

Privacy Policy

Pfizer Australia Pty Ltd ("Pfizer") is bound by the National Privacy Principles ("**Principles**") contained in the Commonwealth Privacy Act 1988 (Cth) and will only collect and use personal information in accordance with those Principles. The Principles are designed to protect the confidentiality of personal information and the privacy of individuals by regulating the way personal information is managed.

In summary, the Principles define '*personal information*' as information or an opinion relating to an individual which can be used to identify that individual.

We understand that when interacting with us the privacy and confidentiality of your personal information is important to you. That is why we are committed to safeguarding the personal information you provide to us. Pfizer's intention is to use the personal information provided to us by you to make any dealings with Pfizer better suited to your needs. Pfizer believes that choice is one of the most important privacy principles. You have the choice not to submit personal information (other than as may be required by law) to us although this may result in us being unable to provide products and services to you or reduce your ability to fully participate in all aspects of our web sites.

What information does Pfizer collect?

Pfizer may collect personal information about you through our interactions with you. Generally, Pfizer may keep a record of your name, contact details (i.e. address, telephone number, etc), and when collecting personal information for business purposes your professional details (e.g. qualifications, speciality, areas of interest), details on your practice/business (e.g. size, use of products) and details of your dealings with us. Other information may be collected from other sources but those sources will provide details of what personal information is being collected and why.

By way of example, Pfizer may collect information about:

- Human and Animal Health Professionals (e.g. doctor, nurse, pharmacist, veterinarian, vet nurse, etc) in the course of:
 - responding to their product queries;
 - meetings with our sales representatives;
 - complying with our regulatory obligations (e.g. notification of important product safety information); and
 - participation in Pfizer sponsored programs (e.g. clinical trials, expert panels, educational programs, research grants and disease management programs);
- Members of the general public in the course of:
 - using our customer or product information services;
 - participation in non-prescription product promotional activities; and
 - participation in Pfizer sponsored programs (e.g. clinical trials, educational programs and disease management programs);
- Service providers in the course of providing services to Pfizer.

The personal information collected may vary depending on your particular interaction with Pfizer but will be limited to that information necessary to record and manage our interaction with you (e.g. your name, relevant contact details and information about the interaction).

If any personal information is collected through visiting a Pfizer website you will be informed of its use, purpose, who it may be disclosed to and the procedure to gain access to it through specific statements and privacy policies on the website. Pfizer may provide links on its website to other sites including sites run by its affiliates. These sites may have different privacy policies and you are advised to check the privacy policy on those sites.

How does Pfizer use personal information and to whom does Pfizer disclose it?

The Principles generally require Pfizer to use personal information only for the primary purpose indicated to you when you provided it, or for secondary purposes which are related to the primary purpose.

In general, Pfizer uses personal information for the following purposes:

- maintaining a record of medical queries, complaints and adverse event or adverse reaction reports relating to our products and reporting these to relevant regulatory bodies, such as the Therapeutic Goods Administration, as may be required;

- to provide health products or services (including advice) that have been requested;
- sending you material on our activities and products or developments in pharmaceutical treatments that Pfizer believes may be of interest to you and tailoring marketing services to suit your needs;
- administering conferences, symposia, expert panels, seminars or other similar programs organised by us, which you agree to participate in or be involved with;
- administering disease awareness/management programs or other similar programs organised by us, which you agree to participate in or be involved with;
- to involve doctors/investigators (and people who assist them) in clinical trials;
- to comply with legal obligations such as notifying you of matters that we may be required by law to notify you of (e.g. product recalls);
- managing, planning and arranging meetings between you and our sales representatives;
- monitoring and reviewing our compliance with relevant regulations and codes of conduct in our dealings with you and monitoring the quality, safety and efficacy of our products; and
- generating customer lists for the purposes of market research.

Pfizer may disclose personal information to:

- its affiliates within or outside of Australia, in which case your personal information will be collected, used, disclosed, managed and stored in accordance with this policy; and
- third parties within or outside of Australia to help Pfizer improve its pharmaceutical products and health services; and
- regulatory authorities, within or outside of Australia, and ethics committees as part of a clinical trial evaluation, monitoring or inspection process.

As Pfizer changes and grows Pfizer might buy or sell companies, subsidiaries or assets and generally, customer information is one of the transferred business assets, particularly if Pfizer or substantially all of its assets are acquired.

Generally, we require that organisations outside Pfizer who handle or obtain personal information as service providers to Pfizer acknowledge the confidentiality of this information, undertake to respect an individual's right to privacy and comply with the National Privacy Principles and this Policy. However, we are not responsible for the privacy or security practices of any third party (including third parties that we are permitted to disclose your personal information to in accordance with this policy or any applicable laws). The collection and use of your information by such third party may be subject to separate privacy and security policies.

In most cases, if you do not provide information about yourself which Pfizer has requested, Pfizer may not be able to provide you with the relevant service or information required.

Notice

Where Pfizer collects personal information directly from you, we will inform you about the purpose and use of the collected information and the choices and means, if any, we offer individuals for limiting what we do with their personal information.

Sensitive information is subject to greater restrictions

Some personal information collected by Pfizer is considered 'sensitive'. Sensitive information which Pfizer may collect includes a person's state of health and medical history.

The Principles require that sensitive information is used and disclosed only for the purposes for which it was provided, or a directly related secondary purpose, unless you agree otherwise or for other specific reasons such as if the use or disclosure of this information is required by law or to prevent a serious and imminent threat to life or health of an individual.

Security of personal information

Pfizer is committed to keeping your personal information secure. All reasonable precautions using existing technology and practices will be taken to protect information from loss, misuse or alteration. We will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access.

While we endeavour to keep information on Pfizer websites, including those provided by you or on your behalf, secure and confidential, we will not be responsible for any breach of security caused by third parties and do not represent that Pfizer websites are completely secure.

Pfizer has directed its staff that personal information must be dealt with in accordance with this Policy and kept secure from unauthorised access or disclosure. We will limit access to personal information to Pfizer personnel on a need to know basis. We educate our staff about their duty to protect your privacy and provide training regarding this Policy.

Cookies

Pfizer, in common with many website operators, may use standard technology called cookies on its websites. Cookies are small data files that are downloaded onto your computer when you visit a particular website. Cookies help provide additional functionality to the site or to help us analyse site usage more accurately. For instance, our server may set a cookie that keeps you from having to enter a password more than once during a visit to one of our sites. In all cases in which cookies are used, the cookie will not collect personal information except with your explicit permission. You can disable cookies by turning them off in your browser, however, some areas of Pfizer websites may not function properly if you do so.

Spam

Pfizer's interactions with you are also regulated under the Spam Act. Pfizer complies with these laws and will not send you a commercial electronic message unless permitted by the Act.

IP Addresses

An IP (internet protocol) address is a number that is automatically assigned to your computer by your internet service provider when you log on. Your IP address is not linked to your personal information but we do preserve the right to use IP addresses to identify individuals who may threaten our site, services or customers.

Clickstream data

A "clickstream" or "clickstream data" reflect the specific web pages visited by an individual user and importantly, the manner or traffic pattern by which a user moves from one web page to another. Pfizer tracks this information only within its websites. This information is tracked and used to understand user habits and personalise the content, banner ads and promotions that users will see on the website. Clickstream data does not contain or reveal any personal information about the user.

Links

Pfizer websites may contain links to other sites that we think may be of interest to you. However, Pfizer is not responsible for the privacy practices or the content of such web sites. When linking to the other site, you should always check that the site's privacy policy before providing any personal information.

Mail and email information

If you wish to stop receiving any e-mails or other consumer communications from Pfizer which may be sent to you in the future based on your request for this information, or if you have submitted personally identifiable information through a Pfizer web site and would like to have that information deleted from our records, please notify us.

Pfizer will preserve the contents of any e-mail message that you send if we believe that we have a legal requirement to do so. E-mails sent to or from Pfizer are routinely monitored for quality control, systems administration and legal compliance purposes.

Sales Representatives

Our sales representatives will collect general information about you and your practice as outlined above. This may include information about your prescribing practices.

Clinical trials

Generally, Pfizer will not collect personal information about clinical trial patients without their consent. Should such collection be necessary, a separate consent for the collection will be obtained from those involved.

Consumer Telephone Hotline

Pfizer collects your name and telephone number for the purpose of being able to contact you at a later date about your inquiry or interest. The information may also be used for producing an adverse reaction report if you are calling to report an adverse reaction to one of our products.

Cross-border data transfer

As part of a group of companies located in many different countries, Pfizer provides some personal information to persons in other countries. When we do that, we make sure that we comply with the safeguards provided under Australian law.

Accessing and updating personal information that Pfizer holds about you

Pfizer has appointed a Privacy Officer to oversee Pfizer's management of personal information in accordance with this Policy and the Commonwealth Privacy Act. The Privacy Officer's contact details are set out below.

You can, in most cases, access the personal information Pfizer holds about you. If you wish to do so, please contact the Privacy Officer.

Pfizer endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. Please contact the Privacy Officer if you believe that the information Pfizer holds about you requires changing or becomes out-of-date.

Changes to our Privacy Policy

Pfizer reserves the right to change this Policy, as Pfizer deems appropriate. Should any changes occur to our Privacy Policy, it will be posted on our websites and will be available on request.

What if you have an enquiry?

If you have any questions about this Privacy Policy or Pfizer's privacy practices please contact the Pfizer Privacy Officer at privacyofficer.australia@pfizer.com or the address set out below. Pfizer will endeavour to act promptly in response to a request.

How to contact us

If you have questions about Pfizer and privacy, wish to provide feedback about this policy, would like to update your personal details held by Pfizer or wish to access information held by Pfizer about you, please contact Pfizer's Privacy Officer at:

E-mail: privacyofficer.australia@pfizer.com
Phone: (02) 9850 3221
Postal address: The Privacy Officer
Pfizer Australia Pty Ltd
38-42 Wharf Road
West Ryde NSW 2114