

Information on the processing of personal data for Medical Information activities

Pursuant to the applicable legislation on the protection of personal data, Recordati AG a company of the Recordati Group. ("Recordati", or the "Data Controller"), has drawn up this document (the "Notice") to describe how it will process personal data in the context of the enquiries received through the Global Medical Information service, made available to data subjects via the following channels: phone call and email.

1. Data Controller and Data Protection Officer

The data controller is Recordati AG, with registered office in Lindenstrasse 8, 6340, Baar, Switzerland, a company of the Recordati Group.

The representative of the data controller in the EU is Recordati Industria Chimica e Farmaceutica Spa.

The representative of the data controller in the UK is Recordati UK Ltd.

The Data Protection Officer of the Recordati Group (hereinafter "DPO") can be contacted at the following e-mail address: groupDPO@recordati.com, for any request regarding the processing of your personal data and the exercise of your rights.

2. Types of data processed

The following personal data will be processed:

- i) personal and identification data (such as name, surname, date of birth);
- ii) data relating to the person involved (such as gender, medication);
- iii) if a healthcare professional is contacting us, information about its profession (such as institution, address, contact details);
- iv) contact details (such as e-mail, telephone number, address).

3. Purpose of processing and legal basis

Your personal data will be processed for the following purposes. Next to each of them, we also indicate the relevant legal basis:

| # | Purpose of processing | Legal basis |
|---|---|--|
| 1 | To manage your enquiry made via email or phone and provide you with a reply. | Compliance with legal obligations applicable to us; Our legitimate interest, consisting in the interest in ensuring that your questions have been duly answered. |
| 2 | In case of adverse events or product complaints, to share relevant information with our Pharmacovigilance and Quality Assurance departments, in compliance with applicable obligations. | Compliance with legal obligations applicable to us. |

The provision of your personal data for the purposes mentioned above is mandatory; in failure, we will not be able to manage your enquiry and/or provide you with a reply.

4. Processing methods and storage period

The processing will be based on the principles of lawfulness, fairness, transparency, proportionality and minimization and will be carried out using suitable tools to guarantee security and confidentiality through the use of procedures that avoid the risk of loss, unauthorized access, illicit use and dissemination of data.

The data processed for the purpose described in par. 3. 1 above will be kept for the time necessary to reply to your request, and on average about 30 working days.

The data processed for the purpose described in par. 3.2 above will be kept for the time necessary to comply with pharmacovigilance obligations. Please refer to our notice for pharmacovigilance purposes for further information.

5. Communication and transfer of data

Your personal data may be accessed by Recordati employees and collaborators, specifically designated as persons authorised to process it, where necessary for the pursuit of the purposes described above.

Your data may also be communicated or made accessible to consultants and third-party suppliers of technical or organizational services, functional to the purposes described above, in their capacity as our data processors, specifically designated and instructed on the basis of a specific contract. Notably, your data will be processed by ProPharma Group, a company based in the United Kingdom, appointed as data processor by Recordati which is in charge of managing our Medical Information activities.

The data may also be accessed by authorities or other public bodies by virtue of legal provisions or secondary or EU legislation, in their capacity as independent data controllers, for their respective institutional purposes.

Personal data will be transferred to UK and Switzerland for the purposes set out above. Transfer of data to those countries is performed based on the adequacy decisions issued by the European Commission. The Swiss Federal Data Protection and Information Commissioner and the UK Information Commissioner's Office have also deemed the European Union as providing an appropriate level of data protection. Should circumstances change, Recordati will revise the transfer and ensure to operate in compliance with the applicable privacy laws.

6. Rights of the Data Subject

The Data Controller informs you that you can exercise, at any time, the following rights by contacting the Data Controller or the DPO at the addresses indicated above:

- a) the **"right of access"** to your data and, in particular, to obtain confirmation on whether personal data concerning you are being processed, and obtain a copy;
- b) the **"right to rectification"**, i.e. the right to request the rectification of inaccurate data or the completion of incomplete data;
- c) the **"right to erasure"**, i.e. the right to request the deletion or erasure of your personal data;
- d) the **"right to restriction of processing"**, i.e. the right to obtain from the Data Controller the restriction of processing in certain cases provided for pursuant to the privacy legislation;
- e) the **"right to data portability"**, i.e. the right to receive (or to transmit directly to another data controller) personal data in a structured, commonly used and machine-readable format;
- f) the **"right to object"**, i.e. the right to object, in whole or in part:
 - to the processing of personal data carried out by the data controller for its own legitimate interest;
 - The exercise of the above rights is not subject to any formal constraint and is free of charge. The Data Controller may ask you to verify your identity before taking further action following your request to exercise the rights referred to above.

You may also lodge a complaint with the competent Supervisory Authority ((in particular, in Switzerland, with Swiss Federal Data Protection and Information Commissioner; in the UK, with the Information Commissioner's Office, and, in EU countries, with the Data Protection Authority of the Member State of your habitual residence, place of work or place of the alleged violation)), if you are of the opinion that your personal data are being processed in such a way as to result in violations of privacy legislation. You may also contact the Supervisory Authority if the exercise of your rights is subject to delay, limitation or exclusion by the Data Controller.

In order to facilitate the exercise of the right to lodge a complaint, the name and contact details of the Supervisory Authorities of the European Union are available at the following link: [Our Members | European Data Protection Board \(europa.eu\)](#).