

# Privacy Notice

Effective Date: February 9, 2024

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## Introduction

This Privacy Notice (“Notice”) provides you with information on how Baxter Healthcare Corporation and its affiliates and subsidiaries, including the Baxter operating entity in your local country (collectively “Baxter,” “we,” “us”) collect, process, use, disclose and store your personal data when you request medical information from us about Baxter products (“Medical Information Inquiries”). This Notice applies to registered healthcare professional and other authorized individuals, including patients, who make Medical Information Inquiries (“individuals”, “you”, “your”).

Baxter makes available different communication methods, (e.g., telephone, email, online portals), for individuals to submit Medical Information Inquiries. The availability of a particular method of communication depends on an individual’s role and relationship with Baxter (e.g., healthcare professional or patient) and the individual’s local country of residence.

This Notice explains what personal data is collected through each communication method you may use to submit Medical Information Inquiries, how Baxter will process your personal data and how you can exercise your rights regarding your personal data.

Please note, that the process of submitting Medical Information Inquiries is not intended for reporting pharmacovigilance related information, therapeutic product adverse events or product complaints. For information on how to report therapeutic product adverse events or other pharmacovigilance related information to Baxter, please go to <https://www.baxter.com/report-adverse-event>. To report a product complaint related to Baxter products, please go to <https://productfeedback.baxter.com/>.

## Baxter’s Role

Baxter is responsible for the processing of personal data for the purposes described in this Notice below. Baxter is the Controller for the individuals located in the EEA/UK, Switzerland or in other countries where similar terms under applicable privacy laws are met.

Please keep in mind that if you are an individual located in the United States, Baxter may also be governed by the Health Insurance Portability and Accountability Act (“HIPAA”) and your information may be protected in accordance with Baxter’s Notice of Privacy Practices linked here [HIPAA Notice of Privacy Practices | Baxter](#).

## What Personal Data We Collect and How We Collect Your Personal Data

The following describes that personal data that we collect from you, how we collect this personal data and why we collect your personal data.

- 1. When you are a Healthcare Professional or an authorised by a Healthcare Professional individual (non-patient)**

Baxter provides online websites/portals for healthcare professionals and other authorized individuals who are not patients to use to submit Medical Information Inquiries to Baxter. More specifically we collect your personal data in the following ways:

- the iCare Portal or Medical Information Online; (*If you use Baxter iCare Portal, please refer to the iCare Terms of Use & Privacy Notice for further details*)
- phone requests/inquiries for medical information, including recorded messages;
- email, fax and paper requests/inquiries for medical information;
- in-person requests/inquiries for medical information;
- websites such as corporate websites; and
- via Baxter colleagues.

We process the following categories of personal data:

- Contact information, including name, address, phone number, and email address .
- Information regarding your title and your profession, including your place of employment and/or affiliation.
- Patient health data, including patient clinical data if relevant for the medical information requested. (*If you are a healthcare professional, and you provide us with a patient's personal data when submitting a request for medical information, you agree to provide a copy of this Privacy Notice to such patient. You are kindly asked to avoid sharing patients' health data with us.*)
- In case of the iCare Portal or Medical Information Online specifically: username and password, information regarding a user's session, including user ID, date registered, last login date and time, language selection, and any downloaded content and a corresponding time stamp and other information the constitutes personal data and that is derived from cookies and other similar technologies.
- Any other personal information you may submit in connection with your Medical Information Inquiries.

## **2. When you are a Patient**

Patients may submit Medical Information Inquiries to Baxter by contacting Baxter by telephone or email, or by both phone and email, depending on the country where you are located . In addressing such requests, we may collect the following personal data from you:

- Contact information, including name, address, phone number, and email address.
- Your health data that you may provide to us as relevant to allow us to respond to your Medical Information Inquiry.

## **Why we are collecting and processing Your Personal Data and what legal basis we rely on**

We will process your personal data for the following purposes:

- To provide you with Medical Information Online related services.
- To support your account and assist with registration.
- To track your usage of the Medical Information Online portal.
- To obtain and respond to your Medical Information Inquiries.
- To provide healthcare professionals and other non-patient authorized individuals with the online websites/portals for you to use to submit Medical Information Inquiries.

- To support healthcare professionals and other non-patient authorized individuals with online websites/portals user account and assist with registration to such online websites/portals.
- As applicable, to enable you to search our database about the products available in the country where you are located.
- To comply with our record-keeping requirements, including for audits and compliance purposes.

Baxter will collect and process your personal data based on our legitimate interests and, for reasons of public interest in the field of public health, such as protection against serious cross-border threats to health, or for the purposes of ensuring high standards of quality and safety of healthcare and medicinal products or medical devices. In some cases, we process sensitive personal data in our medical information service to ensure high standards of quality and safety of health care and of Baxter products, as a responsible pharmaceutical company. If you are a patient and depending on the country where you are located, we may rely on your explicit consent to process your health information.

The provision of your personal data is voluntary, however if you do not provide your personal data, we may not be able to address your query.

We will not use this information for any other purpose, and your personal data will not be shared with any other party unless we are legally obliged to do so (e.g. by regulatory authorities) or unless such third-party acts on behalf of Baxter as data processor (or any other similar term).

### **With whom we may share your Personal Data**

For the purposes outlined above, Baxter may transfer your personal data to the following:

- Baxter Medical Information employees strictly on a need-to-know basis with strictly defined rights and if around the globe, including but not limited to employees communicating and providing responses to medical enquiries requestors and receiving and reporting all medical inquiries.
- Healthcare professionals involved in monitoring the patient and healthcare professionals or other professionals who can provide additional information.
- other Baxter group companies; and
- Baxter's service providers acting on behalf of Baxter, such as service providers to support the administration, hosting and functionality of our online website/portals, other IT system administration and user support services, including call centres.

### **International Data Transfers**

Some of the individuals and entities who will receive your personal data may be located or may have relevant operations in a destination outside of your country which may have less strict, or no, data protection laws, when compared to the laws in your country. Baxter is a global company and therefore uses global vendors and subcontractors as well as global IT systems and applications. As a result, your personal data may be transferred to our global Baxter affiliates and to our employees and contractors who work for us and are located outside of your own country, such as in the United States (the list of Baxter Group entities and the places of their establishment is set out at

<https://www.baxter.com/location-selector>), for the purposes described in this Notice. Any transfers of personal data to Baxter group companies or third parties outside your local country will be conducted in compliance with the international data transfer restrictions that apply under applicable data protection laws.

We take legally required steps under applicable data protection law to ensure that adequate safeguards are in place (e.g., standard contractual clauses, data transfer agreements) to protect your personal data in accordance with this Privacy Notice. You may contact us for a copy of the safeguards which we have put in place to protect your personal data and privacy rights when we make cross-border transfers of your personal data.

### **How Long we Keep your Personal Data**

Your personal data will only be kept for as long as we reasonably consider necessary for achieving the purposes set out above and as is required and/or permissible under applicable law. You have the ability to remove your profile and request the deletion of your personal data.

### **Do Not Track**

Certain laws require Baxter to indicate whether we honour “Do Not Track” settings in your browser concerning targeted advertising. As of the effective date of this Notice, an industry standard has not yet been established on how to respond to these signals, and therefore Baxter does not currently respond to such signals. Instead, we adhere to the standards set out in this Notice. If you have any questions, please contact us using the information provided below.

### **Your Rights**

Depending on where you are located, you may have the following rights with respect to your personal data:

- Check whether we hold personal data about you, and, if so, what kind and for what purposes. You also have the right to know the identities or categories of recipients of your personal data and to request access to or copies of your personal data.
- Request rectification (correction) of your personal data if it is inaccurate or incomplete.
- Request the erasure of your data, unless we have a legal obligation to process your data, or another exception applies. If you want to delete your user account, you may do that anytime by accessing your user profile in the “My Profile” tab and then selecting the “Personal Data” tab.
- Request us to restrict the processing of your personal data and not delete it under certain circumstances.
- Object to the processing of your personal data.
- Request information on the identities or categories of third parties to which your personal data are transferred.
- If we process your personal data based upon your consent, you may have the right to withdraw your consent at any time, however, your withdrawal of consent will not affect the lawfulness of our processing of your personal data before you withdrew your consent (you may exercise your right to withdraw your consent by contacting us using the contact details provided below).
- If we process your data electronically through automated means, and we do so based on your consent or a contract, you have the right to request a machine-readable copy of your

data from us, and to have us transmit that data directly to another controller, where technically feasible.

- Lodge a complaint with a supervisory authority in your country.

### **How to Contact Us**

You can exercise any of your rights or get additional information about your rights, this Privacy Notice, or how we process your personal data, by contacting Baxter's Data Protection Officer by email to: [privacy@baxter.com](mailto:privacy@baxter.com).

Privacy telephone: Ethics and Compliance Hotline at 1-844-294-5418

Privacy mail: Baxter Healthcare Corporation  
Baxter International Inc.  
ATTN: Data Protection Officer, Global Privacy Office  
1 Baxter Parkway  
Deerfield, IL USA 60015

**U.S. STATE LAW SUPPLEMENT:  
SUPPLEMENTAL PRIVACY STATEMENT FOR U.S. RESIDENTS AS APPLICABLE  
Last Revised: February 9, 2024**

Baxter Healthcare Corporation, together with its affiliates and subsidiaries (“Baxter,” “we,” “our” or “us”) provides this supplemental privacy statement (“**Supplement**”) to the Privacy Notice for U.S. Residents as Applicable (“**Consumers**,” “**you**”) to provide you with additional information, as required by applicable state law, on how we use and disclose your information that we collect from you.

If you would like to receive a copy of this Supplement in an alternate format (e.g., printable) or language, please contact us using the information provided below.

We may periodically update this Supplement to describe new features, products or services we offer and how it may affect our use of information about you. If we make material changes to this Supplement, we will post a notice on our site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

***1. Personal Information Collected and Disclosed***

“Personal Information” as used in this Supplement means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or household. The Personal Information Baxter collects from you is listed in the Privacy Notice. In particular, Baxter will collect and disclose the below listed statutory categories of Personal Information from Consumers for the following purposes.

<b>Categories of Personal Information Collected &amp; Disclosed</b>
<b>Identifiers</b> - A real name, address, email address.
<b>Personal information categories</b> - A name, address, telephone number, email address, title and employment, online website/portal account username and password, medical information. Some personal information included in this category may overlap with other categories.
<b>Internet or other similar network activity</b> - Browsing history, search history, information on your interaction with a website, or application.
<b>Professional or employment-related information</b> - Information regarding your title and your profession, including your place of employment and/or affiliation.

Please see of the section entitled, “What Personal Data we Collect and How we Collect Your Personal Data” in our Privacy Notice above for a description of how Baxter collects this Personal Information.

The above listed categories of Personal Information are disclosed to the categories of third parties discussed in the sections entitled, “**Sharing your Personal Data with our Service Providers**” and “**International Data Transfers**” in our Privacy Notice above.

The above listed categories of Personal Information are collected and disclosed for the business

purposes stated in the Privacy Notice (section entitled, “What Personal Data we Collect and How we Collect Your Personal Data”) and retained as stated in the Privacy Notice above (section entitled, “How Long We Keep Your Personal Data”).

**2. Sale, Cross-Context Behavioral Advertising, Targeted Advertising**

Certain state laws regulate the “sale” of Personal Information, which may include not only the traditional selling of data, but also many sharing arrangements where the recipient can use the personal information that they receive for the recipient’s own commercial purposes. State laws may also regulate the disclosure of Personal Information to third parties for cross-context behavioral advertising (referred to as “sharing” under the California Consumer Privacy Act of 2018 or “targeted advertising,” as such practice is more commonly referred to). Please note, that for purposes of this Supplement, “sale” may be broadly defined to include exchanges of Personal Information for monetary or other valuable consideration.

We do not “sell” “share,” or use your Personal Information for purposes of targeted advertising. We also do not knowingly “sell” or “share” the Personal Information of individuals under the age of 16.

**3. Your Privacy Rights**

Depending on your location, you may be afforded certain privacy rights. In general, you may exercise your privacy rights with respect to your Personal Information as set forth in the table below by following the instructions set forth below in this Supplement. Please note that applicable law sets forth a process to follow when evaluating your request, and there are also some exceptions to these rights.

Privacy Rights	Description
<p style="text-align: center;"><b>Notice</b></p>	<p>You may have the right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared.</p>
<p style="text-align: center;"><b>Right to Know/Access</b></p>	<p>You may have the right to confirm whether your Personal Information is being processed. You may have the right to request that we disclose to you what Personal Information of yours has been collected, used, disclosed, and sold or shared, including, depending on your location:</p> <ul style="list-style-type: none"> <li>• The categories of Personal Information collected about you.</li> <li>• The categories of sources from which the Personal Information is collected.</li> <li>• The business or commercial purpose for collecting, selling, or sharing the Personal Information.</li> <li>• The categories of Personal information, if any, that were disclosed for a business purpose or sold to third parties.</li> <li>• The categories of third parties to whom the information was disclosed or sold.</li> <li>• The specific pieces of personal information collected about you.</li> </ul>

<b>Data Portability</b>	You may have the right to receive copies of your Personal Information that we have collected in a commonly used and machine-readable format.
<b>Right to Delete</b>	You may have the right to request deletion of the Personal Information collected about you.
<b>Right to Correct</b>	You may have the right to request the correction of inaccurate personal information that is maintained about you.
<b>Right to Opt-Out of Sale, Cross-Context Behavioural Advertising, Targeted Advertising</b>	Certain laws may provide you the right to opt-out of the sale of your Personal Information and the use or disclosure of your Personal Information for cross-context behavioural advertising (i.e., “sharing” under the California Consumer Privacy Act) or targeted advertising. We do not use or disclose your Personal Information in these ways.
<b>Profiling through Automated Decision-Making</b>	We do not apply automated processing to your Personal Information for purposes of profiling. However, if we did, you may have the right to request information about the logic involved in certain types of automated practices and a description of the likely outcome of such processes, and the right to opt out.
<b>Right to Limit the Use of Sensitive Personal Information</b>	If you are a health care professional or other authorized non-patient individual, we do not collect your Sensitive Personal Information, except for your online website/portal account log-in information. If you are a patient, we collect your health information, which constitutes Sensitive Personal Information. We do not use or disclose your Sensitive Personal Information for purposes other than those specified in Section 7027(m) of the California Consumer Privacy Act regulations. If we did, you may have the right to limit certain uses of your Sensitive Personal Information.
<b>Right to Non-Discrimination</b>	You have the right to not receive discriminatory treatment if you exercise any of the rights conferred to you by law.

#### ***4. How to Exercise Your Rights***

If you would like to exercise any of your rights listed above, please contact us using the information below. You may also designate an authorized agent to make a request to exercise your rights on your behalf. In order to do so, you must contact us using the information below.

When contacting us to exercise your rights, please adhere to the following guidelines:

- ***Tell Us Which Right You Are Exercising***: Specify which right you want to exercise and the Personal Information to which your request relates (if it does not relate to you). If you are acting as an authorized agent on behalf of someone else, please clearly indicate this fact and indicate your authority to act on their behalf.
- ***Help Us Verify Your Identity***: Contact us using the information below and provide us with enough information to verify your identity. Please note that if we cannot initially verify your identity, we may request additional information to complete the verification process.

Any Personal Information you disclose to us for purposes of verifying your identity will solely be used for the purpose of verification.

- ***Direct Response Delivery***: Inform us of the delivery mechanism with which you prefer to receive our response. You may specify, for example, email, mail, or through your account (if you have one with us).

Please note that you do not need to create an account with us in order to make a request to exercise your rights hereunder.

Please contact us to appeal any decision made on your request.

### ***5. Responses to Your Requests***

Receipt of your request will be confirmed consistent with applicable law. You will generally receive a response to your request within forty-five (45) days. However, where reasonably necessary and where permitted by law, the response time may be extended by an additional forty-five (45) days, provided you are given notice of such extension first. If the information is provided to you electronically, it will be in a portable format and, to the extent technically feasible, in a machine readable, readily useable format that allows you to freely transmit this information without hindrance.

Please note that you will not be charged for making a request, provided that you make no more than two (2) requests per year. Where permitted by law, your request may be denied, for example, if your requests are determined to be unfounded or excessive (e.g., repetitive in nature), or a reasonable fee may be charged. In these circumstances, you will receive a notice regarding this denial and the reason for such denial.

### ***6. Other Privacy Rights for California Residents***

Under California Civil Code Section 1798.83, individuals who reside in California and who have an existing business relationship with us may request information about the disclosure of certain categories of personal information to third parties for the third parties' direct marketing purposes, if any. To make such a request, please use the information in the Contact Information section below. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in the response. This request may be made no more than once per calendar year.

### ***7. Contact Information***

To exercise one or more of your rights, or to contact us with questions and concerns about this privacy policy, please contact us at:

Email: [privacy@baxter.com](mailto:privacy@baxter.com)  
Mail: Baxter Healthcare Corporation  
Baxter International Inc.  
ATTN: Global Privacy Office  
1 Baxter Parkway  
Deerfield, IL USA 60015

Ethics and Compliance Hotline: 1-844-294-5418