



Personal Data Protection Policy for Patients

Roche Thailand Ltd. ("Company", "we", "us" or "our") would like to ask you to thoroughly read and understand this Personal Data Protection Policy for Patients ("Policy") as this Policy provides you with explanations on the details and procedures of which the Company undertakes in relation to your personal data as required by the Personal Data Protection Act B.E. 2562 (2019) as well as rules, regulations and any other notifications issued by virtue thereof, as may be amended from time to time ("PDPA"), i.e. the collection, use, disclosure, retention and/or otherwise processing of your personal data (collectively referred to as the "processing") and your rights in relation to your personal data. The details of which are as follows:

1. About the Company

Company may carry out the projects such as Roche Patient Assistant Program (RPAP), Roche Special Arrangement Program (RSAP), Patient Financial Assistant Program, Patient Access Program for Patients who are the Civil Servants and any other programs in order to provide assistance to the patients and for the benefits of the patients in having access to drugs and/or medical treatment (collectively referred to as the "Program(s)"). In addition, in the event that you would like to receive medical treatment by using the drugs for purposes other than the indications indicated in the label or the prescription which has been registered with the Food and Drug Administration, the Company may contact and coordinate with the health facilities, hospitals, clinics, physicians and/or any other healthcare personnel.

2. The Processing of Personal Data

The Company wishes to provide assistance to you in order to enable you to have access to drugs and medical treatments without an aim to obtain any commercial benefits from you. Due to this reason and for the purpose of transparency, the Company may require third party(ies) to process your personal data, which includes sensitive personal data as specified in Section 26 of the PDPA, for and on behalf of the Company. This is to limit the Company's access to your personal data. Nonetheless, such limitation of access does not mean the Company will not be able to have access to your personal data. In other words, in case of necessity, the Company may access and process your personal data by ourselves. The Company may collect your personal data through the following channels:

- a. Directly from You: In the event that you have filled in the application form to participate in the Programs or when you contact the Company directly through any channels.
- b. Treating Physicians or Health Facilities: The Company may collect your personal data from your treating physicians or the health facilities which you have visited for medical treatments.
- c. Other Third Parties: For example, persons or legal entities which are engaged by the Company to process your personal data on behalf of the Company in order to carry out the acts pursuant to the purposes which are specified in this Policy.

3. If you have provided us with the personal data of your relative or any other contact person ("Contact Person"), you hereby represent that you have already informed the Contact Person of this Policy and have obtained consent from the Contact Person to disclose his/her personal data to the Company, or that there is other legal basis which enables the disclosure of the Contact Person to the Company for such data to be processed for the purposes specified herein this Policy.

4. Collected Personal Data

a. Patients

The Company may collect the following personal data from you:



- (1) General Personal Data – for example, name, surname, address, phone number, mobile phone number, email address, identification card number, date of birth, age, gender, Hospital Number, voice records of conversation, signature.
- (2) Sensitive Personal Data – for example, health-related data, disease, medical conditions, weight, height, drug allergies, laboratory diagnostic information, information on the drugs which you are using, information on the disease diagnostics, information on the adverse drug events or adverse drug reactions, information on the outcome of medical treatment, indications, information on the appointment with physicians, medical expenses, medical treatment reimbursements.

b. Contact Person

The Company may collect your personal data from the Patients which are your name, surname, phone number, relationship with the Patient.

c. Legal Guardian

In case of minor, the Company needs to obtain consent from the minor's father, mother or legal guardian ("Legal Guardian"). Therefore, the Company will collect personal data of the Legal Guardian directly from you which are name, surname, phone number, signature, relationship with the Patient as well as any other documentary evidence which proves the lawful and legal authorization to enter into a juristic act on behalf of the Patient.

5. Purposes of the Collection of Personal Data

- a. The Company collects your personal data for the following purposes:

Purposes	Details and Legal Basis
To consider and make determination on your application to participate in the Program	<p>The Company processes your personal data in order to consider and assess your qualifications to participate in the Program pursuant to your application to participate in the Program, and to make determination on the acceptance or rejection of your application to participate in the Program.</p> <p>Legal Basis</p> <ul style="list-style-type: none"> ▪ To Proceed with Your Request Prior to Entering into a Contract ▪ Legitimate Interest: For the consideration and assessment of your qualifications as well as determination on your application to participate in the Program ▪ Explicit Consent: For the processing of sensitive personal data
To perform obligations under the Program	<p>The Company processes your personal data in order to perform our obligations in enabling you to have access to drugs which are required for the medical treatments and to provide supports to you in relation to the costs of drugs, to provide you with drugs free-of-charge or to undertake any other actions pursuant to the terms and conditions of the Program which have been agreed between you and the</p>



Purposes	Details and Legal Basis
<p>To conduct audit on and monitor your participation in the Program</p>	<p>Company and which may be amended from time to time. This shall include any other relevant proceedings.</p> <p>Legal Basis</p> <ul style="list-style-type: none"> ▪ Performance of Contractual Obligations ▪ Explicit Consent: For the processing of sensitive personal data <p>The Company processes your personal data in order to conduct audit on and monitor your participation in the Program – for example, number of your visits at health facilities, number of times which you have received drugs under the Program, outcome of the medical treatment under the Program, whereby such information will be used for the analyzation and assessment of the qualifications of the Program and products of the Company as well as to verify the operations which are undertaken under the Program.</p> <p>Legal Basis</p> <ul style="list-style-type: none"> ▪ Performance of Contractual Obligations ▪ Legitimate Interest: For the processing of personal data for above-stated purposes which are not included in the terms and conditions that you have agreed with us ▪ Explicit Consent: For the processing of sensitive personal data
<p>Pharmacovigilance</p>	<p>The Company processes your personal data for the purpose of pharmacovigilance and we may examine, analyze and assess the results that we have obtained in order to prevent the possible occurrence of other side effects or fore the Company’s product development.</p> <p>Legal Basis</p> <ul style="list-style-type: none"> ▪ Legitimate Interest ▪ Compliance with Legal Obligations: For the cases where the applicable law imposes obligation on the Company to carry out pharmacovigilance ▪ Explicit Consent: For the processing of sensitive personal data
<p>Report of Drug Adverse Events or Drug Adverse Reactions</p>	<p>The Company processes your personal data for the purposes of reporting the group companies, affiliates and relevant authorities on the drug adverse events or drug adverse reactions which occurred from the use of the drugs of the Company – for example, the Food and Drug Administration</p> <p>Legal Basis</p>



Purposes	Details and Legal Basis
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	<ul style="list-style-type: none"> ▪ Legitimate Interest ▪ Compliance with Legal Obligations: For the cases where the applicable law imposes obligation on the Company to make a report on the adverse drug event or adverse drug reaction ▪ Explicit Consent: For the processing of sensitive personal data where the law does not specify otherwise
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Compliance with Legal Obligations	<p>The Company processes your personal data in order to comply with our obligations under the laws which include compliance with the orders of the courts, official or competent authorities.</p> <p>Legal Basis Compliance with Legal Obligations</p>
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Verification and Confirmation of your consent	<p>The Company processes your personal data in order to verify and retain as evidence that you have granted consent where you would like to receive medical treatments by using the drugs outside the scope of the indications specified in the label or prescription which has been registered with the Food and Drug Administration.</p> <p>Legal Basis</p> <ul style="list-style-type: none"> ▪ Legitimate Interest ▪ Explicit Consent: For the processing of sensitive personal data where the law does not specify otherwise
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Contact and communication regarding the Program, inquiries or questions	<p>The Company processes your personal data in order to provide you with information, respond to your inquiries or concerns, provide you with advice, or to otherwise contact and communicate with you regarding the Program or the use of the Company's products. This shall include contact and communication with the Contact Person and Legal Guardian.</p> <p>Legal Basis</p> <ul style="list-style-type: none"> ▪ Legitimate Interest ▪ Explicit Consent: For the processing of sensitive personal data where the law does not specify otherwise
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Establishment, compliance, use or defense of legal claims	<p>The Company processes your personal data for the purpose of establishing, complying, using or defending our legal claims.</p> <p>Legal Basis</p> <ul style="list-style-type: none"> ▪ Legitimate Interest
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Purposes

Details and Legal Basis

- Establishment, Compliance, Use or Defense of Legal Claims: For the processing of sensitive personal data where the law does not specify otherwise

In any event, the Company will not use your personal data for marketing purposes.

- b. Where your personal data is required in order to proceed with your request prior to entering into a contract or for the performance of contractual obligations, failure to provide personal data under said circumstances may result in the Company being unable to proceed with your request to participate in the Program or to perform our obligations according to the terms and conditions between you and the Company, either in whole or in part.
 - c. Where your personal data is needed for the purposes of compliance with laws, court orders, orders of competent officials or competent government agencies, failure to provide your personal data under said circumstances may result in the Company and/or you be in violation or non-compliance with such applicable laws or orders.
6. Disclosure of Your Personal Data
- a. Group Companies and Affiliates: The Company may disclose your personal data to group companies and affiliates which are located outside of Thailand. The destination countries may not have adequate personal data protection standard as required by the PDPA. Notwithstanding this, the Company will undertake necessary acts to ensure that your personal data will be protected pursuant to the adequate personal data protection standards set forth by the PDPA.
 - b. Third Parties: The Company may disclose your personal data to the following third parties:
 - (1) Service providers who/which provide services to the Company in contacting and coordinating with you in relation to your participation in the Program in order to allow such service providers to assess your eligibility for participation in the Program, contacting and communicating with you, providing you with assistance during your participation in the Program, retaining documents and information which are related to your participation on the Program, and undertaking any other actions as required by the Company from time to time in order to achieve the purposes specified herein this Policy.
 - (2) Service providers who/which provide audit services to the Company – for example, conduct audit on the operations of the Programs, correctness of your participation in the Program, your medical expense reimbursement, drug disbursement and drug use under the Programs, etc.
 - (3) Government agencies, supervisory authorities, and other organizations as prescribed by law, which shall include the Food and Drug Administration, in order to report the adverse drug events or adverse drug reactions as required by law. In the event that you are entitled for the civil servant benefit scheme, the Company may disclose your personal data to the Comptroller General's Department upon request.
7. Retention Period of the Personal Data
- The Company may retain your personal data for a varied period of time, depending on the purposes of the collection, use and disclosure as described hereinabove. In any event, the retention of your personal data will be within the scope of necessity for the purposes or as required by law only. In general, the Company will retain your personal data for the following period:



- a. Application Form to participate in the Company's Program and supporting documents will be retained by the Company for a period of 10 (Ten) years from the date of receipt of such documents. Personal data of the Legal Guardians and the Contact Person will be retained for the same period.
- b. Information on the adverse drug events, adverse drug reactions, and information on the pharmacovigilance will be retained by the Company from the date of which the Company has received such report and for a period of 25 (Twenty Five) years after the cessation of the distribution of drugs.

8. Rights to Your Personal Data

You are entitled to the following rights to your personal data:

- a. Where you have given consent for the processing of your personal data, you are entitled to withdraw your consent at any time, unless otherwise prescribed by law. The said withdrawal of your consent shall not affect the processing of your personal data which you have duly given consent prior to such withdrawal of consent.
- b. You are entitled to request to have access and to obtain a copy of your personal data, or request the Company to make disclosure of the acquisition of your personal data which you did not consent to.
- c. You are entitled to obtain your personal data in a format which is generally readable or usable by an automatic tool or device, and to request the Company to transmit your personal data in such format to another data controller.
- d. You are entitled to request the Company to delete or destruct your personal data which is in the possession or control of the Company, or to de-identify such data.
- e. You are entitled to object to the processing of your personal data or to request that the Company suspends the use of such personal data.
- f. You are entitled to request the Company to correct, complete and update your personal data.
- g. You are entitled to lodge complaint to the official or personal data protection supervisory authority.

The exercise of any of your rights as stated above will be subject to the provisions and conditions of the applicable law.

9. Integrity of Information

You hereby represent that personal data which you have provided to the Company are correct, complete and the most updated. If there is any change in your personal data, you shall notify the Company of such change in order for the Company to ensure that your personal data are correct, complete and updated at all times. The Company reserves the right to request for documentary evidence in certain circumstances in order to verify the identify and/or information which you have provided before proceeding with the changes as requested.

10. Change to this Policy

If the Company needs to amend, add, alter or modify this Policy and which may cause changes to the purposes of the processing of personal data, or under any circumstances as specifically required by law, the Company will notify you of such changes and where the law requires, obtain your consent, before proceeding with such changes, additions, alterations or modifications.

For changes under other circumstances, the Company reserves the right to change, add, alter or modify this Policy without the need to make prior notice. The Company may notify you of such changes, additions, alterations or modifications in general for you to be informed of the changes to this Policy.

11. Contact Us

If you have any inquiries regarding this Policy or would like to exercise the rights to your personal data, please contact us via email at parnjit.tharnpanich@roche.com and/or phone at +66 (0)2017 5676.