

Online Supplement 4. Approaches to data presentation decreasing the accessibility of payment disclosures

Part A: Techniques used when publishing payment data on individual company websites

1. Publish data as PDF documents (and not csv or XLS files) to make analysis difficult (example: most companies throughout Europe, except where the pharmaceutical industry trade groups created centralised databases).
2. Make the PDF document available only in an online viewer rather than as a separate file to prevent it from being downloaded for analysis (example: [Menarini Switzerland](#)).
3. Publish PDF documents consisting of images (and not text) to prevent any searches within the data (e.g. for recipient names) (example: [Pfizer Sweden](#)).
4. Reduce the resolution of image-based PDF documents to make them *almost* unreadable without constantly zooming in and out (example: [Novo-Nordisk Spain](#)).
5. Create PDF documents with repeated table headers occupying most of each page in the disclosure report. In some cases, if the content is image-based, the resulting PDF can exceed 1800 pages, and over 350 MB, which discourages users from opening or downloading it (example: [Novartis Italy](#)).
6. Require users to follow a lengthy process of accepting the “Terms of use” of the disclosed information to discourage engagement with the data (example: [Pfizer Spain](#)).

Note: Different techniques can be combined. For example, the disclosure report can be made available only in an online viewer (2), with each page published as an image (3) and in a low resolution (4) (example: [Roche Italy](#)).

Part B: Techniques used when publishing payment data in centralised databases.

1. Require users to follow a lengthy process of accepting the “terms of use” of the disclosed information to discourage engaging with the data (example: the Czech [Transparentní spolupráce](#) database).
2. Enable searching only for specific recipients, without the possibility of searching for companies or recipient categories (e.g. medical specialties) (the Czech [Transparentní spolupráce](#) database).
3. Make searches conditional on obtaining recipient ID numbers from another website (example: the Czech [Transparentní spolupráce](#) database)
4. Do not include the possibility of downloading the database as a single file to prevent analysis (Examples: [the Irish Transfer of Value database](#) – and all centralised industry platforms except Disclosure UK)