

# **Personal Data Protection Policy**

Santen Pharmaceutical Asia Pte Ltd ("**SANTEN**") collects personal data to support its learning, research, administration, personal development, to process applications for admission of candidates to SANTEN and for other functions such as general wholesale trade (including general importers and exporters).

SANTEN's Personal Data Protection Policy ("**Policy**") discloses how SANTEN collects, uses, access, stores, transfers and handles your personal data, in accordance with the Personal Data Protection Act 2012 (Act 26 of 2012) ("**Act**"). By providing your personal data to SANTEN, you are consenting to this Policy and the collection, use, access, storage, transfer and processing of your personal information by SANTEN and its respective representatives and/or agents as described in this Policy.

This Data Protection Policy supplements but does not supersede nor replace any consent you may have previously provided to SANTEN in respect of your Personal Data, and your consents are in addition to any rights which to any SANTEN and/or its respective representatives and/or agents may have at law to collect, use or disclose your Personal Data with or without your consent.

#### 1. Personal Data

"Personal Data" refers to data, whether true or not, about an individual who can be identified from that data; or from that data and other information which an organization has or is likely to have access.

Such Personal Data includes, but is not limited to, your name, gender, date of birth, passport or other identification number, telephone number(s), residential mailing address, personal email address, photographs or CCTV footage from which you can be identified, and any other personal information or details that you provide to SANTEN.

### 2. Purposes for the Collection, Use and Disclosure of Personal Data

Such Personal Data will be collected, used, disclosed, transferred and/or processed by SANTEN for the following purposes: -

- (a) Processing, administering and/or managing your contractual relationship with SANTEN;
- (b) For your use of any online services available at any of SANTEN's or its affiliates' or related corporations' websites and/or through other telecommunication channels;
- (c) Facilitating or managing any business transaction(s) with you;
- (d) When you interact with our officers, employees, authorised agents via telephone calls, mail, inperson meetings, email and any other forms of communication;
- (e) For SANTEN or its respective officers, employees, sub-contractors, assigns, affiliates, successors, service providers and/or agents to conduct research, clinical trials or the relevant obtain regulatory approvals or licences for its products devices and services from the relevant authorities.



- (f) For identification and verification purposes in connection with any of the services or products that may be supplied to you by SANTEN or its affiliates or related corporation;
- (g) Carrying out due diligence or other screening activities in accordance with the law or regulatory requirements or risk management procedures that may have been put in place by SANTEN, including conducting background checks or obtaining of references and/or other information about applicants from previous employers;
- (h) Responding to any of your enquiries;
- (i) To disclose to our agents, affiliates or related corporations for the purposes of managing or delivering training programme;
- (j) Investigating fraud, misconduct, any unlawful action or omissions and whether or not there is any suspicions of the aforementioned:
- (k) Responding to requests for information from the Government, public agencies, ministries, statutory boards or other similar authorities from time to time;
- Carrying out market-related or similar research and analysis for SANTEN's operational strategy and policy planning purposes;
- (m) Organising events for healthcare professionals or patients;
- (n) For legal purposes (including but not limited to obtaining external legal advice and dispute resolution proceedings);
- (o) With consent, sending you marketing, advertising, and promotional information, including materials and information on courses in SANTEN or its Affiliates or related corporations and/or other events via postal mail, email, SMS, fax, voice calls or other forms of communication;
- (p) Any other additional purpose that is consistent with the original purpose for which consent was given; and
- (q) When you submit your Personal Data to us for any other reasons.

Such Personal Data may be disclosed by SANTEN to our Affiliates or related corporations, third party service providers or agents (whether in Singapore or elsewhere in the world where such OUs or service providers are sited) for one or more of the above purposes, as such third party service providers or agents, if engaged by SANTEN, would be processing your Personal Data for SANTEN, for one or more of the above purposes.



### 3. Withdrawal of Consent

If you would like to withdraw your consent to any use of your Personal Data as set out in this Policy, please fill in the Withdrawal of Consent Form and send it to the Data Protection Officer.

Please note that when you withdraw your consent to any use of your Personal Data as set out in this Policy, it may affect the services provided by SANTEN or the Affiliates or related corporations when such consent is regarded as a condition of providing services from SANTEN or its Affiliates or related corporations.

### 4. Access

If you would like to access your Personal Data which we collect, use, disclose and/or process, please fill in the Access to Personal Data Request Form and send it the Data Protection Officer.

We may charge an access fee at the point of request to cover the reasonable cost of retrieving the information and supplying it to you as permitted under the Act.

Access to personal data may be refused if access to such information could reasonably be expected to cause harm to an individual's safety; reveal the identity of another individual who has provided the personal data but has not consented to the disclosure of his or her identity; or be contrary to national interest.

# 5. Accuracy and Correction

SANTEN makes reasonable efforts to ensure that the Personal Data it collects is accurate and complete. To assist SANTEN in keeping its records up-to-date, it is important that you inform SANTEN of any changes to your Personal Data in writing. If you would like to correct any inaccuracies of your Personal Data, please fill in the Correction of Personal Data Request Form and send it to the Data Protection Officer.

# 6. Security of Personal Data

SANTEN has reasonable security arrangements in place to protect the Personal Data that it possesses to prevent unauthorized access, collection, use, disclosure or similar risks. Please take note that no computer, electronic or data storage system is immune from intrusion and therefore, we cannot guarantee the absolute security of any Personal Data we may have collected from or about you, or that for example no harmful code will enter SANTEN's websites (for example viruses, bugs, trojan horses, spyware or adware). You are advised to take note of the risks and implement the necessary precautions.

# 7. Transfer of Personal Data

SANTEN has in place reasonable measures to ensure that transfer of Personal Data out of the jurisdiction is protected and in compliance with the Personal Data Protection Act.



### 8. Retention of Personal Data

SANTEN will retain your Personal Data for a reasonable period for the purposes for which it was processed or until you request for SANTEN to delete the Personal Data, or as required by law.

# 9. Personal Data Protection Officer

Should you have any questions, feedback or concerns relating to SANTEN's Personal Data Protection policies or wish to access, correct or withdraw any consent relating to your personal data, please contact our Data Protection Officer:-

Email address: dpo\_sg@santen.asia

Postal address: The Data Protection Officer,

Santen Pharmaceutical Asia Pte. Ltd.

6 Temasek Boulevard #20-03/04, Suntec Tower Four,

Singapore 038986

Please include the following information for verification purposes:-

- (a) Your full name and NRIC or Passport number;
- (b) A clear photocopy of your NRIC or Passport;
- (c) Your contact details;
- (d) Name of the officer, employee and his or her division by whom your personal data was collected; and
- (e) Details of your request

By providing to us with complete information, we will be able to provide you access to, update or correct your personal data as soon as reasonably possible. Alternatively, you may submit your request in person at SANTEN's registered address.

For more information on how SANTEN handles complaints pertaining to Personal Data, please refer to SANTEN's Personal Data Protection Complaints Procedure.