

Privacy Notice for Animal Health Professionals

1. Organization/s responsible for data processing

MSD Animal Health GmbH
Bürgenstrasse 8
6005 Lucerne

(hereinafter “MSD” or “We”)

This Privacy Notice describes how we process the personal data of Animal Health Professionals, including veterinarians, veterinary surgeons, veterinary nurses, non-veterinary professionals associated with disciplines in animal science and nutrition, farmers and others who provide animal healthcare services in a professional capacity (hereinafter “Animal Health Professionals” or “You”), how we use personal data, and any rights you have regarding your personal data.

2. Personal data processed by us

Personal data is any information relating to you that we collect in connection with any interactions with you, such as our meetings, your participation in our training or information programs, events, your inquiries, and your communication with us. We may also process personal data that you provide to us or that results from your use of our websites or online services and those of our partners. We receive personal data from companies that provide information in the healthcare sector, sources of information open to the public, and business partners. Depending on the purpose of the data processing, we process the following personal data:

- Last name, first name
- Contact details (such as mailing address, telephone numbers, email address, fax number), language
- Data about your professional activity, including academic titles, data about your general and professional education, specialty, research activity, publications, CV, roles, connections, practices, and clinics at which you work
- Data relating to our interactions with you and use of our services
- Preferences with regard to the way you communicate with MSD, times when you can be best reached, and frequency of communication, specialty or main interest
- Service and event data: information about your participation in meetings, training, events or programs, travel or logistical details, and records of interactions with us
- Financial and bank information you provide to us, credit card number, VAT number
- Login data
- Navigation data on our websites, applications or online services or those of our partners (see our [Global Internet Privacy Policy](#) and our [Global Online Tracking Policy](#), cookies (see our Cookie Preference Center in this regard, which can be found at the bottom of our website by clicking on the “Cookie Preferences” button)

If MSD asks you to provide your personal data, you have the right to decline. If you decline to provide data required by us to either comply with legal obligations or to provide you with a requested service or to perform contractual obligations, we will not be able to provide those services or enter into a contract with you. If that is the case, we will inform you accordingly.

3. Purpose of processing

We only process your personal information where we have a suitable legal basis. Please see below a list of our business processes with the associated legal basis:

Fulfillment of our legitimate interest (art. 31 sec. 1 DPA):

- Onboarding, verification, and credential management
- Implementation, monitoring, and evaluation of our activities

- Conduct of training or information on the use of our products
- Response to your questions and other customer support management
- Satisfaction surveys, tracking of interest in the provided information, business analytics and other key account management activities
- Initiation of scientific collaboration or research measures
- Maintenance of a database to track our interactions with you, establishment of contact through our team members or electronically to inform you about our products and services, our treatment approaches and to send you information that meets your needs or interests
- Invitation to conferences, professional, scientific, or medical events or trainings, webinars
- Analysis of your preferences or your profile, to organise our business activities, providing training and information offerings, providing information of greater relevance to your specialty areas and interests, and to improve the use of our websites, platforms and services (including profiling)
- Consolidation and controlling of the finances of the MSD group companies
- Security monitoring, fraud prevention, and incident response

Fulfilment of our legal obligations (art. 31 sec. 1 DPA):

- Pharmacovigilance: monitoring and reporting adverse events, product complaints, and the safety of the use of products. Please see our [medical information and pharmacovigilance reporting privacy notice](#)
- Transparency, anti-corruption, and investigation of business relationships with unauthorized third parties to identify and prevent them
- Review of your eligibility to access certain products, services or information that may only be provided to animal healthcare professionals

Fulfilment of our contractual obligations (art. 31 sec. 2 lit. a DPA):

- Account creation and access control for our portals, platforms and applications
- Order management and fulfilment for product supply, incl. pricing, discounts, and benefits program administration
- Contracts covering products, expert opinions, presentations, projects, studies, clinical trials, consultation and initiation of the contractual relationship, contractually stipulated performances in this regard
- Implementation of projects (such as projects to optimise or monitor medical care), including creation of questionnaires, analysis of responses, and monitoring of any measures taken
- Travel management and event logistics, where travel is part of contractual obligations
- Management of your participation in medical or scientific research

Based on your consent (art. 31 sec. 1 DPA):

- Market research
- Transmission of personalised messages and newsletters and other types of direct marketing. You have the right to withdraw this consent at any time by selecting the “unsubscribe” link shown in every marketing communication you receive from us
- Personalization and profiling
- Consent based testimonials or case studies featuring you
- Tracking in our websites for non-essential cookies

4. Sharing personal data with Third parties

Depending on the purpose for which your personal data is processed, your personal data may be shared with the following categories of recipients:

- With MSD group companies in the United Kingdom, Switzerland, and the EU, as well as with the parent company Merck & Co, Inc., Rahway, NJ, USA and within the corporate group across different countries and regions
- With professional associations in the context of regulations, particularly transparency regulations
- With authorities and courts to comply with legal, regulatory, or judicial requirements or orders
- With third parties who process your personal data as data processors at the direction of MSD (such as database managers, email transmission and analysis, management of login data, providers, contract research organizations, etc.)
- With third parties who provide services in the animal healthcare sector
- With other animal healthcare professionals in the context of projects (such as projects for optimization or monitoring of medical care)
- With entities in the context of development, distribution, co-promotion, or marketing agreements, or with third parties in the context of mergers, splits, conversions, as-set transfers, and liquidations

5. Security and retention period of personal data

MSD has implemented appropriate technical and organizational measures, including security policies, rules and technical measures to protect and safeguard your personal data under its control from unauthorized access, improper use or disclosure, unauthorized modification, unlawful destruction or accidental loss. We may use third party vendors and hosting partners to provide the necessary hardware, software, networking, storage, and related technology required to securely provide our products and services. Our Company employees and data processors that have access to and are associated with the processing of your personal data, are obliged to respect the confidentiality of your personal data.

MSD will retain your personal data for as long as is necessary for the purposes described. This often means that we will keep your personal data for the duration of your account or engagement with you and will be terminated in accordance with the agreement. Please note, however, that where applicable legislation requires us to do so, it will be required to keep records of your personal data even after such termination during the term established by applicable law. As a rule, personal data may be retained for up to 11 years after termination of your interaction with us, the project or the contractual relationship based on the activity we have engaged in with you. When your data is processed for pharmacovigilance purposes, your personal data will be retained for up to 35 years.

6. Disclosure of personal data abroad

Your personal data may be disclosed as needed to MSD entities and third parties located in the United States and other countries outside of the European Union (EU) or European Economic Area (EEA), including in countries that may not provide the same level of data protection as Switzerland. In particular, your personal data may be transferred to countries in which MSD has group companies; the countries are listed [here](#). Where transfers occur, our company has implemented appropriate security and compliance mechanisms to ensure your personal data is protected as required and your rights are respected, such as Global Cross-Border Privacy Rules certification, Binding Corporate Rules (BCR), EU-U.S. Data Privacy Framework (DPF) program, the UK Extension to DPF and the Swiss-U.S. Data Privacy Framework program or approved data protection contractual clauses. Additionally, the recipients of your personal information are bound to duties of confidentiality through legally binding framework.

More information on these measures is described in our [Global Cross Border Privacy Rules Policy](#) and your rights provided by these can be obtained by contacting : [Privacy Office](#).

7. Your rights as a data subject

In accordance with the provisions of the Swiss Data Protection Law and subject to the conditions provided for in these provisions for exercising these rights, you have a right to access or correct information, to object to

or request the restriction of processing of your personal information, and to request erasure and portability of your own personal information.

If you wish to exercise these rights, you can use the this [data privacy request form](#).

Alternatively, you may submit your request by email to [Privacy Office](#) to the attention of the Office of the Data Protection Officer. If necessary, you may also use the unsubscribe links in our communication with you.

You also have the right to file a complaint with the Federal Data Protection and Information Commissioner.

To find more information about our data protection practices, please visit www.msdprivacy.com.

We may update this Privacy Notice periodically in response to changing laws, regulations, and industry practices. We reserve the right to modify, add or remove portions of this Notice at our discretion. If we decide to change this Notice, we will post the updated version. If the changes are material, we will post the changes prior to the effective date of the change.