

# Privacy Policy

(Last updated: June 7, 2023)

Chemical Works of Gedeon Richter Plc. (seat: 1103 Budapest, Gyömrői út 19-21., Hungary; Company Registration Number: Cg.01-10-040944; data protection officer (hereinafter "DPO"): Dr. Zsófia Szántó; DPO's email address: dataprotection@richter.hu; hereinafter "we", "us" or "Company") is committed to protecting the privacy of individuals. This privacy notice (hereinafter "Privacy Notice") informs you about the processing of the personal data collected by us from the users, subscribers, visitors (hereinafter collectively "Data Subjects") of our website's (hereinafter "Website") services (hereinafter "Services"). This Website is reserved for healthcare professionals in accordance with the Terms of Use. Data Subjects below the age 16 (hereinafter "Minors") are not eligible to use the Services and we ask that minors do not submit any personal data to the Company.

Please read this Privacy Notice in conjunction with our general Terms of Use and Cookie Notice.

We may revise the Privacy Notice at any time by updating this posting and we will obtain your consent to the changes when necessary. You can determine when the Privacy Notice was last revised by referring to the "Last updated" legend at the top of this Privacy Notice.

## 1. WHO WILL BE THE DATA CONTROLLER?

The data controller is the Company. Your data will be processed by the Company in compliance with 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 or "GDPR"), and the national data protection laws of Hungary applicable to this Website, including but not limited to Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information.

## 2. OVERVIEW OF DATA PROCESSING ACTIVITIES

Processing purpose	Personal data	Legal basis	Retention period
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## 3. WHAT IS THE PURPOSE OF DATA PROCESSING?

We handle personal data in accordance with the data processing purposes set out in Section 2.

We may also process your personal data for purposes previously communicated to you from time to time, as long as such other purposes are directly relating to and compatible with the purposes indicated in this Privacy Notice and the Cookie Notice.

## 4. WHAT IS THE LEGAL BASIS OF DATA PROCESSING?

We rely on your consent for carrying out your requests (2. A.), registering you as a healthcare professional (2. B.) and for sending personalized communications and newsletters and to provide information about our products, (2. D.). You have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Failure to provide the requested personal data may result in us being unable to provide to you our Services. Wherever we rely on your consent for processing personal data, we will separately seek your consent to such data processing activities.

In relation to adverse effect notifications (2. C.), the legal basis of data processing is our legal requirement to comply with European and national pharmacovigilance laws.

Personal data will also be processed to the extent this is required to pursue our legitimate interests as a data controller (e.g. to protect against and to prevent fraud (2. E.), to manage our professional relations (2. G.), to handle complaints and enforce our terms and conditions (2. F.)). If the legal basis for processing your personal data is legitimate interest, you have the right to object to the data processing (see Section 12 for more details).

## **5. WHAT PERSONAL DATA MAY WE COLLECT?**

In the course of our activities and for the purposes indicated above, we may process (collect) the following personal data of Data Subjects.

- Language preferences. This information allows us sending communications to you in languages you understand.
- Email address. This information allows us to identify you and sending communications to you, including direct marketing messages (if you consent to receiving such communications). We also use your email when asking for feedback in respect of the quality of provision of our Services or provide you with customer support.
- General usage information. Information that informs us on how you use our Services when you use our Website, including IP address, time of visit, visited pages, on-page interactions, limited detail location information, device and software of the user, first-time or repeated visits, traffic source information. We use this information to improve our Services to you, as well as to identify improvement areas of the quality of our Services.

Our Services are not aimed at collecting sensitive personal data from Data Subjects, other than adverse reactions information (health data) for pharmacovigilance purposes.

## **6. DO WE USE COOKIES?**

Our Website may use cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you are browsing our Website and also allows us to improve our Website.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

For more information regarding the use of cookies on our Website, please read our separate Cookie Notice here <https://goldumbrellas.com/docs/cookie-policy.pdf>

## **7. WHERE IS THE INFORMATION STORED AND WHO WILL SEE THE INFORMATION?**

The personal data collected from you as Data Subject will be handled by our employees, kept confidential and used by us for lawful and relevant purposes for providing our services to you. Only those authorized persons and departments within the Company will have access to your personal data who have an essential need to know that data for the fulfilment of their activities. We will not disclose any of your personal data to third parties, any external bodies or organizations, except as set out below, or unless you consent to data transfer or the data transfer is required or permitted by law.

In case of information provided in the course of adverse reaction notification, we will disclose that information to the EudraVigilance system of the European Medicines Agency (seat: Domenico Scarlattilaan 6, 1083 HS Amsterdam, The Netherlands; website: <https://www.ema.europa.eu/>; phone: +31(0)88 781 6000), and local regulatory authorities will access adverse reaction notifications, who will process personal or other data connected to adverse event as sole data controllers besides the Company based on legal obligations addressed to these competent authorities.

We may engage third party vendors as data processors (hereinafter “Data Processor”) to provide services to us, and share your personal data with such third parties as well as with legal and other advisors, consultants that assist us. Nonetheless, in such a case, we always ensure confidentiality of your personal data, for example by concluding a confidentiality and non- disclosure agreement.

Such third party vendor Data Processors we employ are:

Name of Data Processor: KMAK Kelet-Magyarországi Adatközpont Kft.

Contact details Seat: 5000 Szolnok, Szapáry utca 20. 3/6

Website: <https://www.kmak.hu>

Email: [info@kmak.hu](mailto:info@kmak.hu)

Phone: +3615566368

Responsible for data protection issues:

Data protection officer (DPO): We haven't appointed yet.

Operational Director: Sándor Hamari, [sandor.hamari@kmak.hu](mailto:sandor.hamari@kmak.hu)

## **8. HOW LONG WILL PERSONAL DATA BE RETAINED?**

We keep personal data for no longer than is necessary for us to fulfil the purposes for which such personal data was processed (collected) unless we are specifically required to process personal data longer by applicable laws. Please refer to Section 2 for specific details of retention periods of the particular data processing activities.

We will delete and erase personal data if

- (i) you withdraw consent on which the data processing is based and there is no other legal ground for the processing;
- (ii) if you object to the data processing and there are no overriding legitimate grounds for the data processing, or you object to the processing for purposes of direct marketing;
- (iii) the personal data have been unlawfully processed; and

(iv) the personal data have to be erased for compliance with a legal obligation to which the Company is subject.

Deletion shall not apply to the extent that processing is necessary for compliance with a legal obligation which requires data processing by the Company or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company (if any); for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or for the establishment, exercise or defense of legal claims of the Company.

In case of registrations or subscriptions of healthcare professionals with our Website that have not been confirmed, we store the personal data for a period of fifteen (15) days. In case of completed registrations or subscriptions, we store your personal data and maintain your account with us until you withdraw your consent to data processing or you request that we delete your personal data or you unsubscribe from our newsletters or other direct marketing communications.

## **9. DO INTERNATIONAL DATA TRANSFERS OCCUR?**

We do not transfer your personal data to a country or territory outside the European Economic Area.

## **10. HOW DO WE ENSURE DATA INTEGRITY?**

All practicable and reasonable steps will be taken to ensure that personal data held by us is accurate. Please, keep your personal data up to date, and to inform us of any changes to such personal data you provide to us.

## **11. HOW DO WE PROTECT PERSONAL DATA?**

We will take all necessary steps to ensure security of the personal data and to avoid unauthorized or accidental access, collection, use, disclosure, copying, modification, disposal, erasure or other unauthorized use. Please note that electronic transmission of information cannot be entirely secure. We use Secure Sockets Layer (“SSL”) and password encryption in order to protect the security of information that we process. Please also note that you have the affirmative duty to keep your password information safe and not to share this data with third persons.

Any information we receive about possible adverse events related to our products, will only be accessible to a restricted number of personnel who are in the need of having access to such data in order to perform their employment duties with such data, and the data are protected by appropriate technical and organizational measures.

## **12. WHAT ARE YOUR RIGHTS AND REMEDIES?**

You have the right to have incomplete, incorrect inappropriate or outdated personal data corrected. If you believe any of the personal data we hold about you is incomplete, incorrect or outdated, you can contact us and we will make the necessary corrections within one month. All practicable and reasonable steps will be taken to ensure that personal data held by us is accurate. We will restrict the processing of your personal data if you dispute its accuracy until such claim cannot be verified beyond doubt.

You may request that we delete your personal data, but we may be required by law to keep such information and not delete it (or to restrict processing of this information for a certain time), in which case we will comply with the deletion request only after having fulfilled such requirements.

We will either delete your personal data permanently or inform you of our legal basis for keeping the personal data within one month.

You have the right to be informed whether your personal data is being processed, what personal data, on what legal basis, for what purpose and period of time, from which source is processed about you, and to whom, when, under which legal basis, was your personal data transferred, and whether the Company applies automated decision-making or profiling and the logic of profiling. At your request, the Company shall make available a copy of the processed personal data free of charge for the first time; and charging a reasonable fee based on administrative costs in case of further copies. We will respond to such request for access to personal data as soon as possible, but within one month from its submission at the latest. We may request the provision of additional information necessary to confirm your identity.

You have the right to request restriction of processing in the following cases:

- (a) the accuracy of the personal data is contested by you, until accuracy is verified (see above);
- (b) the processing is unlawful but you oppose the deletion of the personal data and request the restriction of their use instead;
- (c) the Company no longer needs the personal data for the processing purposes, but you require the personal data for the establishment, exercise or defense of legal claims;
- (d) you objected to processing as set out below, until verification of whether the Company's legitimate grounds override your objection.

If processing is restricted, with the exception of storage, the personal data may only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person.

## **RIGHT TO OBJECT, INCLUDING TO DIRECT MARKETING**

In some cases, we may use your personal data to provide you information related to our products and industry or invite you to events. You are entitled to object to the processing of your personal data at any time if the legal basis for processing is legitimate interest by sending an email to [dataprotection@richter.hu](mailto:dataprotection@richter.hu) or you can unsubscribe to receiving further newsletter by using the link provided in each newsletter.. Such objection will be investigated by us within one month of filing the objection and we will inform you whether we have terminated the processing by deleting your personal data or if we have rejected your objection. In case of objection to processing for direct marketing purposes based on legitimate interest and/or unsubscribing by using a link in a newsletter, the data processing will be terminated without investigation and we will inform you within the same timeframe.

If your personal data is processed on the basis of your consent and by automated means, you have the right to receive your personal data, which you provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit the data to another controller without hindrance from the Company.

If you consider that your privacy and data protection rights have been infringed, you may contact the relevant data protection authority supervising the activities of the Company, namely the National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság; seat: H-1055 Budapest, Falk Miksa utca 9-11., Hungary; website:

www.naih.hu; phone: +36-1-391-1400; fax:+36 1 391 1410; email address: ugyfelszolgalat@naih.hu) or to the competent data protection regulatory authority located in the European Union's relevant Member State where your habitual residence, place of work or place of the alleged infringement is. The competent data protection authority can be found here:

[https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

You may also go to court to protect your personal data, in case of going to court in Hungary, you may bring the action before the regional court having territorial jurisdiction over your domicile (permanent address) or place of residence (temporary address), or the seat of the Company, at your choice.

This Website may contain links to third party websites. These linked websites are not under our control, and are regulated by their own privacy policies. We are not responsible for the privacy practices of any such linked websites.

### **13. HOW CAN YOU CONTACT US ABOUT THIS PRIVACY NOTICE?**

For more information regarding privacy and data protection inquiries and requests by Data Subjects, please contact the Company's dedicated channels (email: [dataprotection@richter.hu](mailto:dataprotection@richter.hu); postal address: 1475 Budapest Pf.: 27., Hungary).