

EpiPen Reminder Service Data Privacy Notice

Data Protection Information for the EpiPen® Reminder Service

Last Updated: May 2025

This privacy notice (“**Notice**”) provides you with information on the processing of your personal data (“**Data Processing**”) by Viatris company that is providing you with the EpiPen Expiry Alert Service as data controller (“**Controller**”) related to the EpiPen Expiry Alert Service (“**Service**”).

1. Summary of the Data processing

The Controller offers the Service to patients who have been prescribed an EpiPen Auto Injector pen (**EpiPen®**).

Using the Service is subject to completing a registration. During the course of the registration, you provide the personal data listed in point 2. below.

Once the registration process is completed, you will receive an email to your email address provided, where you can confirm your registration by clicking on “Confirm subscription”. This will take you to the opt-in confirmation landing page and you’ll also receive an opt-in confirmation email. After that, you will be notified by email when your EpiPen® is reaching the end of its shelf Life (“**Double opt-in confirmation**”).

The email communication is automatically sent 4 weeks, 2 weeks prior and 1 day after the expiration of your EpiPen®. You can opt-out from the email notifications related to the ongoing month expiry or all current and future programmes registered to. For more information, please see point 8.3. of the Notice (Right to withdraw consent).

2. Categories of Personal data

We process the following Personal data about you:

- your name and surname;
- email address;
- phone number *(non-mandatory, you do not have to provide your phone number);
- expiration date of your EpiPen® provided by the user;
- the fact of your Double opt-in confirmation;
- the fact that you use the EpiPen®

3. Purposes of Data processing

The purpose of the Data processing is to remind you that your EpiPen® is about to expire or has already expired.

4. Legal Basis

We process your Personal data based on your consent, in line with Article 6 (1) a) and Article 9 (2) a) of the European Union’s General Data Protection Regulation (“**GDPR**”).

The Data processing is necessary for providing the Service to you. Therefore, if you withdraw your consent to the Data processing, we will be no longer be able to provide the Service to you.

5. Storage duration

Your Personal data will be stored only as long as we need it for providing the Service. **We delete your Personal data 7 days after the delivery of the post one day-notification.**

In case of withdrawing your consent, we delete your Personal data immediately.

If you wish to use our reminder service again for a new EpiPen®, please register again.

6. Recipients

We do not share your Personal data with other recipients. Exceptions are EEA-based service providers who provide or maintain our IT infrastructure and who are separately obligated to confidentiality.

7. Profiling or automated decision making

The Data Processing does not involve automated individual decision-making or profiling. This means that your Personal data will not be analysed in any way to draw conclusions about you, nor will any automated decision be made about you without human intervention based on the Personal data.

8. Your Rights as a Data subject

As a Data subject, You have the following rights, provided that the legal requirements are met:

- Right of access (GDPR Art. 15);
- Right to rectification, (GDPR Art. 16);
- Right to withdraw consent (GDPR Art. 7(3));
- Right to erasure, (GDPR Art. 17);
- Right to restriction of processing, (GDPR Art. 18);
- Right to data portability, (GDPR Art. 20);
- Right to lodge a complaint with a supervisory authority and effective judicial remedy (GDPR Art. 77, 78 and 79).

You may exercise these rights at any time by contacting us at one of the following contact details:

- Our Data Protection Officer: dataprivacy@viatris.com

Below you may find a description of each right.

8.1. Right to access

You have the right to access to information at any time on whether and how your Personal data is processed by us, including the purposes of the Data Processing, the recipients to whom your Personal data have been disclosed, the storage duration, any rights you may have in relation to the data processing, and in the event of a transfer to a third country or an international organisation, information on the guarantees in this regard. When exercising the right of access, you also have the right to request a copy of the data.

8.2. Right to rectification

If you believe that your Personal data processed is incorrect or has changed in the meantime, you may request the rectification of the Personal data concerned. If there is any doubt regarding the corrected data, we may request you to provide evidence.

8.3. Right to withdraw consent

You have the right to withdraw your consent any time either fully or partially. Withdrawing your consent has no effect on the legality of the Data Processing before the consent was withdrawn.

To withdraw your consent to email notifications, please click on “Click here to unsubscribe” link found in the notification emails you receive from us while providing the Service.

8.4. Right to erasure (“right to be forgotten”)

We erase your Personal data without undue delay if any of the following conditions is met:

- The purpose of the Data Processing has ceased;
- You decided to withdraw your consent;
- the Data processing was unlawful; or
- According to applicable regulations we are obliged to delete your Personal data.

Please note that we might not be obliged to erase your Personal data in all circumstances, particularly when the Data Processing is necessary for the establishment, exercise, or defense of legal claims.

In case of erasure, we will not be able to provide the Service to you anymore.

8.5. Right to restriction of processing

Restriction of Data Processing means that the Personal data affected by the restriction will not be processed by the Controller, except for storage.

You may request to restrict the Data processing if one of the following conditions is met:

- You dispute the accuracy of the Personal data;
- You believe that the Data Processing was unlawful, but instead of erasure of the Personal data You request the restriction of Data processing;
- we no longer need the Personal data for the purposes of the Data processing, but You require them for the establishment, exercise or defence of legal claims.

Please note that we might not be obliged to restrict the processing of your Personal data in all circumstances, particularly when Data Processing is necessary for the establishment, exercise, or defense of legal claims.

8.6. Right to data portability

Upon your request we'll provide your Personal data in a structured, widely used, machine-readable format (e.g. pdf, email) to you or to another organization designated by you.

8.7. Right to lodge a complaint with a supervisory authority

If you consider that the Data Processing infringes the GDPR, you also have the right to lodge a complaint with the data protection supervisory authority in the EU Member State of your habitual residence, place of work or place of alleged infringement.

For further information please visit: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en#member-hu