

IBM PRIVACY NOTICE TO SMS STAKEHOLDERS

1. Collection of your Personal Information

International Business Machines Corporation (“IBM”) is engaged by various clients in the healthcare and life sciences industry, including but not limited to biomedical, pharmaceutical, and medical device companies (“Clients”), to identify and facilitate engagements with key stakeholders such as scientific thought leaders (referred to as “Stakeholders”). IBM collects, stores, ranks and shares with Clients publicly available personal information related to Stakeholder’s professional, academic, and/or scientific activities, for its legitimate business interests, including providing Clients with clinical and market access insights, and facilitating potential engagements between Stakeholders and Clients (“Business Purpose”). The personal information is obtained from publicly available data sources such as PubMed, ClinicalTrials.gov, conference programs, and scientific associations, and may include:

- Business-related contact and biographical information, including name, address, phone number, email address, professional affiliations, association memberships, education, and specialties (all only if available in the public domain)

To meet individual Client needs for specific engagements, IBM also ranks Stakeholders according to specific criteria that are determined by the individual Client depending on their field(s) of interest. The criteria generally weigh such factors as publications, clinical trials, committee memberships, and association memberships, as well as other potential factors. The goal of this exercise is to provide the most relevant Stakeholders for each Client and foster efficient communication and collaboration between Stakeholders and Clients.

In addition to providing information about you to the Client, IBM stores and maintains your information in a Stakeholder database to be utilized for similar future engagements with other Clients. Subject to your right to object, data will be stored as long as necessary for the Business purpose and as required to comply with any legal obligations. Maintaining your information not only allows us to ensure a robust and accurate database for our Clients, but it also gives you the best opportunity as a leader in your field to be connected to life sciences companies in need of your knowledge and expertise.

IBM’s Clients may also store the data we provide them, including your personal information. Please note, IBM’s Clients may choose to share all data with their affiliates and development partners anywhere in the world.

2. How we protect data

IBM is a trusted vendor to many of the world’s top life sciences companies, and our engagements with these Clients for the Business Purpose described in this Privacy Notice are a key portion of our business activities. We take steps to ensure all Stakeholder information is up-to-date and accurate before providing it as part of any Client engagement. Additionally, IBM’s agreements with our Clients require that Clients maintain all adequate and legally required safeguards and comply with all applicable laws and regulations related to your personal data. For more information on how IBM handles personal information, please visit IBM’s Privacy Statement at <https://www.ibm.com/privacy/us/en/>.

3. Your rights

You can request to access, update, delete or correct the personal information we maintain about you in the database (subject to any exceptions under applicable data protection laws) by contacting IBM Privacy using the webform at <https://www.ibm.com/privacy/contact/us-en/>. Your message will be forwarded to the appropriate member of IBM's Data Privacy Team, such as Data Protection Officers or members of their teams.

For additional information on IBM's general privacy practices that apply to personal information, including you can also read IBM's company privacy policy statement ("IBM Privacy Statement") at <https://www.ibm.com/privacy/us/en/>. The IBM Privacy Statement also explains you may have additional rights pursuant to your local law applicable to the processing. For example, if the processing of your personal information is subject to the EU General Data Protection Regulation ("GDPR"), and your personal information is processed based on legitimate interests, you have the right to object to the processing on grounds relating to your specific situation. Under GDPR you may also have the right to request to have your personal information deleted or restricted and ask for portability of your personal. Please send such requests to IBM's Data Privacy Team using the webform at <https://www.ibm.com/privacy/contact/us-en/>

IF YOU ARE A CALIFORNIA RESIDENT, YOU HAVE SPECIFIC RIGHTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT OF 2018 (CCPA), AS FOLLOWS:

Collection, Business Purposes and Disclosure of Personal Information

As described in this Privacy Notice, we have collected and disclosed, for a Business Purpose (including providing Clients with clinical and market access insights, and facilitating potential engagements between Stakeholders and Clients), your information from the following categories in the last twelve months:

Business-related contact and biographical information, including name, address, phone number, email address, professional affiliations, association memberships, education, and specialties (all only if available in the public domain)

All personal information is obtained from publicly available data sources such as PubMed, ClinicalTrials.gov, conference programs, scientific associations. This includes Personal Information defined by the CCPA as:

- Personal information under the Customer Records provision of the California Civil Code like your name, postal address, and email address, you provide to the public domain
- Professional information like your employer name and job title

Sources and Sharing of Personal Information

This Privacy Notice and [IBM Privacy Statement](#) describes the types of sources from which we collect Personal Information and how we share your information with third parties. As explained, we may collect publicly available Personal Information from third party websites. We may share information about you with our various clients in the healthcare and life sciences industry, including but not limited to biomedical, pharmaceutical, and medical device companies ("Clients"), to identify and facilitate engagements with key stakeholders such as scientific thought leaders) (referred to as "Stakeholders"), based on information available in the public domain.

Sale of Personal Information

Depending on your choices, during the past twelve months, we may have “sold” information, as that term is defined in the CCPA, to Clients for the Business Purpose:

- **Personal and Professional Information available in the public domain**

You can make choices to allow or prevent such uses. To opt-out of IBM selling your personal information relating to the Business Purpose to Clients for their own purposes, please send the request to IBM Privacy using the webform <https://www.ibm.com/privacy/contact/us-en/>

Rights Relating to Your Personal Information

In addition to the rights granted under this Privacy Notice and the [IBM Privacy Statement](#), as a California resident, you have the right to:

Know your Personal Information

You can request specific pieces of Personal Information, or information about the categories of Personal Information that IBM holds about you by submitting a request through our webform at <https://www.ibm.com/privacy/contact/us-en/> or by calling (toll free) 1-800-IBM-4YOU (1-800-426-4968). Please note this number only addresses inquiries from U.S. and Canada.

Request Deletion of your Personal Information

You can request the deletion of the Personal Information that IBM holds about you by submitting a request through our webform [at https://www.ibm.com/privacy/contact/us-en/](https://www.ibm.com/privacy/contact/us-en/) or by calling (toll free) 1-800-IBM-4YOU (1-800-426-4968).

Non-Discrimination

If you choose to exercise any of these rights, we will not deny goods or services to you or provide different quality of services.

How to Contact Us

Questions about this Policy or about IBM's handling of your Personal Information may be submitted through our webform <https://www.ibm.com/privacy/contact/us-en/> or by calling (toll free) 1-800-IBM-4YOU (1-800-426-4968).

To read more about IBM's general privacy practices that apply to the Personal Information we collect, use and share, please visit the [IBM Privacy Statement](#).