

Digital Assets Summary

1 Key Principles



Approve all components together in final form

- Digital assets need to be reviewed within the channel that they will be delivered through, including interactivity, downloads, links etc

Consider national variation

- Digital communications containing product or medical information must clearly and prominently identify the intended target audience (country, and audience type)

Consider general public access

- Most countries do not allow promotion of 'prescription only medicines' to the general public.
- Exceptions are the USA, and New Zealand.

Data Privacy and IT security

Digital media must conform to regulations covering:

- Data privacy – ensuring that data are only used for the purposes for which they were gathered
- Data security – ensuring that data are protected through adequate passwords etc
- Confidentiality

Permission

- required when proactively 'pushing' information towards an audience
- opt out option required in the 'push' scenario

2 Websites



All the usual rules for promotional materials apply plus:

- need to protect the public from promotional content
- promotional and non-promotional considerations
- everything you see on screen should be reviewed, including all attachments and links
- geographical considerations
- legal requirements relating to web-sites such as cookies, data privacy etc
- consider how search engines will relate to the site and meta data
- consider how different devices and internet browsers will display the data
- consider elements of the site that allow two way data sharing

4 Email, digital adverts and apps

Web applications and mobile applications (e.g. for iPhones, iPads and Android devices) are subject to similar regulatory controls to those that apply to websites.



For apps the app store icon and description need to be considered as part of the review. Also consider how any restrictions to access may be applied.

For digital adverts signatories need to consider whether the screen view might make content misleading,

3 Social Media



Remember: These are fully accessible to the general public.

Company employees posting on social media (even with personal views) may be considered to be representing the company.

Case law is evolving as digital media evolve: FDA have made it clear that the use of the 'like' button in Facebook will constitute endorsement of that content by a company.

5 Obligatory Information

The following are required on all digital assets:

- Intended audience
- Nature and level of AZ involvement
- For above country websites links to local websites where possible
- Date of last approval
- Link to Legal Notice
- Adverse event reporting information

Consider local regulations which may require other information such as:



Cookie notices



Other legal notices