



INCYTE PRIVACY NOTICE HEALTHCARE PROFESSIONALS (HCP) AND INSTITUTIONAL OR PHARMACY BUSINESS CONTACTS CANADA

Incyte Corporation (“we”, “our”, “us”, “Company” or “Incyte”) is committed to maintaining the security, confidentiality and privacy of your personal information. This Privacy Notice is for Canadian Healthcare Professionals (“HCP”) and other Canadian institutional or pharmacy business contacts (“you”) who interact with us, including informally, as part of an Incyte pharmaceutical research activity, as part of a consulting relationship, or as part of Incyte’s obligation to report safety information to various regulatory agencies (this “**Privacy Notice**”).

This Privacy Notice applies to our collection, use and disclosure of personal information about you. For the purposes of this Privacy Notice, “personal information” refers to any information that relates to a natural person and allows that individual to be identified directly or indirectly. This Privacy Notice also does not impose limits on the collection, use or disclosure of the following information by Incyte:

- Business contact information (to the extent that such information is not considered personal information under applicable privacy laws);
- certain publicly available information (to the extent permitted by applicable law); and
- other information excluded by applicable privacy laws.

If you are unsure if or how this Privacy Notice applies to you, please contact Incyte’s Privacy Officer for more information.

When we collect your personal information:

- We take or require appropriate technical, physical, and organisational measures (such as multifactor password authentication, encryption, access restriction, etc.) to protect your personal information from misuse or unauthorized alteration, loss, or access;
- We collect and use your personal information only as needed for the purpose(s) outlined below or as authorized or required by law; and
- We keep your personal information up to date and endeavor to ensure that it is accurate, however in some instances we rely on you to notify us if you’ve made a change.

We may make changes to this Privacy Notice to reflect changes in our legal or regulatory obligations, or in how we manage your personal information. We will update this Privacy Notice to reflect the changes. This Privacy Notice was last amended on November 4, 2024.

What personal information do we collect and for what purposes?



The categories of personal information we collect, and our use of personal information, may vary depending upon the nature of your relationship and interaction with Incyte, as set out below:

1. Healthcare Professional Business Contacts

- We may collect and use the following data:
 - Your name, business contact information, and professional qualifications;
 - Information relevant to your professional interests such as promotional, medical, and educational information; and
 - Your potential or actual involvement in our clinical development programs.
- Wherever possible, we collect this information directly from you. In certain circumstances, we may collect it from a third party or from online publicly available sources, in accordance with applicable law.
- We may collect personal information for the following purposes:
 - to schedule meetings with you;
 - to determine your interest in receiving information relating to Incyte products;
 - to provide information relevant to your professional interests such as promotional, and educational information;
 - to initiate or follow-up for clinical development programs; and
 - to comply with voluntary or regulatory transparency reporting disclosures or other regulatory obligations.

2. Research Investigators & Research Staff

- We may collect and use the following data:
 - Your name, business contact information, and professional qualifications and interests; and
 - Information specific to our professional interactions with you.
- Wherever possible, we collect this information directly from you. In certain circumstances, we may collect it from a third party or from online publicly available sources, in accordance with applicable law.
- We collect personal information for the following purposes:
 - to coordinate your involvement in an Incyte sponsored research
 - to contact you, contract with you, provide you with information about the research, and schedule meetings and appointments with you;
 - to comply with Incyte's legal obligations in its conduct of research; and to comply with voluntary or regulatory transparency reporting disclosures where applicable.

3. Adverse Event/Special Situation/Product Complaint Reporters

- We may collect and use the following data: your name, business contact information, credentials, and employer.
- We may collect the above information: (a) from you directly, or (b) from a patient or a patient's caregiver.
- We may collect this personal information for the following purposes:
 - to understand the safety and efficacy of Incyte's study drugs or products in the market place; and/or



- to comply with Incyte’s legal obligations under applicable laws in the conduct of research or manufacturing and distribution of a marketed product for reporting safety and product complaints.

4. Medical Information Requestors

- We may collect and use the following data: your name, business contact, credentials, and employer.
- We may collect the above information directly from you.
- We may collect and use this personal information for the purposes of answering your unsolicited questions related to Incyte products or studies or related disease state information.

5. Consultants

- We may collect and use the following data:
 - Your name, contact information, education, professional experience, qualifications, licenses, photo, and national identifiers such as social insurance number or tax number;
 - Information specific to our professional interactions such as meetings, meeting notes, and audio or video recordings;
 - Payment and/or bank details; and
 - Other details necessary to comply with voluntary or regulatory transparency reporting disclosures
- Wherever possible, we collect this information directly from you. In certain circumstances, we may collect it from a third party or from online publicly available sources, in accordance with applicable law. Automated Decision Making: Incyte uses an automated process to determine applicable payment rates for consulting activities according to your qualifications and professional experience. This process is conducted in order to enter into a contract with you at rates that are likely to be considered fair market value for compliance purposes. You have the right to (1) ask for intervention by an Incyte representative in this process; (2) express your point of view regarding the outcome; and (3) contest the decision. You can engage with your Incyte contact to do any of these or you can contact Incyte’s Data Protection Officer as noted below.
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Do you need to provide us with your personal information?

We will obtain your consent to collect, use or disclose personal information except where we are authorized or required by law to do so without consent, for example to comply with regulatory or legal requirements, to obtain legal advice. If you do not consent, we may not be able to provide you with some of our products and services and in some cases we may not be able to continue our relationship with you.

Who do we share your personal information with?

We may disclose your personal information to third parties for the purposes named above, including to the following:

- Our affiliate companies in the worldwide Incyte Group, including affiliates in other countries (a list of all Incyte companies is available under: <https://incyte.com/contact-us/locations>);



- Third party consultants, service providers, partner companies contracted by or on behalf of Incyte or its affiliates;
- Healthcare professional boards and authorities;
- Government agencies, regulators, or public authorities, but only when they require us to. In some instances, these government agencies may make your personal information public in accordance with applicable laws or guidelines;
- Publicly online as part of voluntary transparency disclosures (however, in these circumstances we will only share the minimal amount of information necessary for the purpose of the disclosure); and
- Where required by institutional policy or government entity, to your employer.

Where is your personal information used or stored?

We make reasonable efforts to maintain physical, technical and administrative safeguards that are appropriate to secure your personal information. These safeguards are designed to protect your personal information from loss or unauthorized access.

We may transfer your personal information to other jurisdictions outside of your province of residence (including to other Canadian provinces, the United States and other jurisdictions outside of your jurisdiction of residence in Canada) in order to achieve the purposes listed in this policy. All such transfers of your personal information will be made in accordance with applicable data protection laws, and we will use contractual and other methods to ensure that your personal information will continue to receive an adequate level of protection.

You may contact our Privacy Officer (whose contact information is provided below) to obtain information about our policies and practices regarding our transfer of personal information outside of Canada, or to ask questions about the collection, use, disclosure or storage of personal information by us or our foreign service providers.

Where required by applicable law, we will conduct the necessary data privacy impact assessments prior to communicating your personal information outside of your jurisdiction of residence.

How long is your personal information retained?

Except as permitted or required by law or regulation, we make reasonable efforts to retain your personal information only as long as we believe necessary to fulfill the purposes for which the personal information was collected, and as required or authorized by applicable law.

- **Healthcare Professional Business Contacts** - We keep and use your information for as long as necessary for the administration of our relationship and no longer than three years after the last contact with you unless otherwise required under applicable transparency reporting disclosures or other regulatory obligations.



- **Research Investigators & Research Staff** - We keep and use your information for as long as necessary for the administration of our business relationship but no longer than thirty years after the conclusion of the research as necessary to comply with applicable legal or regulatory obligations.
- **Adverse Event/Special Situation/Product Complaint Reporters** - We keep and use your information for as long as necessary to comply with Incyte's legal obligations under applicable laws but no longer than thirty years after the conclusion of the research or after the life of the product as necessary to comply with legal or regulatory obligations.
- **Medical Information Requestors** - We keep and use your information for as long as necessary to comply with Incyte's legal obligations under applicable laws but no longer than thirty years after the end of the life of the marketed product as necessary to comply with legal or regulatory obligations.
- **Consultants** - We keep and use your information for as long as necessary for the administration of this relationship but no longer than three years after the last contact with you, unless otherwise required under transparency reporting requirements or applicable law. .
- **Business Contacts at Institutions or Pharmacies** - We keep and use your information for as long as necessary for the administration of our business relationship but no longer than three years after the last contact with you. In all circumstances, if we use your personal information to render a decision concerning you, we will retain this personal information for at least one year.
- We will destroy, erase or make anonymous (to the extent permitted by applicable laws) documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retaining the information and retention is no longer necessary for a legal or business purpose.

What are your rights?

You have a number of rights that apply to our use of your personal information. The availability of some of these rights depend on your province of residence and may also be subject to certain conditions and restrictions. You may have the right:

- to obtain access to the personal information that we hold about you, together with information about how and on what basis that personal information is processed;
- to correction of the personal information that we have collected about you.

Your right to access or correction of the personal information that we hold about you is not absolute. There are instances where law or regulations allow or require us to refuse to provide some or all of the personal information that we hold about you. If we do not correct the information, we will explain the reasons why and annotate your file to show the request for correction. Where permitted by applicable laws, we expressly reserve the right to charge a reasonable fee for the transcription, reproduction or transmission of documents containing your personal information.

- **Consent:** You may have the right to withdraw consent to the collection, use and disclosure of your



personal information, subject to limits in applicable law. Withdrawing consent does not affect the lawfulness of an use or communication of your personal information by us up to that point and does not oblige us to delete your personal information if we are otherwise allowed to retain it under applicable law.

Residents of Quebec may have the following rights:

- **Portability:** You may have the right to obtain a machine-readable copy of the personal information that we hold or to have us transfer it to another third party of your choice.
- **De-indexation:** You may have the right to request, in certain circumstances, that we cease disseminating your personal information or to de-index any hyperlink that allows access to that personal information by technological means, if such dissemination causes you harm or contravenes a court order or applicable privacy laws.

We may ask you for additional information to confirm your identity and for security purposes before processing your request.

If you have any questions about your personal information or to exercise any of the above rights, please contact Incyte's Privacy Officer: privacy@incyte.com.

Who can you contact regarding your rights?

Data Controller: The entity that determines why and how your personal information is processed is called a Controller. The Controller for the processing of your personal information is the Incyte organisation or affiliate listed below, depending on our relationship with you.

- **Healthcare Professional Business Contacts:** the Incyte affiliate where you are located or that serves the area where you are located, in this case, Incyte Biosciences Canada.
- **Research Investigators & Research Staff:** the sponsor of the research for which you are an investigator.
- **Adverse Event/Special Situation/Product Compliant Reporters:** For clinical study products, the sponsor of the research for which you are reporting. For marketed products, Incyte Biosciences Canada.
- **Consultants:** the Incyte affiliate who you have a contract with.
- **Business Contacts at Institutions or Pharmacies:** Incyte Biosciences Canada

A list of all Incyte companies is available under: <https://incyte.com/contact-us/locations>.

Data Protection Officer Incyte: privacy@incyte.com.