CAVEAT DOCUMENT

Accompanying statement to data released from VigiBase, the WHO international database of suspected adverse drug reactions

Uppsala Monitoring Centre (UMC) in its role as the World Health Organization (WHO) Collaborating Centre for International Drug Monitoring receives reports of suspected adverse reactions to medicinal products from National Centres in countries participating in the WHO pharmacovigilance network, the WHO Programme for International Drug Monitoring (PIDM). The information is stored in VigiBase, the WHO international database of suspected adverse drug reactions (ADRs). It is important to understand the limitations and qualifications that apply to this information and its use.

The reports submitted to UMC generally describe no more than suspicions which have arisen from observation of an unexpected or unwanted event. In most instances it cannot be proven that a specific medicinal product (rather than, for example, underlying illness or other concomitant medication) is the cause of an event.

Reports submitted to National Centres come from both regulated and voluntary sources. Some National Centres accept reports only from medical practitioners; other National Centres accept reports from a broader range of reporters, including patients. Some National Centres include reports from pharmaceutical companies in the information submitted to UMC; other National Centres do not.

The volume of reports for a particular medicinal product may be influenced by the extent of use of the product, publicity, the nature of the reactions and other factors. No information is provided on the number of patients exposed to the product.

Some National Centres that contribute information to VigiBase make an assessment of the likelihood that a medicinal product caused the suspected reaction, while others do not. Time from receipt of a report by a National Centre until submission to UMC varies from country to country. Information obtained from UMC may therefore differ from those obtained directly from National Centres.

If in doubt or in need of help for interpretation of country specific data, UMC recommends to contact the concerned NC before using the data.

For the above reasons interpretations of adverse reaction data, and particularly those based on comparisons between medicinal products, may be misleading. The supplied data come from a variety of sources. The likelihood of a causal relationship is not the same in all reports. Any use of this information must take these factors into account.

Confidential data

According to WHO policy and UMC Guidelines, ADR reports sent from the WHO PIDM member countries to VigiBase are anonymized, but they are still to be considered sensitive due to the nature of the data.

When receiving and using adverse reaction data ("Data"), the user agrees and acknowledges that it will be the controller of any such Data. Accordingly, the user shall adhere to all applicable legislation such as, but not limited to, EU and national legislation regarding protection of personal data (e.g. the Data Protection Directive 95/46/EC and Regulation (EC) No 45/2001, as applicable). Transfer of sensitive data to a third party is generally prohibited subject to limited exceptions explicitly stated in applicable legislation.

As the controller of the Data, the user shall be liable for any and all processing of the Data and shall indemnify and hold the UMC harmless against any claim from a data subject or any other person or entity due to a breach of any legislation or other regulation regarding the processing of the Data.

Non-permitted use of VigiBase Data includes, but is not limited to:

- · patient identification or patient targeting
- identification, profiling or targeting of general practitioners or practice

Any publication, in whole or in part, of information obtained from UMC must include a statement:

- (i) regarding the source of the information
- (ii) that the information comes from a variety of sources, and the likelihood that the suspected adverse reaction is drug-related is not the same in all cases,
- (iii) that the information does not represent the opinion of the World Health Organization.

Omission of this statement may exclude the responsible person or organization from receiving further information from VigiBase.

UMC may, in its sole discretion, provide further instructions to the user, responsible person and/or organization in addition to those specified in this statement and the user, responsible person and/or organization undertakes to comply with all such instructions.

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