

MSD Data Privacy Commitment to Health Care Professionals

FACTS	<p>This Notice provides a comprehensive overview of the processing of personal data about health care professionals by Merck & Co., Inc. (WS3B-85, One Merck Drive, Whitehouse Station, NJ, USA) and its Belgian branches MSD Belgium BVBA/SPRL (Clos du Lynx 5, 1200 Brussels, Belgium) and Merck Sharp & Dohme (Europe) Inc. (Clos du Lynx 5, 1200 Brussels, Belgium). These Merck entities (hereafter "MSD") act as controllers of the processing.</p>
Privacy at MSD	<p>Consistent with the Merck tradition of upholding high ethical standards across our business practices, we have demonstrated our commitment to privacy by establishing a global privacy program to support compliance with applicable privacy laws and standards for protecting personal information around the world.</p>
Why?	<p>MSD collects, receives, uses and shares identifiable information ("personal information") about physicians, pharmacists, investigators, researchers and other health care professionals in accordance with and as permitted by applicable laws, and, where applicable, as authorized by applicable government authorities, in connection with our everyday business operations, which may include:</p> <ul style="list-style-type: none"> • clinical, epidemiology and outcomes research study management • adverse experience and product complaint reporting • patient assistance and reimbursement support programs • communicating information about our products through our professional representatives, our web sites, via e-mail, postal mail and other channels, including promotional and other marketing communications • symposia, conferences and other scientific and educational programs • requests for product samples and orders for our products, where permitted by law • financial disclosure reporting • business research and marketing research • auditing our programs and resources for compliance and security purposes • identifying and engaging scientific experts and leaders • providing access to our resources and keeping track of our interactions with you both offline and online (our online practices are governed by our Internet Privacy Policy (www.merck.com or www.msd-belgium.be)) • tracking payments made to health care professionals for services performed on behalf of MSD • development of sales and marketing programs • delivery of programs and materials to your patients • determining the appropriateness, given the requirements of laws applicable to our business, of engaging health care professionals for certain of the business purposes described above • legal proceedings and government investigations, including preservation of relevant data • as required or expressly authorized by laws applicable to MSD business globally <p>Where local laws require that you provide specific consent for the collection, use and disclosure of personal information for some of these programs, you may be asked to provide your consent by filling out a paper form, an online form, in a telephone discussion or by other appropriate and permitted means. Except where we are required by law to use or disclose personal information for certain purposes, you also may opt-out of specific programs by contacting us as described in the "Contact Us" section of this form. If we process your personal data for direct marketing purposes, you can always object against such processing free of charge.</p>
What?	<p>The types of personal information we collect (directly from you or from public or third party information sources) and share depend on the nature of the relationship you have with MSD and the requirements of applicable laws. This information may include, among other things:</p> <ul style="list-style-type: none"> • contact information • professional credentials, publications, patents and other scientific and medical achievements • roles or positions held with governmental bodies or hospital or payor organizations • date of birth, day or year of birth, or age • organizational and institutional affiliations • programs and activities in which you participated • information about your prescribing of MSD products • agreements you have executed with the company • payment-related information, including tax identification number • your communications preferences • information about your scientific and medical colleagues and leaders in your specialty area

Effective Date: November 1, 2009.

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How?	<p>In the section below, we list the reasons that pharmaceutical companies like MSD typically may share personal information about health care professionals, the reasons that MSD shares this information, and whether you can limit this sharing. MSD implements reasonable and appropriate security measures to protect personal information in accordance with its sensitivity from loss, misuse and unauthorized access, disclosure, alteration or destruction.</p> <p>Your personal data may be transferred to a destination outside the European Economic Area ("EEA"). You hereby consent to such transfer. In 2001, Merck & Co., Inc. certified its adherence to the Safe Harbor Agreement between the European Commission and the U.S. Department of Commerce for transfers of personal information about health care professionals and other individuals from the EEA to the United States. A copy of the Merck Safe Harbor Privacy Policy is available at http://www.merck.com/policy/safe_harbor/home.html.</p>	
Reasons personal information about you could be shared	Do we share?	Can you limit this sharing?
To companies MSD collaborates with: to use for their own products and services.	No, unless you provide your express (opt-in) permission for this sharing.	Yes
To companies that MSD does not collaborate with: to use to market to you.	No, unless you provide your express (opt-in) permission.	Yes
Reporting to government authorities (such as FDA in USA).	Yes, for example, to report safety information about our products.	No
To parties in relevant legal proceedings as authorized by the presiding court or tribunal and otherwise to the extent required or explicitly authorized by applicable law.	Yes	No
In the event that for business reasons MSD decides to divest part or all of its business through sale, merger or acquisition, to actual or prospective purchasers.	Yes, based on written agreements that personal information will be protected appropriately in these circumstances.	Generally, no, except where local law permits you to opt-out or requires your express consent.
With companies globally that provide services on our behalf and in accordance with our instructions (for example, to deliver specific information you have requested).	Yes, if the business operation is supported by another company. As a global company, we may work with companies around the world to provide services for or on our behalf, and we will require those companies to protect personal information in accordance with applicable laws, rules and regulations and privacy policies of MSD.	<p>Generally, no. We have instituted policy, contractual and administrative mechanisms requiring protection of personal information by other companies that process personal information on our behalf globally. However, where local law provides a right for you to limit this sharing, we will comply with such requirements.</p> <p>In circumstances where our business operations are supported by other companies, such as a company that we contract with to mail the materials you request, you will not be able to limit this sharing and still receive the service.</p>
<p>To affiliates* within the Merck & Co., Inc. family of companies globally for everyday business purposes as described in this Notice.</p> <p><i>*Affiliates are companies related by common ownership or control. Outside of the United States, affiliates of Merck & Co., Inc. generally operate under the names "MSD" or "Merck Sharp & Dohme".</i></p>	Yes, as a global company, we generally share personal information across our offices globally for the purposes described in this notice, however, only those individuals with a legitimate business need to access personal information for these purposes are granted such access. For example, payment information will be available only to local Merck or MSD office in your country and the USA group responsible for payments.	<p>Generally, no. We have instituted policy, contractual and administrative mechanisms requiring protection of personal information across our business globally. However, where local law provides a right for you to limit this sharing, we will comply with such requirements.</p> <p>You may request that we not transfer personal information outside of your country, however, in most cases this will substantially limit the services we can provide to you. Where our computer servers, databases or processes are located in another country, in most cases we will be unable to fulfill such a request and still provide the service to you.</p>

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To other companies we collaborate with solely for activities related to products or services jointly offered or developed by Merck and that company	Yes, based on written agreements in place between Merck and those companies.	Yes, if you specifically request to opt-out.
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Contact Us



If you have questions regarding this Notice or the personal information MSD collects, uses and shares about you, or if you would like to change your communications preferences (such as to opt-out of receiving e-mail, facsimile or other direct marketing communications) or to opt-out of particular programs, or if you would like to access or update personal information about you in MSD databases in accordance with your rights under applicable law, please contact us. In some cases, we may be required to work with or refer you to a third party to enable you to opt-out.

To contact the Privacy Office of MSD B.V., Belgian branch or MSD (Europe) Inc., Belgian branch, write to:

MSD Privacy Office
MSD Belgium BVBA/SPRL
Clos du Lynx, 5
1200 Brussels, Belgium
+32 2 373 42 11

To contact the Privacy Office at Merck & Co., Inc., the parent company of MSD, write to:

Merck Privacy Office
Merck & Co., Inc.
WS3B-85
One Merck Drive
Whitehouse Station, NJ 08889-0100, USA
+1 888 776 8364

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