

# CONSENT: Find Out What it Means to You

January 1, 2015

By Brian Sharkey

The intersection of the data privacy protections afforded to European Union citizens and the implementation of EFPIA's Disclosure Code.

By adopting this Disclosure Code, EFPIA intended to provide a consistent, uniform, self-regulatory approach to transparency reporting for the pharmaceutical industry across Europe that would demonstrate to European governments that they did not need to intervene or legislate in this area. Moreover, EFPIA's adoption of the Disclosure Code was intended to fulfill societal expectations that industry be transparent in their dealings with HCPs and other stakeholders.

Because the Disclosure Code is a voluntary form of self-regulation and is not a law, and because of the data privacy protections afforded to European Union citizens under the governing European Union Directive and national laws, companies must, as a general proposition, obtain consent in order to publicly disclose the individual-level information called for in the Disclosure Code.