

Privacy Notice for the Novartis Experience on Medisafe ^[1]

Thank you for your trust in Novartis Pharmaceuticals Corporation (“we,” “our,” or “us”). We are a U.S.-based affiliate of the Novartis global group, a world leader in healthcare. This Privacy Policy explains how we use and disclose the information we collect from you through the Novartis Experience hosted by Medisafe (the “Experience”).

This Privacy Policy applies to the Experience for all Novartis products. It only pertains to information collected through the Experience, and does not apply to any other areas of the Medisafe application, or other products, services, or platforms that may support or interact with the Experience.

What Information Do We Collect?

Information We Obtain from You or from the Support Services You Are Enrolled In: We collect the information listed below through your use of the Experience, or from Novartis support services that integrate with the Experience when you enroll, such as your medication patient support program, co-pay program or other medication or financial assistance program. We will use the information to deliver the Experience to you, including account registration or verification, providing updates about your insurance benefits, medication shipment, or co-pay details, helping you assess and maintain adherence to your medication regimen, as well as content and interactive features.

- Contact information: First name, last name, email address, phone number, zip code, mailing address so that we can identify you, contact you, and authenticate your account;
- Demographic information, including your age, birth date, and gender;
- Account information, including your username and password;
- Medical or health information, including your prescription medication, dosage, renewal dates, appointment dates, and information about your engagement with symptoms tracking features;
- Insurance and payment information, including insurance and benefits information, program enrollment, co-pay balance, co-pay renewal, and benefit card;
- Information you choose to provide outside of the Experience, for example, if you send us an inquiry using the contact information provided below or otherwise make a customer service inquiry associated with the Experience.

If you submit personal information relating to other people to us, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy

Policy.

Information Automatically Collected From You: When you download and use the Experience, we and our service providers may collect usage data as well as technical data about your device. This automatically collected information may include:

- Internet or other electronic network activity information: such as the date and time the Experience accesses our servers and what information and files have been downloaded to the Experience.
- Through your device: Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Experience you are using. We use this information to ensure that the offerings function properly.
- Through your use of the Experience: When you download and use the Experience, we may track and collect app usage data, such as the date and time the app on your device accesses our servers and the information and files that have been downloaded to the app.
- Using cookies: Cookies are small text files stored directly on your device. We use cookies to collect information such as time spent on the Experience, pages visited, pages you view immediately before and after you access the Experience, the search terms you enter, and other anonymous traffic data. Cookies allow us to recognize you and personalize your experience, to facilitate navigation, and to display information more effectively. We also use cookies to gather statistical information about the use of the Experience in order to understand how they are used, improve them, and resolve questions about them. If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or to be given the choice of declining or accepting cookies from a particular site. You may wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html> [2]. If you do not accept our cookies, you may experience some inconvenience in your use of the Experience.
- Using pixel tags and other similar technologies: We may use pixel tags (also known as web beacons and clear GIFs) to, among other things, track the actions of users of the Experience and our email recipients, measure the success of our marketing campaigns and compile statistics about usage of the Experience and response rates.
- Using Adobe Flash technology (including Flash Local Shared Objects ("Flash LSOs")) and other similar technologies: We may use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Experience. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the [Website Storage Settings Panel](#) [3]. You can also control Flash LSOs by going to the [Global Storage Settings Panel](#) [4] and following the instructions (which may include instructions that explain, for example, how to delete existing Flash LSOs (referred to "information" on the Macromedia site), how to prevent Flash LSOs from being placed on your computer without your being asked, and how to block Flash LSOs that are not being delivered by

the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.

- IP Address: Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP Address may be identified and logged automatically in our server log files whenever a user accesses the Experience, along with the time of the visit and the page(s) visited. Collecting IP Addresses is standard practice and is done automatically by many websites, applications and other services. We use IP Addresses for purposes such as calculating usage levels of the Experience, helping diagnose server problems, and administering the Experience.
- Precise Real-Time Location Information: We may collect precise, real-time information about the location of your mobile device. We may use your device's location to provide you with personalized location-based services and content, including marketing communications. You may be permitted to allow or deny the use of your device's location by managing your location services preferences through your device settings.

How Do We Use Your Information?

In addition to using your information to provide the Experience as described above, and to deliver programs, services, products, or information that you request, we may use it:

- to verify your identity when you access your account with the Experience and ensure the security of your personal information;
- to provide customer support, account management services, and to engage in system maintenance;
- to answer your questions about the services, or otherwise communicate with you about the Experience;
- to provide you with information about the Experience, our other products, programs, or services, your accounts, and notices;
- to deliver targeted ads and other marketing communications that may be of interest to you;
- to permit you to participate in polls, surveys, promotions, or other interactive features;
- to personalize your experience and better tailor content to you, such as by providing interactive or personalized elements on the Experience and providing you with content based on your interests and requests;
- to help us, our subsidiaries, affiliates, and business partners better understand our audiences, evaluate user interest in the Experience, improve the Experience, and perform other market research activities;
- for other business purposes, such as data analysis; audits; monitoring and prevention of

fraud, infringement, and other potential misuse of the Experience; modifying the Experience; determining the effectiveness of our promotional campaigns; and operating and expanding our business activities, including the development of new products and services; and

- as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

In addition to those purposes listed above, we may use your information for any other purpose disclosed to you at the time of collection or when you provide your authorization.

When and to Whom Do We Disclose Your Information?

The information we collect from and about you may be disclosed:

- to our subsidiaries and affiliates within the Novartis Group ^[5] of companies, for the purposes described in this Privacy Policy;
- to third parties that provide services to us, such as fulfilling requests for information, answering calls, administering programs or projects, assisting in research and development, or delivering advertisements or other communications;
- to business partners who offer products or services jointly with us or with our subsidiaries or affiliates;
- as required by law, such as to law enforcement, to health authorities to report possible adverse events, during government inspections or audits, as ordered or directed by courts or other governmental agencies, or in order to comply with a subpoena or other legal process;
- when we believe in good faith that disclosure is necessary to protect legal rights or the security or integrity of the Experience; protect your safety or the safety of others; investigate fraud, a breach of contract, or a violation of law; or respond to a government request; and
- to third parties, advisors, and other entities to the extent reasonably necessary for development of or to proceed with the negotiation or completion of a corporate or commercial transaction, including a reorganization, merger, acquisition, joint venture, sale, or other disposition of all or a portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

We may use or disclose information that does not personally identify you for any purpose, except where we are required to do otherwise under applicable law.

Your Choices

When you are enrolled in the Experience, we offer the following choices that you can exercise with regard to your personal information.

- **Opt-out of the Experience.** You can opt-out of the Experience at any time by following the prompts at the bottom of the navigation drawer on the home screen when you are in the Experience. Opting out of the Experience on Medisafe will not affect your participation in your underlying patient support program. To make changes to your participation in those programs, you can unsubscribe from any email sent by the program or by calling the program's phone number or by calling Novartis at 1-888-NOW-NOVA (1-888-669-6682).
- **Opt out of Medisafe or In-App Notifications.** Please visit the [Medisafe privacy policy](#) ^[6] to find more information on how to opt out of the full Medisafe app or to control in-app notifications.

We do not currently respond to web browser "do not track" signals or other mechanisms that provide a method to opt out of the collection of information across websites or other online services.

Children's Information

The Experience is not intended for or directed to individuals under the age of eighteen (18). If a parent or guardian becomes aware that his or her child has directly provided us with personal information, please contact us by using the contact information below.

Accessing and Updating Your Information

We encourage you to update the personal information you provide to us, to help us continue to provide information that best meets your needs. You may be able to update this information through the Experience, or visit <https://www.pharma.us.novartis.com/utills/contact/info/emails> ^[7], write to us at Novartis Pharmaceuticals Corporation, 1 Health Plaza, East Hanover, New Jersey, 07936 attention Privacy Office, or call us at 1-888-NOW-NOVA (1-888-669-6682).

Third-Party Services

The Experience is hosted within the Medisafe mobile application, which is owned and operated by Medisafe Project Ltd., a third party. Your use of the Medisafe mobile application may be governed by the Medisafe privacy policy, which may establish information collection, use, or disclosure practices different from our own. We encourage you to review the [Medisafe privacy policy](#) ^[6]. In addition, your use of devices, digital assistants or third-party platforms to engage with the Experience is subject to the privacy policies and practices of those entities. We encourage you to review the privacy policies of those third parties.

Additional State-Specific Information for United States Residents

Some states (including but not limited to California, Nevada, and Texas), have state specific rights for their residents. Click [here](#) [8] to learn more about those state specific rights.

Changes to This Privacy Policy

This Privacy Policy became effective on February 1, 2020. We may update it from time to time. You are advised to consult the Privacy Policy regularly for any changes. If we make a material change to the Privacy Policy, we will take reasonable steps to notify you as may be required by law prior to putting the changes into effect.

How to Contact Us

If you have any questions, please visit

<https://www.pharma.us.novartis.com/utils/contact/info/emaili> [7] write to us at Novartis Pharmaceuticals Corporation, 1 Health Plaza, East Hanover, New Jersey, 07936 attention Privacy Office, or call us at 1-888-NOW-NOVA (1-888-669-6682).

Publish Date:

Dec 18, 2019

Accordion Type:

Collapsible

Source URL: <https://www.pharma.us.novartis.com/Novartis-Experience-on-Medisafe-Privacy-Policy>

Links

[1] <https://www.pharma.us.novartis.com/Novartis-Experience-on-Medisafe-Privacy-Policy>

[2] <http://www.allaboutcookies.org/manage-cookies/index.html>

[3] https://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html

[4] https://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager03.html

[5] <http://www.novartis.com/>

[6] <https://www.medisafe.com/privacy-policy/>

[7] <https://www.pharma.us.novartis.com/utils/contact/info/emaili>

[8] <https://www.pharma.us.novartis.com/state-privacy-notice>