# Consent to processing of personal data for disclosure of transfers of value

Openness and transparency are keywords for the pharmaceutical industry. An objective of the industry is to increase the understanding about the important collaborations between pharmaceutical companies and healthcare organizations and its co-workers. A part of this work is that transfers of value, e.g. consultancy fees, from pharmaceutical companies to healthcare professionals (HCPs) and otherwise to healthcare organizations (HCOs) are publically disclosed.

Läkemedelsindustriföreningen (LIF) has therefore adopted ethical rules under which the Assignor is obligated to disclose transfers of value which the Assignor makes to you. Disclosures shall be made annually within six months after the end of the relevant reporting period by way of the Assignor pub­lishing the information [in LIF's collaboration database[[1]](#footnote-2)/on the Assignor's website].

## Processing of Personal Data

In order to satisfy this obligation the Assignor collects and processes, in addition to information re­garding direct and indirect transfers of value to you, the following information: name, work place and address to work place. Additionally, the Assignor collects and processes data about your e-mail ad­dress in order for the Assignor to contact you, e.g. to send information to you prior to the publication of a transfer of value. The Assignor collects the information either directly from you or from your employer.

Please notify the Assignor immediately if your personal details are not up-to-date. Contact information to the Assignor is set out below. The Assignor is the data controller in relation to the processing of your personal data.

The information remains publically available during three years calculated from the date on which the information first was published. The Client is, however, obligated to store the information regarding transfers of value made to you for at least five years after the end of each reporting period. In addition, the Assignor stores the information for as long as is necessary in order for the Assignor to satisfy legal or contractual obligations, or in order to establish, exercise or defend legal claims. When your personal data are no longer necessary for these purposes, the personal data will be securely deleted.

## Transfer of Personal Data

As the Assignor is part of a global group of companies, the Assignor will transfer your personal data to group companies for the abovementioned purposes. The transfer to the group companies is based on the same legal ground as the processing as such. Moreover, the Assignor engages service providers to process your personal data on behalf of the Assignor. Such service providers may only process your personal data in accordance with the Assignor's express instructions and may not use your data for their own purposes.

In some cases these group companies and service providers are established in countries outside the EU/EEA, which do not provide the same level of protection as the EU. In order to ensure that your personal data are protected the Assignor will enter into, where necessary, data transfer agreements which include the EU Commission's standard contractual clauses. As of 25 May 2018, you are entitled to receive a copy of the clauses upon request by contacting the Assignor, please find the contact in­formation below. For an updated list regarding to which countries that the Assignor transfers your personal data, please see [◆].

***N.B.*** *If the Assignor has adopted Binding Corporate Rules (BCRs) for transfers of personal data within the group of companies, this section must be amended accordingly.*

**Consent to Processing of your Personal Data for Individual Disclosure**

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| --- | --- |
| [ ]   | I hereby consent to the processing of my personal data and information regarding transfers of value which the Assignor, directly or indirectly, has made or will make for public disclosure of this data in accordance with LIF's ethical rules. |
| Name: | Date: |
| Signature: |

If you do not provide your consent, the Assignor will process your personal data based on a balancing of interest test in order to satisfy the Assignor's legitimate interest of fulfilling its disclosure obliga­tions under LIF's ethical rules and disclose transfers of value that the Assignor will make or has made to you on an aggregated level instead.

## Your Rights

You have the right to request access to the personal data which the Assignor processes about you. Moreover, you have the right to request that incorrect or complete personal data is corrected. You also have the right to, at any time, withdraw your consent to the Assignor's processing of your personal data, with future effect. If you revoke your consent the Assignor will continue to process your personal data based on a balancing of interest test in order to satisfy the Assignor's legitimate interest of ful­filling its disclosure obligations under LIF's ethical rules and publish transfers of value that the As­signor potentially will make or has made to you on an aggregated level instead.

As of the 25 May 2018 you also have, to the extent applicable data protection legislation provides, a right to object to certain processing of personal data, a right to request restriction of the processing of your personal data, and a right to data portability.

The right to data portability covers such personal data which the Assignor processes based on an agreement between you and the Assignor or based on your consent, and which you have provided, i.e. your name, work place, address to work place, e-mail address, and information about the transfers of value which the Assignor, directly or indirectly, has made to you.

**If You Have Questions**

If you have any questions or concerns regarding the Assignor's processing of your personal data, please contact [contact person] on [◆]. [The Assignor has also appointed a data protection officer whom you can contact on the following contact details: [◆].] Naturally, you also have the right, should you wish, to lodge a complaint with the Swedish Data Inspection Board.

[Assignor's full legal name], [company registration number]

[Assignor's address]

***N.B.*** *The definition of "Assignor" can of course be changed. If the consent is obtained separately, it may be appropriate to instead use the company name and if the consent has been collected in connec­tion with an agreement it may be appropriate to use the same definition as is used in the agreement, e.g. the "Company".*

1. Available at: http://www.lif.se/etik/samarbetsdatabaser/ [↑](#footnote-ref-2)