

BMS GENERAL PRIVACY NOTICE

BMS United States Privacy Notice: For residents of the US, please refer to our separate United States Privacy Notice [here](#) or at <https://www.bms.com/assets/bms/us/en-us/pdf/bms-global-united-states-privacy-notice.pdf>. The US Privacy Notice supersedes this General privacy notice for all US residents.

BMS US Consumer Health Data Privacy Notices:

[Washington Consumer Health Data Privacy Policy](#): if you are a resident of Washington or an individual who falls within the definition of Consumer under Washington’s My Health My Data Act.

[Nevada Consumer Health Data Privacy Policy](#): if you are a resident of Nevada.

If you are a healthcare professional, you can access our other notice here: [HCP Privacy Notice](#) (<https://www.bms.com/privacy-policy.html#hcp>).

To access BMS Privacy notice center in your language, you can access our [27](#) below.

[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. 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 dpo@bms.com or as described below.

1. WHO WE ARE



We are Bristol Myers Squibb Company (BMS). 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 a 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 www.bms.com.

2. INTRODUCTION – HOW THIS NOTICE APPLIES TO YOU



This general privacy notice (“**Notice**”) is a global Notice. It describes how Bristol Myers Squibb Uses 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.

If you are an employee, supplier, or business partner, there may be additional privacy notices that apply to your information. Please refer to the information you received from us as an employee for additional privacy notice information, and if you are a supplier or business partner, please refer to your contractual agreements with BMS for additional information.

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 will provide you with more details on the Personal Information we collect about you. . Where this is the case, we will provide a supplemental or just-in-time privacy notice that explains such Use when we collect it. You should read any supplemental explanation in conjunction with this Notice.

Compliance with applicable laws

As a multinational company operating worldwide, the collection of your Personal Information will vary depending on the laws of your country (“**Applicable Data Protection Law**”), which establish rules about the collection certain information about you or privacy rights. You can read more information about the data we collect about you in [section 4](#) or about your rights in [section 11](#).

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.

Some area of our web sites and platforms will 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/legal-notice.html) (https://www.bms.com/legal-notice.html) and if you are visiting our website for safety reasons, our page on [medical information](https://www.bmsmedinfo.com) (https://www.bmsmedinfo.com).

Below, you can read the categories of Personal Information that we collect about you online.

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 can 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 vary 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 web sites 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 license 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 17 below for more information.
Interest-Based Advertising (IBA).	We may use 3rd party advertising companies to tailor online and mobile advertisements to you based on predictions about your interests. We explain how we may Use your Personal Information in this context in our section about cookies .

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 includes 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 examples of categories of Personal Information and, where applicable categories of sensitive Personal Information that we collect about you.

For more details about how BMS handles Personal Information of patients outside of research activities, please read [section 14](#).

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	In some cases, we classify, organize, 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:

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- data relating to how you behave using our technologies (for example websites, mobile applications, platforms, or care programs); or
 - data used to categorize, analyse, or predict performance and preferences.

You can read more about this activity in [section 10](#) below.

Sentiment analysis and analytics, social media and data from publicly available sources

We often obtain information from publicly available sources. Such information originates from third-party service providers specialized in social media listening, or from the Internet so that we can understand how the general public or influencers perceive our brand, products and activities.

Examples of information that we collect online and through social media in this context, includes:

- the volume of coverage, reach and popularity data, 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 either via our channels, websites, social media or via third-party providers.

When we obtain information from publicly available sources, we do not make individual decisions on users unless we inform you otherwise. We usually limit information Used for this purpose to obtain 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.

Data from social media activities and monitoring

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. We receive aggregate information or, when needed, access Personal Information about you, such as your username, profile, and what you say, like or comment on our channel.

We also monitor our channels for drug safety purposes.

As In such case, BMS will collect information about potential adverse events about someone using a BMS product. If we identify or receive safety information about patients, we may be required obtaining additional

information and notify competent authorities about pharmacovigilance cases.

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.

**Information
technology-related
data**

The information we collect originates 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. Where required under Applicable Data Protection Laws, we will inform you and ask for your permission prior to collecting such information.

**De-identified and
anonymized
information**

We may use Personal Information about you to:

- aggregate and/or de-identify information about you; or
- use suggestions, comments, and ideas that are not personally identifiable.

Special categories of data / sensitive Personal Information

In some situations, we collect sensitive Personal Information about you. Depending upon the country in which you reside and the particular context for the collection of such Personal Information, this includes:

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; and
 - Precise geolocation.
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Health information

(if permitted or required by law)

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

- 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.
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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:

- 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);
- in the context of a specific treatment, such as for personalized medicines, using medical devices or digital platforms or applications;
- when we engage service providers, business partners or institutions for services, collaborations or operations;
- when 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;
- when 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;
- when 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
- when 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:

- when we receive information about you through a healthcare professional where necessary for pharmacovigilance, incident management, risk management, investigation, or litigation purposes;
- when we obtain information that is accessible from public registries, databases, or other third-party sources, such as service providers, agencies or private organizations;
- when 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 will either inform you, anonymize the data or get your prior consent;
- when 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; or

- when you make public posts on social media platforms that we follow (for example, so that we can understand public opinions).

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, de-identify 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, you can read the purposes for which BMS Uses your Personal Information.

Purposes for which BMS may Use your Personal Information	
Contracting purposes	<p>We collect 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 includes:</p> <ul style="list-style-type: none"> • when you need access or authorization to connect to our systems, devices or enter our facilities; • to protect our systems and IT infrastructure; • when assisting us in our activities; and • when we conduct audits or assessments of your organization. <p>This includes obtaining Personal Information before, during and after we enter into a contract with you, your organization and your staff.</p>
Collaboration and research purposes	<p>When we partner with other organizations, including private or public alliances, institutions, for regional or local discussions, or life science industry groups associations and consortiums.</p>

<p>Patient advocacy and support programs</p>	<p>When we exchange, interact or establish partnerships with service providers, local, regional or global patient advocacy associations or organizations, or other life sciences companies, including in the context of patient-related support or management programs.</p>
<p>Providing innovative products, such as devices or personalized medicine</p>	<p>As we develop and manufacture innovative therapies, we can Use Personal Information, which can include sensitive Personal Information about you, in particular when providing:</p> <ul style="list-style-type: none"> • personalized medicines, such as cell therapies, or other innovative therapies; or • digital health platforms, digital or medical devices, medical equipment, tools or applications. <p>In this context, we can keep Personal Information, including health information, about you for manufacturing, quality or safety purposes.</p>
<p>Managing BMS's relationship with you</p>	<p>When we:</p> <ul style="list-style-type: none"> • 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.
<p>Commercial and marketing activities</p>	<p>When conducting our business operations, there are instances where we can interact with you in person or digitally or to improve our brand and products, such as through the following activities:</p> <ul style="list-style-type: none"> • 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 including advertising: we Process your Personal Information to provide you with marketing

information, including in-person, by electronic or remote means. We do this by conducting advertising ourselves or through the sharing of your Personal Information to third parties acting on our behalf. You can understand more about advertising in our section on [section on cookies](#); and

- **Websites and social media platforms:** we 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 and studies	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 monitoring (materiovigilance), when interacting with authorities, regulatory agencies and bodies, or when conducting real-world evidence activities.
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 ".
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 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	When keeping and preserving 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 to third parties, courts, or governmental bodies. 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 (for example in the United States). However, when Applicable Data Protection 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 applicable legal basis or combination of legal bases we Use when Processing your Personal Information.

Our legal bases	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;

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- 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.

We may use Personal Information about you, your staff, suppliers and third parties with whom you collaborate, for example to:

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

- send you requests for proposals, suggest partnerships and collaborations;
- conduct due diligence, assessments or audits of your organization;
- assess the feasibility of a study with your institution and to contract with you, your institution and staff; or
- 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;
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- anti-bribery and other laws that prohibits conflicts interest; or
 - to respond to government regulators, agencies, courts, or other third parties in legal proceedings.
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We use the **public interest**

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:

- 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**

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.

Other legal exceptions

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.

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. In other instances, we may require your prior consent:

With your **consent**

- to send you commercial communications electronically, such as for direct marketing, market research, surveys, or for general interactions with you;
- to invite you to events or to propose you participate in various BMS activities and initiatives; or
- to use your images (such as your photographs, audio or video recordings) for interviews, events or other BMS initiatives.

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

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. .

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:

- **Processors / service providers / contractors** that assist in providing information technology services, patient support services, call center and customer service-related services, order fulfilment, payment processing, shipping services, clinical trials and studies support, marketing, advertising or market research services, including using online means or tracking technologies (for more information see [section 17](#) below), events, meeting and planning services, newsletters and other communications, services related to talent acquisition or consultancy, legal and accounting services, security and fraud detection, patient and drug safety and monitoring services;
- **business partners** such as external scientists and healthcare professionals to review and assist us with healthcare compliance activities and institutions and other organizations with whom we collaborate to support our activities, such as clinical studies, patient support programs activities, or commercial activities associated with our products;

- **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.

[Data sharing in connection with a transfer of control](#)

Circumstances may arise where we decide to reorganize or divest part or all of our business or a line of our business (or any portion of our assets), including our information databases and websites, through a sale, divestiture, merger, acquisition, in the event of a bankruptcy, or other means of transfer. In any such circumstance, your Personal Information may be shared with, sold, transferred, rented, licensed, or otherwise provided or made available by us or on our behalf to actual or potential parties to, and in connection with, the contemplated transaction (without your consent or any further notice to you). In such circumstances, we will seek written assurances that Personal Information about you submitted through this Website will be protected appropriately.

[If you are in the European Economic Area \(“EEA”\) and Switzerland](#)

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 and Switzerland), 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 and Switzerland](#)

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



We may use algorithms that will enable us to use automated decision-making, including to create profiles. However, when we use certain technologies, software or algorithms, which may allow us to create profiles, perform tiering and ranking, further understand trends and statistics or use other advanced technologies or to engage in 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 (i) draw this to your attention, (ii) where required integrate human oversight in the process, and (iii) 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 dpo@bms.com or via this [contact form](https://www.bms.com/about-us/contact-us.html) (<https://www.bms.com/about-us/contact-us.html>) 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 the Processing of your Personal Data for certain purposes, such as when we use (i) our legitimate interest, (ii) for marketing purposes (opt-out) or (iii) when using automated-decision making without human intervention; and

- where you have provided us with your **consent** to Use your Personal Data, 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 dpo@bms.com. If you are resident in a State that provides you with more rights (such as California), you can submit requests by calling 855-961-0474 or by completing the online form at www.bms.com/dpo/us/request. For further details, see our section on [State Privacy Rights](#).

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 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.

12. HOW LONG WE RETAIN YOUR INFORMATION



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 organizational controls to protect your Personal Information that we hold to prevent unauthorized 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.

Despite our efforts, as described above, to maintain reasonable security safeguards and prevent all breaches, the security of information transmitted through the internet cannot, be guaranteed despite our efforts to maintain reasonable security safeguards.

14. APPLYING TO WORK AT BMS



BMS will Process your Personal Data to evaluate your application to work at BMS. When applying for an opportunity at BMS, we will 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/>. 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.

Technologies we use in the recruitment process

If you apply for a role at BMS through our websites, we may use technologies that use automation to filter your candidacy based on objective criteria. We also use chatbots, automated messaging and similar AI-enabled tools that help us facilitate the selection of our future BMS talents.

These tools help with activities such as matching candidates to roles, ranking or scoring more suitable candidates, following up with you after you visit our websites, scheduling interviews, and summarizing interview discussions. They analyze job-related information (such as skills, experience, and availability) to support recruiters and hiring managers.

These systems process information you provide in your application, including your resume, work history, education, and responses to screening questions. While these technologies assist with certain steps in our recruitment process and provide recommendations, all final decisions, including those affecting whether candidates advance to subsequent stages in the applicant process, are made by our talent acquisition teams with meaningful human review and independent judgment.

Depending on your location and the specific role you apply for, additional disclosures about our use of AI in recruitment may be provided to you separately. You can find more information about your rights in [11](#) of this Notice.

[Where do we Use your Personal Information for job application](#)

As a multinational organization, 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.

More information about data protection for job applicants in your market

List of job applicant privacy notices for other jurisdictions					
<u>Argentina</u>	<u>Australia</u>	<u>Austria</u>	<u>Belgium EN</u> <u>Belgium NR</u> <u>Belgium FR</u>	<u>Brazil</u>	<u>Canada EN</u> <u>Canada FR</u>
<u>Chile</u>	<u>China</u>	<u>Colombia</u>	<u>Czech Republic</u>	<u>Denmark</u>	<u>Finland</u>
<u>France</u>	<u>Germany</u>	<u>Greece</u>	<u>Hong Kong</u>	<u>Hungary</u>	<u>India</u>
<u>Ireland</u>	<u>Israel</u>	<u>Italy</u>	<u>Japan</u>	<u>Korea</u>	<u>Luxembourg EN</u> <u>Luxembourg FR</u>
<u>Mexico</u>	<u>Netherlands NL</u>	<u>New Zealand</u>	<u>Norway</u>	<u>Peru</u>	<u>Poland</u>
<u>Portugal</u>	<u>Romania</u>	<u>Saudi Arabia EN</u> <u>Saudi Arabia AR</u>	<u>Singapore</u>	<u>Spain</u>	<u>Sweden</u>

Switzerland DE	Taiwan	Thailand	Turkey	United Arab Emirates	United Kingdom
Switzerland FR					

You can find more information about how BMS handles your Personal Data if you become part of our workforce in our employee privacy notice:

- in English here: <https://www.bms.com/privacy-policy.html#employees>; or
- in other languages here: <https://www.bms.com/privacy-policy.html#employees-markets>.

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, 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.

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. If you are involved in a research project, clinical trial or in a study you can contact your physician or contact dpo@bms.com. 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, if you agree to share such information with us or, if permitted, by information you prior to the collection of your Personal Information. In some instances, we may have interactions with you or access information about you outside of our clinical research activities. This may happen, for example and where permitted, when:

- accessing our personalized medicines, other innovative therapies or devices;
- BMS collaborates with patient organizations;
- inviting you to our events;
- we propose patient support programs;
- we use certain digital technologies, platform or device;
- we use patient recruitment websites or conduct awareness or recruitment campaigns on social media; 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 contact your physician or dpo@bms.com if you need further information relating 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. 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	
<u>Strictly necessary cookies</u>	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.
<u>Performance and analytics cookies</u>	Those cookies may allow BMS to: <ul style="list-style-type: none">• improve our websites;• understand trends, statistics, capture audience metrics or other site usage about the use of the website or other platform that we may use (such as for analytics purposes);• remember language or other preferences when you navigate; or• use other features on our websites, applications, platforms and devices to improve your Online use.
<u>Social media cookies</u>	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 Web sites.
<u>Web server data and other technologies</u>	BMS, and 3 rd parties we work with, may also collect usage data from our Web site to better understand Web site usage as a whole and to determine which areas of our Web site users prefer (e.g., based on the number of visits to those areas). BMS and 3 rd parties we work with store and use this information for statistical reporting.
<u>Advertising cookies</u>	Cookies classified as advertising cookies are specifically designed to gather information from you on your device to display advertisements to you based on relevant topics that interest you.

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;
 - other trackers that enable functionalities such as remote interactions with you through chatbots, instant messaging; or
 - cookies used for authentication purposes.
-

[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 plugins’ 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.

- **Collect and analyse advertising campaigns.** We use, and allow certain 3rd parties to use, other technologies, such as web beacons, on our websites and in our digital communications to tailor advertising, or to measure the effectiveness of advertising campaigns. A web beacon is a clear GIF (Graphics Interchange Format) that a company can place on a web site or in digital communications to allow it or a third party (such as an Internet advertising, audience measurement, or social media company). As a result, we and these 3rd parties may collect and use information about your online visits to our websites or engagement with our digital communications.

[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.

[Do-Not-Track Signals](#)

While some browsers have incorporated Do Not Track (“DNT”) preferences, we do not honor Do Not Track signal. This means that when you visit our Web sites, the collection of traffic data occurs even when do-not-track signals are enabled on your internet browser. For more information about do not track signals, visit <https://www.allaboutdnt.com>.

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. You are bound by any such revisions and should therefore periodically visit this page to review the most current privacy statement.

19. ONLINE PRIVACY FOR CHILDREN

We are committed to protecting the privacy of children. We do not intend to collect Personal Information from children under 18 years old. If a child has provided us with his or her information that enables us to identify him or her, the parent or guardian of that child may contact us at (877) 274-0626.

20. POLICY ON USE OF SOCIAL SECURITY NUMBERS

Bristol Myers Squibb has a policy which provides for the proper use and protection of Social Security numbers obtained in the course of doing business by Bristol Myers Squibb. Such policy protects the

confidentiality of Social Security numbers, prohibits unlawful disclosure of Social Security numbers, and limits access to Social Security numbers. This policy applies to all methods of collection of Social Security numbers, including Social Security numbers obtained by oral, written and electronic means.

21. CONTACT US



If you have questions about this Notice or want to obtain more information about our privacy practices, please read the privacy notice of your country of residence for local information and contact details, contact our Data Protection Officer or contact us by postal mail as described below.

Contact	Name of the legal entity / controller
For residents in the United States you can contact BMS at:	Bristol Myers Squibb Company P.O. Box 640 Palatine, IL 60078-0640 800-332-2056 United States
For residents in the United States you can contact Celgene at:	Celgene Corporation Route 206 and Province Line Road, Princeton, NJ, 08543, Route 206 and Province Line Road Princeton, NJ 08543 United States

22. BMS PRIVACY NOTICE CENTERS IN YOUR MARKET

You can access our Privacy notice center in other languages for your relevant jurisdiction here:

List of BMS Privacy notice centers for other jurisdictions					
Argentina	Australia	Austria	Belgium EN Belgium NR Belgium FR	Brazil	Canada EN Canada FR
Chile	China	Colombia	Czech Republic	Denmark	Finland
France	Germany	Greece	Hong Kong	Hungary	India
Ireland	Israel	Italy	Japan	Korea	Luxembourg EN Luxembourg FR
Mexico	Netherlands NL	New Zealand	Norway	Peru	Poland

Portugal	Romania	Saudi Arabia EN Saudi Arabia AR	Singapore	Spain	Sweden
Switzerland DE Switzerland FR	Taiwan	Thailand	Turkey	United Arab Emirates	United Kingdom