

IQVIA OneKey Privacy Notice

Introduction

IQVIA (**we, us, our**) specializes in the provision of products and services to healthcare and life sciences organizations. Our services include the collection and verification of information about healthcare professionals (**you, your**) that we provide to our customers, including national healthcare service providers, so that they can maintain accurate and up to date information on healthcare professionals.

Accurate data on healthcare professionals is important to life sciences for many reasons, for example, to help ensure patients receive the right medicines for their disease or condition, and to help bring new medicines to market to improve patient outcomes and lower costs. We also play a pivotal role enabling efficient and effective communication to you across multiple media channels and are proud of the record of service that has served life sciences and the healthcare industry so well.

This notice sets out how we will use and share your personal data and it also describes your data protection rights, including the right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the “Your Rights” section.

1. Type of personal data collected and sources of data

Most of the data that we collect, verify and process is professional information about medical practitioners, pharmacists, nurses, and other healthcare professionals. This information does not relate to any individual patients.

We process the following information about healthcare professionals:

Category	Details	Source of data
Identification Information	Title, year of birth, first name and last name, initials, nickname or maiden name if available.	These categories of personal data may have been previously collected directly from you, from public sources such as websites, conferences, publications, medical or social media, from our customers or through a member of your place of work or clinical setting who you have authorised to provide such personal data to us.
Contact Information	Telephone and fax number of your place of work/clinical setting, home address (only where you have specifically requested to receive post), mobile phone number (where provided), business and/or personal email address.	
Employment Information	Healthcare professional type and role, practice and therapeutic areas, specialities and tendencies, job title, name of your place of work/clinical setting.	
Location Information	Address of your place of work/clinical setting and map coordinates to enable display of your workplace location on a map.	
Professional Experience Information	Year of graduation, degree(s) and university(s) concerned, professional qualifications, experience, interests and medical specialty, professional registration number, activities in the field of research.	
Marketing Information	Your marketing preferences, including any consents.	
Online Activity Information	Information about your online presence and activity on social media platforms.	
		This category may also be collected from publicly accessible

		social media sites.
Prescription Data	Information about prescriptions you may have written which they dispensed. We and our life science customers use this information for research purposes, including to understand the prescribing practices of healthcare professionals – for example, understanding which types of products you prescribe frequently and whether you prescribe a particular medicine more than other medicines relevant to the same therapeutic area.	This category may be collected from pharmacies, general practice, and hospital systems.

2. How do we use this information, and what is the legal basis for this use?

We collect and process the categories of data above to create and keep up to date our OneKey database. We do this to make OneKey available to our customers in the healthcare sector, i.e. healthcare industry professionals, health authorities, pharmaceutical companies, research organizations, market research companies, and their agents, so that our customers can use OneKey for legitimate business purposes which may include to contact or interact with healthcare professionals, to offer health-related products or services, and/or to manage their supply chains. The lawful basis we rely on to process the information listed in the OneKey database, is our legitimate interest in offering this service to our customers, so they can contact healthcare professionals for these purposes. We have set out below more information about the purposes for which we make the OneKey database available, and which categories of data are processed for these purposes.

Purpose	Categories of Personal Data
HCP Direct Communications Legal compliance purposes (for example, to meet transparency obligations or adverse event reporting), and to enable direct communications with healthcare professionals in relation to important and sometimes vitally urgent safety warnings and drug recalls.	Identification Information, Contact Information, Employment Information, Location Information, Professional Experience Information, Online Activity Information
HCP Enrolment Recruitment of healthcare professionals for participation in clinical trials, market research and other research studies, including to evaluate the potential suitability of healthcare professionals for recruitment into particular clinical trials and research studies.	All categories
Conducting Market Studies and Research Conducting market studies and research in the public and private sectors, increasing the transparency of national, regional, and local healthcare systems, health data management, improving healthcare services and increasing efficiencies to lower costs.	All categories
Updates to CRM Processing updates to customer relationship management (CRM) systems and conducting direct communications and marketing to healthcare professionals to support the promotion, distribution and development of medical products and services, to inform	All categories

healthcare professionals about new products, newly approved uses for existing products, medical/healthcare events and conferences, to distribute free samples, and to enable patients to identify, locate and contact the healthcare professionals of their choice.	
Distributor and Pharmaceutical Companies Service Improvement Helping distributors and pharmaceutical companies improve their distribution and service levels, better manage promotions, and assess compliance with brand specific promotion agreements.	All categories
Authentication To validate the status of healthcare professional users of IQVIA-hosted technology solutions in order to show them medical and other content addressed only for healthcare professionals (for example, educational content).	Identification Information, Contact Information, Employment Information, Professional Experience Information.

We will often build a profile relating to your professional activities. To do this we analyse information about the healthcare practices, specialities, and preferences of individual healthcare professionals. We do this to personalise and optimise the relevance and frequency of interactions with healthcare professionals. In particular, we establish activity profiles for therapeutic areas of interest based on your attributes and statistical data (especially activity by therapeutic area, density of practitioners in a particular area, quantity, timing and pattern of interactions with healthcare professionals). We also look at your interests based on your professional social media profile and other publicly available websites. We do this so that the communications about new products, or opportunities to participate in market research, surveys or clinical trials, are most relevant to you.

In all cases where we ask you to provide information directly, provision of the requested personal data is optional.

Where the lawful basis for our processing is legitimate interests, we have carried out a balancing test to confirm whether we have legitimate interests in processing your personal data, what the impact of this processing is and whether healthcare professionals' interests may outweigh our and our customers' legitimate interests. We can provide more information about this balancing test on request.

3. How we share your personal data

We may share your data with the following categories of recipients and always only the minimum necessary for the purposes indicated herein:

Personal Data Category	Category of Recipient	Why?
All categories of personal data	IQVIA group companies	<ul style="list-style-type: none"> To operate, improve, and develop our services To compare the data against some of our IQVIA group's other databases and ensure that that it is up to date To make the data available to our customers as part of other similar services we may offer
All categories of personal data	Third party service providers	We employ other companies and individuals to perform functions on our behalf. Examples include website hosting and maintenance, customer service

		operations, identity checking, fulfilling orders for products or services, delivering packages, sending postal mail and e-mail, processing payments and providing customer service.
All categories of personal data	Government authorities, law enforcement and fraud prevention agencies	To comply with official requests to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law.
All categories of personal data	Prospective Buyer/Seller	In the event that the business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.
All categories of personal data	Customers	We share data with our customers for the purposes described in section 2) above.

In addition, in the event of any reorganization, restructuring, merger or transfer of all or any portion of our business or assets, your personal information may be transferred to IQVIA affiliates or related bodies corporate.

4. Your Rights

You have the right to ask us for a copy of your information, to correct it, erase or restrict its processing, or to ask us to transfer (port) some of this information to other organisations. You may also object to certain processing, such as profiling we perform for the purposes of direct marketing. If you have given us your consent to process your data, you can withdraw this consent at any time. These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data. In some instances, this means that we may retain data even if you withdraw your consent.

You also have the right at any time to unsubscribe from marketing communications and to object to profiling related to marketing communications.

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data or wish to unsubscribe from marketing communications or exercise your rights, you can get in touch as set out in the Contact Us section below.

If you have unresolved concerns, you also have the right to complain to the data protection authority in the country where you live, work, or where you consider a breach has occurred.

5. International transfers

As the database is operated on a worldwide basis, the database may be stored or accessed outside the EEA and the UK by IQVIA affiliates, our customers and third-party providers located in other jurisdictions where our affiliates operate (listed on the office locations page of www.iqv.com).

Information is transferred outside the EEA and the UK:

- To the following countries that the EEA and the UK have determined offer adequate protection for personal data under Art.45 of the EU and UK GDPR: Argentina – [EU Adequacy Decision](#); Canada – [EU Adequacy Decision \(Commercial Organisations\)](#); Japan – [EU Adequacy Decision](#); New Zealand – [EU Adequacy Decision](#); Israel – [EU Adequacy Decision](#); Republic

of Korea – [EU Adequacy Decision](#); Switzerland – [EU Adequacy Decision](#); United States – [EU Adequacy Decision \(commercial organisations participating in the EU-US Data Privacy Framework\)](#); United Kingdom – [EU Adequacy Decision under the GDPR](#); Uruguay - [EU Adequacy Decision](#); These countries are also covered by the UK’s adequacy regulations and are listed on the [Information Commissioner’s Office](#)’s website.

- Where we have put in place standard contractual clauses for the transfer of personal data to third countries (controller to controller (for transfers to customers and IQVIA affiliates) and controller to processor (for transfers to third party providers) adopted by the European Commission under Commission Implementing Decision (EU) 2021/914 in accordance with Art.46(2) GDPR and, in the case of transfers from the UK, as amended by the UK International Data Transfer Addendum to the EU Standard Contractual Clauses issued by the Information Commissioner.

A copy of the relevant mechanism can be provided by us for your review on request.

6. Data Retention

We will keep the information we have about you in our database for as long as it remains accurate, and you remain a member of the healthcare profession. We will keep your data thereafter only for legal backup and audit purposes and to comply with applicable laws.

7. Changes to this Notice

We may update this notice from time to time. We encourage you to review this notice periodically to stay informed about how we are using and protecting information in the OneKey database. Any changes to this notice take effect immediately after being posted or otherwise provided by us.

8. Contact Us

IQVIA Ltd, The Point, 37 North Warf, London, W2 1AF, United Kingdom is the controller for all health care professionals whose personal data is processed in the OneKey Database.

You can also contact our EU Data Protection Officer at eu.dpo@iqvia.com
