

## Valneva UK Limited Privacy Policy

Valneva UK Limited ("**Valneva**") has created this privacy statement in order to demonstrate our firm commitment to privacy. The following discloses our information gathering and use practices for the Valneva website, [www.valnevauk.com](http://www.valnevauk.com) and pages to which it links or which are owned by Valneva and which refer to the present Privacy Statement (collectively referred to as the "**Site**").

The present policy (hereafter referred to as the "**Privacy Policy**") regulates your access and use of the Site and serves to inform you of our policy pertaining to the collection, use and disclosure of information that you may provide, whether intentionally or unintentionally, by your use of the Site.

IT IS THUS IMPORTANT THAT YOU CAREFULLY READ AND FULLY UNDERSTAND THE ENTIRE PRIVACY POLICY PRIOR TO USING THE SITE.

Valneva ("**we**", "**us**" or "**our**") recognises our responsibility to protect Personal Data in our custody or control. "**Personal Data**" has the meaning given in the Data Protection Act 1998 ("**the Act**") and generally means information about an identifiable individual, such as your name, birthday, gender, address, email address, phone number, health information, and comments or enquiries you have made about our products or services when such comments or enquiries are linked to you or any other information of similar nature.

For the purposes of the Act, we are the data controller.

This Privacy Policy applies to individuals we deal with in the United Kingdom including consumers, patients, healthcare professionals and others within the healthcare or pharmaceutical industries ("**you**" or "**your**"), and explains how we collect, use, disclose and protect your Personal Data. This Privacy Policy does not apply to information about our employees or to information that is not Personal Data.

### **1. Personal Data Collection**

Valneva and its agents and representatives collect Personal Data, including sensitive personal data (as such term is defined in the Act) in a number of circumstances, including when you provide it to us voluntarily or in other circumstances with your consent or as permitted or required by law. For example, we may collect your Personal Data when you:

- request information;
- enquire or provide comments about our products and services;
- participate in advisory boards;
- participate in clinical trials;
- participate in contests or other promotions;
- fill out questionnaires or surveys;
- participate in social media, or post information on bulletins or on the Site;

- submit your resume or other Personal Data in connection with employment possibilities with us; or
- otherwise provide your Personal Data to us, including by telephone, mail, email, facsimile or through any of the Site.

The information we may collect includes:

- personal and business contact information, such as name, birthday, title, address, telephone, gender number and email address or any other information of similar nature.;
- information that our sales representatives may collect during their visits with physicians and other healthcare professionals with whom they deal, for instance title, qualifications, areas of practice or specialisation, their questions or comments about our products, and related information about healthcare professionals and their administrators relevant to maintaining and managing our relationship with such persons;
- names and other contact details of patients who use our products and their physicians and, in certain circumstances, sensitive personal data, and patient medical history, for example, where we have received a report of an adverse event, where we are providing patient-specific assistance with respect to the use or reimbursement of our products, or where we are assisting in or co-ordinating product recalls;
- information collected in connection with enquiries or comments made by individuals who contact our Medical Information representatives;
- names and other contact details of physicians participating in advisory boards and the opinions or comments expressed by those physicians during advisory board meetings;
- names and other contact details of physicians involved in running clinical trials, together with their professional information such as curriculum vitae and other information that is required to be reported to relevant regulatory bodies;
- information such as name, age, and gender of patients participating in clinical trials together with the clinical data collected in the course of the clinical trials. Valneva generally receives patients' clinical data that has been recorded using identifiers other than the patients' full name, such as the patients' initials. More comprehensive patient data, including full names, may be reviewed by our clinical site managers when they attend at the trial site for compliance monitoring;
- information from individuals visiting our premises such as their name and the name of the organisation for which they work or which they represent. We may also post video cameras in public-access areas on our premises; and
- other information with your consent or as permitted or required by law.

Calls to and from Valneva may be recorded and/or monitored for quality and training purposes. Recordings may also be used to help us develop and improve our products and services. Information may also be actively and passively collected by the Site. See "the Site" below for details.

## **2. Purposes**

Valneva collects Personal Data for a variety of purposes relating to the operation of our business and the delivery of services to you, including to:

- a) provide our products and services and generally manage and administer our business including maintaining business records for reasonable periods and defending and bringing legal actions;
- b) develop and improve our products;
- c) provide you with health and product-related information;
- d) reply to your requests, enquiries and comments;
- e) receive and assess product enquiries, reports of adverse events, and product complaints;
- f) assist in or co-ordinate product recalls;
- g) establish and maintain our relationship with healthcare professionals and administrators and other individuals with whom we have contact in the course of our business;
- h) provide assistance and advice to healthcare professionals and institutions with respect to our products;
- i) test and analyse our products for efficacy and safety;
- j) meet legal, regulatory, insurance, security, ethical and processing requirements such as adverse event and clinical reporting to relevant regulatory bodies;
- k) monitor compliance with informed consent requirements when patients participate in clinical trials, and verify that clinical data collected by Valneva in the course of the clinical trial conforms to the source data available at the site of the clinical trial;
- l) use feedback provided to us in the course of advisory board meetings to develop the strategic positioning of our products;
- m) manage, administer, collect and enforce accounts;
- n) provide remuneration to individuals who have performed services for Valneva;
- o) enable us to act responsibly in the event of a health or other crisis or emergency and to enhance workplace security;
- p) evaluate resumes or other Personal Data submitted to us in connection with employment possibilities. For candidates who are not offered or do not accept a position, we may retain their information in the event that an appropriate position becomes available or that they re-apply to Valneva;
- q) offer and administer contests, promotions, surveys and websites including social media;
- r) ensure the security and integrity of the Site and operations.

We may also use your Personal Data for other purposes with your consent or as permitted or required by law.

### **3. Use of Service Providers**

We may transfer Personal Data to outside agents or service providers (including affiliates acting in this capacity) that perform services on our behalf, for example: certain payroll and benefits administration functions; receipt and administration of certain adverse event or product quality complaints; certain credit card, billing, mailing, marketing, information technology and/or data hosting or processing services, or similar services, or otherwise to collect, use, disclose, store or process Personal Data on our behalf for the purposes described in this Privacy Policy. Some of these service providers may be located outside of the EEA. While outside of the EEA, your Personal Data will be subject to applicable foreign legal requirements, which may include lawful requirements to disclose Personal Data to government authorities in certain circumstances.

### **4. Disclosures**

Valneva may disclose your Personal Data (including Sensitive Personal Data) in the following circumstances:

We may disclose Personal Data when required in order to meet legal, regulatory, industry self-regulatory, insurance, audit, security or ethical requirements, including obligations to health and drug regulatory and self-regulatory bodies, physicians, hospitals, or other healthcare facilities.

Your Personal Data may be used by Valneva and disclosed to parties connected with the contemplated or actual financing, insuring, sale, assignment or other disposal of all or part of Valneva's business or assets, including for the purpose of permitting such parties to determine whether to proceed or continue with such transaction or business relationship and to fulfil reporting or audit requirements. Assignees or successors of Valneva or our business or assets may use and disclose your Personal Data for similar purposes as those described in this Privacy Policy.

We also may disclose your Personal Data to third parties, located in the EEA and/or any other country, where required or permitted by applicable laws, court orders, or government regulations (including as required by national and foreign laws applicable to Valneva or our agents and service providers).

### **5. Consent**

By using the Site, you are indicating your acceptance to follow and be bound by the Privacy Policy in its entirety, as it may be modified from time to time without prior notice or indication to you to that effect, as well as by the Terms and conditions of use of the Site, as published from time to time by Valneva.

You authorise Valneva to collect and to retain all relevant information relating to your use of this Site and you hereby authorise any party to provide us with such information. You understand and agree that unless you notify Valneva of the contrary by e-mailing us, you further authorise us to disclose, on a confidential basis, to any party with whom

Valneva has business relations, all relevant information relating to your dealings with us and this Site.

By using the Site, you are also indicating your understanding of the fact that whenever you submit information through this Site, you explicitly authorise us to collect, use and disclose such information within the parameters set out in the present Privacy Policy, as amended from time to time.

If you have provided us with Personal Data and wish to withdraw your consent to its retention, use or disclosure, please contact us as described below in the “Access, Correction and Contacting Us” section.

You may withdraw or withhold your consent, subject to legal or contractual restrictions and reasonable notice, or by ticking the relevant boxes on the forms when you submit or we collect Personal Data from you (as applicable). If you withdraw your consent to certain uses of your Personal Data, we may no longer be able to provide certain of our products or services. Where we have provided or are providing services to you, your consent will be valid for so long as necessary to fulfil the purposes described in this Privacy Policy or otherwise at the time of collection.

There are instances where we may be permitted or required by law to collect, use or disclose your Personal Data without your consent including, for example, to comply with a court order, to comply with national or international regulations or a legally permitted enquiry by a government agency, or to collect a debt owed to us.

## **6. Security**

We may establish and maintain a file of your Personal Data for the purposes described in this Privacy Policy. You may request a copy of that information upon written request and payment of an administrative fee of £10. Authorised employees, agents and mandataries of Valneva who require access to your Personal Data in order to fulfill their job requirements will have access to your Personal Data.

We take reasonable steps to protect your Personal Data using physical (locked filing cabinets and restricted access to offices), electronic (especially firewalls) or procedural security measures appropriate to the sensitivity of the information. Valneva will take appropriate steps to ensure that Personal Data about you is protected from loss or theft, as well as unauthorised access, disclosure, copying, use or modification.

Although we have enacted security measures, we cannot guarantee the security of any information that you submit via email or over the Internet. Submission of Personal Data using such networks is done at your own risk, since no Internet transmission is ever 100% secure or error-free (in particular, emails sent to or from the Site may not be secure). You should take special care in deciding what information you send to us via email or posting on the Site. Moreover, where you use passwords, ID numbers or other special access features on the Site, it is your responsibility to safeguard them.

## **7. Links to other websites**

The Site may contain links or references to other websites to which this Privacy Policy does not apply. Valneva is not responsible for the data collection and use practices of companies or organisations to which the Site may provide links. We encourage you to read the privacy statement/policy of every website you visit.

Valneva makes no representations whatsoever about any other website which you may access through this Site. In addition, a link to a website does not mean that Valneva endorses or accepts any responsibility for the content, or the use, of such website

## **8. The Site**

### ***Active Information Collection***

The Site may actively collect information from visitors both by asking you specific questions and by permitting you to communicate directly with us via email and/or feedback forms. Some of the information that you submit on the Site may be Personal Data.

### ***Passive Information Collection***

As you navigate through the Site, certain information can be passively collected (that is, gathered without your actively providing the information) using various technologies and means, such as Internet Protocol addresses, cookies, Internet tags, web beacons and navigational data collection (log files, server logs, clickstream). Your Internet browser automatically transmits to the website some of this anonymous information, such as the URL of the website you just came from and the Internet Protocol address and the browser version your computer is currently using. The Site may also collect anonymous information from your computer through cookies and Internet tags or web beacons. You may set your browser to notify you when a cookie is sent or to refuse cookies altogether, but certain features of the Site might not work without cookies.

The Site may use and combine such passively collected anonymous information to provide better service to site visitors, customise the sites based on your preferences, compile and analyse statistics and trends, and otherwise administer and improve the sites for your use. Such information is not combined with Personal Data actively collected on the Site unless you have consented.

### ***Cookies***

The following is a description of cookies and other passive tracking methods.

A "cookie" is a bit of information that a website sends to your web browser that helps the site remember information about you and your preferences.

"Session" cookies are temporary bits of information that are used to improve navigation, block visitors from providing information where inappropriate and collect aggregate statistical information on the site. They are erased once you exit your web browser or otherwise turn off your computer.

"Persistent" cookies are more permanent bits of information that are placed on the hard drive of your computer and stay there unless you delete the cookie. Persistent cookies store information on your computer for a number of purposes, such as retrieving certain information you have previously provided (such as passwords), helping to determine what areas of the website visitors find most valuable, and customising the website based on your preferences on an ongoing basis.

Detailed below are the cookies that have been implemented on this site:-

<b>Name</b>	<b>Purpose</b>	<b>Expires</b>
_ga	This helps us count how many people visit the Site by tracking if you've visited before	2 years
_gat	Used to manage the rate at which page view requests are made	10 minutes
VISITOR_INFO1_LIVE	Let's YouTube count the views of embedded YouTube videos	8 months
PREF	Records basic user preferences for YouTube videos	2 years
seen_cookie_message	Saves a message to let us know that you've seen our cookie message	1 month

### ***IP Addresses and Tags***

A site may use Internet Protocol (IP) addresses. An IP address is a number assigned to your computer by your Internet service provider. In most cases an IP address is dynamic (changing each time you connect to the Internet), rather than static (unique to a particular user's computer). The IP address can be used to diagnose problems with a server, report aggregate information, determine the fastest route for your computer to use in connecting to a site, and administer and improve the site.

"Internet tags" (also known as single-pixel GIFs, clear GIFs, invisible GIFs, and 1-by-1 GIFs) are smaller than cookies and tell the website server information such as the IP address and browser type related to the visitor's computer. Tags may be placed both on online advertisements that bring people to the site and on different pages of the site. Such tags indicate how many times a page is opened and which information is consulted.

"Navigational data" (log files, server logs, and clickstream data) are used for system management, to improve the content of the site, for market research purposes, and to communicate information to visitors.

## **9. Collection of Personal data from Children**

It is neither our goal nor intention to collect or post Personal Data from children under the age of eighteen without their parent's or guardian's consent. Valneva does not knowingly provide any personally identifying information collected from children, regardless of its source, to any third party for any purpose whatsoever. When a child submits information to the Valneva Site, the child's parent or guardian receives an e-mail alerting them to the child's registration and provides instructions on how the parent could delete the child's registration, if so desired. Although children may be allowed to participate in contests, if a child wins, notification and prizes are sent to the parents or guardians identified in the initial registration process. Valneva encourages parents and guardians to spend time online with their children and to participate in the interactive activities offered on the Sites.

Notwithstanding the foregoing, it is possible that we nevertheless collect such information from children if same is provided to us. We therefore encourage parents to inform their children about the possible consequences of using the Site and disclosing information through the said Site. We will not assume any responsibility with respect to the use of the Site or disclosure of information via the Site by children.

CHILDREN ARE HEREBY REQUIRED TO OBTAIN THE PERMISSION OF THEIR PARENT OR LEGAL GUARDIAN BEFORE PROVIDING ANY PERSONAL DATA TO US.

## **10. Privacy Policy Changes**

This Privacy Policy may be revised from time to time. If we intend to use or disclose Personal Data for purposes materially different than those described in this Privacy Policy, we will make reasonable efforts to notify affected individuals, if necessary, including by posting the revised Privacy Policy on this site. We recommend that you review this Privacy Policy frequently.

Your continued provision of Personal Data or use of the Site following any changes to this Privacy Policy constitutes your acceptance of any such changes.

## **11. Access, Correction and Contacting Us**

You may contact us as described below in order to:

- a) receive a copy of the most current version of our Privacy Policy;
- b) communicate any questions, comments, or concerns about our Privacy Policy or Personal Data handling practices or to request additional information;
- c) request to withdraw your consent to our retention, use or disclosure of your Personal Data; and/or
- d) request access to or correction of your Personal Data.

Requests regarding items c and d above must be made in writing. We will take reasonable steps to verify your identity before granting access or making corrections.

You may contact us by writing to us at the following address:  
Valneva UK Limited, Centaur House, Ancells Business Park, Ancells Road, Fleet,  
Hampshire GU51 2UJ

NOTE: If you are a physician or other healthcare professional and would like to record an adverse event, please contact [safety@valneva.com](mailto:safety@valneva.com)

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