PFIZER INC. SAFE HARBOR PRIVACY POLICY

FOR CLINICAL RESEARCH, ADVERSE EVENT REPORTING, PRODUCT COMPLAINT HANDLING, MEDICAL INQUIRIES AND LEGAL / REGULATORY COMPLIANCE ACTIVITIES

Pfizer Inc. has created this Safe Harbor Privacy Policy to help you learn about how we handle Personal Information that is collected by our subsidiaries located in the European Economic Area (the “EEA”) and Switzerland and transferred to Pfizer Inc. in the United States (“Pfizer U.S.”) in connection with our clinical research; adverse event reporting; product complaint handling; medical inquiries; and certain legal and regulatory compliance activities such as anti-corruption due diligence conducted on vendors. This Safe Harbor Privacy Policy supplements Pfizer’s U.S. Website Privacy Policy (http://www.pfizer.com/general/privacy). Unless specifically defined in this policy, the terms in this Safe Harbor Privacy Policy have the same meaning as in Pfizer’s U.S. Website Privacy Policy.

Pfizer U.S. has subscribed to and will adhere to the U.S.-EU and U.S.-Swiss Safe Harbor programs (“Safe Harbor Programs”) by adopting and implementing the Safe Harbor Privacy Principles, which include a set of frequently asked questions (collectively, the “Principles”). More information about the Safe Harbor Programs can be found at http://export.gov/safeharbor/. This Policy applies to Pfizer Inc. in the United States.

When we use the term “Personal Information” in this Safe Harbor Policy (the “Policy”), we are referring to any information that (i) is recorded in any form; (ii) is about or is related to a specific individual; (iii) can be linked to that individual; and (iv) is transferred by our subsidiaries in the EEA and Switzerland to the U.S.

When we use the term “Sensitive Personal Information” in this Policy, we are referring to a particular subset of an individual’s Personal Information that provides details of his or her race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns his or her health.

Our general practices for implementing the Principles with respect to the Personal Information we receive from the EEA and Switzerland are described below.

Personal Information Received from the EEA and Switzerland

In connection with its clinical research; adverse event reporting; product complaint handling; medical inquiries; and certain legal and regulatory compliance activities such as anti-corruption due diligence conducted on vendors, Pfizer U.S. may receive Personal Information from entities in the EEA and Switzerland about clinical research study subjects, investigators and related support personnel, adverse event reporters and subjects, healthcare professionals, vendors, and other individuals. Such information may include name, address, telephone number, date of birth, gender, marital status, physical attributes, prescriber information, email address, racial or ethnic origin, political affiliations, banking and financial data, data concerning health or sex life or medical records, and data relating to offenses and/or criminal convictions.
Use of Personal Information

Any Personal Information sent to us may be used by Pfizer U.S. and its agents for the purposes indicated in notices and policies that Pfizer has previously made available to you. Such purposes include, for example, carrying out and supporting Pfizer’s clinical research, pharmacovigilance and adverse event reporting activities; responding to product complaints and medical inquiries; and complying with certain legal and regulatory obligations such as anti-corruption due diligence conducted on vendors. If we intend to use your information for a purpose that is incompatible with these purposes or if we intend to disclose it to a type of third party not previously identified, we will notify you and offer you the opportunity to opt out of such uses and/or disclosures where it involves non-sensitive information or opt-in where sensitive information is involved.

Agents and Service Providers

We sometimes contract with other companies and individuals to perform functions or services on our behalf. They may have access to Personal Information needed to perform their functions, but are restricted from using the Personal Information for purposes other than providing services for us or to us. Pfizer U.S. requires that its agents and service providers that have access to Personal Information received from the EEA and Switzerland either subscribe to the Safe Harbor Principles or are subject to the EU Privacy Directive and the Swiss Federal Act on Data Protection or another adequacy finding or enter into a written agreement with us that requires them to provide at least the same level of privacy protection as is required by the relevant Safe Harbor Principles.

Data Security

We use reasonable physical, electronic, and administrative safeguards to protect your Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

Data Integrity

We take reasonable steps to ensure that Personal Information we process is reliable for its intended use, accurate, complete, and current to the extent necessary for the purposes for which we use the Personal Information.

Access to Personal Information

You can ask to review and correct Personal Information that we maintain about you by following the procedures set forth in the original notice you received or, alternatively, by sending a written request to privacy.officer@pfizer.com.

Safe Harbor Enforcement and Dispute Resolution

If you have any questions or concerns, please write to us at privacy.officer@pfizer.com or the address listed in the Contact Information below. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the Safe Harbor Principles. If an issue cannot be resolved through Pfizer’s internal dispute resolution mechanism,
individuals may submit the complaint to JAMS, which serves as Pfizer’s third-party dispute resolution provider:

JAMS
620 Eighth Avenue, 34th Floor
New York, NY 10018  USA
P 212-751-2700

Contact Information
If you have any questions regarding this Safe Harbor Privacy Policy, please contact us by email at privacy.officer@pfizer.com, or please write to the following address:

Chief Privacy Officer
Pfizer Inc.
235 East 42nd Street
New York, New York, 10017
Telephone: 877-356-6195
Email:  privacy.officer@pfizer.com

Privacy Policy Changes
This policy may be changed from time to time, consistent with the requirements of the Safe Harbor. You can determine when this Policy was last revised by referring to the "LAST UPDATED" legend at the top of this page. Any changes to our Policy will become effective upon our posting of the revised Policy on the Site.