

PharmaLex Japan Privacy Notice

Declaration of Protection of Personal Information

As a personal information handling business operator as defined in the Act on the Protection of Personal Information (hereinafter referred to as the “Act”), PharmaLex Japan, Inc (PharmaLex Japan) recognizes the need for and importance of protection of personal information. To ensure rigorous protection of personal information, PharmaLex Japan complies with the policy below concerning the protection of personal information and familiarizes all personnel with this policy.

1. Policy

- a. PharmaLex Japan complies with the Act, guidelines issued by the Personal Information Protection Commission (PPC), and other laws and regulations concerning proper handling of personal information.
- b. PharmaLex Japan acquires personal information in a proper manner, and except as otherwise provided by law, uses such information within the purpose of utilization of personal information that has been disclosed in advance, was informed or explicitly stated at the time of receipt.
- c. In order to prevent loss, alteration or leakage of personal information, PharmaLex Japan implements appropriate security controls for handling of personal information including information security.
- d. PharmaLex Japan reviews, on a regular basis, its management system and efforts for the protection of personal information to attain continuous improvement.

2. Purpose for processing personal information

PharmaLex Japan collects and processes personal information for the following purposes:

- a. To appropriately provide and perform clinical research and regulatory compliance services.
- b. To respond to inquiries and requests.
- c. To provide information about the range of services available to customers.
- d. To comply with legal and regulatory requirements.
- e. To use clinical trials document management and archiving tools, business operation tools and applications, in order to deliver services to customers and to protect the company for security, business continuity and disaster recovery purposes.
- f. To conduct analysis, research and development services for customers.

3. What personal data we collect about you

PharmaLex Japan may collect and process different types of personal data in the course of operating the business and providing services. These include:

- Basic personal data such as name and job title;
- Contact data such as telephone number, email address and postal address;
- Demographic data such as preferences;
- Website usage and other technical information such as details of visits to the PharmaLex Japan website or information collected through cookies and other tracking technologies;

- Personal data provided to PharmaLex Japan by or on behalf of clients or generated by PharmaLex Japan in the course of providing services, which may, where relevant include sensitive information;
- Recruitment related data such as curriculum vitae, education and employment history, details of professional memberships and other information relevant to potential recruitment to PharmaLex Japan.

4. Recipients of personal data

PharmaLex Japan may share your personal data with the below third parties where necessary and in relation to any of the above specific purposes:

- any Pharmalex and Cencora group companies;
- our professional advisors;
- our suppliers, business partners and sub-contractors;
- search engine and web analytics services providers;
- relevant regulators and other authorities, including law enforcement bodies;
- credit reference and fraud prevention agencies;
- entities providing due diligence and/or know your customer services;
- entities with whom we are entering into a joint venture; and,
- your advisors and/or other entities linked with you or your business.

5. How long we keep your personal data

PharmaLex Japan will retain your personal data for as long as is necessary to fulfil the purpose for which this data was collected and any other permitted linked purpose (for example correspondence related to any service provided may be retained until the contracted service has expired or in order to comply with regulatory requirements regarding the retention of such data). If personal data is used for two purposes, PharmaLex Japan will retain it until the purpose with the latest period expires; but will stop using it for the purpose with a shorter period once that period expires. PharmaLex Japan retention periods are also based on business needs and good practice.

6. How we protect your personal data

PharmaLex Japan recognises that information security is an integral element of data privacy. While no data transmission (including over the Internet or any website) can be guaranteed to be secure from intrusion, we implement a range of commercially reasonable physical, technical and procedural measures to help protect personal data from unauthorised access, use, disclosure, alteration or destruction in accordance with data protection law requirements.

Information that you provide to us is stored on our or our service providers' secure servers and accessed and used subject to our security policies and standards, or those agreed with our service providers and in some cases our clients.

Everyone at PharmaLex Japan and any third-party service providers we may engage that process personal data on our behalf (for the purposes listed above) are also contractually obligated to respect the confidentiality of personal data.

7. What are your rights in relation to personal data?

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by opting out by contacting us at privacy@cencora.com

In addition, you have the following rights:

- Where you have consented to us using your personal data, you can withdraw that consent at any time.
- If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.
- You also have the right, with some exceptions, to ask us to provide a copy of any personal data we hold about you.
- Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine-readable format.

Please you wish to exercise your rights, please refer to the appropriate personal data request form that is available via our website.

<https://www.pharmalex.com/personal-data-request-forms-japan/>

8. Complaints and inquiries

If you have an inquiry or complaint about the use of your personal information, please contact: privacy@cencora.com