

PRIVACY NOTICE – Digihaler®, v1.5, United Kingdom

Effective Date: July 2023

This notice (the "Privacy Notice") is provided to you by Teva Pharmaceutical Industries Ltd., Teva Pharmaceuticals Europe B.V. and its affiliates as relevant ("Teva"). You can view a list of all the Teva affiliates at the following website: <https://www.tevapharm.com/contact-us/>.

This Privacy Notice explains our policies and practices for handling personal information and the choices you can make about the way your personal information is collected and used. It applies only to the use and collection of data by (or in relation to) the Digihaler ("product") and product-related patient support sites and application (together, the "App"), and does not apply to any other data collected by Teva or its affiliates through any other mobile app, website or other means that are not connected to the product. Further information on Teva's wider processing of personal data can be found in its main website privacy notice ([link](#)), and in its drug safety surveillance privacy policy ([link](#)). In all circumstances, Teva are committed to complying with applicable data privacy regulations and requirements including the UK and EU General Data Protection Regulation.

This Privacy Notice may be supplemented, as the case may be, by further information provided to you in specific situations such as where you participate in studies involving the product or App.

As used in this Privacy Notice, "we", "our" and "us" means Teva, and related companies and affiliates.

Collection of Your Information

The personal information we collect

We collect and store the following information:

- **Identification data:** name, address, e-mail address, mobile number, date of birth
- **User demographics:** interests and behaviours based upon information provided by you during your use of the App
- **Account information:** username and password, preferred language for the App, relationship to other account holders (e.g. patient or dependent), account administration-related personal information, including the messages you send us (e.g. support queries), the consents you provide, the access credentials (e.g. username and password) for your account, and related information (e.g. customer service notes)
- **Health registration details:** medical information and other health information that you provide during account registration or otherwise, including details of your healthcare organisation or professional, and participation in Digihaler clinical trials (if relevant)
- **Location data:** device GPS data (if switched on by you)
- **Health usage data:** We also collect and store data about the products connected to the App, and how you use those products, including but not limited to the product type, frequency and duration of use, and certain quality measures

- **Health-related data:** additional health analysis or scores derived from the evaluation of your registration and usage data and other relevant external factors such as local weather patterns
- **Technical usage data:** location, internet and electronic network activity information, such as your device type, Internet protocol (IP) address, device identifiers, device manufacturers, operating system, Internet service provider, the date and time of your website use and App use, information about the links you click and your activity within the App, and other standard log information, error-reporting information in the event of a technical error, including the device type and version, device identifiers, the time the error occurred, the feature being used, the state of the application when the error occurred, and any communications or content provided at the time the error occurred.

Why we collect, use and store this personal data

We need to have a legal basis to process your data. We set each of these legal bases below, explain what they are, and assign a letter to each so that you can understand which legal basis we are relying on to process your data for different activities. The section below then explains the purposes for which we process your data, the processing operations that we carry out, and the categories of data that we use in each case.

Legal basis

A) Contractual necessity – if we enter into a contract you – including the Terms of Use of the App – we have certain obligations and contractual rights. We rely on this legal basis when we need to process your data to fulfil the contract.

B) Consent – we ask for your consent to use your data in given situations. Where we process your health data, this must be explicit consent. Whenever we ask with your consent we will explain the situations where we use your data and for what purposes.

C) Legitimate interest – there are instances where we have a legitimate interest to use your data. Our legitimate interest will vary depending on what we are using your data for, and we explain below what the interest is and how it relates to the processing operations that we are carrying out. Where we process personal data on the basis of a legitimate interest, then – as required by data protection law – we have carried out a balancing test to document our interests, to consider what the impact of the processing will be on individuals and to determine whether individuals' interests outweigh our interests in the processing taking place. You can obtain more information about this balancing test by using the contact details at the end of the notice.

D) Legal obligation – as an organisation we have obligations to comply with legal, regulatory and other requirements under EU, Member State or UK laws. In certain cases we have to use your data to meet these obligations.

How and why we use personal information

Purpose of Processing:

1. To register your account on the App and account hosting, including syncing any information previously collected on the inhaler before registration.
 - a. **Categories of personal data**
 - Identification data
 - Account information
 - Health registration details
 - Health usage data
 - b. **Legal Basis**
 - Performance of a contract
 - Consent (health data)
 - c. **Data Retention**

For the length of our relationship. In the event of two years inactivity, we will also delete your account.
 - d. **Third Parties who Access/ Use Data**

TEVA's third party processors located in the EU (user account registration and content hosting)
2. To process and deliver our products, services and App to you
 - a. **Categories of personal data**
 - Identification data
 - Account information
 - Health registration details
 - Health usage data
 - Health related data
 - Technical usage data;
 - Location data (device GPS)
 - b. **Legal Basis**
 - Performance of a contract
 - B. Consent (health data and location data)
 - c. **Data Retention**

For the length of our relationship. In the event of two years inactivity, we will also delete your account.
 - d. **Third Parties who Access/ Use Data**

TEVA's third party processors located in the European Union and the UK (development, hosting, monitoring, maintenance/support)
3. To carry out health data analysis, to allow use to improve our product and services and carry out associated research and development.
 - a. **Categories of personal data**
 - Identification data (pseudonymised)
 - User demographics
 - Health usage data
 - Health related data

- Technical usage data;
- Location data (device GPS)

b. Legal Basis

- B. Consent

c. Data Retention

Pseudonymised immediately, anonymised upon account deletion (see above for the account deletion process).

d. Third Parties who Access/ Use Data

TEVA's third party processors located in the European Union and UK (IT support, analytics, hosting).

- 4.** To carry out technical analysis, to optimise and improve our product/services, and App including troubleshooting, performance measuring, service development, data analysis, testing, system maintenance.

a. Categories of personal data

- Identification data (pseudonymised)
- Account information (pseudonymised)
- User demographics
- Health usage data
- Technical usage data;
- Location data (device GPS)

b. Legal Basis

- B. Consent

c. Data Retention

Pseudonymised immediately, anonymised upon account deletion (see above for the account deletion process).

d. Third Parties who Access/ Use Data

TEVA's third party processors located in the European Union and UK (IT support, analytics, hosting).

- 5.** To communicate with you, including managing questions or complaints about the App, service or product, sending you surveys and requesting feedback.

a. Categories of personal data

- Identification data
- Account information
- Health registration details

b. Legal Basis

- C. Legitimate interest
- B. Consent (health data)

c. Data Retention

Your information will be retained for a maximum period of two years.

d. Third Parties who Access/ Use Data

TEVA's third party processors located in the European Union: (IT hosting and support).

6. Where available and selected, allowing access to your data for the purposes of providing our patient support services.

a. Categories of personal data

- Identification data
- Account information, Health registration details

b. Legal Basis

- B. Consent (health data)

c. Data Retention

Your information will be retained for the length of the patient support services, and a further two years.

d. Third Parties who Access/ Use Data

TEVA's third party processors located in the European Union: (provision of the patient support services).

7. To share your information with your nominated healthcare professionals.

a. Categories of personal data

- Identification data
- Health registration details
- Health usage data
- Health related data

b. Legal Basis

- B. Consent (health data)

c. Data Retention

For the length of our relationship. In the event of two years inactivity, we will also delete your account. Your healthcare professional may continue to retain this information – see below.

d. Third Parties who Access/ Use Data

Your nominated healthcare professionals.

8. To deploy cookies and similar technologies.

a. Categories of personal data

- Technical usage data (strictly necessary)

b. Legal Basis

- C. Legitimate interests

c. Data Retention

Your information will be retained for a maximum period of six months.

d. Third Parties who Access/ Use Data

None.

9. To protect our legitimate business interests and legal rights – for example, in connection with legal claims, dispute resolution compliance, regulatory, auditing and investigative purposes.

a. Categories of personal data

- Identification data
- Account information
- User demographics
- Health registration details
- Technical usage data
- Health usage Data
- Health-related data

b. Legal Basis

- C. Legitimate interests
- D. where mandated by law, legal obligation

c. Data Retention

As required for these purposes. In practice, this will be at least 2 years, but may extend this as reasonably required to meet this obligations, or in accordance with applicable laws.

d. Third Parties who Access/ Use Data

Possible third party controllers: professional firms advising us on these matters and with government authorities and/or law enforcement officials.

Where we collect personal information to enter into or perform our contract with you or to comply with our legal obligations, this is mandatory and we will not be able to perform the contract or we may be prevented from complying with our legal obligations to you or third parties (such as mandatory reporting requirements) without this information. In other cases, provision of the requested personal information is optional, but this may affect your ability to receive certain services or take part in certain activities where the information is needed for those purposes.

Sharing Your Personal Information

Please see “How and Why We use Your Personal Data” section for more information on the recipients of your personal data.

For all categories of personal data, we will share personal data only as necessary with other functions and companies in the Teva group of companies worldwide such as Teva Pharmaceuticals Industries Ltd. in Israel, Teva Pharmaceuticals Europe B.V., Teva Croatia (PLIVA HRVATSKA), and Teva Pharmaceuticals USA Inc. These entities provide IT support, IT hosting and other group services such as HR, Finance and other support. These entities may also require your information for compliance with applicable laws.

Generally, as described in the chart above, we may share your personal data with the following additional categories of recipients (in all cases, only when necessary to fulfil their functions):

- third party service providers which process your personal information on behalf of Teva and who are bound by contractual and legal obligations to keep your personal information confidential and appropriately secure, such as:

- IT support, website and database hosting, user account and content hosting, event management and analytics providers ;
- Patient support services, such as assisting patients with use of the app and with use of their medical device;
- Inquiry and other database hosting and support;
- external consultants, professional advisors and agents, including lawyers and auditors. When dealing with such providers, we require them to strictly comply with all applicable data protection rules and laws, as well as the specific rules applicable to their activities and the protection of the information they process in the course of such activity;
- government authorities, regulatory agencies and law enforcement officials;
- in the event that the business is sold or integrated with another business, potentially our advisers, any prospective purchasers and/or their advisers, and any new owners of the business, and third parties (and their advisors) with whom we merge with or acquire in future.

We may also share your personal information under circumstances we believe reasonably necessary to protect the personal safety of users of Teva products and services, or other persons.

Note that in the App, you can also give other authorized individuals (e.g. healthcare organisations) access to your personal information, or send it to other people (e.g. family members) in PDF format.

Sharing with Healthcare Organisations

The App may offer functionality in which you can share your personal data with healthcare professionals as part of one or more Healthcare Organisations. If you choose to use this functionality, you will need to enter an Invitation Code provided to you by one of the Healthcare Organisation participants into the app, and you must consent to share your personal information and product usage data for each Healthcare Organisation. This will result in the sharing of your data with the Healthcare Organisation through a Teva managed platform. The Healthcare Organisation will then determine which individuals in their practice will have access to the platform in order to provide you with care.

The use and further disclosure of your personal data by the Healthcare Organisation(s) you have shared with is not covered by this Privacy Notice. You should ask your Healthcare Organisation(s) for information about how they use your information and who has access to it.

The list of Healthcare Organisations you have current given access to is listed in the App. Where you remove consent for a Healthcare Organisation, their name is removed from the App. The Healthcare Organisation will be notified that their access has been removed, and they may contact you about this. This removal will not affect the copies of information already downloaded by the Healthcare Organisation and you should (if desired) tell the recipient to return or delete their own copies of the personal information. Their ability to do this may be limited by relevant law.

Statistics

Where you give your consent, we pseudonymise your information to produce statistical datasets. We use user demographic information, such as the percentage of visitors within certain age brackets, to gain user insights or improve the App or related services. We also may aggregate this information, and share this anonymous, aggregated information, which does not include personal information and is not subject to this Privacy Notice, with third parties.

Third Party Content or Services

As a resource to App users, we may provide third party content or other materials within the App (e.g. weather information provided by third parties, and/or links to websites operated by third parties). Please be aware that unless explicitly stated, the practices of those third parties, on their own websites for example, are not covered under this Privacy Notice. We suggest that when following a link to a website or service, you always read the applicable privacy notice before volunteering any personally identifiable information. Likewise, any data you backup to a third party server (e.g., your iCloud or Google account) is subject to that third party's privacy notice.

Geolocation Data

Some features of this App, such as location specific allergy or usage recommendations and daily self-assessment reporting, may make use of your device's geolocation data and the App may therefore access your device's geolocation capabilities (e.g., GPS). This information is only used for these purposes, plus any analytics purposes to which you have consented, and only when you have enabled location services in your settings on your mobile device. We may use or disclose to third parties such geolocation information for the purpose of providing these features.

Although Teva may use or disclose geolocation data, we are not capable of assisting in an emergency.

Transfers

Teva primarily stores your personal data using its data hosting processors, whose servers are based in the EU. Teva additionally shares your personal data to its affiliates in the USA and in Israel in order to carry out the processing described in the table above. When transferring your information to Israel, Teva relies on the European Commission's adequacy decision with respect to the transfer of data from the European Union to Israel (or equivalents, from time to time, under UK law); when transferring to other companies in countries outside the EEA and the UK which do not benefit from an adequacy decision from the European Commission (including to the USA), Teva generally relies on EU Commission approved standard contractual clauses (or equivalents, from time to time, under UK law). Information on the relevant mechanism can be provided upon request.

How We Store Your Information

Please refer to the "**How and why we use personal information**" section above for relevant retention periods for each purpose of processing.

If you ask us to delete your account, and withdraw your consent, we will act on this promptly. Where your account becomes inactive, and you do not make use of the App or sites for two years, we will also take action to delete your account. We will otherwise store your personal data for no longer than is necessary for the performance of our obligations or to achieve the purposes for which the information was collected, or as may be permitted under applicable law.

To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the data; the potential risk of harm from unauthorised use or disclosure of the data; the purposes for which we process the data and whether we can achieve those purposes through other means; and the applicable legal requirements. Unless otherwise required by applicable law, at the end of the retention period we will remove personal data from our systems and records or take appropriate steps to properly anonymise it.

Your Rights

You may be entitled under applicable law to ask Teva for a copy of your information, to correct it, erase or restrict its processing, or to ask us to transfer some of this information to other organisations. You may also have rights to object to some processing. These rights may be limited in some situations; for example, where we can demonstrate we have a legal requirement to process your personal information.

Where you have consented to the processing of your data, you may withdraw such consent at any time, free of charge and without undue detriment. The withdrawal of your consent will not affect the lawfulness of the processing that took place prior to your consent being withdrawn.

Where you request that we erase your information, or withdraw your consent, we will take action to anonymise your information as appropriate. We may still be required to keep some of your information.

If you have any concerns about how we process your personal information or wish to exercise any of your rights or wish to obtain other information, such as a copy of a legitimate interests balancing test, you can get in touch with Teva's Data Protection Office by contacting us (see below for contact info).

We hope that we can satisfy any queries you may have about the way in which we process your personal information. However, if you have unresolved concerns you also have the right to complain to the data protection authority in the location in which you live, work or believe a data protection breach has occurred. For UK individuals, this will be the [Information Commissioner's Office](#).

Security

Teva takes measures to secure your personal data from accidental loss and from unauthorized access, use, alteration or disclosure. Data is transferred securely using SSL encryption and stored on secure

servers. Additionally, we take further information security measures including access controls, stringent physical security and robust information collection, storage & processing practices. However, the internet is an open system and Teva cannot guarantee that unauthorized third parties will never be able to defeat those measures or use your personal information for improper purposes.

Contact Information

You can contact Teva's European and UK Data Protection Officer, Bird & Bird International, at EUPrivacy@tevaeu.com.

If you wish to exercise your rights to access information, you can contact us according to the below:

For UK and Ireland:

Telephone: +44 (0)207 540 7117

Email: medinfo@tevauk.com

Changes to this Notice

This Notice may change from time to time. Teva will place an updated version of the Notice on this page and may otherwise communicate changes as appropriate. If we believe we need to seek a new consent for our processing, we will either request this through the App or contact you using the contact information you have provided.