
Information pursuant to Article 13 of the GDPR on the processing of personal data for healthcare professionals

Pursuant to the legislation on the protection of personal data, including Regulation (EU) 2016/679 ("GDPR"), as well as Legislative Decree 196/2003 as amended by Legislative Decree 101/2018 (the "Privacy Code"), Recordati Industria Chimica e Farmaceutica S.p.A. ("Recordati", or also the "Data Controller"), has drawn up this document (the "Notice") to describe how it will process personal data in the context of the relationship with healthcare professionals (the "Data Subjects") with whom it comes into contact.

1. Data Controller and Data Protection Officer

The data controller is Recordati Industria Chimica e Farmaceutica S.p.A., with registered office in Milan, Via Matteo Civitali 1, a company of the Recordati Group.

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 Data that will be processed are:

- i) personal and identification data (name, surname, date of birth);
- ii) data relating to the profession (job title, address where the professional activity is carried out);
- iii) contact details (e-mail, telephone number);
- iv) data relating to the interests expressed, as well as any additional information that you may provide during visits and medical-scientific information (such as, by way of example, interests in the scientific, technological or research fields, interests in technological applications and platforms at the service of medicine, interests in the use of digital communication channels, interests in pharmaceutical products).

3. Purpose of processing and legal basis

Your personal data will be collected, processed and used for the following purposes; next to each of them, we indicate the legal bases on which the processing is based:

Purpose of processing	Legal basis for the processing
a) To carry out scientific information activities on the drugs and products marketed by Recordati and related activities (such as, for example, the presentation of drugs, the collection of requests and the supply of samples, as well as activities aimed at planning and monitoring visits)	Execution of a request by the Data Subject or pre-contractual measures taken at the request of the Data Subject
b) To carry out scientific information activities (such as, for example, presentation of drugs, sharing of medical or educational content, provide updates on our products, services, events, etc.) through e-mail, Microsoft Teams or other digital or web-based communication tools (including sending invitations to participate in congresses, conferences or medical-scientific meetings organized or sponsored by Recordati)	Consent of the Data Subject expressed through the form below.
c) To carry out profiling activities aimed at improving the medical-scientific information promoted by Recordati through the visits of medical-scientific representatives and/or the sending of communications in line with the interests expressed by the Data Subjects and the indication of scientific events that may be of interest to them.	Consent of the Data Subject expressed through the form below.
d) To communicate the personal data to other companies	Consent of the Data Subject expressed through the form below.

belonging to the Recordati Group¹ for the performance of their own medical, scientific and promotional information purposes on the products marketed by the Recordati Group. We will share your data only with the relevant entity of the country where you reside.

The provision of data for the purposes referred to in letter a) is mandatory; in failure, indeed, it will not be possible to receive the requested scientific information. On the other hand, the provision of data for the additional purposes indicated above (letters b)-d)) is optional; failure to do so will have no effect on your request for scientific information.

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 purposes described above will be kept for the entire duration of the relationship with you. Your data will also be deleted in the event of the exercise of the right of objection or erasure, which can be done at any time by contacting the Data Controller or the DPO at the addresses indicated above. When the processing is based on your consent, your data will be processed until you withdraw your consent.

5. Communication and transfer of data

Your personal data may be accessed by Recordati's 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 suppliers of technical 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, such as communication agencies, suppliers of CRM tools and companies that provide technical support services for these tools. The complete list of recipients is available upon request to the Data Controller.

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 not be transferred outside the European Economic Area². If, in the future, Recordati intends to transfer your personal data outside the European Economic Area, this transfer will take place in compliance with the conditions set out in current legislation.

6. Rights of the Data Subject

The Data Controller informs you that you will always have the right to withdraw your consent at any time, as well as to 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 of the existence or otherwise of personal data concerning you;
- 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 erasure, the transformation into anonymous form of 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 restriction of processing in certain cases provided for pursuant to the privacy legislation;

¹ The list of companies of the Recordati Group to whom we may share your personal data is available at this [link](#). We will share your data only with the relevant entity of the country where you reside. We will not transfer your data outside of the EU/EEA.

² The European Economic Area (EEA) consists of Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Republic of Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden.

- 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:
 - 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.

The exercise of the above rights is not subject to any formal constraint and is free of charge. Recordati 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 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 \(europa.eu\)](#). If you wish to lodge a complaint with the competent supervisory authority for the Italian territory, the complaint form is available at the following link: [Complaints](#).

Date _____

Signature _____