

**BMS PRIVACY NOTICE  
FOR INVESTIGATORS AND RELEVANT STUDY PERSONNEL**



**Our Commitment**

**At BMS your privacy matters.** This privacy notice applies to personal information Bristol-Myers Squibb Company (“BMS”, “us”, “our”) will process about you as an investigator, site’s personnel or medical staff (“you” or “your”) in the context of interventional and non-interventional studies. As the sponsor of clinical studies, BMS is responsible for handling your personal information. We explain you how we process feasibility data and other information about you before and after selection if your site will participate in a BMS study, in accordance with data protection laws and, where applicable, ICH Guideline for Good Clinical Practice (“GCP Guideline”). You can read this notice online here: <https://www.bmsstudyconnect.com/us/en/investigators-privacy-policy.html>.

**1. WHO WE ARE**



We are Bristol-Myers Squibb (BMS), a company member of the Bristol Myers Squibb Company group. As sponsor of clinical studies, BMS together with our worldwide affiliates and other entities that are part of the BMS group will be the controller of your personal information. Please refer to the study protocol or the study documentation to access the BMS entity that is responsible as sponsor for handling your personal information in the context of a particular study.

**2. FOR CANDIDATE SITES (pre-selection)**



When assessing your site for potential BMS clinical studies, we usually obtain it from questionnaires or depending on your interactions with BMS, from third parties with whom we collaborate or external sources providing us with your data. Below, we explain you what data we collect, for what purpose and, where applicable, how we justify such use.

| How BMS Uses Your Information before Site Selection |  |
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| <b>Type of information</b>                          | <p>As part of the evaluation of your site’s capability, BMS will collect:</p> <ul style="list-style-type: none"> <li>• <b>profile data</b>, which may include your professional information (such as your contact details, degree, academic appointments, and your research experience) and about the study site (i.e.: personnel, IRB, ethics committees’ background, laboratory / pharmacy capabilities, equipment); and</li> <li>• <b>feasibility data</b>: which relates to the evaluation of your study site’s medical and operational capability to participate in a specific study. This may also include your site’s historical performance metrics and experience.</li> </ul> |

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|---------------------------|--|
|                           | BMS may also collect other relevant documents needed to conduct the evaluation of your study site for potential study participation.   |
| <b>Purpose(s) for use</b> | <p>BMS collects such information about you for the following purposes:</p> <ul style="list-style-type: none"> <li>identifying and evaluating your site for potential study participation; and</li> <li>we may store your personal information in our resource database for potential future collaborations and studies or in case of an inspection by an authority.</li> </ul>   |
| <b>Legal bases</b>        | <p>During the selection process, we collect your information on the basis of:</p> <ul style="list-style-type: none"> <li>our <b>legitimate interest</b> as a Sponsor of clinical studies;</li> <li>to take steps prior to <b>entering into a contract</b>; or</li> <li>to <b>comply with applicable laws</b> and regulations or authorities' guidance, which require Sponsors to collect certain information for evidence of your qualifications.</li> </ul> <p>Where required in your country of residence, we will ask your prior consent for the processing, transfer or sharing of your personal information with third parties outside of your country.</p> |

### 3. FOR SELECTED SITES (post-selection)



If your site is selected to participate in a BMS clinical trial, we will keep profile and feasibility data collected from your site and ask for additional information and documentation from you, your staff, site's personnel and to enter into a contract with you. Below, we provide you more information such use.

| <b>How BMS May Use of Your Information after Your Site is Selected</b> |  |
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| <b>Type of information</b>   | <p>BMS will collect additional information that may include:</p> <ul style="list-style-type: none"> <li>data derived from electronic health records (EHR);</li> <li>Satellite site details;</li> <li>financial disclosure; and</li> <li>curriculum vitae and professional licenses.</li> </ul> <p>BMS may also collect other relevant documents and data needed for compliance, due diligence, to avoid conflict of interests and prepare your site onboarding and activation.</p> |
| <b>Purpose(s) for use</b>  | <p>If your site is selected, the data collected before, during and after the selection process will be used:</p> <ul style="list-style-type: none"> <li>for the management of the BMS clinical studies in accordance with the applicable legislation in the context of clinical research;</li> <li>to comply with regulatory requirements or to disclose personal information to competent regulatory authority or public registries (such as clinicaltrial.gov); or</li> </ul>    |

- to enable patient recruitment via BMS study-related websites where we publish available clinical studies (such as <https://www.bmsstudyconnect.com>).

**Please note:** In some instances, we may share your professional contact details, site's profile and performance related data with other sponsors to facilitate research opportunities. When doing so, you may choose to make your personal information available to such third parties.

#### Legal bases

Where a legal basis is required to justify how we use your personal information, BMS will process your personal information on the basis of:

- a **contractual necessity** to obtain and prepare the necessary documentation to enter into a contract, and thereafter manage such relationship, with you and/or your institution;
- its **legitimate interest** to publish contact details on its clinical studies-related website or contact you for further study participation. You may object to such processing by contacting us at the address below or contacting our data protection office; and
- **applicable laws** and international standards to keep your data for the conduct of clinical studies for evidence of qualifications of investigators and sub-investigators.

Where required by applicable laws, we will ask your prior consent for the processing, transfer or sharing of your personal information with third parties outside of your country of residence.

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#### 4. SHARING THIS NOTICE WITH THE SITE'S PERSONNEL



This notice applies to personal information of investigators and your site's personnel. As part of your responsibility please share this notice with your site's personnel whose personal information is shared with us.

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#### 5. CONFIDENTIALITY AND SECURITY



We will process your personal information in our systems. When BMS requires assistance of partners or service providers to assist us, such as Contract Research Organizations (CROs), we may share your personal information with them. In such cases, we will put in place appropriate technical and organizational measures, including contracts and confidentiality provisions to ensure third parties also protect your data.

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#### 6. STORAGE AND RECORD RETENTION



BMS aims to retain your information for no longer than necessary for the specific purposes identified in this notice. Note that BMS may keep your personal information for a longer duration, where applicable laws or regulations require or allow BMS to do so.

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## 7. THIRD PARTIES AND DATA TRANSFER



Due to the global nature of clinical studies, the processing and storage of personal information is often conducted in centralized locations outside your country. Therefore, we may need to transfer your information to other BMS entities and disclose your information to third parties that provide services to BMS, which includes access from countries which legislation may not offer the same level of protection to your information as in your country, such as the United States.

We may also obtain information about you from third parties or share it with partners managing databases, which may involve sharing or accessing your site's profile or performance in the conduct of clinical trials. This includes, where applicable and permitted, making your personal information available through investigator registries that other sponsors or CROs can use to improve clinical trial opportunities.

**How we securely transfer it.** When disclosing your personal information to third parties or transferring it outside your country, BMS will implement: (a) appropriate safeguards or agreements for international transfers of personal data (such as binding corporate rules (BCR) for transfers within the BMS group and standard contractual clauses when using authorized third parties); and (b) appropriate security measures to protect your personal information from unauthorized use, access or disclosure and in accordance with any data protection laws.

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## 8. YOUR RIGHTS



Where the legislation of your country gives you the right to access, verify your personal information held by BMS, receive a copy of it, object, restrict, request its deletion or correction and object to certain processing, you can exercise your rights by contacting BMS at the address below. If you have questions, if you want to know more about how BMS handles personal information about you or to exercise your rights, you can read our HCP privacy notice here: <https://www.bms.com/privacy-policy.html#hcp> and, if applicable, on the official BMS website of your country.

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## 9. CHANGES TO THIS PRIVACY NOTICE



BMS may update this notice from time to time by posting any revisions on our website. Where any material revisions are made, BMS may place a prominent notice on our website and when required, we will directly notify you. You should therefore periodically visit our page to review the most current privacy notice or contact us for more information.

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## 10. CONFIRMATION ABOUT THIS NOTICE



Except for countries where consent is not required for processing your personal information<sup>1</sup>, you hereby confirm that you have read this notice and consent to the use of your personal data as set out in this privacy notice.

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<sup>1</sup> Note that if your site is based in one of the following countries, BMS processes your personal data either on the basis of its legitimate interest, contractual need or to comply with the law. This may include for example countries such as Australia, Brazil, EEA countries, UK and Switzerland, Hong-Kong, New Zealand, US, Taiwan or Turkey.

## 11. CONTACT US



If you have questions about this notice or want to obtain more information about our privacy practices, please visit our privacy notice center at <https://www.bms.com/privacy-policy.html>, or contact us by e-mail or postal mail at:

| For residents in the EEA, Switzerland and UK  | For residents in all other jurisdictions   |
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| <p><b>European Data Protection Officer</b></p> <p>Engineering Building<br/>Cruiserath Drive, Mulhuddart<br/>Dublin 15<br/>Ireland</p> <p>e-mail: <a href="mailto:eudpo@bms.com">eudpo@bms.com</a></p> | <p><b>Data Protection Office</b></p> <p>Bristol Myers Squibb<br/>P.O. Box 640<br/>Palatine, IL 60078-0640<br/>800-332-2056</p> <p>e-mail: <a href="mailto:dpo@bms.com">dpo@bms.com</a></p> |