

Privacy Policy

1. Introduction

The Medicines Patent Pool (or "MPP") values your privacy. This Privacy Policy demonstrates our commitment to ensure your privacy and the confidentiality of your personal data ("Personal Data") when you use our website (including on the MedsPaL webpage <https://www.medspal.org> and the LAPal website, <https://lapal.medicinespatentpool.org/>) or communicate with us.

When accessing our websites and/or communicating with us via the contact form on our websites, email or other channels you consent to this Privacy Policy. In case you should not agree to any part of this Privacy Policy, you must inform us and discontinue using our websites.

We may change this Privacy Policy at any time. The up-to-date Privacy Policy is available on our website.

2. Personal Data we process

We process the following Personal Data:

- Personal details you provide to us when communicating with us or when you subscribe to one of our newsletters (such as the name, email and job title, work or academic affiliations city, country, and content of the communication).
- Data relating to your consultation of MPP online content: such as your IP address and your operating system, web beacons, data elements stored on your device (analysis and marketing cookies and other similar technologies), the browser used to consult our website, information about your device (e.g. device serial number, date and time of use, etc.) and technical and factual data relating to its use (e.g. Internet and Bluetooth pairing, pages viewed and searches made in MPP online content), connectivity data (such as what you click on and what you request), your approximate geographical location and the duration of sessions.
- Any other information you may provide to us: for example, your signature, photographs, opinions, location or any other information you provide to us in the course of using MPP online content or using our services (for example, your requests for information, telephone calls, emails, the content of your communications or personal visits).

3. Purposes for processing your Personal Data

We use Personal Data for the purposes of (i) providing you with online content and associated services (including access to MedsPal and LAPal databases and related features), and enabling us to improve, develop and optimise MPP online content and related services in terms of their quality, performance or security, (ii) managing our relationship with you, as well as communicating with you, including to send you newsletters, (iii) to maintain our list of contacts and/or (iv) to provide you with other information you may request from us. Personal Data will only be used by us and shared with our technology suppliers (who are obliged to protect your Personal Data to the same extent as we are), courts, authorities and self-regulatory bodies, as well as other third parties with whom you allow us to share data. We do not sell or otherwise transfer your Personal Data to third parties except with your prior consent or as we are required under applicable law or regulation. We do not subject you to profiling or automated decision-making. Personal Data relating to communications will be saved for as long as you are a contact to us, subject to any applicable legal or regulatory retention obligations.

4. Where do we process your Personal Data?

As a Swiss foundation, we mainly process Personal Data in Switzerland, and store Personal Data either in Switzerland or in the European Union.

When sharing data with the recipients listed under section 3, we may transfer data to other countries, including outside of Switzerland and the EU (and/or of Iceland, Liechtenstein and Norway, which are part of the European Economic Area) or the UK, possibly to jurisdictions which do not provide an adequate level of protection of Personal Data pursuant to the applicable decision of the Swiss Federal Council or according to the Applicable Legislation. If Personal Data is transferred to a country that does not provide adequate data protection, MPP will ensure adequate

protection by using sufficient safeguards, such as the use of standard contractual clauses established by the EU Commission, as amended and approved by the Federal Data Protection and Information Commissioner (FDPIC) to comply with Swiss law. Where appropriate, we rely on exceptional legal authorizations in certain cases, such as obtaining your express consent to a specific communication or where the communication of Personal Data abroad is directly related to and necessary for the conclusion or performance of a contract between you and MPP or between MPP and a third party in your interest. It is also possible that certain communications of Personal Data abroad are necessary for the exercise or defence of the rights of MPP or another entity affiliated to MPP before a foreign court or authority.

In particular, because of our use of services such as Google Analytics to optimise the performance of our services, products, Google may store or process your Personal Data within the United States or in any country where Google or its affiliates or subcontractors maintain facilities. Where this is the case, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with applicable law.

Questions relating to these data transfers and the warranties applied in a specific case may be addressed at any time to the contact person mentioned at the bottom of this Policy.

5. Cookies

Cookies are small text files that are downloaded to your device by visiting the Medicines Patent Pool's website or opening our information emails (such as newsflashes or newsletters). Cookies (including third party cookies such as tracking technologies provided by Google Analytics) are in particular used to improve the website or for general communication purposes by providing information on interaction of unique browser-device pairs with the website (such as number of sessions and time spent); statistical information on interaction with the website (including referrals thereto, popularity of certain content, accessing users' categories, regions, languages, demographics, browser and device types and similar information); or statistical information on interaction with our information emails (such as if they have been opened or forwarded or links have been clicked on).

Third-party service providers such as Google may track your use of our website, combine this information with information from other websites you have visited (and which they also track) and use such combined information for their own purposes. If you have registered with the respective service providers, they may be able to identify you. In these instances, their processing of your personal data will be governed by their privacy policies (to see how Google uses your personal data when you use our website, please refer [here](#)).

You may change your browser settings to delete and block cookies (or to deactivate Google Analytics or alternatively download and install the browser add-on from, for example, Google available [here](#)). By continuing to use the Medicines Patent Pool's website without changing your settings (or using the add-on, as applicable) you consent to our and our third-party service providers' use of cookies.

6. Our basis for processing your Personal Data

When processing Personal Data for the purposes described herein, we rely on your consent to this Privacy Policy, our legitimate interests in communicating with you, as one of our contacts, about our operations and our events and/or our performance of any contract or another ground for lawful processing of your Personal Data under the applicable laws and regulations.

7. Protecting your Personal Data

We restrict the use and access to your Personal Data to those who have an absolute need-to-know to provide you with access to our website and/or communicate with you. We maintain appropriate technical and organisational measures to preserve the confidentiality and integrity of your Personal Data. We regularly review our security policies and procedures to ensure our systems are secure and protected, and we ensure compliance with all applicable data protection and security laws.

Our site may, from time to time, contain links to the websites of our networks of partners, and affiliates. MPP is not responsible for the content of websites linked to its site and operated by third parties. When accessing a third party

site, it is your responsibility to take the time to read the privacy statement and legal terms and conditions that apply to that site.

8. Your Choices and Rights

We welcome your inquiries and comments. You have the right to be informed by us on any processing of your Personal Data to verify the lawfulness of processing. If you are affected by incorrect or incomplete Personal Data, you may request rectification or completion of any relevant data. To the extent allowed by applicable law, you may request the deletion of your Personal Data or a temporary restriction of processing in certain instances and you may also object to the processing of your Personal Data, in which case we may however not be in a position to provide any related services.

The above-mentioned rights may also be limited – for example, when MPP is required to obtain and process your Personal Data to comply with applicable law and regulation, to assert or defend against legal claims, or when we have other legitimate grounds for the processing that override your interests and rights. MPP may therefore be entitled to continue processing your Personal Data even after you have chosen to withdraw your consent or objected to the processing of your Personal Data.

9. Contacts

If you have any questions or would like to exercise the rights as referred to above, or you are dissatisfied with any aspect of our processing of your Personal Data, please feel free to contact us at legal@medicinespatentpool.org or at our address: 7 rue de Varembe, 1202 Geneva, Switzerland.