

Information notice on the processing of personal data for healthcare professionals

1. Legal references

Pursuant to current legislation on the protection of personal data, including Regulation (EU) 2016/679 ("**GDPR**"), as well as national laws such as Belgian Law on the protection of individuals with regard to the processing of personal data of 30 July 2018, Dutch GDPR Implementation Act (*Uitvoeringswet Algemene Verordening gegevensbescherming*) of 16 May 2018 or Luxembourg Law of 1 August 2018 on the organisation of the National Commission for Data Protection and implementation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (collectively referred to as the "**Privacy Legislation**"), **Recordati Industria Chimica e Farmaceutica S.p.A.** ("**Recordati**" or the "**Data Controller**"), provides you in your capacity as a healthcare professional ("**HCP**" or the "**Data Subject**") with the following information on the processing of your personal data collected and processed by Recordati as part of the performance of scientific information activities.

Personal data will be processed in compliance with the Privacy Legislation and the relevant applicable provisions issued by the Data Protection Authority.

2. Who processes your personal data

- **Data Controller:**
The data controller is Recordati BV, with registered office in Brussels, Avenue du Bourgmestre Demunter, 5 Boite 4, 1090 Jette (Belgium), which can be contacted at +32 2 461.01.36.
- **Data Protection Officer** (*hereinafter* referred to as "**DPO**"):
Recordati has appointed a DPO, who can be contacted at the following e-mail address: groupDPO@recordati.com, to whom Data Subjects can address any request regarding the processing of their personal data.
- **Authorised personnel:**
All Recordati employees/collaborators who access, or will access, the personal data of the Data Subject operate/will operate under the direct authority of the Data Controller, and are appointed, pursuant to Article 29 of the GDPR, as persons authorized to process data having received, in this regard, adequate operating instructions.

3. Types of personal data processed

The personal data that will be processed are:

- **personal and identification data of the Data Subject** (name and surname, date of birth, gender, fiscal code, professional title of the Data Subject, registration in the register of doctors);
- **contact details of the Data Subject** (telephone number, e-mail address, address where the Data Subject carries out the professional activity);
- **further information relating to the HCP profile** (such as, by way of example, interests, aptitude and approach in the scientific, technological or research fields, with respect to (i) technological applications and platforms at the service of medicine, (ii) therapeutic behaviours, (iii) the use of digital communication channels and (iv) interests in pharmaceutical products) that Recordati may acquire from the Data Subject during visits and/or interviews with its medical representatives;
- **data relating to the Data Subject's interaction with Recordati** (such as, for example, opening of emails, visualization of medical-scientific content, interactions of the Data Subject with e-mail links and content, duration of the Data Subject's "engagement" on Recordati web pages, participation in webinars, fruition of web content, etc.).

4. The purposes, legal bases of the processing and the period of storage of personal data

Recordati will process the Data Subject's personal data for the following purposes (the "**Purposes**");

Purpose of the processing	Legal basis	Retention period
a) Carry out preparatory steps for scientific information activities on drugs and products marketed by the Recordati Group and related activities (such as, by way of example, the presentation of medicines, the collection of requests and the supply of samples, as well as activities aimed at planning visits, orientation, guidance and monitoring of scientific information activities), in clinics, doctors' offices and hospitals where HCPs carry out their professional activity.	Art. 6, paragraph 1, lett. f) of the GDPR: legitimate interest of the Data Controller to plan and carry out and optimize scientific information activities.	Unless the Data Subject exercises the right to object, personal data will be stored for a period of five (5) years from collection and recording within Recordati's systems.
b) Carry out profiling activities based on the needs, interests and professional characteristics of HCPs in the scientific, technological and/or research fields for (i) internal analysis, management and planning of scientific information activities, and (ii) personalized scientific information communications on the drugs and products marketed by the Recordati Group. In the event of refusal to provide data for personalized scientific information communications or objection to the processing, we inform you that the HCP may still receive general medical and scientific information and content from Recordati.	Art. 6 (1) (f) GDPR: legitimate interest of the Data Controller to plan and carry out targeted and personalized scientific information activities in favour of HCPs in order to improve their effectiveness.	Unless the Data Subject exercises the right to object, personal data will be stored for a period of five (5) years from collection and recording within Recordati's systems.
c) To send scientific information communications on drugs and products marketed by the Recordati Group through e-mail or other digital or non-digital tools (including sending invitations to participate in congresses, conferences or medical-scientific meetings, webinars and training events organized or sponsored by Recordati).	Art. 6 (1) (a) GDPR: explicit consent of the Data Subject.	Personal data will be stored until the Data Subject exercises the right to withdraw the consent given, which may take place at any time by contacting the Data Controller and/or the DPO and, in any case, for a period of five (5) years from the moment of expression of consent.

The provision of personal data processed for the purposes indicated above is optional. In the event of refusal to provide your data, objection to processing or withdrawal of the consent previously given, Recordati will not be able to carry out the scientific information activities towards the HCP or the communications, as described above.

At the end of the storage periods identified above, the personal data of the Data Subjects will be deleted, unless there are further legitimate interests of the Data Controller and/or legal obligations that make their storage necessary, subject to minimization.

The Data Controller also informs the Data Subject that at the time of collection and on the occasion of sending each communication made for the pursuit of the aforementioned Purpose, he/she has the possibility to: (i) **withdraw**, at any time, any consent given, it being understood that the withdrawal of consent does not affect the lawfulness of the processing based on consent before the withdrawal; (ii) **object** to the processing of their personal data based on the legitimate interest of the Company, in the manner better described in point 9 below.

If the Company intends to use the personal data for any other purpose that is incompatible with the Purposes for which they were originally collected or authorised, the Company will inform the Data Subject in advance and, where required, request specific consent for such processing activity.

5. Profiling

The Data Controller informs the Data Subjects that, with reference to the Purpose referred to in Paragraph 4 letter b) above (i.e. profiling activities), this activity has the sole purpose of identifying, on the basis of specific parameters identified by Recordati, in a precise and effective manner the professional and scientific profiles of the Data Subjects, as well as their specific professional needs so as to allow the same to optimize the performance of the activity of scientific information and the distribution of its contents.

Through profiling, the Company intends to avoid the forwarding of mass medical-scientific communications and *spamming* to Data Subjects and to encourage a personalized communication system that is more relevant and adherent to the needs, interests and professional characteristics of the Data Subjects, which, moreover, will also indirectly benefit the patients of the individual Data Subjects.

In any case, the profiling mentioned above:

- will not take place on the basis of an automated decision-making process from which legal or similarly significant effects derive for the Data Subjects pursuant to art. 22 of the GDPR;
- will not affect the rights of the Data Subjects;
- will not have any prolonged and permanent impact for Data Subjects, considering that the personal data collected by the Company through its medical representatives are periodically updated.

Furthermore, considering that the processing in question is based on the legitimate interest of the Data Controller, the Data Controller guarantees that it has previously carried out an assessment aimed at ensuring the proportionality of the processing so that the rights and freedoms of the Data Subjects are not prejudiced, taking into account their reasonable expectations in relation to the specific processing activity carried out (so-called "*Legitimate Interest Assessment*" or "**LIA**").

Data Subjects may request **further information on the LIA** referred to above, by contacting the Data Controller or the DPO at the addresses indicated below.

This is without prejudice to the right of the Data Subject to object to the performance of profiling activities at any time, in accordance with the procedures better described in point 9 below.

6. Processing methods

In relation to the Purposes listed above, the processing of personal data will consist of some of the activities indicated in Article 4, paragraph 1, no. 2) of the GDPR, namely: collection, recording, organization, consultation, processing, cancellation and destruction of personal data.

The processing of personal data will be based on the principles of lawfulness, fairness, transparency, proportionality and minimization and will be carried out both on paper and electronically, and will take place through suitable tools, as far as reasonable and state-of-the-art, to guarantee security and confidentiality through the use of appropriate procedures that avoid the risk of loss, unauthorized access, unlawful use and dissemination of data.

7. Recipients

The Data Controller informs the Data Subjects that their personal data may be communicated or made accessible for the pursuit of the Purposes to additional recipients or categories of recipients, as independent data controllers or, where necessary, data processors specifically selected and appointed pursuant to Article 28 of the GDPR, which include:

- suppliers of platforms for customer *relationship management* (CRM) and related technical assistance and maintenance services;
- communication agencies and/or event organization;
- competent authorities by virtue of legal provisions or regulations or European Union legislation;
- Recordati SpA, as administrator of the CRM platform in use by the Recordati Group.

The complete list of recipients, including more details on their headquarters, is kept at the Data Controller's registered office and can be consulted upon request to be sent to the addresses indicated in the epigraph of this policy.

In any case, the personal data of the Data Subjects will not be disseminated.

8. Transfer of Data abroad

The Data will not be transferred outside the European Economic Area.

If in the future transfer of the Personal Data outside of the European Economic Area occurs, Recordati will comply with the guarantees provided for by the Privacy Legislation and, in particular, pursuant to art. 44 – 49 of the GDPR.

The Data Subject can contact the DPO as described in point 9 to obtain information about the specific safeguards that will be implemented for transfers of his/her Personal Data outside the EU.

9. The rights of the Data Subject

The Data Controller informs the Data Subject that, in accordance with the law, he/she will always have the right to withdraw his/her consent at any time, if given, as well as to exercise, at any time, the following rights (collectively, the "**Rights**"):

- a) the "**right to access**" and specifically to obtain confirmation of the existence or otherwise of Personal Data concerning him/her and their communication in intelligible form;
- b) the "**right to rectification**", i.e. the right to request the rectification or, if interested, the integration of personal data;
- c) the "**right to erasure**", i.e. the right to request the erasure or, transformation into anonymous form of personal data processed in violation of the law, including those whose retention is not necessary in relation to the Purposes for which the personal data were collected or subsequently processed;
- d) the "**right to restriction of processing**", i.e. the right to obtain from the Data Controller the limitation of processing in certain cases provided for under 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;
 - to the processing of personal data carried out by the Data Controller for marketing or profiling purposes.

In the above cases, where necessary, the Data Controller will inform the third parties to whom the Data Subject's personal data are communicated of the possible exercise of the rights, except in specific cases in which this is not possible or is too burdensome and, in any case, in accordance with the provisions of the Privacy Legislation.

It is expressly understood, as provided for in Article 21 of the GDPR, that in the event of the exercise of the right to object by the Data Subject, the Data Controller will refrain from further processing the personal data unless the Data Controller demonstrates the existence of compelling legitimate reasons for proceeding with the processing that prevail over the interests, rights and freedoms of the Data Subject or for the ascertainment, the exercise or defence of a right in court. Where the Data Subject objects to processing for direct marketing purposes, the Data Controller will no longer process Personal Data for such purposes.

The exercise of the foregoing rights is not subject to any formal constraint and is free of charge. The Company may possibly require Data Subjects to verify their identity before taking further action following the request to exercise the rights referred to above.

In any case, as provided for by Article 38 of the GDPR, the Data Subject may freely contact the DPO for all matters relating to the processing of his/her personal data and/or if he/she wishes to exercise his/her Rights:

- by ordinary mail, to the address of the registered office of Recordati BV., with registered office in Brussels, Avenue du Bourgmestre Demunter, 5 Boite 4, 1090 Jette (Belgium);
- by phone, to the number of Recordati BV: +32 2 461.01.36;
- by e-mail to the DPO: groupDPO@recordati.com.

10. Complaint

The Data Controller informs the Data Subject that, pursuant to the Privacy Legislation, he/she has the right to lodge a complaint with the competent Supervisory Authority (in particular in the Member State of his/her habitual residence, place of work or place of the alleged violation), if he/she is of the opinion that his/her personal data are processed in such a way as to involve violations of the GDPR. In addition, the Data Subject may contact the competent Supervisory Authority if the exercise of his/her rights is subject to delay, limitation or exclusion by the Data Controller. The contact details of the Belgian, Dutch and Luxembourg data protection authority can be found here:

- For Belgium: Autorité de protection des données / Gegevensbeschermingsautoriteit; Rue de la Presse 35, 1000 Brussels, Belgium; contact@apd-gba.be; [Klacht indienen | Gegevensbeschermingsautoriteit](#);
- For the Netherlands: Autoriteit Persoonsgegevens, Hoge Nieuwstraat 8, 2514 EL The Hague, the Netherlands; [Een tip of klacht indienen bij de AP | Autoriteit Persoonsgegevens](#);
- For Luxembourg: Commission nationale pour la protection des données, Service des réclamations, 15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg; [Complaint form - Individuals - National Data Protection Commission - Luxembourg](#).

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

11. Update and revision

This information notice may be subject to amendments and additions. We will always endeavour to draw your attention to any material changes to our data processing practices and policies.