

## NAFDAC NIGERIA - MED SAFETY APP PRIVACY POLICY

Thank you for downloading the WEB-RADR med safety app for reporting adverse events and other drug related problems to the Pharmacovigilance and Post-Marketing Surveillance (National Pharmacovigilance Centre) NPC NAFDAC Nigeria. As much as we are committed to promoting the rationale and safe use of medicines and other healthcare products in Nigeria, we are equally committed to ensuring that we respect your privacy, only collect the information on adverse events necessary for you to use the platform safely and easily, and that we are transparent in the way we handle your data.

### Med Safety App Privacy

This privacy policy has been put together to let you know how we collect data, how we handle it and what we do, and don't do. There may be links to other sites on our website or in our apps, so make sure you also read their privacy policy when visiting those other sites.

### What personal information do we collect?

We only collect data we need to investigate reports of adverse events with the use of medicines, pharmaceuticals and other healthcare products in Nigeria. Here is a list of the personal information we collect:

- First and last name
  - This is so that we can identify both the reporter and the patients; approve your access and send you critical and useful information through our app and as well as establish follow-up contacts in cases of serious adverse events.
- Phone number
  - This is our 'unique identifier', it stops fake accounts being setup and helps to secure you access via two-factor authentication during registration. It also lets you recover your registered email via text to help in resetting your password if needed. We can equally contact you to follow-up on investigations related to Individual Case Safety Reports (ICSRs)
- Email address
  - This is so that we can confirm your successful registration and is the way to reset your password. If you are having trouble accessing or using our app it also lets the support team get in contact with you. Again, more importantly we provide automated acknowledgements and subsequent feedbacks on submitted reports via your registered e-mail address

In some circumstances we will also ask you to select or confirm your role within the health facility or organization (e.g. pharmacist, physician, nurse, laboratory scientist, others etc.). This ensures you see the most relevant content and communications. You can keep your personal information up to date directly through the relevant profile section on our mobile app.

### How do we get this information?

**User Registration** – anyone can download the Med Safety App from the App Store or Google Play and register an account. When you register you need to enter the information we set out above so that you can be verified as a genuine user and give you access to the features and functionality of the app.

## Other information that we collect

We do collect usage data on the usage of the Med Safety App. This includes data like total users, active users, new users, sessions, sessions per user etc.

## How we use personal information

In the language of privacy principles, we only use your personal information for necessary and related purposes. Specifically for us, this means:

- We use it to give you access to our apps and make sure you are who you say you are via your registered account.
- We use it to log and respond to support queries when users are having issues with the mobile app so that you don't get stuck if an error happens while using the app and make sure you have a good experience with our platform.
- We use it to respond to feedback about our apps and try to improve the platform and services we make available to you.

Your personal information will also be visible to our technical partner (Medicines and Healthcare Products Regulatory Agency in the United Kingdom) and the National Pharmacovigilance Centre in NAFDAC that you have access to in Nigeria. The MHRA is responsible for maintaining the platform content for NAFDAC Nigeria, managing user access and communicating with the NPC.

You never 'have to' provide personal information to us; however it will make it difficult to use our platform and all its features if you don't. We only collect the minimum information needed to give you a safe and user-friendly experience.

We **do not**:

- Share your personal information for advertising or marketing purposes
- Send marketing emails or text messages
- Keep or process your personal information for any other commercial purpose

## Third party services

We do use some third-party services to help run our platform and provide support. We only use trusted and well-known services to handle any of our app's data, and only some of these services handle personal information. These services are required to handle your information with appropriate privacy rules and obligations and have the relevant certifications. Some of these providers may be located in the MHRA United Kingdom, Uppsala Monitoring Centre Sweden and WHO Geneva Switzerland.

In some cases law enforcement, government authorities, or your employer may have personal information disclosed to them when it is necessary to comply with:

- A law, regulation or enforcement request
- Detect, prevent or address a fraud, security or safety issue relating to the app or other products
- Protect against harm to our users or organization

We may also disclose your personal information to other third parties in circumstances where you have consented to that disclosure.

## **Security**

We take all reasonable steps to make sure that the personal information we hold is protected against misuse, loss, unauthorized access, modification or disclosure. We will hold personal information in electronic forms in secure databases on secure premises, accessible only by authorized staff.

## **Access and deletion of personal information**

Yes, we can do it. If you would like to access or change the personal information we hold about you, or you would like more information, get in touch with us through [pharmacovigilance@nafdac.gov.ng](mailto:pharmacovigilance@nafdac.gov.ng) or [medsafetyapp@nafdac.gov.ng](mailto:medsafetyapp@nafdac.gov.ng). **Remember**, you can always check and update your own personal information via our mobile app profile section.

If you would like to request a further review of any personal information, we will need to double and triple check you are who you say you are so we might ask you some questions to prove your identity. You are also welcome to request that all your personal information is removed from our systems by sending a request to through [pharmacovigilance@nafdac.gov.ng](mailto:pharmacovigilance@nafdac.gov.ng) or [medsafetyapp@nafdac.gov.ng](mailto:medsafetyapp@nafdac.gov.ng). We will do our best to resolve any requests as soon as possible and in line with our timelines below.

We will take all reasonable steps to provide access and/or deletion of all personal information within 30 days from your request. In less complex cases, we will attempt to provide this service within 14 days.

## **Changes to this privacy policy**

Things change sometimes, so we do need to make updates to our privacy policy from time to time. Our most up to date privacy policy will always be published on our website at [www.nafdac.gov.ng](http://www.nafdac.gov.ng). When major changes occur in the way that we collect and disclose your personal information we will notify you of those changes.

## **How to contact us**

If you would like some additional information or have a specific question about the policy or the data we use, feel free to send us an email at [pharmacovigilance@nafdac.gov.ng](mailto:pharmacovigilance@nafdac.gov.ng) or [medsafetyapp@nafdac.gov.ng](mailto:medsafetyapp@nafdac.gov.ng). If you do have any feedback we are always looking to improve our systems so please send an email to the above address and we will get back to you as soon as possible. We treat all feedback and queries seriously and will always deal with them confidentially.

If you agree to the terms of this privacy, please tick the box below;