Incyte is committed to ensure compliance with Data Privacy laws. This short guide helps you understand better some of the concepts behind our Privacy notices.

**What is (European) Personal Data?**

*Any information relating to an identified or identifiable individual (including publicly available data) who is residing in Europe or whose data is processed in Europe*

**Examples of individuals:** employees, healthcare professionals, service provider and supplier personnel, customers, and patients

**Examples of Personal Data:** any information related to an individual such as an email address, an individual’s name, an IP address, a job title, information on personal interests, occupation, information on meeting with the individual etc.

**What is Sensitive (European) Personal Data?**

**Personal Data relating to:**
- Physical or mental health or sex life, genetic data, biometric data
- Racial or ethnic origin
- Religious or philosophical belief
- Trade-union membership
- Political opinion

**What does Process/ Processing mean?**

*Any use of Personal Data:*

E.g. to store host, access, change, share, collect, record, organize, adapt or alter, retrieve, consult, use, disclosure, disseminate or make available, align or combine, block, erase, or destroy

**What does Transfer/ Transferring mean?**

*To disclose personal data to a third party (including within the Incyte group of companies)*

Not only physical or electronic transfers, includes electronic storage with a third party (e.g. on servers/cloud) or remote access by a third party (even if the data is physically located at the Data Controller).

Restrictions and additional safeguards apply if Personal Data is transferred outside of the EEA (European Economic Area) or Switzerland.
In order to evaluate Privacy Compliance, the following roles are attributed to the different actors and have impact on legal obligations:

**What is a Data Controller?**

The person or company that alone or jointly with others determines the purposes and means of the processing of Personal Data; that is, the why and how of a processing activity.

**Key aspect:** Ability to decide and instruct how Personal Data is being processed.

**In practice:** In most relations with Service Providers, Incyte will likely be the Data Controller.

**What is a Data Processor?**

A Data Processor is a person (other than an employee of the Data Controller) who Processes Personal Data on behalf of a Data Controller.

**Key aspect:** A Data Processor is rather closely involved in the processing of Personal Data but does not have the authority to allocate responsibility that a Data Controller has. The Data Processor is only acting on behalf of the Data Controller.

**In practice:** In most relations Incyte’s Service Providers will likely be the Data Processors.

**What is a Data Subject?**

A natural person /individual whose Personal Data is processed by a Data Controller or Data Processor. In our notices we mostly refer instead to the individual.

**In practice:** E.g. a Healthcare Professional, an employee, a patient, service provider or supplier personnel etc.
We inform people that Incyte is processing their Personal Data, which data is processed, for which purpose, and with whom the data is shared.

We only collect and process Personal Data that are strictly necessary and relevant for legitimate purposes.

We process Personal Data for legitimate purposes only and ensure it is only processed for such a purpose that is notified to or consented by individuals.

We grant internal and external access to Personal Data on a strict need-to-know basis. We ensure that we have proper contracts with third parties obliging them to protect the data and to use it appropriately.

We keep Personal Data secure and protect it from loss, destruction or unauthorized access through the use of physical and IT safeguards e.g. locked file rooms, server firewalls, passwords, etc.

We know if Personal Data will be transferred or stored outside of Europe and ensure that proper contracts are put in place.

We inform people about their rights of access, deletion, restriction, portability and correction of Personal Data, their rights to ask us to stop processing their data and their right to complain to the local Data Protection Authority.

We inform people how to exercise these rights by contacting EU_Data_Privacy@incyte.com