PRIVACY POLICY FOR PFIZER ATLAS SURVEILLANCE WEBSITE

Pfizer respects your privacy and understands that health is a very personal and private subject. This Privacy Policy describes the personal information Pfizer collects about you on the ATLAS Surveillance website (www.atlas-surveillance.com) from which you linked ("Site"); how we use that information; how we protect it; and the choices you may make with respect to your personal information. When we refer to ourselves as "we" or "Pfizer," we mean our entire company including the affiliates within our family of companies, e.g., a subsidiary. Your visit to the Site is subject to this Privacy Policy and to our Terms of Use.

Our Site may contain links to third-party websites/ content/ services that are not owned or controlled by Pfizer. Pfizer is not responsible for how these properties operate or treat your personal information so we recommend that you read the privacy policies and terms associated with these third party properties carefully.

INFORMATION WE COLLECT AND USE

We collect personal information you choose to provide, e.g., through registrations, applications and surveys, and in connection with your inquiries. For example, you may choose to provide your name and/or contact information. Healthcare providers may choose to provide information relating to their specialties and professional affiliations.

In addition, we may gather information about you automatically through your use of the Site, e.g., your IP address and how you navigate our Site.

From time to time, we may use or augment the personal information we have about you with information obtained from third parties. For example, we may use such third party information to confirm contact to verify licensure of healthcare professionals or to better understand your interests by associating demographic information with the information you have provided.
HOW WE USE PERSONAL INFORMATION

We may use your personal information in the following ways:

TO SERVE YOU:

We may use your personal information to respond to your inquiries and provide the products and services you request. When you respond to a promotion or service offering, we will provide the specific materials you request as well as communications about related products, brands, health topics and disease states. We also use your information to deliver the content and services we believe you will find the most relevant. For example, a female user may receive information on products targeted at women that a male user will not see; a user who we know is a healthcare professional who treats arthritis may receive information relating to new arthritis therapies. In addition, we may use personal identifiers to recognize you when you arrive at the Site via an external link, e.g., such as a link appearing on a third party site or in an email Pfizer has presented to you. We will also use your information to provide customer service and support.

TO SERVE THIRD PARTIES YOU ASK US TO SERVE:

Our websites may offer various tools and functionality. Some of these are provided by Pfizer while others are provided by third parties. For example, Pfizer may provide functionality on the Site that will allow you to forward and share certain content with a friend or colleague. In addition, the Site may also offer third party sharing functionality such as third party social media widgets/tools/buttons. If you choose to use Pfizer sharing functionality to refer someone to our content, products or services, we will use your information and that of the individual you are sharing with to send the content or link you request, but we do not access, store or use the information relating to the individual you wish to share with other than in connection with your request. If you use third party sharing functionality, including social media widgets/tools/buttons, such use is subject to the third party’s privacy policy and terms. As with all links to non-Pfizer websites/content/services, we recommend that you read the privacy policies and terms associated with these third party properties carefully.
TO VALIDATE YOUR ABILITY TO ACCESS / USE CERTAIN PRODUCTS, SERVICES AND INFORMATION:

Some products, services and information we offer may only be suitable for/ accessible to individuals meeting certain eligibility or other criteria. In such cases, we may verify that you meet such criteria. For example, certain information relating to our products is only intended for and accessible to licensed healthcare professionals and we may use information we collect directly from you and from outside sources to validate your licensure and eligibility to view such information.

IN ACCORDANCE WITH SPECIAL PROGRAM TERMS:

On occasion, Pfizer may offer special programs, activities, clinical trials, events or promotions via the Site (“Special Programs”) that have specific terms, privacy notices and/or informed consent forms that explain how any personal information you provide will be processed in connection with the Special Program (“Special Program Terms”). Pfizer will honor those Special Program Terms with respect to your personal information. Some of these Special Programs may involve sharing information with a third party and Pfizer will provide you with notice of this. You may be offered the opportunity to agree to or opt-out of the sharing of your information with such third party. But, in some instances, it may be necessary to agree to sharing with a third party in order to participate in a particular Special Program. If you consent/do not opt-out, we will share your information with the third party; and the personal information you provide may be used by the third party in accordance with the Special Program Terms and, unless provided otherwise in such Special Program Terms, for their own purposes in accordance with their own policies/terms. We strongly suggest you review both the Special Program Terms and any applicable third party policies/ terms before participating.

TO IMPROVE PRODUCTS AND SERVICES AND PROTECT PATIENTS AND CONSUMERS:

We use the information you provide to better understand how our products and services impact you and those you care for, to track and respond to safety concerns and to further develop and improve our products and services. For example, you may be invited to participate in a survey relating to our products or services; healthcare professionals may be invited to participate in various programs or panels of experts. In addition, we use the information you provide to comply with our regulatory monitoring and reporting obligations including those related to adverse events, product complaints and patient safety.
TO IDENTIFY THOSE WHO BENEFIT FROM/RECOMMEND OUR PRODUCTS/ SERVICES:
From time to time, we seek out individuals, e.g., patients, healthcare professionals, who have benefitted from or recommend our products and services.

IN AGGREGATED OR DE-IDENTIFIED FORM:
We may aggregate and/or de-identify data about visitors to our Site for various business purposes including product and service development and improvement activities.

HOW WE SHARE YOUR PERSONAL INFORMATION
Pfizer may share your personal information as follows:

IN CONNECTION WITH BUSINESS TRANSFERS:
If we sell or transfer a business unit (such as a subsidiary) or an asset (such as a website) to another company, we will share your personal information with such company and require such company to use and protect your personal information consistent with this Privacy Policy.

WITH SERVICE PROVIDERS AND BUSINESS PARTNERS:
We may retain other companies and individuals to perform services on our behalf and we may collaborate with other companies and individuals with respect to particular products or services (collectively, “Providers”). Examples of Providers include data analysis firms, credit card processing companies, customer service and support providers, email and SMS vendors, web hosting and development companies and fulfillment companies. Providers also include our co-promote partners for products that we jointly develop and/or market with other companies. Some Providers may collect information on our behalf on our Site. These third parties may be provided with access to personal information needed to perform their functions, but they may not use such information other than on our behalf and subject to contracts that protect the confidentiality of the information. In addition, as noted above, we may share information with third parties in accordance with Special Program Terms mentioned above unless you opt-out/do not consent.
TO COMPLY WITH LAW/PROTECT:

We reserve the right to disclose your personal information as required by law, when we believe disclosure is necessary to comply with a regulatory requirement, judicial proceeding, court order, or legal process served on us, or to protect the safety, rights, or property of our customers, the public or Pfizer.

IN THE AGGREGATE/DE-IDENTIFIED:

Pfizer may also disclose aggregate or de-identified data that is not personally identifiable with third parties. Aggregate data is created by pooling information about individuals and describing the data in the aggregate, e.g., 20% of customers who clicked on the X promotion participated in the promotion.

COOKIES AND OTHER TOOLS

Pfizer and its business partners collect information about you by using cookies, tracking pixels and other technologies (collectively, “Tools”). We use this information to better understand, customize and improve user experience with our websites, services and offerings as well as to manage our advertising. For example, we use web analytics services that leverage these Tools to help us to understand how visitors engage with and navigate our Site, e.g., how and when pages in a site are visited and by how many visitors. We are also able to offer our visitors a more customized, relevant experience on our sites using these Tools by delivering content and functionality based on your preferences and interests. If you have provided us with personal information, e.g., through a registration or a request for certain materials, we may associate this personal information with information gathered through the Tools. This allows us to offer increased personalization and functionality.

Your web browser can be set to allow you to control whether you will accept cookies, reject cookies, or to notify you each time a cookie is sent to your browser. If your browser is set to reject cookies, websites that are cookie-enabled will not recognize you when you return to the website, and some website functionality may be lost. The Help section of your browser may tell you how to prevent your browser from accepting cookies. To find out more about cookies, visit www.aboutcookies.org.

In addition to the browser options and opt-out choices described in this policy, we are monitoring the development of do not track (“DNT”) options for consumers and will consider adoption of this standard
when it is finalized. At this time, we do not change our practices in response to DNT browser settings. For information about DNT, visit www.allaboutdnt.org.

SECURITY POLICIES
We use technical, administrative and procedural measures in an attempt to safeguard your personal and other information from unauthorized access or use. No such measure is ever 100% effective though, so we do not guarantee that your personal and other information will be secure from theft, loss, or unauthorized access or use, and we make no representation as to the reasonableness, efficacy, or appropriateness of the measures we use to safeguard such information. Users are responsible for maintaining the secrecy of their own passwords. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us by contacting us at Privacy.Officer@pfizer.com.

YOUR PRIVACY CHOICES AND UPDATES
You may always update your personal information and your preferences. Limited communications may be necessary in order for you to participate in a particular program or service. Different programs and services may offer different phone numbers, links or preference managers that allow you to inform us of your updates and choices, including opting out of particular communications. These contact options are typically available on our Sites or in the emails or texts we send but you may always contact our Privacy Officer for assistance at Privacy.Officer@pfizer.com if you have any difficulty finding these tools or otherwise updating your information or preferences.

TRANSFER OF DATA TO OTHER COUNTRIES
Any information you provide to Pfizer through use of the Site may be stored and processed, transferred between and accessed from the United States and other countries which may not guarantee the same level of protection of personal information as the one in which you reside. However, Pfizer will handle your personal information in accordance with this Privacy Policy regardless of where your personal information is stored/accessed.

CHILDREN'S PRIVACY
We are committed to protecting the privacy of children. We do not knowingly collect personal information from children under the age of 13.
CONTACT US
Please contact us if you have any questions or concerns about your personal information or require assistance in managing your choices.

Pfizer Inc
Privacy Officer
235 East 42nd Street
Mailstop 235/19/12
New York, NY 10017

Privacy Officer

RESOLVING YOUR PRIVACY CONCERNS
If, after attempting to address a privacy question or concern with Pfizer directly by contacting Pfizer's Privacy Officer, you still have a specific privacy concern that has not been resolved, you may choose mediation of that concern by a neutral third party at no cost to you. Pfizer will cover the cost of mediations submitted to the JAMS Alternative Dispute Resolution Service.

JAMS
620 Eighth Avenue, 34th Floor
New York, NY 10018
(212) 751-2700

UPDATES TO OUR PRIVACY POLICY
From time to time, we may update and timely post revisions to this Privacy Policy. Any changes will be effective immediately upon the posting of the revised Privacy Policy. If the Privacy Policy changes in a way that significantly affects how we handle personal information, we will not use the personal information we previously gathered in the manner described in the new policy without providing notice and/or obtaining your consent, as appropriate. Minor changes to the policy may occur that will not significantly affect our use of personal information without notice or consent. We encourage you to periodically review this page for the latest information on our privacy practices. This Privacy Policy was updated as of the effective date listed above.