

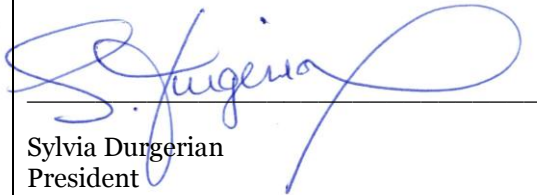
**CODE FOR THE MANAGEMENT OF PROTECTED INFORMATION
RESPECTING HEALTH PROFESSIONALS (EXCLUDING QUEBEC)**

Based on the CSA Model for the Protection of Personal Information CAN/CSA Q830-96.

Code Last Revised: August 2012 (Schedule 1 updated July 2015)

Responsibility:
Sylvia Durgerian - President

We hereby adopt the policies and procedures contained herein and confirm that the management is committed to ensuring that they are applied consistently across the organization.



Sylvia Durgerian
President

IQVIA Solutions Canada Inc.
16720 Trans-Canada Highway
Kirkland, Quebec H9H 5M3

Tel: 514-428-6000

1. Scope

This code is based on the CSA Model Code for the Protection of Personal Information (CAN/CSA-Q830-96). It describes how IQVIA Solutions Canada Inc. (“IQVIA”) subscribes to the principles of the CSA Model Code with respect to the Protected Information described in Clauses 2.1.6 and 2.1.9 below, collected after June 30, 1999.

Protected Information covers two general categories of information – Personal Information and Professional Services Information. Personal Information includes Basic Information of a health services professional. Professional Services Information includes Practice Information and Prescriber Information. All of these terms are more specifically defined in Section 2.1 of this code.

Collection of Protected Information by IQVIA

IQVIA collects information concerning health professionals and various health-care issues from the health professionals themselves, hospitals, pharmacies and software suppliers to pharmacies, as well as sources of publicly-available information, across Canada. IQVIA never has access to a patient record or prescription, which identifies the patient. The information collected does not identify any patient; it may include the age and gender of a patient. It may also include Protected Information about the health professional in the context of his or her practice: the name or other identifier, age, gender, office and mailing address, hospital affiliations, specialization and year of qualification, and information concerning diseases diagnosed and treated by them and drugs dispensed under their prescriptions.

Use of the Information by IQVIA

The information collected is processed and analyzed to produce a range of health-care information products, including information concerning diseases diagnosed and treated by individual health professionals and estimates of prescribing volumes aggregated by groups of 30 or more prescribers.

Such estimates are not a complete record of prescribers’ actual prescribing practices, since IQVIA only obtains information as to the drug dispensed (which is not necessarily the drug prescribed) and does not know what proportion of an individual prescriber’s prescriptions are covered by the information collected, as it collects data from a sample of stores.

Disclosure of the Information by IQVIA

IQVIA offers its health-care information products exclusively to healthcare stakeholders in Canada. The information disclosed does not identify any patient; but may include the age and gender of groups of patients to whom drugs were dispensed. It may also include the following Personal Information and Professional Services Information relating to the health professional in the context of his or her practice: the name or other identifier, together with the age, gender, office and preferred mailing address, preferred language of communication, hospital affiliations, specialization and year of qualification, of individual health professionals, as well as Prescriber Information. With the consent of the health professional concerned, information concerning diseases diagnosed and treated by the health professional may also be disclosed.

2. Definitions

2.1 The following definitions apply in this code.

2.1.1 *Basic Information* means the name or other identifier of individual health professionals, together with, but not limited to, any of the following: age, gender, office and preferred mailing address, preferred language of communication, telephone and facsimile numbers, e-mail address, hospital affiliations, specialization and year of qualification.

- 2.1.2 *Collection* means the act of gathering, acquiring or obtaining Protected Information from any source, including third parties, by any means.
- 2.1.3 *Consent* means voluntary agreement with what is being done or proposed. Consent can be either express or implied. Express consent is given explicitly, either orally or in writing. Express consent is unequivocal and does not require any inference on the part of the organization seeking consent. Implied consent arises where consent may reasonably be inferred from the action or inaction of the individual.
- 2.1.4 *Disclosure* means making Protected Information available to others outside the organization.
- 2.1.5 *Organization* means any association, business, charitable organization, club, government body, institution, professional practice, union or other person or entity from which Protected Information is collected, or to which Protected Information is disclosed.
- 2.1.6 *Personal Information* means information about an identifiable individual that is recorded in any form, including that described in Clause 2.1.1, and for greater clarity, does not include Professional Services Information as defined in Clause 2.1.9.
- 2.1.7 *Practice Information* means information collected by IQVIA concerning the diagnosis or treatment of diseases by identifiable health professionals.
- 2.1.8 *Prescriber Information* means:
- (a) in the case of information collected by IQVIA, information concerning prescription sales transactions, which includes the name or other identifier of the prescriber; and
 - (b) in the case of information disclosed by IQVIA, the identifiable prescriber's prescription volume information in individual or in aggregate form.
- 2.1.9 *Professional Services Information* means information relating to a health services provider that is about the provision of health services by the provider and identifies the health services provider but does not identify the patient, and includes Practice Information and Prescriber Information as defined in Clauses 2.1.7 and 2.1.8.
- 2.1.10 *Protected Information* means Personal Information as defined in Clause 2.1.6 and Professional Services Information as defined in Clause 2.1.9.
- 2.1.11 *Use* means the treatment or handling of Protected Information within an organization.

3. Principles

3.1 Principle 1 - Accountability

- 3.1.1 Accountability for IQVIA's compliance with the principles in this code rests with the Director of Legal Affairs, Canada of IQVIA and the Chief Privacy Officer of IQVIA Inc., even though other individuals within the organization are responsible for the day-to-day collection and processing of Protected Information. In addition, other individuals within our organization may be delegated to act on behalf of the Director of Legal Affairs, Canada of IQVIA and the Chief Privacy Officer of IQVIA Inc.
- 3.1.2 The identity of the individuals designated by IQVIA to oversee our organization's compliance with the principles will be made known upon request.

3.1.3 IQVIA is responsible for Protected Information in its possession or custody. Some Protected Information may be transferred to IQVIA Inc., IQVIA's parent company, for processing inside or outside of Canada, and IQVIA and IQVIA Inc. will provide privacy protection for that information through contractual or other means.

3.1.3.1 IQVIA requires, as a condition of providing Protected Information to any organization, that:

- (a) such information shall not be transferred to any third party for processing, unless such third party has entered into an agreement with IQVIA and/or IQVIA Inc. and the organization with respect to the confidentiality and security of such information;
- (b) such information shall not be used for any purpose other than the purpose for which such information was provided (see Clause 3.2.2); and
- (c) in the case of Prescriber Information, that the organization shall, upon request by a health professional, disclose that the organization has such information, and the organization must adhere to the *Code of Conduct Respecting Prescription Data*, attached hereto as Schedule 1.

3.1.4 IQVIA has implemented policies and practices to give effect to the principles, including:

- (a) implementing procedures to protect Protected Information and to ensure that the organization does not receive any patient identifiers;
- (b) establishing procedures to receive and respond to complaints and inquiries;
- (c) training staff and communicating to staff information about its privacy organization's policies and practices; and
- (d) developing information to explain its organization's privacy policies and procedures.

3.2 Principle 2 - Identifying Purposes

3.2.1 The purposes for which IQVIA collects Protected Information are documented in Clause 3.2.2, in our general information brochure explaining our organization's policies and standards and on our website (www.iqvia.com), in order to comply with the Openness principle (Clause 3.8) and the Individual Access principle (Clause 3.9).

3.2.2 This information is processed and analyzed to provide information products in the form of Practice Information, Basic Information or Prescriber Information (in accordance with Clauses 3.3.1.1, 3.3.1.2 and 3.3.1.3 respectively), information in aggregate form, as well as non-identifiable information products. IQVIA offers these products exclusively to healthcare stakeholders in Canada, including:

- **Federal and provincial government departments and agencies** use the information for educational purposes; to determine adherence to applicable guidelines; to identify prescribing patterns; and generally to create healthcare policy and improve the management of healthcare resources.
- **Health professional bodies** use the information to evaluate health information programs and to identify education and healthcare issues.

- **Individual prescribers** use the information as part of continuing professional education and self-evaluation, by understanding how their prescribing practices compare to normative practices.
- **Pharmaceutical companies** use the information to educate prescribers and to better understand their information needs with respect to effective and cost-efficient prescribing practices and new products and therapies; to obtain participation in clinical trials of new products; to facilitate drug warnings and recalls; and to market their products.
- **Pharmacy banners or pharmacies** use the information to better understand their local, national or provincial market and their market share.
- **Researchers** use the information in studies to provide feedback to health professionals to enhance drug selection; to optimize prescribing practices; to promote more effective or appropriate treatment methods; and to determine the effectiveness of various cost-reduction strategies.
- **Patient advocacy groups** use the information to identify education and healthcare issues and to identify and communicate with interested health professionals.
- **Medical publishers** use the information to send educational materials to health professionals.
- **The lay and trade press** use the information to support the research and publication of reports on current health and healthcare issues in Canada.

3.2.3 IQVIA collects only that Protected Information necessary for such purposes.

3.2.3.1 Where IQVIA collects Practice Information, IQVIA specifies, in a written agreement with the health professional, the purposes for which such information is being collected.

3.2.3.2 Where IQVIA collects Basic Information or Prescriber Information, IQVIA uses other means including direct mailing or advising professional bodies or associations and their members, through various media, to inform health professionals of the purposes for which the information is being collected.

3.2.4 IQVIA will not use or disclose any Protected Information, for any purpose not previously identified pursuant to Clause 3.2.3.1 or 3.2.3.2, except as required or permitted by law. Should these purposes change with respect to Clause 3.2.3.1, IQVIA will specify these changes in a written agreement with the health professional. Should these purposes change with respect to Clause 3.2.3.2, IQVIA will inform health professionals of these changes using similar means as described in Clause 3.2.3.2.

3.2.4.1 Where IQVIA collects Practice Information, IQVIA's staff involved in the collection is trained to explain to the health professional, at the time of the written agreement referred to in Clause 3.2.3.1, the purposes for which the information is being collected.

- 3.2.4.2 Where IQVIA collects Basic Information or Prescriber Information, the Director of Legal Affairs, Canada of IQVIA and the Chief Privacy Officer of IQVIA Inc. or another individual delegated to act on his or her behalf, will explain to the health professional concerned, upon request, the purposes for which the information is being collected.
- 3.2.5 This principle is closely linked to the Limiting Collection principle (Clause 3.4) and the Limiting Use, Disclosure and Retention principle (Clause 3.5).

3.3 Principle 3 - Consent

- 3.3.1 IQVIA collects Basic Information directly from the health professional concerned or from sources of publicly-available information; Practice Information directly from the health professional concerned; and Prescriber Information from sources other than the health professional concerned.
 - 3.3.1.1 Where IQVIA collects Practice Information, it obtains the express consent of the health professional concerned for the collection by IQVIA and the subsequent use (processing) of the information. IQVIA will not disclose Practice Information except with the express consent of the health professional concerned, or as required or permitted by law.
 - 3.3.1.2 Where IQVIA collects Basic Information, it considers that there is implied consent to the collection, use (processing) and disclosure of the information, consistent with the purpose for which this information was made publicly available.
 - 3.3.1.3 IQVIA does not consider that consent is required for the collection of Prescriber Information. IQVIA will only disclose Prescriber Information in individual form when required or permitted by law, or with the express consent, as defined in Clause 2.1.3, of the health professional concerned. IQVIA will only disclose Prescriber Information in aggregate form with respect to groups of 30 or more prescribers.
- 3.3.2 As indicated in Clauses 3.2.3.1 and 3.2.3.2, IQVIA makes every reasonable effort to ensure that health professionals are advised of the purposes for which their Protected Information will be used. Such purposes are stated in such a manner that a health professional can reasonably understand how the information will be used or disclosed.
- 3.3.3 IQVIA does not require any health professional to consent to the collection, use or disclosure of his or her Protected Information, as a condition of supplying any product or service to the health professional.
- 3.3.4 IQVIA also considers that the purposes for which Protected Information collected from a source other than the health professional concerned (see Clauses 3.2.2 and 3.3.1) is used and disclosed are consistent with the purposes for which such information was originally collected, and are not in conflict with the reasonable expectations of any health professional concerned.
- 3.3.5 Subject to the provisions of any written agreement, any consent obtained pursuant to Clause 3.3.1.1, may be withdrawn at any time upon 90 days prior written notice.

3.4 Principle 4 - Limiting Collection

- 3.4.1 IQVIA collects only the amount and the type of Protected Information necessary to fulfill the purposes identified in Clause 3.2.2, and specifies the type of information collected as part of its information-handling policies and practices, in accordance with the Openness principle (Clause 3.8).
- 3.4.2 If any new purposes are identified due to changing business needs, IQVIA will conduct an assessment to ensure that such purposes are consistent with the principles in this code.
- 3.4.3 The requirement that Protected Information be collected fairly and lawfully means that IQVIA will not mislead or deceive individuals about the purpose for which the information is being collected, or obtain consent to collect the information through deception.
- 3.4.4 This principle is closely linked to the Identifying Purposes principle (Clause 3.2) and the Consent principle (Clause 3.3).

3.5 Principle 5 - Limiting Use, Disclosure and Retention

- 3.5.1 IQVIA will not use or disclose Protected Information, for any new purpose, except in accordance with Clauses 3.2.4 and 3.4.2, and uses contractual means to ensure that any organization to which it discloses Protected Information is similarly obligated (see Clause 3.1.3.1).
- 3.5.2 The contractual means referred to in Clause 3.5.1 includes the *Code of Conduct Respecting Prescription Data*, attached hereto as Schedule 1.
- 3.5.3 IQVIA has developed guidelines and implemented procedures with respect to the retention of Protected Information, including a minimum retention period of two years and a maximum retention period of 20 years. IQVIA does not use Protected Information to make any decision affecting an individual health professional.
- 3.5.4 IQVIA destroys, erases or renders anonymous any Protected Information that is no longer required to fulfill the purposes identified in Clause 3.2.2, and has developed guidelines and implemented procedures to govern the destruction, erasure or anonymizing of Protected Information, and uses contractual means to ensure that any organization to which it discloses Protected Information is similarly obligated.
- 3.5.5 This principle is closely linked to the Consent principle (Clause 3.3), the Identifying Purposes principle (Clause 3.2) and the Individual Access principle (Clause 3.9).

3.6 Principle 6 - Accuracy

- 3.6.1 IQVIA uses its best efforts, including contractual means and a variety of sources, to ensure that Protected Information collected by it is accurate and complete. Various data analysis techniques are also used to detect and correct errors.
- 3.6.2 The purposes for which Protected Information is used require that IQVIA collect the information on an ongoing basis. Basic Information is continually updated. Practice Information and Prescriber Information are, by their nature, collected in relation to specific consecutive periods. IQVIA compiles all Protected Information collected, and provides such information to IQVIA Inc., on a weekly or monthly basis. Such information

is processed on a weekly or monthly basis, in order to provide the most up-to-date information available.

- 3.6.3 All Practice and Prescriber Information is, by its nature, specific to a particular period. IQVIA advises any user of Practice or Prescriber Information as to the period to which such information relates and the basis on which such information was prepared. Similarly, all Basic Information provided by IQVIA is stated to be as of a specified date.

3.7 Principle 7 - Safeguards

- 3.7.1 Where IQVIA collects Protected Information in recorded form directly from the health professional concerned, such information is sent to IQVIA by mail, courier, or electronic transmission with the identity of the prescriber encrypted. Where IQVIA collects Protected Information in recorded form from a source other than the health professional concerned, such information is sent to IQVIA by courier, or electronic transmission with the identity of the prescriber encrypted.
- 3.7.1.1 Once received by IQVIA, it uses a variety of measures (see Clause 3.7.3) to ensure that the information is protected against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. All information collected by IQVIA is kept in the format received and/or in computer format. Once compiled, IQVIA sends the information to IQVIA Inc. by electronic transmission, with the identity of the prescriber encrypted as described above.
- 3.7.1.2 IQVIA use contractual means to ensure that any organization to which Protected Information is disclosed is similarly obligated. All Protected Information disclosed to any user is sent in hard copy or computer format, by bonded courier or electronic transmission.
- 3.7.2 IQVIA affords the highest level of protection to all Protected Information, without distinction as to sensitivity.
- 3.7.3 The methods of protection used by IQVIA include:
- (a) physical measures, such as a segregated computer system and restricted access to its premises and computer facilities;
 - (b) organizational measures, such as internal audits, security clearances, restricted access to the Protected Information and penalties for any breach of such measures; and
 - (c) technological measures, such as periodic testing of its computer security systems, and the use of secure transmission lines, confidential passwords and encryption.
- 3.7.4 All employees of IQVIA are made aware through regular, compulsory in-house seminars of the importance of maintaining the confidentiality of Protected Information, and are required to enter into confidentiality agreements on an annual basis.
- 3.7.5 IQVIA has developed guidelines and implemented procedures governing the disposal or destruction of Protected Information (see Clause 3.5.3), to prevent unauthorized parties from gaining access to the information.

3.8 Principle 8 - Openness

3.8.1 IQVIA is open about its policies and practices with respect to the management of Protected Information, and will provide to any health professional, a copy of this code by mail, upon request to IQVIA Solutions Canada Inc., Corporate Communications Department, 16720 Trans-Canada Highway, Kirkland, Quebec, H9H 5M3; upon request by e-mail (to CanadaInfo@iqvia.com); other written communication by fax to 514-428-6006 or telephone (1-888-400-4672).

3.9 Principle 9 - Individual Access

3.9.1 IQVIA will, upon request by any health professional at any time, provide the health professional with access to a secure online website by which to access their Protected Information in IQVIA's possession concerning the health professional, including that health professional's prescribing practice analysis.

3.9.2 IQVIA requires the name and evidence confirming the identity of the individual requesting the information, in order to provide access to the information referred to in Clause 3.9.1.

3.9.3 IQVIA will provide, as part of the information referred to in Clause 3.9.1, either a list of the third parties to which it has disclosed the information or to which it may have disclosed the information, depending upon the needs of the individual requesting the information.

3.9.4 Where an individual successfully demonstrates the inaccuracy or incompleteness of Protected Information concerning the individual, the information will be amended, within a maximum of 120 days, by correcting or deleting information, or adding information, as required. Where appropriate, IQVIA will promptly transmit the amended information to third parties to which IQVIA has previously provided the information in question.

3.9.5 Where a challenge is not resolved to the satisfaction of the individual, the substance of the unresolved dispute will be recorded by IQVIA. Where appropriate, the existence of the unresolved dispute will be promptly transmitted by IQVIA to third parties to which IQVIA has previously provided the information in question.

3.10 Principle 10 - Challenging Compliance

3.10.1 The individuals accountable for IQVIA's compliance are discussed in Clause 3.1.1.

3.10.2 IQVIA has put procedures in place to receive and respond to complaints and inquiries about its policies and practices relating to the handling of Protected Information. The complaint procedures are easily accessible and simple to use.

3.10.3 IQVIA will, within a maximum of two weeks, inform individuals who make inquiries or lodge complaints, of the existence of the relevant complaint procedures.

3.10.4 IQVIA will promptly investigate all complaints. If a complaint is found to be justified, our organization will take prompt and appropriate measures, including if necessary, amending its policies and practices.

Schedule 1
CODE OF CONDUCT RESPECTING PRESCRIPTION DATA

1. IQVIA Solutions Canada Inc. (“**IQVIA**”) will consult with representatives of the medical and pharmacy profession, the pharmaceutical industry, academia and patient advocacy groups, to advise on issues relating to the collection and use of prescriber-level prescription data (“**Data**”).
2. Except as provided below, neither IQVIA nor its parent corporation, IQVIA Inc., will disclose the Data.
3. IQVIA will provide the Data to pharmaceutical companies, and to pharmacy banners and pharmacies (collectively “**Companies**” or “**Company**” in the singular) solely for the purpose of research, professional education, clinical trials, new therapies and drug marketing in accordance with the guidelines of the Pharmaceutical Advertising Board and Canada’s Research-Based Pharmaceutical Companies.
4. IQVIA will provide the Data to government, health professional bodies or orders, patient advocacy groups, researchers, journalists and professional health publications only for such purposes as identified in the *IQVIA Code for the Management of Protected Information Respecting Health Professionals* and its *Code for the Management of Personal Information Respecting Health Professionals in the Province of Quebec*.
5. Each person, entity or Company, including all employees thereof, to whom IQVIA discloses the Data for any purpose, will agree not to use or disclose the Data for any other purpose. Any unauthorized use or disclosure may result in the termination of the right of the Company, person or entity and/or the employee who used or disclosed the Data without authorization, to use or receive any Data for a minimum period of two years. IQVIA has the sole discretion to establish the terms of such termination.
6. A Company, person or entity or any of their representatives shall, upon request by a prescriber, disclose to the prescriber that the Company has Data concerning the prescriber. Any failure to comply with this requirement may result in termination of the Company’s and/or its employees’ rights to use or receive Data concerning the prescriber for a minimum period of two years. IQVIA has the sole discretion to establish the terms of such termination.
7. In the event that a prescriber requests access to their Data directly from a Company, person or entity or their representatives, a copy of the Data shall be provided to the prescriber (i) in the same form and format as provided by IQVIA to the Company, person or entity, (ii) but in no case shall the Data include any information about any prescriber other than the individual who requested the Data, and (iii) the Company, person or entity must indicate which information about the prescriber was provided by IQVIA. Any failure to comply with this requirement may result in termination of the right of the Company, person or entity or their employees to use or receive Data concerning the prescriber for a minimum period of two years. IQVIA has the sole discretion to establish the terms of such termination.
8. A Company, person or entity or its representatives must refer to IQVIA, prescribers who wish to obtain an estimate of their prescribing profile by reference to an aggregated profile of their peer group. Upon request, IQVIA must furnish the prescriber with his or her profile based on an estimate of his or her prescribing activity for the last twelve-month period.