

BMS GENERAL PRIVACY NOTICE

If you are a healthcare professional, participant to a BMS clinical study or research project you can access our other notices here:

[HCP Privacy Notice](https://www.bms.com/ie/privacy-policy.html#hcp) (https://www.bms.com/ie/privacy-policy.html#hcp)

[Research Participants Privacy Notice](https://www.bms.com/ie/privacy-policy.html#studypatient) (https://www.bms.com/ie/privacy-policy.html#studypatient)

[Our Commitment](#)



At Bristol Myers Squibb (BMS), your privacy matters to us. For us, data privacy goes beyond mere compliance with the law. BMS aims to collect, use, and share information that we obtain about you in a manner consistent with our company values, including high ethical standards, integrity, inclusion, fairness, and transparency. We have a dedicated internal team that reviews how BMS accesses, collects, uses, shares, stores, transfers, deletes and protects information about you. To safeguard your data, BMS employs reasonable and appropriate security measures. When upholding your rights as a data subject, you can contact us to respond to any questions you might have that are not answered in this Notice at eudpo@bms.com or as described below.

1. WHO WE ARE

We are Bristol-Myers Squibb (BMS), a company member of the Bristol Myers Squibb Company group. In addition to this Notice, our details (name, address, etc.) may have been given to you separately at the time of the collection of information about you, for example, in a form, an app or website notice, or in an e-mail, containing a link to this Notice. Together with our worldwide affiliates and other entities that are part of the BMS group which have a relationship with you, we are the controllers of your Personal Information. We refer to these entities as “**BMS**”, “**we**”, “**us**” or “**our**”. You can access the main locations of our entities and facilities, markets where we distribute our products and the countries where we operate on <http://www.bms.com/ie>.



2. INTRODUCTION – HOW THIS NOTICE APPLIES TO YOU

This general privacy notice (“**Notice**”) is a global Notice. It describes how Bristol Myers Squibb may Use information about you (“**Personal Data**” or “**Personal Information**”) when you interact with our company, in connection with your use of BMS websites, mobile applications, devices and platforms, when we communicate with you and in the context of our business activities. It also informs you about your privacy rights and the measures and processes we put in place to protect your data.



This Notice applies whether you are a patient, member of the public, visitor, shareholder or investor, member of a regulatory body or authority, supplier or business partner, job applicant, or any other individual with whom we engage or who is involved in our business activities.

In this Notice, we refer to you as “**you**” or “**your**”. We use the term “**Processing**” or “**Use**” when we refer to the access, collection, recording, organisation, structuring, retrieval, disclosure, storage, transfer, deletion or otherwise use of your Personal Information.

In some instances, we may Use your Personal Information in ways that are not described in this Notice. Where this is the case, we will provide a supplemental or just-in-time privacy Notice that explains such Use. You should read any supplemental explanation in conjunction with this Notice.

Compliance with applicable laws

When Using your Personal Information in the context of our activities, we will do so in compliance with relevant data privacy and data protection laws, which includes regulatory and national law requirements that may apply to such Use and, where applicable, giving you the specific rights that apply in the country where you reside (altogether “**Applicable Data Protection Law**”).

3. HOW WE USE YOUR INFORMATION ONLINE



We may collect your Personal Information online when you use BMS or third-party operated websites and other online resources, including mobile applications, other digital means or platforms. This may also happen through collaborations that we have in place with third parties or companies that host websites for us or with whom we have partnerships for our products, services, or activities. Below, we give you additional information about how we use your information online.

You may interact with BMS or our partners’ websites and platforms that relate to BMS products and services, job application, patient recruitment, disease awareness, scientific research, alliance websites, or applications used in the context of patient support or management programs.

We enter into arrangements for those collaborations to require an appropriate protection of your Personal Information. Some areas of our websites and platforms may require you to submit information in order for BMS to respond to your request, permit you to access specific areas or participate in a particular activity. When visiting our websites, please also read our [Legal Notice](https://www.bms.com/ie/legal-notice.html) (https://www.bms.com/ie/legal-notice.html) and if you are visiting our website for safety reasons, the [Pharmacovigilance Notice](https://www.bms.com/ie/pharmacovigilance.html) (https://www.bms.com/ie/pharmacovigilance.html).

We have identified examples where we Use your Personal Information online in the table below.

Online Information that we may collect when you use our sites	
Contact information	If you communicate with us through the "contact us" link on our sites, we may ask you for your Personal Information, such as your name, telephone number, professional information and e-mail address so that we can verify your identity, or respond to your questions and comments.

Website features	Our site offers various features, which we may change from time to time. We may ask you to submit certain Personal Information so we can communicate with you about these features and manage them properly.
Contacting Medical Information or reporting an adverse event	If you contact our medical information team (medinfo) or report an adverse event in relation to a BMS product, the information you provide (including your name, contact details, professional information and your questions) will be documented and retained on our databases for purposes of dealing with your enquiry and to comply with the law.
Connections and authentication	Some areas of our websites and platforms can be restricted. It may require you to log in with usernames, passwords and other authentication mechanisms that belong to you, that you create or that we provide you. When using such features, this may automatically allow us to access certain of your account credentials or other personal user account details to verify your identity or that you have a valid licence to practice as a professional.
Other uses of information	We may Use the Personal Information you provide through BMS websites or platforms for our internal purposes. These purposes include administration of the site, data analytics, compliance with our legal obligations or our internal policies and procedures.
Cookies and similar tracking technologies	When connecting to our various websites, applications, and other digital platforms, we may use cookies and other similar technologies that may allow us or third parties to collect Personal Information about you. Depending on the country where you reside, you may opt-in or opt-out from options or technologies that we use and display. Please read our cookie section below for more information.

Links to other third-party websites

As a convenience to users, our sites contain links to other third-party websites that may offer additional information, such as educational or professional materials, services and contacts. This Notice does not apply to your use of those other websites. Before using the linked websites, please review their privacy notices to understand how they use and protect your Personal Information.

4. WHAT INFORMATION WE MAY PROCESS ABOUT YOU

The information that we Process about you may include various categories of Personal Data depending on your interactions with BMS, third parties with whom we collaborate, or external sources that provide



us with your Personal Data. We have outlined below the main categories of Personal Information and, where applicable categories of sensitive Personal Information that we may collect about you.

Examples of general categories of Personal Information	
Contact information	Full name, personal or professional postal and/or email address, phone number and other contact details.
Identification information	Full name, initials, date of birth, photographs, or government-issued identification, such as driving licence, passport, professional licence number, or government ID number.
Financial information	Payment-related information, such as your bank address or account details and number, tax-related information for business purposes, or other information about you, your relatives, connections, your suppliers or third parties for example to verify the absence of conflicts of interest or to comply with anti-bribery laws.
Professional information	Job title, CVs and resume, educational information, professional qualifications, position, work experience, background checks, professional networks, programs, publications and activities, referrals and, other relevant professional information where needed.
Categorization and classification data	<p>In some cases, we may classify, organise, rank, rate or create profiles relating to our audiences (for example, via our customer relationship management system or other similar tools). When doing so, those activities are conducted with human intervention by BMS staff or authorised third-party employees to capture:</p> <ul style="list-style-type: none"> • data relating to how you behave using our technologies (for example websites, mobile applications, platforms, or care programs); • data used to categorize, analyse, or predict performance and preferences. <p>You can read more about this activity in section 10 below.</p>
Sentiment analysis and analytics, social media and data from publicly available sources	<p>We may obtain information from publicly available sources, third-party service providers specialized in social media listening, or from the Internet to understand how the general public or influencers perceive our brand, products and activities.</p> <p>This may include collecting information about:</p>

-
- the volume of coverage, reach and popularity, sentiments (negative/positive), most frequent words and topics that you use, engagement (amount of likes, favourites, comments, shares of users on a specific topic), contributors' demographics (native language, country of origin and gender), and date and time of posts to see development over time, which we may collect via either our channels, websites, social media or via third-party providers.

When conducting such activity, we do not make individual decisions on users unless we inform you otherwise. We have agreements in place with third parties to protect and limit information Used for this purpose to aggregate reports. If we need to specifically identify you, we will use reasonable efforts to inform you about our Use of your Personal Information. You can read more about this activity in [section 10](#) below.

BMS uses social media channels to share important news about our research and commercial activities, programs, and initiatives to improve the life of patients. You may connect using your login details on such platforms or visit publicly available pages. When monitoring our channels, we may receive aggregate information or access Personal Information about you, such as your username, profile, and what you say, like or comment on our channel.

When monitoring our channels, BMS may also receive information about potential adverse events about someone using a BMS product. If we identify or receive safety information about patients, we may be required to notify competent authorities about pharmacovigilance cases.

Data from social media activities and monitoring

You should consider carefully what information about yourself and others (such as colleagues, friends, customers, or patients) you choose to share when you use social media. If you need to report any concern about our products, we encourage you to contact us via our contact forms on our official BMS sites. Because the information you may share becomes public and often cannot be permanently erased on those platforms, we recommend that you do not report sensitive information, including health information through BMS social media platforms.

We may provide additional notice and choices to you about how BMS may Use Personal Information on social media platforms, our websites and other online resources that we utilize.

**Information
technology-related
data**

The information we may collect might originate from your use of BMS's sites, websites, mobile applications, and other connected devices (such as medical devices and Apps) and includes:

- Internet Protocol (IP) address, geolocation data, your browser, operating systems, device ID;
 - data captured by cookies and similar tracking technologies, which may include analytics information and information about the date and time of your request (read our [cookies section](#) below); or
 - Information that we may collect that describes and gives information about other data ("metadata"). This Notice applies to the extent such metadata allows us to draw precise conclusions about your private life, to identify you or to further Use your Personal Information for our purposes.
-

Examples of special categories of data / sensitive Personal Information

In some situations, we may collect sensitive Personal Information about you. When doing so, we apply stronger safeguards to protect your privacy. Depending upon the country in which you reside and the particular context for the collection of such Personal Information, this may include the following information:

**General types of
sensitive Personal
Information**

- Data revealing race or ethnicity (such as for diversity and inclusion initiatives);
 - Political opinions (such as for employment purposes);
 - Religious or philosophical beliefs (such as for tax purposes), or trade union membership (such as to comply with labor laws);
 - Bank account and payment details (such as when contracting with you);
 - National ID, passport number, social security number, driver's license number (such as when contracting with you or to comply with the law);
 - In certain situations, or jurisdictions, e-mail content or text messages (such as non-solicited content);
 - Criminal records or creditworthy information (such as to enter into a contract with you or to comply with the law);
 - Data related to a person's sex life or sexual orientation;
 - Precise geolocation.
-

We may collect data relating to your health in limited contexts, which includes:

Health information

(if permitted or required by law)

- health data or status needed for managing accidents cases or for disease prevention in the context of public health;
- dietary preferences or restrictions (such as food allergies), special conditions or disabilities when attending an event;
- genetic or biometric information, (for example, for identification and safety purposes, in relation to BMS's risk management and drug safety programs, for accessibility purposes for visitors to BMS facilities and manufacturing sites, or for security or fraud prevention or detection purposes); or
- other health data, combined with other identifiers that we may collect to provide you with cell therapies, personalized medicines and other innovative therapies or devices that we use to manufacture our products, ensure product quality, safety, performance, vigilance and to ensure patient safety. Such Personal Information may include your initials, name, key-coded or pseudonymized data, and other related information necessary for the provision of our products when necessary to protect your health safety or to comply with the law.

Please note: The categories of Personal Data listed above are not exhaustive and may vary depending on the way that you interact with us or the type of Personal Data that BMS needs to Process for particular activities. In the event that BMS Uses Personal Data about you which is not listed in this Notice, we will employ appropriate means to inform you about the information that we will Use at the time of collection or when we communicate with you.

5. WHERE DO WE GET YOUR INFORMATION FROM



In most cases, BMS will collect information directly from you, although sometimes we will obtain information from public or third-party information sources or from use of web-based, devices or other technologies which automatically generate such information. We have outlined below the main ways BMS collects and Processes Personal Data when interacting directly or indirectly with you.

[We may collect information from you directly:](#)

Such as when:

- we interact with you in the course of our activities or when you participate in a BMS activity, event or program (such as diversity and inclusion, ambassador or patient support programs);

- we collect information in the context of a specific treatment, such as for personalized medicines, using medical devices or digital platforms or applications;
- we engage service providers, business partners or institutions for services, collaborations or operations;
- you sign up to receive our communications to become a member of our databases or when registering to receive our press releases, e-mail alerts, marketing communications or more information about our activities;
- you share information with us through our various contact points, such as through our company products, commercial, clinical or alliance websites, mobile applications, contact forms, call centers, career application websites, during offices or manufacturing site visits, or for product inquiries;
- we collect information about you from your computer or other devices you use when visiting BMS's website or mobile applications, or other products, our offices and facilities; or
- you share medical information with us relating to adverse events, pharmacovigilance or incidents involving devices or applications. These disclosures can be communicated in-person or remotely, including by calling us, or via our websites and other digital channels or means of communication.

We may collect Information about you indirectly:

Such as when:

- we receive information about you through a healthcare professional where necessary for pharmacovigilance, incident management, risk management, investigation, or litigation purposes;
- we obtain information that is accessible from public registries, databases, or other third-party sources, such as service providers, agencies or private organisations;
- you have made information about you publicly available on the Internet, including websites, social media platforms, scientific reviews, articles and publications and other sources, in which case we may either inform you, anonymize the data or get your prior consent;
- necessary to verify your credentials, professional information (such as by accessing publicly accessible information, national registries or third-party databases) or your identity for compliance, security or ID verification purposes;
- you make public posts on social media platforms that we follow (for example, so that we can understand public opinions); or
- conducting pharmacovigilance monitoring activities, or in the context of incidents or other post-market surveillance obligations.

We may also collect information about you automatically, such as for security and systems monitoring (e.g. through video (CCTV) recording) and building access control logs when you visit our offices or in other contexts made apparent to you at the time.

6. DATA MINIMIZATION



Where permitted and feasible, and to protect your right to privacy, BMS will take reasonable steps to remove or anonymize information that may directly or indirectly identify you, and restrict to the minimum the amount of Personal Information that BMS Uses, submits or transfers to third parties, courts, or governmental bodies.

7. FOR WHAT PURPOSES DOES BMS PROCESS YOUR INFORMATION



This is a global Notice. BMS Processes your information in the context of our regular activities, and in accordance with the purposes as set out in this Notice, a separate notice, or when Applicable Data Protection Laws either permit or require us to do so. These purposes may vary depending on where you live and where BMS operates. Where the laws of a country restrict or prohibit certain activities described in this Notice, we will comply with such requirements. This may include refraining or not Using your Information for those purposes restricted or prohibited in that country.

Below, we list some of the main, but not all, of our purposes for which we may Use Personal Information about you.

Main purposes for which BMS may Use your Personal Information

Contracting purposes	<p>We may Use Personal Information about you, your staff and third parties with whom you collaborate in the context of the services that you provide to us. Such Personal Information may include:</p> <ul style="list-style-type: none">• when you need access or authorisation to connect to our systems, devices or enter our facilities;• to protect our systems and IT infrastructure;• when assisting us in our activities; or• when we conduct audits or assessments of your organisation. <p>This includes obtaining Personal Information before, during and after we enter into a contract with your, your organisation and your staff.</p>
Collaboration and research purposes	<p>We may Use Personal Information about you when we partner with other organisations, including private or public alliances, institutions, regional or local discussions, or life science industry groups associations and consortiums.</p>
Patient advocacy and support programs	<p>When we exchange, interact or establish partnerships with service providers, local, regional or global patient advocacy associations or organisations, or other life sciences companies, including in the context of patient-related support or management programs.</p>

As we develop and manufacture innovative therapies, we may Use Personal Information, which may include sensitive Personal Information about you when providing:

Providing innovative products, such as devices or personalized medicine

- personalized medicines, such as cell-therapies, or other innovative therapies; or
- digital health platforms, digital or medical devices, medical equipment, tools or applications.

In this context, we may keep Personal Information, including health information, about you for manufacturing, quality or safety purposes.

For example, when we:

Managing BMS's relationship with you

- respond to your questions, comments, application and requests;
- manage your access to our systems, devices and facilities;
- conduct due diligence (including for compliance with anti-bribery laws and to avoid conflict of interests) or audits activities;
- invite you to our events, activities, initiatives or programs;
- conduct assessments, provide training, perform background checks or identity verification, send invoices; or
- have to disclose information to competent authorities.

When conducting our business operations, we may interact with you in person or digitally or to improve our brand and products, such as through the following activities:

Commercial and marketing activities

- **Market Research and surveys:** we collect Personal Information about individuals for market research purposes. We collect this information through surveys and interviews with patients and healthcare professionals or other stakeholders to help us improve our products and understand the market;
- **Direct Marketing:** we Process Personal Information to provide marketing information to individuals, including in-person, by electronic or remote means; or
- **Websites and social media platforms:** we may use social media to inform the public about our activities. We might collect aggregate information about social media users when

you comment on BMS-related topics or use BMS media channels. See more details in our [section 4](#).

In the context of clinical operations, studies and programs

BMS Uses limited Personal Information before, during and after we place a pharmaceutical product or a medical device on the market. This includes during our sponsored clinical trials and studies, such as for drug safety (pharmacovigilance), or incident or post-market surveillance monitoring (materiovigilance), or when interacting with authorities, regulatory agencies and bodies. We may also conduct real-world evidence activities in compliance with regulatory requirements.

Job application

When we Process professional information to assess individual's suitability for roles at BMS or collaboration purposes, such as when you apply on our career websites, through a job offer posted online or through agencies with whom we have partnerships. You can read more information in section 14 "[Applying to work at BMS](#)".

Patient recruitment activities and websites

When we conduct in-person and activities to inform the general public, healthcare professionals and patients about our diseases, upcoming medicines and treatments or studies that may enable individuals to apply to such clinical trials or studies that we conduct.

Regulatory and compliance

When we Process information to comply with regulatory obligations particularly where they relate to drug safety and risk management obligations, and obligations related to spend-transparency and similar requirements specific to the pharmaceutical sector.

Investigations, prosecutions, or defence of legal claims

For example, we may have to keep, preserve Personal Information about you in order to protect our rights, or for the protection of third-party rights. In certain situations, we may have to submit or transfer such information third parties, courts, or governmental bodies including outside your country of residence. Where permitted and feasible, and to protect your right to privacy, BMS will take reasonable steps to remove or anonymize information that may directly or indirectly identify you and restrict to the minimum the amount of Personal Information that BMS submits or transfers to third parties, courts, or governmental bodies.

Other purposes: BMS will Process your Personal Information for other purposes, where permitted or when required such as reporting information for BMS's risk management and drug safety obligations.

8. HOW BMS JUSTIFIES USING YOUR INFORMATION



In this section, we describe our legal justifications (commonly referred to as “**legal basis**”) for the Use of your Personal Information related to each of our main Processing activities. We will use the legal basis that is most appropriate for the purpose and circumstances related to such Processing. Below, we have explained which legal bases we may choose or have to use when Using your Personal Information.

There may be times where we must use your consent to Process your Personal Information. We may also decide to ask your permission to Process your Personal Data, such as in the context of voluntary initiatives or activities.

Please note: depending on the country where you reside, the law of your country may not require that BMS use a specific legal basis to justify Using your Personal Information, including transfers of your Personal Information outside your country. However, when Applicable Law requires a legal basis, we will inform you about what legal basis we use at the time of the collection or when we communicate with you. If your jurisdiction requires consent to Process your Personal Information when you interact with us, we will obtain your consent prior to the Use of such Information.

In the following table, you can read more details about what legal basis or combination of legal bases we use when Processing your Personal Information.

Our legal bases	Examples of activities that we conduct with your Personal Information
We may use our legitimate business interest or private interest to Process your Personal Information for	<ul style="list-style-type: none">• conducting our regular commercial activities;• scientific and statistical research purposes;• registering BMS visitors and supplier personnel visiting our offices;• improving our products and services;• interacting with contractors, patients and the general public;• keeping you informed about our regular activities, such as with newsletters;• conducting market research and surveys;• collecting information that you decide to share on the internet or social media platforms, collecting responses from surveys, sending you newsletters, and inviting you to events;• responding to your enquiries;• engaging with you whether in-person, remotely, or digitally to organize our activities, or exchange information with you about our products or initiatives, or services;

-
- conducting profiling activities, such as tiering of individuals, our customers, key opinion leaders, visitors of our websites, through the use of applications and devices, and for other similar activities or through other means;
 - conducting research activities alone or together with other third parties;
 - to prevent crime (such as fraud, financial crime, and theft of intellectual and industry property) and to ensure the integrity of our manufacturing and other operations; or
 - when necessary to enable us to operate as a pharmaceutical company.
-

When we rely on our **contractual relationship** with you

when Using Personal Information about you, your staff, suppliers and third parties with whom you collaborate, for example to:

- send you requests for proposals or suggest partnership and collaboration;
 - conduct due diligence, assessments or audits of your organisation;
 - assess the feasibility of a study with your institution and to contract with you, your institution and staff;
 - generally manage the contractual relationship with you as a partner, supplier or a third party service provider, such as for billing and payment purposes.
-

To **comply with applicable laws**

We may Use your Personal Information, including keeping or sharing it with authorities as required or when allowed by Applicable Data Protection Laws, such as to:

- respond to or notify authorities about pharmacovigilance monitoring activities, incidents or other post-market surveillance obligations,
 - for spend transparency;
 - tax or accounting;
 - anti-bribery and other laws that prohibits conflicts interest;
 - to respond to government regulators, agencies, courts, or other third parties in legal proceedings.
-

We use the public interest	<p>when the law of your country enables us to rely on it, in particular in situations that will be of significant public interest, such as for:</p> <ul style="list-style-type: none"> • scientific research that leads to medical breakthroughs or new medicines, seeking for a better understanding of diseases or to improve our products; • to provide early access to our medicines; • the prevention of diseases (such as in a pandemic situation); or • preventing or the detection of crime.
We may use your Vital interests	<p>In limited situations, BMS may have to collect information, which includes the use of sensitive Personal Data about you to protect your life or against incidents or other threats.</p>
Other legal exceptions	<p>In some instances, the law of your country may allow BMS to use a legal exception. This may apply, for example, when Using your health data to conduct research projects or to ensure high standards of quality and safety of health care and of medicinal products or medical devices.</p>
With your consent	<p>We may use your prior permission when the law of your country requires us to do so, for example to Use your Personal Information, disclose it, transfer it to, or share it with, third parties, including outside your country of residence.</p> <p>In other instances, we may require your prior consent to:</p> <ul style="list-style-type: none"> • engage with you remotely or in-person, to send you commercial communications electronically (via an opt-in or a right to opt-out), such as for direct marketing, market research, surveys, propose collaborations, or for general interactions with you; • invite you to events or to propose you participate in various BMS activities and initiatives; • use your media content and your images (such as your photographs, audio or video recordings) for interviews, events or other BMS initiatives.
<p>When you consent to the Processing of your Personal Information, you may have the right to withdraw that permission at any time. In such case, we will cease to Use your information in the future and, unless BMS has an obligation to keep it for a longer period, we will employ reasonable measures to</p>	

limit or prevent further Use of it. This includes archiving, blocking, or employing encryption, anonymization, or erasure techniques.

9. WITH WHOM DO WE SHARE YOUR INFORMATION



As a multinational company operating worldwide, your Personal Information may be shared with, or accessed by, parties located outside your country of residence. If you are located outside of the United States, BMS may share your Personal Information with parties located in countries that provide less protection than in your country, which includes the United States. We may also Process and share your Personal Information with some of our affiliates and other members of the BMS group including selected and approved third parties (vendors and business partners) that help us operate worldwide. When doing so, we implement appropriate measures to prevent unauthorised access or Use of your Personal Information.

Below you can find more information about how BMS shares your Personal Information within its group of entities and with third parties.

[Sharing your Personal Information within the BMS group](#)

Often, we share your Personal Information within the BMS group of companies (“**BMS Group**”). This may include the Bristol Myers Squibb Company headquarters in the United States and all of its current and future subsidiaries, branch offices, affiliates, entities and other companies that are part of, owned or controlled by, the BMS Group. When exchanging information internally, we rely on appropriate arrangements and mechanisms to cover any transfer of your Personal Information within our corporate structure, such as binding corporate rules (BCRs), contractual arrangements approved by authorities or based on consent.

[Sharing your Personal Information with third parties](#)

To conduct our business, we share with, or disclose Personal Information to, third parties, such as:

- **Third-party service providers** for the purpose of outsourcing specific business activities to request external support and resources. This may include companies that provide information technology services, clinical trials and studies support, marketing or market research services, events, meeting and planning services, or services related to talent acquisition or consultancy;
- **business partners** such as external scientists and healthcare professionals to review and assist us with healthcare compliance activities and institutions and other organisations with whom we collaborate to support our clinical or commercial activities (such as for clinical studies, patient support programs, and so on);
- **Regulatory and health authorities** including governmental bodies (such as the FDA, EMA, NHS), data protection authorities, tax authorities, or courts in case of disputes, when permitted or required by Applicable Data Protection Law; and

- **third parties to whom BMS is legally obligated to provide such information**, such as other parties in litigation or legal disputes, guardians, conservators, or individuals with powers of attorney.

When engaging with third parties, we enter into agreements with them for the Processing of Personal Data so that such Processing is carried out in accordance with our instructions, in a confidential, secure, and transparent manner in order to protect your privacy rights. When it is not possible to enter into an agreement with a third party, such as when engaging, reporting or interacting with regulatory or health authorities or courts, and when legally possible, we will use our best efforts to implement appropriate security measures and controls (such as pseudonymisation) to protect your Personal Information.

If you are in the European Economic Area (“EEA”), Switzerland and the United Kingdom

Whenever we transfer your Personal Information within the EEA, Switzerland or to countries that are deemed “adequate”, such countries are deemed to offer the same level of protection as given by the law of your country. When accessing your Personal Data from, or transferring it, **outside of the EEA or Switzerland** to countries that **may not provide the same level of protection as your own country**, we will use appropriate safeguards to protect your right to privacy. For example, such safeguards may consist of using Standard Contractual Clauses (to exchange information with third parties outside of the EEA, Switzerland and the United Kingdom), Binding Corporate Rules (for data transfer within the BMS group of companies) as approved by the European Commission or the competent authority, data transfer agreements or your consent.

If you are outside the EEA, Switzerland and the United Kingdom

Where possible, we will allow access to or the transfer of your Personal Information outside your country of residence:

- to countries that provide a reasonable high level of data protection;
- using the most appropriate data transfer mechanisms available to BMS; or
- where required by Applicable Data Protection Laws, after we get your prior permission, for the collection, disclosure to third parties and the transfer of your Personal Information to a country which does not provide an adequate protection equivalent to the laws of your country of residence.

10. AUTOMATED DECISION-MAKING AND INDIVIDUALS’ RIGHTS

Unless permitted by law, **BMS does not make decisions based solely on automated Processing (including profiling) of individual data unless we inform you otherwise prior to the Processing.** We may use algorithms that will enable us to use automated decision-making, including to create profiles. This means that when we use certain technologies, software or algorithms, which may allow us to create profiles, tiering, further understand trends and statistics or use other advanced technologies or automated processing, someone will be involved to validate decisions resulting from such use.



As the use of such technologies evolves, we may use algorithms without a person involved in the decision. In this case, if this activity requires us to Process your Personal Information that is not anonymized, we will comply with any applicable legal requirements, such as to draw this to your attention and provide you with information about the logic involved in the decision, as well as the significance and the envisaged consequences for you of such Use of your Personal Information. Depending on your country of residence, you will have the right to ask that such decision is taken by an individual.

11. WHAT ARE MY RIGHTS AND HOW TO EXERCISE THEM



You have a number of rights related to the Personal Data that we Process about you (this will depend on the jurisdiction where you reside and the legal basis that we use). Most often, exercising your right is free of charge. We may also have to clarify your request and explain if we can comply with it or if this is restricted in your situation. You can always contact BMS at eudpo@bms.com to find out more about your rights and how best to exercise them.

Below we have listed individual rights that may apply depending on your jurisdiction.

You may have the right to:

- **receive a copy** of your Personal Data we hold about you;
- **correct** your Personal Data we hold about you;
- where applicable, **receive a machine-readable copy** of your Personal Data (portability);
- ask us to **delete** your Personal Data or **restrict** how it is used;
- where applicable, **object** to Processing of your Personal Data for certain purposes, such as when we use it for marketing purposes (opt-out); and
- where you have provided us with your **consent** to Use your Personal Data, you can withdraw your consent at any time without affecting BMS' Use of such information before your withdrawal of consent.

Exceptions to your rights

There may be exceptions to your privacy rights described in this Notice. This depends on the country where you reside, why we are Processing your Personal Data and if your request may impair the rights of others. If we cannot comply with your request to exercise your privacy rights, for example when we keep your information for regulatory purposes or for the investigation, prosecution, or defence of a legal claim, we will explain this to you when you contact us.

Example

If you ask BMS to stop sending you marketing communications by e-mail, we may keep your e-mail address and other contact details in case we conduct other activities with you, such as when we have a contract with you or if we have a legal or a regulatory obligation to keep your contact details.

[How to contact us](#)

If you have any questions about how we Use your Personal Information, please contact our Data Protection Office at eudpo@bms.com.

Note: We may need to request specific information from you to help us confirm your identity. If your request is complex or if you have made a large number of requests, it may take us longer to respond to you, but we will keep you informed of any delays. You will not have to pay a fee to obtain a copy of your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

[Lodging a complaint with a competent supervisory authority](#)

In some countries, you may have the right to lodge a complaint to the relevant data protection or competent authority if you believe that we Process your Personal Information unlawfully or are violating your rights. For example, in the European Union, you can access the list of competent data protection authorities, including the authority in your country of residence by clicking [here](#) or by visiting: https://edpb.europa.eu/about-edpb/board/members_en. For Ireland, for example, if you feel that we have been unable to resolve your information rights concern, you have the right to raise the matter with the Data Protection Commission by using the [online contact form](#).

12. HOW LONG WE RETAIN YOUR INFORMATION



We aim not to retain your Personal Information for longer than necessary for the specific business purposes for which it was collected. After that, unless we are required to continue to maintain the information by law, we may anonymize, restrict, block or delete it.

In certain cases, BMS may retain your Personal Information for a longer period for the purpose that we have and, in a manner, or a format, that may require BMS to keep certain identifiers. In such case, we may archive it and apply appropriate measures which may consist of blocking, preventing, obfuscating, pseudonymizing, key-coding, or restricting any further access and Use of Personal Information about you. When retaining and storing information about you in our systems, we have put in place data retention schedules in accordance with our company policy and in compliance with Applicable Data Protection Laws.

When assessing the appropriate retention period, we take into account the quantity, nature and sensitivity of Personal Data, the potential risk of harm in the event of unauthorised use or disclosure, the purposes of the Processing and whether or not these purposes can be achieved by other means, as well as applicable legal obligations.

13. HOW DO WE PROTECT YOUR INFORMATION

We implement appropriate technical and organisational controls to protect your Personal Information that we hold to prevent unauthorised Processing, loss of data, disclosure, use, alteration, or destruction.



Where appropriate, we use encryption, pseudonymisation (such as key coding), de-identification and other technologies that can assist us in securing the information about you, including measures to restore access to your information. We also require our service providers to comply with reasonable and recognized data privacy and security requirements.

We conduct tests and reviews of our technologies and processes, including a review of our business partners and vendors, so that our security controls remain effective. Also, we may further anonymize your Personal Information when it is no longer needed for the purpose for which BMS originally collected such Information.

14. APPLYING TO WORK AT BMS

BMS may Process your Personal Data to evaluate your application to work at BMS. When applying for an opportunity at BMS, we may collect and Process Personal Information about you directly or indirectly from our official websites, third parties or when you make this information publicly available or accessible by third parties for recruitment purposes. You can consult our career opportunities on this page: <https://careers.bms.com/ie>. Below, you can find more information about how BMS Processes your Personal Information when you apply to work for us.

To consider your application we may collect:

- **your professional experience**, such as job title, education information, professional qualifications, work experience, publications, and professional networks, programs and activities in which you participated;
- **your contact details**, such as your e-mail address, full name, date of birth and other information necessary to submit your application;
- **information gathered from agencies**, such as information from recruitment agencies, reference providers, and (where permitted by law) background screening providers;
- **publicly available information from** a company website, internet searches or social media platforms such as LinkedIn or other social media platforms, and publicly available profile information (such as your experience, skills, and interests);
- **information that you allow us to access**, for example, if you choose to simplify your login Process to the job platform to allow direct access once you have signed in to your third party social media user account, (such as Gmail or Yahoo!), or if you want to upload information to the platform (such as from LinkedIn) instead of manually completing an application; and
- **other information** that you submit to us, that we obtain indirectly or that we access when looking for new hires or career opportunities.

As your job application proceeds

We may ask you to share additional Personal Information with us, such as:



- **official information**, such as government issued identification number or tax status;
- **financial information**, such as bank account details;
- **special categories of Personal Data / sensitive Personal Data**, including (where it is permitted, necessary or required for your application) information about your health, marital status, trade union membership religion, criminal records, or credit worthiness data; or
- **other information** necessary for your interview or providing you with a job offer, such as details of any known disability or workplace accessibility needs, background information, travel and expenses, performance management, emergency contact details, compensation, hours of work, holidays and benefits-related information.

Where do we Use your Personal Information for job application

As a multinational organisation, our affiliates transfer information globally. When you upload information to a job search platform, you provide it to all our affiliates, each of which may Process it for its own recruitment purposes. This is the case even where you respond to a job posting that mentions a particular BMS affiliate. Accordingly, we may transfer globally information about you (for example, if you are in the European Economic Area ("EEA"), your information may be transferred outside the EEA; if you are in Australia, your information may be transferred outside Australia).

We will not keep your Personal Information for longer than needed to consider your application. However, we may ask your permission to keep some information about you for a longer period (for example your CV or resume, work experience, cover letters and so on) to consider your eligibility for further job opportunities.

15. WHAT INFORMATION DO WE COLLECT ABOUT OUR PATIENTS



BMS Processes Personal Information about patients that use our treatments and in the context of our clinical research activities. We may also Use patient Personal Information in connection with certain activities, such as through our services, patient websites, collaborations or consortium agreements with third parties (for example genetic data), during events interviews, for advocacy related activities, or for clinical trials, studies or research projects linked to our products (for example to recruit you through our websites or business partners).

Note, this section, together with this Notice, does not apply to participants to clinical trials.

This Notice applies to how BMS may Use Personal Information about you when you participate in non-clinical activities. You can read our specific [Patient privacy notice](https://www.bms.com/ie/privacy-policy.html#studypatient) (https://www.bms.com/ie/privacy-policy.html#studypatient) if you are involved in a research project, clinical trial or in a study. Below, you will find out more information about Personal Data that we collect about patients in contexts other than clinical studies or research projects.

Patients participating in non-clinical research activities with BMS

In the context of non-clinical research activities, BMS generally does not collect patient data, except in certain occasions, such as where we have reporting obligations to authorities, when we engage directly with you, via third parties, when you contact us, when accessing websites or other platforms, or if you agree to share such information with us. In some instances, we may have interactions with you or access information about you outside of our clinical research activities. This may happen when:

- accessing our personalized medicines, other innovative therapies or devices;
- BMS collaborates with patient organisations;
- we recruit you for our clinical studies;
- inviting you to our events;
- we propose patient support programs; or
- when conducting surveys, market research, interviews or propose ambassador programs.

When doing so, BMS will either collect information that does not allow us to identify you or use technical measures to limit the risk of identification. For example, we may use measures that could include:

- replacing your information such as name, identification number or any other information with a code (key-coded study data);
- using a third party provider who will only share your Personal Information in an aggregate manner with BMS;
- anonymizing your Personal Information after its collection; or
- requesting your prior consent.

If BMS accesses Personal Information about you that is sensitive, we will protect it adequately. For more information about our Use of sensitive data, please refer to [section 4](#).

16. CHILDREN



BMS websites and mobile applications are not intended or designed for children under the age of 13. Depending on the country where you reside, you may not use this website under the age of 16 or 18. We do not collect information from any individual we know to be under the age of 13 (or older if your country is more restrictive). Please refer to our [Research Participants Privacy Notice](https://www.bms.com/ie/privacy-policy.html#studypatient) (https://www.bms.com/ie/privacy-policy.html#studypatient) for further information relating to non-adults participation to our studies.

17. COOKIES AND TRACKING TECHNOLOGIES



Depending on the country where you reside, you may manage your preferences on cookies and similar tracking technologies through the use of consent management tools that are available on our websites. This section applies to cookies and similar tracking technologies and we explain what our use of cookies and similar tracking technologies means to you and how to disable tracking (such as using opt-in or opt-

out preferences). When we collect information that may enable us to identify you, the other sections of this Notice will apply.

What are cookies?

A cookie is a small piece of data that a website asks your browser to store on your device in order to remember information about you, such as your language preference or login information. Such cookies when set by us are called first-party cookies. We may also use third-party cookies – which are cookies from a domain different than the domain of the website you are visiting (for example, those used by social media, instant messaging, CRM or marketing platforms, or advertising companies). For more information about cookies, types of cookies and how to manage cookies, including how to block them and delete them, please visit <http://www.allaboutcookies.org>.

Below, we list the main categories of cookies and similar tracking technologies that we may use when you connect to our websites, use our web-based platforms, applications, devices, or when you interact with us electronically or when you receive electronic communications from us (“**Online Use**”). You can learn more about the purposes for which BMS may use such technologies for your Online Use.

What categories of cookies may BMS use?

We generally use certain types of cookies during your session on our website (“session cookies”). To improve your experience or remember your preferences or choices, we may use cookies that will remain on your device unless you remove them (“persistent cookies”). When using cookies on our websites and other digital services, such technology may include:

Categories of cookies and tracking technologies that BMS may use

Strictly necessary cookies (“required”)

Those cookies and tracking technologies enable our websites to operate and to improve the security of our website for your Online use, such as when you have to authenticate or use login functionalities to access restricted parts of our websites (such as using patient or physician login or page selection to restricted pages or areas of a website or application).

Performance cookies

Those cookies may allow BMS to:

- improve our websites;
- remember language or other preferences when you navigate; or
- use other features on our websites, applications, platforms and devices to improve your Online use.

Social media cookies

On certain BMS websites, we may use social media plugins for you to share interesting content or to connect to certain accounts to share your

Personal Information with us. Such platforms may access your history of navigation and collect information about your browsing journey under their own terms. You can access more information when connecting to our sites.

Analytics cookies

These cookies enable us to better know the use of our websites, establish statistics on their uses and visits (e.g. information on each visited page, how long a user navigates on a specific page, how long it takes to download a specific page, what are the users' actions on each page (click, selection, etc.)).

Other tracking technologies

When using third-party software or websites, mobile applications, devices, web-based platforms or through other Online use, the technology may involve certain built-in tracking technologies. This may include:

- **web beacons**, web server data and similar technologies;
- **tracking pixels**, which we may include as an image in our communications to you.

This may allow us to understand when you read electronic communications that we send you, to send you more accurate and relevant content and improve our communications to you. When using such technology, we may receive aggregate or anonymized information. In certain cases, we may collect Personal Information about you that includes:

- location data (such as the city, region and from where you opened your e-mail);
 - your IP address;
 - browser and device information: such as your mobile or desktop Operating System (OS), e-mail software type, device and user agent; or
 - time and date of when you open our electronic communications.
- **other trackers** that enables functionalities such as remote interactions with you through chatbots, instant messaging and other online features on our websites or third-party software that we use for our activities.

Why do we use cookies on our website?

In addition to the explanation provided in this Notice and the section above, we use cookies or similar tracking technologies in various instances, such as for the following purposes:

- **Making your experience more efficient, faster and easier:** by remembering your preferences, like preferred language, display and other settings, maintaining your session, and for

authentication purposes. This helps us to provide you with a better user experience. These cookies are also referred to as Session-Id cookies, authentication cookies, and User Interface customization cookies.

- **Gain useful knowledge about how the site is used:** by collecting information about the number of visitors and other uses. This helps us improve our sites. These cookies are also referred to as analytics cookies. For this purpose, we use services such as Google Analytics which means that Google and similar suppliers will also have access to this information (including your IP address and any other equipment identifiers such as the IMEI number and the MAC address).
- **Provide easy access to our websites.** This helps us to direct you, share with you our content within sites such as Facebook, Twitter, LinkedIn, YouTube or Pinterest or allow you to share content that is of your interest. To the extent we use such technology, these ‘social media plug-ins’ may store cookies and similar technology on your computer or other device. This means that the social media sites may access this information (including your IP address), may identify that you interacted with the BMS site.
- **Improve our marketing communications to you.** Certain cookies, such as web beacons or tracking pixels, may be used by third party systems, such as customer relationship management systems or other service providers who help us manage e-mail campaigns. Those trackers enable us to better understand the success of our communications and the relevance of the content that we share with you. This may allow us to reduce the number of e-mails that we send you and provide you with content, scientific information, or initiatives that are more tailored to your interests.

[How can you object or refuse cookies?](#)

Subject to the law of your country, in particular in the European Union, we will either inform you, ask your prior permission (opt-in) before placing tracking technologies on your device, or provide you with a right to object (opt-out) for the purposes that we describe in this section. Your web browser, e-mail software (such as Microsoft outlook, or Google Gmail) and other clients that you use can be set to manage cookies and similar trackers and even reject them by default. Do bear in mind that if you set your browser to automatically reject cookies, your user experience when visiting websites will not be the same: your preferences may not be remembered, some functionality may be lost and you may not be able to access certain areas or features of the sites.

For more details on the cookies that we use, you can read our cookie table below or, where applicable, on the website that you use by accessing the relevant cookie notice.

18. CHANGES TO THIS PRIVACY NOTICE



BMS may update this notice from time to time by posting any revisions on this website. Where any material revisions are made, BMS may place a prominent notice on this website and when legally required to do so, will directly notify you.

19. CONTACT US



If you have questions about this Notice, or want to obtain more information about our privacy practices, please contact our Data Protection Officer at eudpo@bms.com or contact us by postal mail at:

Contact	Name of the affiliate
To contact BMS	Bristol-Myers Squibb Pharmaceuticals Unlimited Plaza 254 - Blanchardstown Corporate Park 2, Dublin 15 - D15 T867 Ireland
To contact Celgene	Celgene Limited Uxbridge Business Park, Sanderson Road, Uxbridge, Middlesex, UB8 1DH, United Kingdom
European Data Protection Officer	Bristol Myers Squibb Data Protection Officer Engineering Building, Cruiserath Drive, Mulhuddart, Dublin 15 Ireland eudpo@bms.com
European Data Protection Representative	Bristol-Myers Squibb Pharmaceuticals Unlimited Company Plaza 254 Blanchardstown Corporate Park 2 Dublin 15, D15 T867 Ireland