



Privacy Notice

Effective Date: June 30, 2023

This Privacy Notice ("Privacy Notice") provides you with information on how **Baxter Healthcare Corporation**, together with its affiliates, successors, assignors and subcontractors ("Baxter," "we," "our" or "us"), processes your personal data. If you need more information, please contact us at privacy@baxter.com.

Collection of Personal Data

Who this Privacy Notice concerns

The data subjects concerned by the processing described herein are:

- healthcare professionals ("HCPs");
- hospital professionals (e.g., hospital administrators, procurement and finance department employees, etc.);
- other stakeholders with whom Baxter may exchange while conducting its business (e.g., Ministry or regulatory body representatives, academics, etc.).

All of them referred to as "contacts", "you".

What Personal Data Baxter Collects About You

Personal Data collected directly from you: Baxter will collect the following personal data directly from you: first and last name, gender, work and/or personal email, hospital or institution of your affiliation, city, state/province, postal code, country, mobile, fixed phone, fax, professional specialty, title or professional position, product area of interest, expertise or affiliation, interest in programs/activities/products/therapies and channels, scientific, research or consulting activities, publications and authorships.

Personal Data collected from third parties: Baxter obtains the following types of personal data about you from third parties, including publicly available data bases or publicly available social media pages or platforms: your first and last name, hospital or institution of your affiliation, city, state/province, postal code, country of the hospital or institution with which you are affiliated and your professional specialty, title or professional position, product and or therapy area interest, expertise or affiliation, interest in programs/activities/products and channels, scientific, research or consulting activities, publications, and authorships. Baxter obtains this personal data from third party companies that gather these details from publicly available sources, such as without limitation, the website of your hospital or institution with which are affiliated.

Additional Personal Data collected either from you or third parties: type of professional qualification/credentials (e.g., MD, etc.), practicing status (active or not), publications, areas of international recognition (e.g., countries or regions where you are recognized), areas of specific competence or experience and expertise (e.g., speaking engagements, research activities, advisory boards, etc.), memberships or participation in scientific associations, or other, for a therapeutic area related to Baxter, your experience with Baxter products or therapies, your participation in Baxter initiatives, your training history, your language capabilities, your CV, your education and educational degrees, the IP address of your biographical or professional website. Finally, we may import a link to your LinkedIn profile. Please note that LinkedIn falls under their respective privacy policy.

Personal Data collected passively: Baxter may collect personal data through the use of cookies or other similar technologies. This may vary based upon the unique features of the Baxter websites. Therefore, please review the cookies policy included at the bottom of the Local Baxter Website for any additional information, and you can always adjust your Cookie Settings.

Why we collect your personal data

When Baxter collects your personal data directly from you or from third parties we may use the data for purposes of contacting you by phone and/or sending you, including via email, marketing communications to promote our products, therapies and services, providing you with other information about our products/therapies, including scientific information and research study papers and news, newsletters, as well as sharing information about events, webinars and other virtual activities and educational opportunities in the areas of your interests. In addition to that we may use your personal data in order to reach out to you directly or through third parties to conduct Market Research Projects that aim to gather information from you on our products or therapies including your experience with them as well as information related to specific diseases that fall under Baxter's area of activity or interest. We may also store such data to further communicate with you on specific Market Research Projects or other activities you have participated. In addition, we may use your personal data to tailor and deliver relevant advertisements to you when you are using our services, or when you are accessing a third party service. For example, you may receive online advertisements, emails, texts or social media notifications from us for promotional purposes. We do so on the basis of your consent. In the consent form, Baxter will ask you to provide information about your areas of interests and selected preferences. Providing us your personal data for the purposes described in the previous phrases is voluntary. If you do not consent to Baxter processing your personal data, we will not send you any of the above-mentioned communications or information. Please note that if you provide your consent, you may always withdraw it or change your preferences by following the instructions for unsubscribing available in the consent form. You can also withdraw your consent by contacting us using the contact details in the "How to contact us" section below. Note that withdrawal of your consent does not affect the lawfulness of processing of your personal data before your consent's withdrawal.

We may also process your personal data directly from you or from third parties or publicly available data bases in order to better understand your scientific background and the areas of your expertise as well as your professional preferences, interests, professional recognition and participation in scientific forums or associations, as well as your professional activities of choice, including research activities, publications, speaking activities, advisory boards, based also on Baxter's interaction with you (during events, webinars or trainings for instance), if it is the case. We further capture your opinion about your Baxter experience with our products, services, and therapies, including processing your data from participation in Baxter's on-line trainings on Baxter's products or therapies. We do that in order to identify areas of collaboration or improvement of exchanges with Baxter that would allow us to create opportunities to advance scientific exchange and medical care. We may also process your personal data in order to email you a survey about our collaboration. We conduct all the processing activities mentioned in this paragraph on the basis of our legitimate interests in managing our relationship with you, to interact and improve our relationship with you and understanding your preferences and needs.

Baxter may also process your data from our exchanges as described in the previous paragraphs in order to run analytics on aggregate level that will allow us to optimize our collaboration, further understand your needs and expectations from Baxter but also better comprehend the patients' journey and the healthcare operations, challenges and areas of focus. We rely on Baxter's legitimate interest in allowing us to provide the best experience related to Baxter's products and therapies.

In certain instances, we may conduct automated processing of your data for the purposes of assessing your characteristics as a healthcare professional in relation to clinical preferences, scientific and educational activities of choice. We do so on the basis on your consent. Providing us your personal data for the purposes described in the previous phrases is voluntary. Please note that if you provide your consent, you may always withdraw it by contacting us using the contact details in the "How to contact us" section below. Note that withdrawal of your consent does not affect the lawfulness of processing of your personal data before your consent's withdrawal.

We further collect your personal data from you or third parties in order to, including without limitation, directly communicate with you for issues other than electronic marketing, such as day to day exchanges derived from dealings with you or the organization/hospital/institution you work(ed) for or are associated with, mutual requests related to Baxter's products or therapies, keeping accurate our data bases. We do so on the basis of our legitimate interest.

We may also process your data in order to comply with a legal obligation such as transparency reporting or adverse event reporting.

In the event that we use your personal data for other purposes, not mentioned above, we will inform you about the specific purposes and, when required, on what basis we do so, at the time we collect the personal data from you to the extent required by law.

With whom we may share your personal data and international data transfers

Baxter is a global company and for the purposes outlined above, Baxter may transfer your personal data to other Baxter group companies and Baxter's service providers acting on behalf of Baxter, such as providers of IT system administration and user support services, and providers of IT tools for consent management and mailing services. These third parties are restricted from using your personal data in any way other than to provide services for us and we require them to provide an adequate level of protection for your personal data. For more information about Baxter's service providers respectively reference to the appropriate safeguards regarding the International Data Transfer and the means by which to obtain a copy of them or where they have been made available, please contact us at privacy@baxter.com.

Some of the recipients referred to above will be located or may have relevant operations outside of your country, such as in the United States, where the data protection laws may not provide a level of protection equivalent to the laws in your country. Baxter employs measures to provide an adequate level of data protection, such as Standard Contractual Clauses as in force together with supplementary measures, ensures that all data recipients will provide an adequate level of protection for the personal data, and that appropriate technical and organizational security measures are in place to protect your personal data.

If we are involved in a sale or transfer of all or some of our business assets or operations via a share or asset deal, your personal data may be transferred to the acquiring organization who shall take at least the same or higher standards of care in the processing of your personal data. Should such a sale or transfer occur, you will be informed about this and may withdraw your consent to or - as applicable - object to the transfer of your personal data to, and processing and use of your personal data by the transferee.

How long we keep your personal data

Generally, your data will not be kept for a longer period than is legally required or justified for the purposes of the processing. Specifically, your personal data will be kept for the following time periods:

- If you have given us your consent to send you marketing, commercial and related types of communications, we will keep your data until you withdraw your consent to receive these communications or until we no longer send these types of communications.
- If we have collected your personal data solely to send you the surveys mentioned herein, we will keep your contact details until you opt-out of receiving them or until we no longer need to send you such surveys, whichever happens first. As part of those surveys, we will retain your survey data for as long as you remain a customer of Baxter and we need the information to help us understand how we are performing.
- If we have collected your data indirectly, i.e., from third parties, we will keep your data until our first contact with you and further retention would be subject to your receipt of this privacy notice and/or your consent as applicable. If such contact cannot be performed within a reasonable period of time from the collection day of your data, the data will be deleted.
- Any other data collected or processed will be retained only for as long as we reasonably consider it necessary for achieving the purposes set out above or for as long as we are legally required to retain it. If you have questions about applicable retention periods, please contact us using the contact details provided at the how to contact us section of this Privacy Notice.

Your rights

In certain circumstances, local data protection laws and certain local laws (including the GDPR) give you rights with respect to your personal data. These rights differ by country/region. You can request:

- Access to our copies of your personal data, including knowing whether we hold personal data about you, and, if so, what kind and for what purposes. You can also request information about who has received your personal data.
- That we correct your personal data if you think it is inaccurate or incomplete or request that we erase or delete your personal data, unless we have a legal obligation to hold it or are otherwise permitted by applicable law to retain it.
- Us to restrict the processing of your personal data and not to delete it.
- That we provide you with your personal data that we obtained from you so that you can store and re-use it for your personal use, and you can ask us to provide this personal data to another entity.

You can exercise your rights by contacting your local Baxter entity using the contact details provided in the *"How to contact us"* section.

As described above you also have the right to withdraw your consent or object to our using and disclosing your personal data for purposes of direct marketing or if based on our legitimate interests. You can do so at any time "opting-out" of the marketing or other types of communications described above that you receive based upon your consent, as well as the surveys in accordance with the unsubscribe instructions included in the specific communications. If you are unable to object by opting-out in this manner, please contact us using the contact details provided below. If you believe we are using, disclosing or otherwise processing your personal data in a way that is not in accordance with the law you can lodge a complaint with a data protection authority in your country.

We will handle any request to exercise your rights in accordance with applicable law. Please note that depending on the circumstances, some of the above rights may not apply.

Security

We have reasonable and appropriate security measures in place to protect against the loss, misuse, and alteration of any personal data we receive about you through the Local Baxter Websites. We maintain reasonable security standards to protect the personal data that we maintain. If you have any questions about the security of your personal data, you can contact us by using the other contact details in the *"How to contact us"* section.

How to contact us

Please address your requests or questions concerning the processing of your personal data to:

Email: privacy@baxter.com

Mail:

Baxter International Inc.

ATTN: Global Privacy Office

1 Baxter Parkway, Deerfield, IL USA 60015

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

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

**U.S. STATE LAW SUPPLEMENT:
 SUPPLEMENTAL PRIVACY STATEMENT FOR U.S. RESIDENTS
 Effective Date: January 1, 2020
 Last Revised: June 2023**

Baxter Healthcare Corporation, together with its affiliates, successors, assignors and subcontractors ("Baxter," "we," "our" or "us") provides this supplemental privacy statement ("**Supplement**") to the Privacy Notice to U.S. Residents ("**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.

Categories of Personal Information Collected & Disclosed
Identifiers - A real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name.
Personal information categories - A name, address, telephone number, education, employment, employment history. Some personal information included in this category may overlap with other categories.
Protected classification characteristics - Gender.
Commercial Information - Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, marketing preferences, survey responses, and other information you provide to us.
Internet or other similar network activity - Browsing history, search history, information on your interaction with a website, application, or advertisement.
Professional or employment-related information - Current job history, scope of practice.
Education information - Education information that is not publicly available personally identifiable information.
Inferences drawn from other personal information - Profile reflecting your purchasing preferences.

Please see of the section entitled, "What Personal Data Baxter Collects About You" 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 section entitled, "With Whom We May Share Your Personal Data 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, "Why 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 ("sharing" under the California Consumer Privacy Act of 2018 or "targeted advertising," as such practice is more commonly referred to).

We make certain categories of Personal Information available to third parties in order to receive targeted advertising-related services, such as when we make browsing information available (e.g., through third-party tags on our digital properties) to carry out, measure, and improve our ad campaigns and reach users with more relevant ads and content and to third-party analytics providers to help us improve our websites and your user experience. These disclosures may be considered a "sale" and "share" of personal information or "targeted advertising" under applicable state law. To opt-out of these activities, please see below.

- **Analytics Tools:** Analytics tools and technologies are an element of Baxter Websites. By using cookies and other technologies, we may collect and store information such as time of visit, pages visited, time spent on each page of a Baxter website, the IP address, and the type of operating system devices use to access a Baxter website. To learn more about these analytics tools, please review the cookies policy located on the Baxter website you are visiting.
- **Advertising:** We may also engage third party service providers to use the information gathered through the use of the technologies described above on behalf of Baxter to personalize the content of, as well as to serve you ads on third party websites regarding Baxter goods or services that may be of interest to you based upon your interaction with the Baxter websites. Some of the ads on third party websites may be personalized, meaning that they are intended to be relevant to you based on what we, or the third party service provider serving the ad, know about you or your computer's browsing activity on both the Baxter websites and third-party sites.
- **Cookies:** Baxter may collect personal data through the use of cookies or other similar technologies. This may vary based upon the unique features of the Baxter websites. Therefore, please review the cookies policy included at the bottom of the local Baxter website for any additional information, and you can always adjust your Cookie Settings.

The categories of data that Baxter uses and discloses for these purposes are your identifiers, commercial information, internet or other similar network activity, and professional or employment-related information, as described above.

How to Opt-Out: To opt-out of the "sale" and/or "sharing" of your Personal Information or "targeted advertising" please email privacy@baxter.com or use the contact information at the end of this policy. Please note, we do not knowingly "sell" or "share" the Personal Information of individuals under the age of 16.

You may also opt-out of interest-based advertising by participating companies in the following consumer choice mechanisms:

- -Digital Advertising Alliance (DAA)'s self-regulatory opt-out page (<http://optout.aboutads.info/>) and mobile application-based "AppChoices" download page (<https://youradchoices.com/appchoices>)
- -European Interactive Digital Advertising Alliance (EDAA)'s consumer opt-out page (<http://youronlinechoices.eu>)
- -Network Advertising Initiative (NAI)'s self-regulatory opt-out page (<http://optout.networkadvertising.org/>).

In the mobile environment, most mobile operating systems offer device-based opt-out choices that are transmitted to companies providing interest-based advertising. To set an opt-out preference for a mobile device identifier (such as Apple's IDFA or Android's GAID), visit the device manufacturer's current choice instructions pages, or read more about sending signals to limit ad tracking for your operating system here: <http://www.networkadvertising.org/mobile-choices>.

Please note that these settings must be performed on each device (including each web browser on each device) for which you wish to opt-out, and if you clear your cookies or if you use a different browser or device, you will need to renew your opt-out preferences.

Please note: If you choose to opt-out we will continue to share your personal information with non-advertising-based service providers as described in main Privacy Notice above. In addition, you may still see non-targeted advertisements as permitted by applicable law as you use our website.

We 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
Right to Know/Access	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: <ul style="list-style-type: none"> • The categories of Personal Information collected about you; • The categories of sources from which the Personal Information is collected; • The business or commercial purpose for collecting, selling, or sharing the Personal Information; • The categories of Personal information, if any, that were disclosed for a business purpose or sold to third parties; • The categories of third parties to whom the information was disclosed or sold; and • The specific pieces of personal information collected about you.
Right to Delete	You may have the right to request deletion of the Personal Information collected about you.
Right to Correct	You may have the right to request the correction of inaccurate personal information that is maintained about you.
Right to Opt-Out of Sale, Cross-Context Behavioral Advertising, Targeted Advertising	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 behavioral advertising (i.e., “sharing” under the California Consumer Privacy Act) or targeted advertising. Please see above for details on how to opt-out of these activities.
Automated Decision-Making	You may have the right to request information about the logic involved in certain types of automated decision-making practices and a description of the likely outcome of processes, and the right to opt out of such processes. We may use certain automated processes to tailor and deliver relevant advertisements to you when you are using our services.
Right to Limit the Use of Sensitive Personal Information	We do not collect your Sensitive Personal Information. However, if we did collect your Sensitive Personal Information, you may have the right to limit certain uses of Sensitive Personal Information.
Right to Non-Discrimination	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. California Shine the Light Law:

Under California Civil Code Section 1798.83, individual customers 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

Mail:
Baxter International Inc.
ATTN: Global Privacy Office
1 Baxter Parkway, Deerfield, IL USA 60015

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