on our behalf including, external judges nominated for this Competition, supporting communications agency Interpublic Group, New York, 1114 Avenue of the Americas, New York, NY 10036, United States (“IPG”), Sandoz’s travel agency Carlson Wagonlit Travel Global B.V., Netherlands (“CWT”) and our external event organizers, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed, such as services delivery, marketing, data management, or technical support. These third parties have contracted with us to only use Personal Data for the agreed upon purpose, and not to sell your Personal Data to third parties, and not to disclose it to third parties except as may be permitted by us, as required by law, or as stated in this Privacy Policy. In particular, we use external service providers for the following purposes in the framework of managing the Competition: communications activities, booking travel and accommodation.

Also, Personal Data may be disclosed to a third party if we are required to do so because of applicable laws, court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding here or abroad.

5.2 If we transfer your personal data to external companies outside the European Economic Area (“EEA”) in the absence on an adequacy decision by the European Commission, we will implement appropriate safeguards in order to protect your Personal Data by applying the level of protection required under applicable data privacy laws. For intra-group transfers of personal data, Novartis has adopted Binding Corporate Rules, which you may access [here](#). Binding Corporate Rules constitute a system of principles, rules, and tools, provided by European law, which ensure effective levels of data protection relating to transfers of personal data outside the EEA and Switzerland.

5.3 With respect to the announcement of the shortlisted participants and winners as defined in the T & Cs please be aware that this announcement will include your name, assets shared on submission (incl. images), your idea and will be made available on social media channels, on the Website and in the Novartis intranet.

6. Storage time

The Personal Data collected in the context of this Competition will be deleted after completion of the competition, unless we need your Personal Data to comply with our legal or contractual obligations, or Art. 17 para. 3 lit. e GDPR and § 35 para. 3 Federal Data Protection Act states otherwise.

7. Your rights under data protection legislation

Depending on the circumstances of the specific case, you may have the following data protection rights:

(a) **Right of access, rectification, erasure or restriction of processing:** You have the right to obtain at any time access to your Personal Data stored by us. If we process or use your Personal Data, we shall endeavor to ensure by implementing suitable measures that your Personal Data is accurate and up-to-date for the purposes for which they were collected. If your Personal Data is inaccurate or incomplete, you have the right to obtain the rectification of such Personal Data. Furthermore, you may have the right to obtain the erasure or restriction of processing of your Personal Data, for example if no legitimate business purpose exists anymore for the data processing under this privacy policy or applicable law and the further storage is not necessary under statutory storage obligations.

(b) **Right to data portability:** You may have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format or to transmit this data to another controller.

(c) **Right to object:** If the processing of your personal data is based on Art. 6 para. 1 lit. f GDPR (processing to safeguard the legitimate interests of the controller or a third party), you have the right at any time, for reasons that arise from their particular situation, to object. We will comply with this unless there are compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or if the processing is for the purposes of asserting, exercising or

defending legal claims.

If your data is processed for direct marketing purposes, you have the right to object at any time without giving a reason.

(d) **Right to withdraw your consent:** If you have given your consent to the collection or processing of your Personal Data, you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

(e) You have the right to not be subject to a decision based solely on automated processing which produces legal effects or similarly affects you.

(f) You have the right to lodge a complaint with a supervisory authority (e.g. the competent authority at your place of residence).

If you wish to contact us regarding our use of your personal data or you wish to exercise your data privacy rights, please email us at datenschutz@novartis.com or contact us under the above mentioned address.

Date: 20 September 2018