



Takeda's Position on Data Sharing and Reuse of Health Data

Summary

Leveraging data and data insights is critical to how we serve patients. The responsible sharing and reuse of health data are essential in our work to drive scientific innovation and improve health outcomes.

As such, Takeda:

- Values the potential of health data and commits to a transparent and responsible process of sharing and reusing health data to advance the field of medicine and improve the health and well-being of patients and society.
- Protects the personal data of individuals and the proprietary data of other third parties while respecting privacy and honoring confidentiality.
- Commits to providing responsible access to clinical trial data and publishing via Open Access journals while maintaining appropriate control and stewardship.
- Procures, licenses, and acquires health data from reputable and qualified third parties.
- Reuses health data to inform future Takeda research in a manner that honors consent, fosters trust with society, and helps to sustain our business.

Background

Data are necessary in driving improved patient outcomes. While a substantial amount of health data already exists, the proliferation of such data is expected to continue at a rapid rate as technology progresses and collaborations expand both within and outside of health systems. To maintain trust and drive innovation, Takeda and its partners must use health data in a transparent and responsible

manner based on sound ethical principles and respected international practices.¹

The principles described in this document were initially established via the Takeda Ethics Advisory Council (TEAC). The TEAC is comprised of a diverse group of professionals that include prominent external ethics experts and selected Takeda leaders. The primary responsibility of the TEAC is to perform analyses of emerging ethics topics and provide advice, informing Takeda's development of robust and principled positions on these issues. This document outlines the framework and strategic approach that Takeda is implementing to enable the responsible sharing and reuse of health data.

Takeda's Perspective

The following principles outline Takeda's strategic approach towards sharing and reusing health data from research and development to product distribution:

- **We value the potential of health data. We commit to a transparent and responsible process of sharing and reusing health data to advance the field of medicine and improve the health and well-being of patients and society.** Takeda is committed to collecting, using, reusing, and sharing health data in a way that supports scientific advancement. Our data sharing and reuse activities adhere to, at minimum, the permitted scope of lawful data processing. Takeda recognizes that data sharing requests must be considered in a manner that maintains trust with society. We approach ethical, equitable, and efficient data sharing and reuse with transparency.
- **We protect the personal data of individuals and the proprietary data of other third parties. We respect privacy and honor confidentiality in compliance with Takeda's policies, applicable laws, and regulations.** Takeda is committed to the privacy principles of lawfulness, fairness, and transparency; purpose limitation; data minimization; accuracy; storage limitation; security (confidentiality, integrity, and availability), individual rights, and accountability.²
- **We commit to providing responsible access to clinical trial data and publishing via Open Access journals while maintaining appropriate control and stewardship.**

¹ *OECD Legal Instruments*. legalinstruments.oecd.org. (2022). Retrieved 26 May 2022, from <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0433>.

² *Privacy Notice | Takeda*. [Takeda.com](https://www.takeda.com/privacy-notice/). (2022). Retrieved 31 May 2022, from <https://www.takeda.com/privacy-notice/>.

Takeda supports responsible access to and use of health data through proactive planning and investment in organizational resources and technologies. In clinical research, we honor the inviolability of informed consent. All manuscripts resulting from Takeda-sponsored research will be submitted to Open Access journals allowing researchers, clinicians, patients, and their caregivers to freely access and learn from our research.

- **We procure and license health data from reputable and qualified third parties.** Takeda procures, licenses, and acquires health data consistent with Takeda policies, third-party risk management processes, applicable law, and regulations, privacy, as well as with these ethical principles.
- **We reuse health data to inform future Takeda research in a manner that honors consent, fosters trust with society, and helps to sustain our business.** We share and reuse health data in ways that maintain the integrity of research and do not jeopardize intellectual property, regulatory submission of the clinical trial, or availability and access to medicines.

Conclusion

Takeda commits to sharing and reusing health data responsibly. To achieve this, we will utilize and share health data in a way that is secure, protects privacy, and is ethical. Takeda also actively contributes to the broader scientific community and is dedicated to continuously strengthening and evolving ethical data sharing practices that enable innovative new treatments for patients.

These principles will be regularly revisited by Takeda to ensure they meet the expectations of patients and wider society, both today and in the future. We strive to become the most trusted, science-driven, digital biopharmaceutical company.

About Takeda Pharmaceutical Company Limited

Takeda is a global, values-based, R&D-driven biopharmaceutical leader headquartered in Japan, committed to discover and deliver life-transforming treatments, guided by our commitment to patients, our people, and the planet. Takeda focuses its R&D efforts on four therapeutic areas: Oncology, Rare Genetics and Hematology, Neuroscience, and Gastroenterology (GI). We also make targeted R&D investments in Plasma-Derived Therapies and Vaccines.

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