

# Information Notice on Personal Data Processing and Protection

## 1. Introduction; data controller and its contact details

The company **Chiesi Slovakia s.r.o.**, CIN: 35 871 105, having its registered office at: Šulekova 14, ZIP 811 06 Bratislava, incorporated in OR SR Bratislava 1, file no. 30187/B (hereinafter the “*Company*”), as a **personal data controller**, respects the privacy of individuals and honours the personal data protection. For the above reason, by this notice it wishes to inform the doctors, patients, job seekers and other data subjects about how the Company handles their personal data in its activities, in particular what data are being processed and for what purposes. The Company notifies that only natural persons whose personal data are being processed have the status of data subjects (hereinafter referred to as the “*Data Subjects*”).

**Should any doctor, patient, job seeker or some other Data Subject have any questions regarding this information notice or regarding the collection, processing or protection of his/her personal data, s/he may contact the Company at the e-mail address [office.sk@chiesi.com](mailto:office.sk@chiesi.com) or at the correspondence address of the Company’s registered office.**

## 2. Processed Personal Data and Processing Purpose

The provided, or possibly subsequently generated, personal data are being processed and used solely in accordance with the purpose set forth in this information notice on the processing and protection of personal data.

### ***Doctors***

The Company processes the personal data of doctors primarily for the purposes and in connection with the provision of services within the framework of its business processes (management of visits by the Company’s representatives and keeping records on doctors in the Company’s system), or possibly for the purposes of complying with the associated legal requirements. The above processing of personal data constitutes a legitimate interest of the Company. For these purposes, the Company processes personal data of doctors to the extent of their name and surname, contact details, specialisation and possibly other relevant data.

Furthermore, the Company collects and processes personal data about doctors for the purposes of attendance by doctors at congresses, conferences, off-site meetings or some other marketing events organised by the Company, at which event the doctors are usually provided with accommodation and other services at the destinations. When processing personal data of doctors for the purposes of organising congresses or other marketing events, the processing of personal data takes place on the basis of the consent to the processing of personal data given for this purpose by the individual doctors. For the above purpose, the Company processes personal data of doctors to the extent as per the given consent (in particular, name and surname, date of birth, permanent residence, contact details, etc.).

### ***Patients***

The Company processes the personal data of patients who reported to the Company any adverse drug reactions after using any of the Company’s medicinal products. These personal data are reported by patients in person directly during a phone call or by email. In the course of a phone call or in the email correspondence they are informed on how such provided personal data are handled further. For these purposes, the Company usually processes the personal data of patients to the extent of their name, surname, used medicinal product, description of undesirable or side effects, description of quality complaint etc.

The personal data that are previously anonymised are then transferred in a secured manner to the central collection point within the Company’s parent organisation. The personal data that were sent by e-mail in

the manner described above are immediately discarded after being processed. When acquiring these data by phone, there is no registration or recording taking place within our telephone systems.

The anonymisation principle is applied with NIS-IIT studies or with other studies initiated by Chiesi. If anonymisation is not possible, pseudonymisation is used, and this by adding the applicable article to the contracts with the NIS-IIT-HCP participants or with service providers.

### ***Job seekers***

In connection with recruiting new employees, the Company processes the personal data of job seekers obtained from their CVs and, possibly, within the subsequent recruitment process, and this only for the purposes of eventual conclusion of an employment contract with the applicant and fulfilment of the Company's statutory obligations as a potential employer.

The processed personal data of job seekers include, in particular, their first name, surname, date and place of birth, permanent/temporary residence, contact address, phone number, email address, other personal data included in their CVs (e.g. education, knowledge of foreign languages, expertise and skills, job history and possibly a photo of the job seeker).

### ***Website visitors***

The visitors to these websites (hereinafter the "*Visitors*") do not have to enter any personal data if they wish to use these websites. If the Visitors choose to voluntarily enter their personal data, then the Company's websites collect the entered personal information. The Company will use such data only for the purposes specified therein, where the personal data are provided. If it is in the interest of the Visitors to the Company's website, the Company may use such information to contact the Visitors or to better identify the needs of Visitors and, subsequently, to improve the Company's services.

### ***Suppliers***

If the Company cooperates with suppliers for the purposes of pursuing its activities, then in this respect there occurs the processing of the provided, or later generated, personal data of suppliers (natural persons) and the representatives of suppliers, and this only for the purposes of due performance of contracts with the suppliers and fulfilment of the associated statutory obligations as a client and a taxable entity.

The personal data processed with respect to suppliers and their representatives include, in particular, their first name, surname and contact details (phone number, e-mail address), and with suppliers also the date of birth, address of permanent residence, address of registered office, CIN, TIN, bank account numbers and the data on accepted and provided performances.

### ***General information***

The Company **processes just a minimum of the so-called sensitive data per year**. These are the data relating to medical condition of patients when reporting the so-called adverse reactions. **The Company neither processes any other sensitive personal data**, such as data on racial or ethnic origin, political opinions, religion or philosophical beliefs or membership in trade unions, and also any genetic data, biometric data for the purposes of unique identification of a natural person or on sexual life or sexual orientation of a natural person, **with the exception** of the aforementioned personal **data on the medical condition in the event of reporting adverse reactions** and also in the **occupational medical area** (e.g. in connection with the initial medical examination or medical opinions on the capacity to perform a particular job or on work accidents or occupational diseases).

## **3. Rights of Data Subjects**

The doctors, patients, suppliers of the Company, persons seeking employment in the Company, or possibly

other Data Subjects, hereby acknowledge that the **provision of personal data** to the Company is **voluntary**. Nevertheless, such provision is usually necessary for concluding a contract with a supplier/job seeker and for the fulfilment thereof or for other aforementioned purposes. In case of failing to provide personal data, it is not possible for the Company to perform under the applicable contract or to implement the activity for the Data Subject.

The Data Subjects enjoy the following rights regarding their personal data:

- the right to access their personal data and the right to obtain information about the processing of their personal data that do not result from this information notice;
- the right to require from the Company, as a personal data controller:
  - to correct any inaccurate and supplement any incomplete personal data;
  - to erase personal data in specified cases, for instance on grounds of having been processed in conflict with legal regulations or being no longer necessary for the Company;
  - to limit the processing of personal data of Data Subjects (i.e., so that the Company, in principle, only stores the personal data and does not process them in any manner) in specified cases, i.e. on grounds that they were processed in violation of legal regulations, or if a Data Subject objects their inaccuracy, or if the Company does not need them but the Data Subject requests them;
- the right to transferability of personal data provided by Data Subjects to the Company, and which are processed by the Company in an automated manner, that is to obtain such personal data, or possibly their transfer to another controller in a structured, commonly used and machine-readable format;
- the right to file a complaint with the supervisory authority, such as the Office for Personal Data Protection of the Slovak Republic, provided that they find or believe that the processing of their personal data is taking place in violation of legal regulations;
- in cases where the processing of personal data is based on the consent of a Data Subject, the right to withdraw such consent at any time, without prejudice to the lawfulness of the earlier processing implemented prior to the consent withdrawal;
- in case of personal data processing on grounds of legitimate interests of the Company (e.g. management of visits by the representatives to the doctors and keeping records on doctors), the right to object to such processing.

In order to exercise all of the above rights, as well as any questions and complaints concerning the processing of personal data, the Data Subjects may contact the Company at the email address [office.sk@chiesi.com](mailto:office.sk@chiesi.com) or at the correspondence address of the Company's registered office.

#### **4. Personal data storage place and introduced appropriate technical and organisational measures**

The Company maintains the appropriate administrative, technical and physical safeguards to protect the personal data against any accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access thereto, misuse or any other unlawful form of personal data processing.

The personal data are stored in an electronic form in a controlled and protected environment, protected by the state-of-the-art hardware and software data protection systems and/or in a printed form with maximum protection against access by unauthorised persons.

#### **5. Period, for which the personal data are kept**

The Company uses and keeps the personal data for a period necessary to meet the purposes set forth in this information notice. When the Company no longer needs the personal data acquired for these purposes, then such personal data are deleted, with the exception of personal data that must be archived by law.

The personal data of unsuccessful candidates are stored for a short period of time for the purposes of possibly subsequently approaching the candidate, however no longer than one year after sending the CV or completing the recruitment process, after which period they are shredded or otherwise disposed of. However, the Company reserves the right to retain the result of the recruitment process, and the reason for the result, for more than one year with a potential employee.

## **6. Provision of personal data to third parties**

The personal data collected by the Company about a Data Subject are not disclosed further to any third parties, except in cases described in this information notice or in cases where the Company explicitly informs the Data Subject about such fact in a different manner.

The Company may possibly share the personal data of doctors with its partners (e.g. with an agency, hotel or other accommodation institution, transport company, event organiser), if it is necessary for organising a given event, and this in relation to the purposes described in this information notice.

An IT service provider (management of IT systems) or possibly a supplier of selected software may have random access to certain personal data.

Likewise, the Company provides the personal data to state and other public authorities:

- (i) if required by law;
- (ii) in a response to the requests by courts, law enforcement bodies or other public authorities; or
- (iii) if the Company believes that such provision is necessary to prevent physical harm, damage or financial loss.

In this regard, the Company declares that it carefully selects its suppliers, subcontractors and other contractual partners, only transferring personal data to reliable partners and to the extent necessary. Moreover, it requires from personal data processors that they process any personal data solely in accordance with the Company's instructions and if it is necessary for the provision of services or fulfilment of legal requirements. Likewise, the Company requires them to take appropriate measures to protect the security and confidentiality of personal data.

## **7. Information notice updating**

This information notice may be updated at any time as a result of changes to the Company's procedures governing the processing and protection of personal data. The Company shall place a notice on its websites informing the Data Subjects about all significant changes to this information notice.