

GENERAL INFORMATION NOTICE ABOUT DATA PROTECTION

Rev. No. 4 dated 28/12/2022

E-Pharma Trento Spa (herein after "Data Controller") has applied corporate Procedures and Policies in line with the General Data Protection Regulation of the European Union (GDPR- Reg. EU 2016/679), so as to allow the application of high safety standards and rules aimed at ensuring the correct processing of personal data.

1. **Data Controller** is E-PHARMA TRENTO Spa with registered office in Trento (Trento), Italy, via Provina 2 (herein after "Data Controller"). Any request for information about personal data protection must be sent to the registered office of the Data Controller or to the e-mail address privacy@e-pharma.com
The Data Protection Officer can be contacted at the following address: dpo@e-pharma.com

2. **Purposes of the processing.** The following table lists the processing purposes, next to which are indicated the legal bases for processing.

Processing purpose	Legal basis for processing
Supply of pharmaceutical and dietary services and products	Processing is required for the performance of a contract of which the data subject is a party, or for the execution of pre-contractual measures adopted at the data subject's request (Art. 6 paragraph 1 letter b))
Updates on products and features of production processes	Processing is required for the performance of a contract of which the data subject is a party, or for the execution of pre-contractual measures adopted at the data subject's request (Art. 6 paragraph 1 letter b))
User remarks and requests regarding manufactured products	Processing is required to fulfill a legal obligation (pharmaco-vigilance and/or adverse reactions surveillance - Art. 6 paragraph 1 letter c))
Invoicing	Processing is required for the performance of a contract of which the data subject is a party and to fulfill a legal obligation (Art. 6 paragraph 1 letter c))
Credit collection and transfer	Processing is required to pursue the legitimate interests of the Data Controller, consisting in the safeguarding of its credit (Art. 6 paragraph 1 letter f))
Prevention of fraud, including computer fraud	Processing is required to pursue the legitimate interests of the Data Controller, consisting in its protection against fraudulent operations, even put in place by third parties (Art. 6 paragraph 1 letter f))
Management of visitor access and traffic inside the areas of pertinence of E-Pharma Trento Spa	Processing is required to pursue the legitimate interests of the Data Controller with special reference to the safeguarding of the asset, control of access to the headquarters, detection of permanence inside the headquarters for the identification of the people present and for the handling of emergency situations. (Art. 6 paragraph 1 letters f) and c))
Commercial initiatives for the acquisition of new clients or suppliers	Consent

3. Processing method

The data shall be processed in writing and/or in magnetic, electronic or telematic form. Data supply is not compulsory, but a non-supply may result in the impossibility of meeting contractual obligations and/or data subject's requests.

4. Personal data recipients

Without prejudice to any notifications and dissemination performed in order to fulfill legal obligations, including for the purpose of protecting credit and for the better safeguarding of our rights in each business relationship, only for the purposes related to contractual obligations and/or to meet your requests, your data may be disclosed to:

- our business intermediaries
- banks
- trade information companies
- professionals and consultants
- enterprises operating in the transport sector
- Board of Auditors
- Supervisory Body
- Controlling company and subsidiaries

For the purposes of pharmaco-vigilance and/or adverse reactions surveillance, the data may also be communicated to:

- European Medicines Agency and health authorities of competence
- licensors and licensees
- suppliers of services supporting E-Pharma in its obligations and in the procedures relating to pharmaco-vigilance
- other recipients envisaged by applicable law.

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Socio Unico – Reg. Impr. di Trento 01420070227
Società del gruppo Unifarm soggetta a direzione e coordinamento ex-Art. 2497 c.c.



5. **Data storage.** The data shall be stored for the amount of time indicated in the following table:

Categories	Duration
Clients and Suppliers	10 years
Potential clients (Prospect)	As per the terms of the law for the type of activity, and anyhow until consent revocation, or until the right to object is exercised
Client data for marketing purposes	As per the terms of the law for the type of activity, and anyhow until consent revocation, or until the right to object is exercised
Data of final user clients, for the purposes of pharmaco-vigilance and/or adverse reactions surveillance	For the entire time that the product subject to pharmaco-vigilance is authorized and for at least 10 years after termination of the authorization for its marketing, unless European Union law or national law require longer storage periods
Personal data of Visitors	No more than 30 days after leaving E-Pharma Trento Spa premises

6. Video surveillance

In accordance with the General Provision by the Video Surveillance Authority dated 8/4/2010, we hereby inform you that the Company has installed a video surveillance system at its headquarters.

The video surveillance system is designed to protect corporate assets; video images collected can be used to prevent, deter and prosecute criminal events. Any personal data collected and processed through the video surveillance system consist of images of people and things that transit within the range of operation of such systems, that have been installed in the immediate vicinity of the entrances, both inside and outside the building, as notified by appropriate signage. Images are recorded and stored by personnel appointed by the Data Controller and can only be viewed by the latter, and by the Data Processor, as well as by Judicial or Police authorities.

All images collected will be processed in compliance with the principles of lawfulness, fairness and transparency, as provided by law, and in such a manner as to guarantee their safety and to protect the privacy of any person concerned. Once collected, images are stored for 48 hours and then deleted, except for special requirements related to holidays or Company closure, or in case of specific requests by the Judicial or Police authorities. The system operates 24/7.

7. Transfer of data

For pharmaco-vigilance and/or adverse reactions surveillance purposes, your data may be transferred to countries outside the European Union, including countries whose laws do not offer the same level of privacy protection for personal data as European law. Where possible, we will ensure that transferred data are protected by appropriate safeguards prescribed by EU privacy laws, such as ensuring that recipients enter into standard contractual clauses or enroll in an EU Commission-approved data freedom program. However, when, under applicable EU regulations, data must be disclosed to non-EU authorities responsible for monitoring the safety of medicines or supplements, we may not be able to put such safeguards in place. In that case, such non-EU authorities will process the data in line with the applicable laws in their jurisdiction, which means that you may not have the right to access and control the data disclosed to those authorities that you would enjoy under EU law. In any case, we assure you that disclosure to such non-EU authorities will be in line with EU data protection principles, including the principle of data minimisation, and will be limited, where possible, to data that does not directly identify you.

8. Exercise of the rights of the data subject

As regards the data, individuals may exercise the rights envisaged in Chapter III, articles from 12 to 23, of European Regulation No. 679/2016. Following are the rights indicated in articles 15 and 16 of European Regulation No. 679/2016, which may be exercised by the data subject:

- The data subject has the right to obtain from the Data Controller confirmation as to whether or not data concerning him or her are being processed and, where that is the case, access to the personal data and reception of the following information:
 - the purposes of the processing;
 - the categories of personal data concerned;
 - the recipients or categories of recipient to whom the personal data have been or will be disclosed, and in particular recipients in third countries or international organizations;
 - where possible, the envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period;
 - the existence of the right to request from the Data Controller the rectification or erasure of personal data or the restriction of their processing or to object to their processing;
 - the right to lodge a complaint with a supervisory authority.
- The Data Controller shall provide a copy of the personal data undergoing processing, at the request of the data subject. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.
- The data subject has the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the data processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

4. The data subject has the right to obtain from the Data Controller the erasure of personal data concerning him or her without undue delay when:

- a) The personal data are no longer necessary in relation to the purposes for which they were collected;
- b) The personal data have been unlawfully processed;
- c) The personal data have to be erased for compliance with a legal obligation in the Union or Member State law to which the Data Controller is subject.

Paragraph 4 shall not apply to the extent that processing is necessary for the establishment, exercise or defence of legal claims.

5. Where the legal basis for data processing is based on consent, the data subject has the right to withdraw his or her consent at any time without affecting the lawfulness of processing based on the consent given before withdrawal.

The above rights may be exercised by writing to the contacts given in the paragraph 'Data Controller'.