

EpiPen Trainer Data Privacy Notice

Last Updated: October 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 Trainer Service (‘Service’) as data controller (“**Controller**”).

1. Summary of the Data processing

The Controller offers the Service to patients who have been prescribed an EpiPen Auto Injector pen (**EpiPen®**) and healthcare professionals, carer of patients, and educational institutions such as schools that require EpiPen Trainer for training or emergency preparedness.

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 order. You will further receive an email when your order has been dispatched.

2. Categories of Personal data

We process the following Personal data about you:

- your name and surname;
- postal address
- email address;

3. Purposes of data processing

The purpose of the data processing is to receive your EpiPen Trainer order, prepare and dispatch it as well as communicate the delivery of issues to you.

4. Legal Basis

We process your Personal data based on your consent, in line with Article 6 (1) b) of the **UK GDPR**.

The Data processing is necessary for providing the Service to you. Therefore, if you do not provide your personal data described in Section 2 above, we will not 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.

6. Recipients

Your details will be shared with the EEA or UK-based service providers such as dispatch companies as well as service providers who provide or maintain our IT infrastructure. All the service providers used for the Service are separately obligated to confidentiality.

In case any transfer to sub-service providers/parent company based in the USA, this is done based on the UK International data transfer agreements.

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 (UK GDPR Art. 15);
- Right to rectification, (UK GDPR Art. 16);
- Right to erasure, (UK GDPR Art. 17);
- Right to restriction of processing, (UK GDPR Art. 18);
- Right to data portability, (UK GDPR Art. 20);
- Right to lodge a complaint with a supervisory authority and effective judicial remedy (UK 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 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.

8.4. 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.

8.5. 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.

8.6. Right to lodge a complaint with a supervisory authority

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

For the UK, please visit ICO's website: <https://ico.org.uk/make-a-complaint/>