



## **Visitor Privacy Notice**

**Last updated: November 2021**

**Chugai Pharma Europe Ltd** and **Chugai Pharma UK** (together referred to as “we”, “us” or “our” or “**Chugai**”) respect your right to privacy and treats all your personal data in accordance with Chugai’s “**Privacy Notice**” and applicable privacy and data protection laws. In collecting and processing Chugai acts as controller of your personal data. This Privacy Notice explains who we are, how we collect, share and use personal information about you and how you can exercise your privacy rights.

If you have any questions or concerns about our use of your personal information, please contact us using the contact details provided at the ‘Contact Us’ section of this Privacy Notice.

### **Scope of this Privacy Notice**

This privacy notice applies to Chugai’s processing of personal data of occasional and professional visitors to the Chugai’s premises. If you are visiting or have visited our premises, we may process personal data about you. Please read this Privacy Notice carefully to ensure you don’t miss any information that may be relevant to you.

We meet visitors at our head office, including:

- Chugai Group staff members;
- external training providers;
- job applicants;
- suppliers and tradespeople;
- stakeholders;

### **Why and what type of information do we collect in relation to your visit?**

#### **For Visitor Registration**

We ask all visitors to sign in and out at reception.

Chugai uses a visitor registration system, ProxyClick. If your visit is planned, your host will send your name and visit information to our visitor management platform in preparation to your visit, so that your information is ready for check-in upon your arrival.

If you arrive without an appointment or your host didn’t set up your visit information, you will be asked to check in and provide your visit information upon arrival.

You must wear a visitor badge throughout your visit. Personalised badges will be securely destroyed when you leave the premises.

We will collect and process the following information:

- First and Last Name
- Company Name
- Job Title
- Signature
- e-mail
- Visit details (date/time)
- Vehicle data if parking is required

The purpose for processing this information is for security and safety reasons. The lawful basis we rely on to process your personal data is article 6(1)(f) of the UK GDPR, which allows us to process personal data when it’s necessary for the purposes of our legitimate interests (to manage visits to our premises).

## **For IT Related Data**

We have Wi-Fi available on site for the use of visitors, the use of this service is optional. We'll provide you with the login details which allow the use of our networks. We record the device address and will automatically allocate you an IP address whilst on site. We also log traffic information in the form of sites visited, duration and date sent/received. We don't ask you to agree to terms, and we don't ask you to provide any of your information to get this service.

The purpose for processing this information is to provide you with access to the internet whilst visiting our site. The lawful basis we rely on to process your personal data is article 6(1)(f) of the UK GDPR, which allows us to process personal data when it's necessary for the purposes of our legitimate interests (to manage public internet access control, data protection and security).

## **Image Material**

Closed-circuit television (CCTV) is installed and operates in the building for security purposes. In addition, there are live feed screens installed, however CCTV images and recordings are securely stored and only accessible on a need-to-know basis.

The lawful basis we rely on to process your personal data is article 6(1)(f) of the UK GDPR, which allows us to process personal data when it's necessary for the purposes of our legitimate interests (to maintain security and safety, prevent fraud and theft and if applicable to assist where regulatory compliance).

We may sometimes record audio and video of training sessions delivered by external training providers for distribution to Chugai staff not in attendance. We don't do this without the prior agreement of the training provider and no recordings are shared outside of Chugai. The lawful basis we rely on to process your personal data is article 6(1)(f) of the UK GDPR, which allows us to process personal data when it's necessary for the purposes of our legitimate interests

*Please note that Chugai will not necessarily process all data listed above about you. Only adequate, relevant, and limited data shall be collected and processed for the purpose of your visit.*

## **How do we obtain your personal data**

Chugai will obtain the personal data directly from yourself or if you are visiting a Chugai employee, that person may provide personal data about you to the reception for registration purposes.

Some personal data may also be automatically generated from Chugai's IT system and CCTV system, such as log information and/or image materials.

## **What happens if you do not provide Chugai with any personal data**

Your decision to provide any personal data to chugai is voluntary, however for security purposes, all visitors are required to register themselves in connection with visits to our premises. If you do not wish to provide our personal data in connection with a visit, we may not be able to grant you access to our premises.

## **Use and Sharing of Data**

Chugai will retain control of and responsibility for the use of your information; however, we may share personal data that we collect from you with our company's headquarters, subsidiaries, and affiliates globally or store that data with them. Chugai will also share personal data about you with various outside companies or agents working on our behalf to help fulfil business transactions (such as ProxyClick – our visitor management system service provider) and to help fulfil business operations.

All these companies and agents are required to comply with applicable data protection laws.

Chugai will only transfer data to countries outside the UK and EEA when satisfied that both the party which handles the data and the country it is processing it in provide adequate safeguards for personal privacy.

## **Retention Period**

Chugai will only process your personal data for as long as needed. We retain personal information we collect from you where we have a genuine business need to do so or to comply with applicable legal, tax or accounting requirements.

## **Security**

Chugai takes precautions to ensure that personal data is protected and that the processing is in accordance with applicable data protection rules, consistent with generally accepted industry standards, including technical, administrative, and physical safeguards to protect the personal data submitted to us from loss, misuse and unauthorised access, disclosure, alteration, and destruction.

## **Your Rights**

You have the right to be informed, to request access to data we hold about you, to rectification or (in some cases) erasure of personal data held by Chugai and can request that we restrict processing or object to it. If you wish to make use of one of these rights, please email our DPO.

If we have asked for your consent in order to process your personal data you can withdraw this consent in whole or part at any time. To withdraw consent, please email your local contact, who will explain the consequences of doing so in any particular case and initiate proceedings for withdrawing consent.

## **Your Right to Complain**

You also have the right to lodge a complaint at any time to the relevant supervisory authority for data protection issues, the Information Commissioner's Office (ICO). We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance.

## **Contact us**

Chugai has appointed a data protection officer (DPO) who can respond to any enquiries about our use of your personal data. If you have any questions about this policy, including any requests to exercise your legal rights, please contact our DPO using the details set out below:

- **Post:** Mulliner House, Flanders Road, Turnham Green, London, W4 1NN United Kingdom
- **e-mail:** dataprotection@chugai-pharm.co.uk
- **Phone:** +44 (0)208 987 5600

## **Updates to this Privacy Notice**

We keep this Privacy Notice under regular review, in response to changing legal, technical, or business developments that impact our collection and/or processing of personal data. Any updates will be reflected in this Privacy Notice, which will be marked with a "Last Updated" date at the top,