

# BMS SPEND TRANSPARENCY PRIVACY NOTICE FOR IRELAND

For further information on how we process your personal data as a healthcare professional, you can access our [HCP Privacy Notice](#). For information on our general processing activities, you can access our [BMS General Privacy Notice](#).

## INTRODUCTION

As Bristol Myers Squibb (“BMS”) is a member of the Irish Pharmaceutical Healthcare Association (“IPHA”), we are required to disclose certain details about transfers of value (“TOVs”) we make to healthcare professionals (“HCPs”, “you”) in accordance with the IPHA Code of Practice (the “IPHA Code”). When collecting and disclosing your personal data, BMS and its affiliates will act as controller as detailed in the contact section.

## WHAT TOV INFORMATION WE MAY PROCESS ABOUT YOU

Each time we make a TOV to you, we are required to collect certain data, that includes personal information about you (“Personal Data”), including your name, address and the total value of TOVs made to you in a calendar year by reporting category. We may disclose such information and the methodology used on our website.

## WITH WHOM DO WE SHARE TOV INFORMATION

BMS will share this TOV information with the IPHA, who will publish it on their website at [www.transferofvalue.ie](http://www.transferofvalue.ie). The IPHA will be the data controller for any Personal Data hosted on this website. Please refer to the IPHA's privacy notice available at [www.ipha.ie](http://www.ipha.ie).

## HOW BMS AND IPHA JUSTIFY USING YOUR TOV INFORMATION

In Ireland, BMS relies on legitimate interests to use TOV information, which include:

- decreasing any perception of influence on HCPs by the pharmaceutical industry;
- promoting a culture of integrity of transactions between pharmaceutical companies and HCPs;
- increasing public and patient confidence in the integrity and independence of HCPs;
- ensuring compliance by the pharmaceutical industry with legislative and code restrictions in relation to advertising and promotion;
- demonstrating transparency in relation to the industry’s relationships with HCPs;
- showing accountability in these relationships and compliance by the industry and HCPs in relation to their legal obligations not to provide (on one hand) or accept (on the other hand) inducements to prescribe;
- promoting confidence on the part of the public and on the part of stakeholders (e.g. regulators, managers of public health services, government) in the legitimacy and bona fides of the engagements between the industry and HCPs; and
- providing assistance in avoiding conflicts of interest.

## WHAT ARE YOUR RIGHTS AND HOW TO EXERCISE THEM

When using our legitimate interest, we consider such disclosure a key component of trust, fairness and transparency within the life sciences industry that justifies publishing your contact details. As a result, you have the right to object to such processing if you consider that your right to privacy outweigh our right to disclose

such information. In such case, BMS will share transfer of value data to the IPHA without your name. For more information on your rights relating to information held by BMS, please see our [HCP Privacy Notice](#).

In Ireland, these rights can also be exercised in respect of Personal Data published on the IPHA's website at [www.transferofvalue.ie](http://www.transferofvalue.ie), for which the IPHA is data controller. Please refer to the IPHA's privacy notice available at [www.ipha.ie](http://www.ipha.ie). In Ireland, you also have the right to raise a complaint with the Data Protection Commission by using the [online contact form](#) if you believe that either BMS or IPHA is processing your Personal Data unlawfully or violating your rights.

## HOW LONG BMS AND IPHA RETAIN YOUR TOV INFORMATION

In Ireland, under the IPHA Code we are required to document all TOVs required to be disclosed and maintain the relevant records of the disclosures for a minimum of 5 years after the end of the relevant reporting period. TOV disclosures will be publicly available for a period of 3 years after publication on [www.transferofvalue.ie](http://www.transferofvalue.ie), after which they will be deleted by the IPHA.

## CHANGES TO THIS PRIVACY NOTICE

BMS may update this notice from time to time by posting any revisions on this website. Where any material revisions are made, BMS may place a prominent notice on this website and when legally required to do so, will directly notify you.

## CONTACT BMS OR IPHA

If you have questions about this Privacy Notice, or want to obtain more information about BMS privacy practices, please contact our Data Protection Officer at [eudpo@bms.com](mailto:eudpo@bms.com) or contact us by postal mail at:

Contact	Name of the affiliate
To contact BMS	<b>Bristol-Myers Squibb Pharmaceuticals Unlimited</b> Plaza 254 - Blanchardstown Corporate Park 2, Dublin 15 - D15 T867, Ireland
European Data Protection Officer	<b>Bristol Myers Squibb</b> Data Protection Officer Engineering Building, Cruiserath Drive, Mulhuddart, Dublin 15, Ireland <a href="mailto:eudpo@bms.com">eudpo@bms.com</a>
European Data Protection Representative	<b>Bristol-Myers Squibb Pharmaceuticals Unlimited Company</b> Plaza 254 Blanchardstown Corporate Park 2, Dublin 15, D15 T867 Ireland

For information on how IPHA handles your personal data, for questions or to exercise your rights, you can access IPHA's privacy notice available at <https://www.ipha.ie/footer-links/privacy-statement/>.