

PRIVACY NOTICE ON PERSONAL DATA PROCESSING**VERSION REVIEWED ON 01/06/24**

Dear Madam / Sir,

Considering the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (**General Data Protection Regulation, “GDPR”**), and of the national legislation on the protection and security of personal data

We, Zentiva Pharma UK, 02148996 of 12 New Fetter Lane, London, EC4A 1JP, (hereinafter referred to as “**the Company**”), legal entity which is part of Zentiva Group, together with the rest of the legal entities ([you can view the list of legal entities that are part of Zentiva Group here](#)) as (**Joint Controller**), pursuant to art. 13 and 14 from GDPR, hereby detail the following:

(A) The way in which the Company obtains your personal data

As a general rule, the Company obtains the personal data directly from you.

There may also be situations where we obtain your personal data from other sources. Accordingly, in the course of our business, we may obtain your personal data in any way (for example: face-to-face discussions, telephone conversations, or in writing, electronically and / or in paper format):

- i. from other legal entities that are part of Zentiva Group ([you can view the list of legal entities that are part of Zentiva Group here](#)); and / or
- ii. from other public or private legal entities, with or without legal personality (for example: from your employer); and / or
- iii. following a merger, acquisition of assets or assignment of a debt; and / or
- iv. from contractual partners (for example: IQVIA AG, Dorfplatz 4, 6330 Cham, Switzerland).

(B) The purposes for which the Company processes your personal data and the related legal basis

The Company will process your personal data for the following purposes, when it relies on the following legal basis, as appropriate:

- i. carrying out the activity of promotion of the Company or medical promotion of the Company's products or of the products distributed by the Company, addressed to the healthcare professionals, consisting in:
 - a) medical promotion visits, during which we will rely our processing of your personal data on your **consent**, according to art. 6, paragraph (1), letter a) of the GDPR, expressed by completing the consent form attached hereto, or electronically made available to you; and / or
 - b) medical promotion – controlled distribution of free medical samples (RX and OTC), in which we will rely our processing of your personal data on **compliance with a legal obligation incumbent on the Company**, according to art. 6, paragraph (1), letter c) of the GDPR; and / or
 - c) creation, maintenance, development and overall management by the Company of some customer relationship management (CRM) / databases / analyzes / reports / internal statistics, regarding: (i) the daily medical promotion activity carried out by the medical representative of the Company; (ii) organizational resource planning and overall management; (iii) ensuring the participation of the guests to the medical



promotion events, where we will rely our processing of your personal data on the **satisfaction of some legitimate interests** of the Company, according to art. 6, paragraph (1), letter f) of the GDPR, to which the legitimate interests of the Company listed under Section (C.2) of the document entitled Privacy Notice available on www.zentiva.co.uk are added, which include (in particular) prevention of crime or violations of law, ensuring compliance with regulations, protection of the Company's rights or property;

- d) medical promotion – online, hybrid and / or offline medical promotion events organized internally and / or through third parties, where we will rely our processing of your personal data on your **consent**, according to art. 6, paragraph (1), letter a) of the GDPR, expressed by completing the consent form attached hereto, or electronically made available to you; and / or
- e) reporting to the central and / or local public authorities of the value transfers made by the Company to the healthcare professionals, professional organizations, patients' organizations and any other type of organizations that carry out activities related to human health, healthcare or pharmaceutical assistance (for example: The Information Commissioner's Office, where we will rely our processing of your personal data on **compliance with a legal obligation incumbent on the Company**, according to art. 6, paragraph (1), letter c) of the GDPR; and / or
- f) supporting the scientific activity of the healthcare professionals, where the provisions of the present chapter (B), paragraph (i), letter e) above also applies accordingly and where we will rely our processing of your personal data on **processing necessary for the performance of a contract to which you are a party or in order to take steps at your request, prior to entering into a contract**, according to art. 6, paragraph (1), letter b) of the GDPR; and / or
- ii. maintaining a professional / scientific correspondence between you and the Company, where we will rely our processing of your personal data on **satisfaction of some legitimate interests** of the Company, according to art. 6, paragraph (1), letter f) of the GDPR, which are, in particular, issuing a reply to your queries and keeping a record of this correspondence;
- iii. (electronic – e-mail, video call, face-to-face and / or by telephone) transmission of commercial communications addressed to the healthcare professionals (for example: questionnaires, informative materials (newsletter), invitations to specialty events, web addresses of some web pages etc.), where we will rely our processing of your personal data on your **consent**, according to art. 6, paragraph (1), letter a) of the GDPR, expressed by completing the consent form attached hereto, or electronically made available to you.

(C) The categories of personal data that the Company is processing

In carrying out our activity, we may collect personal data concerning you, in physical and / or electronic format, which we will hold, record, use and process in any other way, in accordance with the applicable legislation and the guidelines established by the present Privacy Notice.

The general rule of thumb is to collect and request the transmission of only those personal data that are adequate, relevant and limited to what we need in the course of our business, depending on the nature of our relationship with you.

Also, the general rule of thumb is not to collect those categories of personal data considered to be special, such as: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data for the unique identification of a natural person; data concerning the sexual life or sexual orientation of a natural person, except in specific and limited situations and ways provided by the applicable legislation on us and in accordance with the applicable



legislation on the protection of personal data (for example: ensuring high standards of quality and safety of pharmaceutical products for human use or medical devices).

Accordingly, the Company processes, in whole or in part, the following categories of personal data concerning you, in relation to the purposes of the processing mentioned in Section (B) above, as appropriate:

- ✓ **identification data** (for example: last name / first name, domicile address, Personal Identification Number, series / number / date of issue of the Identity Card, image, physical / electronic signature, voice);
- ✓ **occupational data** (for example: name and address related to the place/s of work, CV, occupation, profession, job, position, specialty, professional degree, university title, business card, license number / stamp code, institution and form of education, report on the visit);
- ✓ **contact details** (for example: telephone number, work related correspondence / billing address, electronic correspondence address – e-mail, content of electronic communication);
- ✓ **pre / contractual data / contract execution dates** (for example: request, recommendation, declarations on own responsibility, registration number and contract date, details on the object and nature of the contract, event program, participation diploma, attendance sheet, photos of the premises and GPS coordinates of the location);
- ✓ **financial data** (for example: contract amount, expenses associated with the contract, other expenses, date of payment, currency, bank account).

(D) The conditions under which we may disclose your personal data

Your personal data is intended for use by the Company, as (Joint) Controller.

In order to facilitate the activities related to the purposes of the processing detailed in Section (B) above, where applicable and to the extent necessary for a legal and specific purpose, the personal data processed by the Company, according to the above, may be disclosed to:

- ✓ you and / or your representatives, if the case;
- ✓ the parties affiliated to the Company ([you can view the list of legal entities that are part of Zentiva Group here](#));
- ✓ other (contractual) partners (for example: (contractual) partners who are directly or indirectly involved in the conclusion, execution, modification and / or termination of our contract);
- ✓ banking institutions, in connection with any type of transfer of funds;
- ✓ competent public authorities;
- ✓ healthcare related professional bodies;
- ✓ operational service providers (for example: courier, telecommunications, IT, archiving, logistics services – for example: event organizers, CRM provider, IQVIA AG, Dorfplatz 4, 6330 Cham, Switzerland);
- ✓ our consultants (for example: auditors, lawyers);
- ✓ the auditors of our contractual partners, if the case;
- ✓ our (current or potential) business partners, investors, assignees to facilitate transactions with commercial assets (which may include a merger, acquisition, assignment of receivables).

If we transfer your personal data outside the European Union and / or the European Economic Area, this will only be done in compliance with the legal provisions in force, applying appropriate protection measures and notifying you, when and if necessary.

Your personal data is not subject to a decision based solely on automatic data processing (profiling).



(E) Your rights in relation with your personal data

Unless the law provides otherwise, you have the rights provided by art. 15-22 of the GDPR, such as:

- ✓ the right of access;
- ✓ the right to rectification;
- ✓ the right to erasure / the right to be forgotten;
- ✓ the right to restrict processing;
- ✓ the right to data portability;
- ✓ the right to object to the processing;
- ✓ the right not to be subject to a decision based exclusively on automated processing, including profiling;
- ✓ the right to file a complaint with the www.zentiva.co.uk.

For further details, please see Section (O) of the document entitled Privacy Notice, available on www.zentiva.co.uk.

Where the processing of your personal data is based solely on your **consent**, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal.

Except for the right to file a complaint with the Information Commissioner's Office as set forth above, such rights may be exercised by sending a written request to the Data Protection Officer, using all or any of the contact details listed below:

- ✓ e-mail address: DPO (at) zentiva.com; and / or
- ✓ at the registered office of the Company: Zentiva Pharma UK, 12 New Fetter Lane, London, EC4A 1JP; and/or
- ✓ by filling in the form available here: <https://www.zentiva.co.uk/gdpr/rights>.

(F) The duration for which the Company keeps your personal data

The Company will keep your personal data for a period of 5 (five) years (if based on your consent), otherwise as necessary with regard to the applicable limitation periods (for example: 10 years from the termination of the contractual relationship), or as requested for compliance with the legal obligations of storage and archiving imposed by the legislation applicable to the Company (for example: legislation specific to the financial-accounting field or distribution of medicinal product samples).

For further information regarding the specified retention period of particular personal data, please contact us, using the contact details listed Section (E) above.

(G) The manner in which the Company keeps your personal data safe

The Company will make reasonable efforts to protect your personal data in our possession or under our control, by establishing reasonable security measures to prevent unauthorized access, collection, use, disclosure, copying, modification or deletion, as well as other similar risks.

(H) The revisions of the present Privacy Notice

We regularly review the Privacy Notice, without prior notice but of immediate effect and we will communicate any revision through the means of communication that we have available in our interaction with you. We encourage you to periodically visit the Privacy Notice in order to be informed on how we process your personal data in the context of our (potential) interaction, as described in Section (B) above.

