

## PRIVACY POLICY FOR HEALTH CARE PROFESSIONALS

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### 1) INTRODUCTION

This document describes how the website [insert link] (hereinafter "Site") is managed, with reference to the processing of the personal data of users who visit it. The Site is managed by Recordati BV., with registered office in Burgemeester Etienne Demunterl. 5, box 4, 1090 Jette (hereinafter "Recordati", "we", "us"), in its capacity as data controller.

When you browse our Site, interact with us, or use our services ("Services"), we may collect information and personal data about you. For this reason, in accordance with the provisions of Regulation (EU) No. 2016/679, the General Data Protection Regulation ("GDPR"), any national implementing laws and other applicable privacy and data protection legislation, we have created the following document (hereinafter "Privacy Policy") in order to describe what personal data we collect, the purposes and methods of processing it and the security measures we take to protect it.

This Privacy Policy constitutes the information that Recordati provides to data subjects to inform them about the processing of their personal data when visiting the Site pursuant to Article. 13 et seq. of the GDPR and exclusively concerns the Site and the processing of data by Recordati. Any third-party websites referred to on this Site, including through links, are not covered by the information indicated in this Privacy Policy. We advise you to always consult the privacy policies of such third-party websites before interacting with them.

### 2) WHO PROCESSES YOUR DATA

The data controller is Recordati BV., with registered office in Burgemeester Etienne Demunterl. 5, box 4, 1090 Jette, a company of the Recordati Group.

The Data Protection Officer of the Recordati Group can be contacted at the following email address: [groupDPO@recordati.com](mailto:groupDPO@recordati.com).

### 3) WHAT PERSONAL DATA DO WE PROCESS?

Depending on the nature of our relationship and/or interaction(s), we may collect and process Personal Data about you, by electronic or other means, including:

- personal details, such as name, age, gender, nationality; government issued licenses or documents (e.g. passport information and/or tax identification information);
- Through the registration form on a sign up Site we collect identification and contact data such as

name, surname, email, telephone number. We also collect data about your country, your job title, your area of work (marketing, sales, medical) and the company you work for. We also process personal information relating to your activity on the Site, for example when you choose to download informational and communication materials or save your favorite content and set your bookmarks. business contact information, such as your business postal address, telephone, mobile and fax number, e-mail address;

- financial details, such as banking information (for the purpose of making payment to you pursuant to a valid contractual relationship);
- professional details such as employer, licenses, your place of medical practice, job title, educational history, your CV, the medical field in which you are active, professional qualifications and scientific activities (such as previous clinical study experience, and participation in past or pending research studies with us and other companies), employment status, publication of academic or scientific research and articles, memberships in associations and boards, speaking engagements, travel and expense information;
- details of interactions with us and your interests, such as type of meetings we have held, your attendance to events/congresses, topics discussed, your knowledge of and questions you have had on our clinical study activities and products, your interest in our products and your general prescription habits and any other information you may provide to us in our interactions.
- social media content and related social media online activity that is made publicly available by you.

We will usually collect this information directly from you, as well as from publicly available sources such as professional directories (e.g., Medical Societies, Medical Associations), social professional networks (LinkedIn, Twitter), online scientific publications, (e.g., Medical Journals) or professional subscription dataset/databank owned by third-party service providers (such as Veeva, IQVIA).

#### **4) FOR WHAT PURPOSES WE PROCESS YOUR DATA**

We will collect and process your Personal Data for one or more of the following purposes to:

- To operate, improve and troubleshoot our Site. The processing is based on Recordati's legitimate interest, consisting in the interest in guaranteeing a space reserved for our business partners and our affiliated companies, in ensuring the functioning of the Site, in improving its appearance and user experience.
- To get to know our users through the use of cookies and similar tracking technologies. The use of cookies and similar technologies allows us to recognize you when you return to our Site. For more information visit our Cookie Policy [\[INSERT LINK\]](#).
- To contact you to arrange face to face or remote meetings;
- To enter into or renew a contract to which you are a party and administer our customer relationship;
- To publicly disclose any transfers of value made to you, as a healthcare professional (HCP), as required by law or in order to comply with applicable industry standards;
- To provide you with corporate news and updates on Recordati;
- To carry out promotional activities directed at you, subject to other applicable regulatory provisions;
- To arrange (e.g. payment for travel & accommodation) your attendance or invite you to speak at scientific meetings, ad boards, congresses and events organized by us;
- To review a grant, donation or sponsorship request that you may have applied for – whether or not - on behalf of your employer/institution, and assess your professional history for our due diligence purposes (including the HCP's compliance with anti-bribery and corruption laws) and to determine the eligibility to receive the requested grant, donation or sponsorship;
- to allow you to access the Site, share and download information and commercial material relating to

our products, save your favorites and/or bookmarks. Registration on the Site is necessary in order to access the information and commercial material made available by Recordati and relating to the products and country of your interest, which you can save and download for your commercial purposes. The processing is based on the performance of a contract with you or a request from you. The provision of your data is mandatory and in the absence of it you will not be able to register and therefore access the Site.

- To send you communications regarding the presence of new information or commercial materials relating to the products or area of your interest. We ensure that you are always aware of any new informational or commercial materials released on the Site, by sending an informative communication by email. The processing is based on Recordati's legitimate interest consisting in the interest in ensuring that relevant healthcare professionals have up-to-date material or, where required in accordance with applicable legislation in respect of certain direct marketing messages, on the basis of your consent. You may object to receiving these communications from Recordati or withdraw your consent at any time.
- To collect and report to regulatory authorities any adverse events reports or quality complaints;
- invite you to attend scientific events e.g. webinars;
- To provide you with information related to clinical trials and invite you to participate thereto;
- To invite you to share with us your professional insights, to participate in online or phone surveys and other market research activities; or
- To collect and analyze your interests and professional insights to build or improve your professional profile as an HCP to develop, maintain and further enhance our existing or potential professional relationship with you and to provide you with personalized information.

We shall not use your Personal Data for purposes other than the ones specified herein without providing you with prior notification and obtaining your specific consent, where necessary.

The legal grounds for processing your Personal Data for the above-mentioned purposes are the following:

- we may process your Personal Data after obtaining your consent, such as for direct marketing and promotional purposes. This consent may be withdrawn by you at any time without giving any reason. Please note that the withdrawal of consent will not affect processing by us which has already occurred up to the date of withdrawal.
- we may process your Personal Data if necessary, to comply with a legal obligation to which we are subject to, such as our safety reporting and transparency obligations.
- we may process your Personal Data if required for the performance of a contract with you (e.g. consulting; speaker agreement).
- we may process your Personal Data, relying on Recordati's overriding legitimate interests and as permitted under applicable legislation, e.g., conducting professional relationships and operations including strategy and marketing activities; communicating with you about our products and services when you expect to do so; building your professional profile to develop and maintain a current or potential collaboration with you.

## **5) HOW YOUR DATA IS PROCESSED**

Your personal data may be processed by electronic and/or paper means.

The security of your personal data is important to us. We adopt and request our service providers to adopt - appropriate technical and organizational security measures to prevent the loss or destruction, even accidental, of data, illicit or incorrect use and unauthorized access to data, in compliance with applicable legislation. In

addition, the IT systems are configured in such a way that personal and identification data are used only when necessary to achieve the specific processing purposes pursued from time to time.

We implement multiple security technologies and procedures to protect your personal data from the risks described above. However, we would like to point out that electronic transmissions or storage of information are not 100% secure. Therefore, despite the security measures we have put in place to protect your personal data, we cannot guarantee that data loss, misuse or alteration will never occur.

## **6) HOW LONG WE PROCESS YOUR DATA**

Personal data is processed for the time necessary to provide the requested information or Services and, in any case, in accordance with any applicable legal or regulatory obligations. Notably:

- We process your registration data until your request for deletion or the termination of the relationship between us.
- If you receive communications by email, we process your personal data until the relationship between us ends or until you request deletion or objection to processing. You can exercise your rights at any time. More information can be found in section 8 below.
- If you send us questions or requests, we process your personal data for as long as necessary to respond to you and comply with your request.
- For information on the storage of cookies and other technologies, please visit our Cookie Policy [\[INSERT LINK\]](#).

## **7) TO WHOM YOUR DATA IS COMMUNICATED OR TRANSFERRED**

Your personal data will be processed by our duly authorised staff. Your data will also be processed by our suppliers for technical and organizational services functional to the processing purposes indicated above, such as providers for maintenance services for the Site and hosting services. They usually act as our data processors on the basis of our instructions and in accordance with the provisions of the contracts they have entered into with us.

We may disclose your personal data to public authorities or bodies and to any other legitimate recipient in accordance with the law. In this case, the recipients will act as independent data controllers according to their respective institutional purposes.

If we are involved in a reorganization, acquisition, or sale of our company or parts of it, we will disclose your personal data to the third parties involved in the process, in accordance with applicable law. Any third party that is the recipient of your personal data as part of this procedure may only use it within the limits established by this Privacy Policy and applicable legislation.

To receive the updated list of recipients of your personal data, you can contact us using the contact details indicated above.

If your data is transferred abroad to countries that do not provide the same level of data protection as your country, we will ensure that the transfer is carried out in accordance with applicable law, i.e. by obtaining your consent, when necessary, or by taking any other measures necessary to ensure equivalent protection of the data being transferred, including, but not limited to, to implementing the EU Standard Contractual Clauses which may require the recipient to put in place supplementary measures to ensure an essentially equivalent level of protection is provided, as in the EU/EEA, the UK or Switzerland. We will ensure that your rights and an adequate level of protection essentially equivalent to that ensured within the EU/EEA, UK and Switzerland

are guaranteed. If you would like to receive a copy of these safeguards, please contact us using the contact details set out in section 2 of this Privacy Policy. At this time, your personal data is not transferred outside the European Union.

## **8) WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?**

In accordance with the applicable legislation on the protection of personal data, you may at any time request access to your personal data, verify its accuracy or request that it be corrected or updated.

You may also request the erasure of personal data concerning you, as well as the restriction of the processing of the same, in the cases provided for by the law, and you may object in any case to the processing of your data, on the basis of reasons related to your particular situation, unless we demonstrate the existence of compelling legitimate grounds for the processing of the data by us or as otherwise established by the applicable legislation on the protection of personal data.

**You may object to (or, in case the processing is based on your consent, withdraw your consent for) the processing of your personal data at any time in the case of processing for direct marketing purposes.**

You can also request the portability of your data, i.e. to receive such data in a structured, commonly used and machine-readable format, and the transmission of your data to another data controller without hindrance from us.

Finally, you can withdraw your consent to the processing of your personal data, if given, at any time.

Note that the rights mentioned above may sometimes be restricted pursuant to the GDPR.

To exercise the rights mentioned above, you can contact Recordati or the Data Protection Officer of the Recordati Group at the addresses indicated in section 2 of this Privacy Policy.

Finally, you may lodge a complaint with the supervisory authority (for instance, the supervisory authority of your place of residence) or contact the authority if the exercise of your rights is subject to delay, limitation or exclusion by the data controller.

The contact details for EU national supervisory authorities can be found here [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## **9) CHANGES TO THIS PRIVACY POLICY**

We may update and amend all or part of this Privacy Policy at any time. The version published on the Site is the version currently in force. In the event of a change in the text of this Privacy Policy, we will inform you of such changes with a specific banner, link or pop-up on the home page of the Site or through a dedicated email.