

Appendix 5 to Novartis BCR

Complaint Handling Procedure related to the BCR

Data Subjects are encouraged to follow the complaint handling procedure in the present Appendix. Data Subjects are however free to lodge a complaint directly with the competent SAs or to bring a legal claim before the competent courts under section 7.2 of the BCR at any time.

Complaints concerning the BCR shall be handled according to the following procedure:

1. FILING OF A COMPLAINT

1. The Data Subjects shall submit the complaint in their local or other appropriate language directly to the Data Privacy, Digital & AI Compliance (DPDAI) Team via email at: global.privacy_office@novartis.com or, if not possible, in writing at the following address: Novartis Pharma AG, Global Privacy Office, Fabrikstrasse 18, 4056 Basel, Switzerland. Alternatively, the Data Subjects can address the complaint to Novartis France, at the following address: Novartis France SAS, 8 Rue Henri Sainte Claire Deville, 92500 Rueil-Malmaison, France. Employees can also submit their complaints to their Country DPDAI Head, who will promptly inform the relevant management about the complaint.
2. Research Participants, when submitting their complaint, shall provide the name and contact details of their Healthcare Professional whom the DPDAI Team shall contact for further reference.
3. The DPDAI Team shall confirm the receipt of the complaint to the Data Subject, as soon as feasible, in general within five working days from the receipt of the complaint.

2. Principles applicable to the Processing of Personal Information

1. Upon receiving the complaint, the DPDAI Team shall initiate an investigation to verify whether the violation of the BCR has occurred and to determine its scope and effects.
2. Where the investigation has confirmed a violation of the BCR, the DPDAI Team, upon reviewing the investigative report from the responsible investigator, shall send the final summary report to senior management who shall take action to address the complaint.
3. Within one month of receiving the request, the DPDAI Team shall inform the Data Subject in writing either (i) of Novartis' position with regard to the request and any action Novartis has taken or will take in response or (ii) the ultimate date on which he or she will be informed of Novartis' position. This date will be no later than two months after the original one-month period, taking into account the complexity and number of requests. Novartis shall explain the reasons for this delay.

4. If Novartis' response to the complaint is unsatisfactory to the Data Subject (e.g., the request is denied), the Data Subject can file a complaint or claim with the Supervisory Authority or courts in accordance with section 7 of the BCR.

Version History

Effective Date	Owner	Version	CNIL
3 July 2012	Group Data Privacy	1.0	3 July 2012
3 September 2018	Group Data Privacy	2.0	3 September 2018
20 December 2024	Head Data Privacy Digital & AI Compliance Region Europe	3.0	20 December 2024