

Bruno Farmaceutici S.p.A.

Privacy Policy

Information Notice on processing of personal data

Information Notice on processing of personal data - Reporting undesirable effects

Introduction

This document (hereinafter "**Privacy Policy**") provides information on the processing of personal data collected by the company Bruno Farmaceutici S.p.A. (hereinafter "**Company**" or "**Controller**") via this website (hereinafter referred to as "**Site**") and therefore constitutes information notice to the interested parties pursuant to current legislation and as provided by art. 13 of EU Regulation 2016/679 of the European Parliament and the Council of 27 April 2016, concerning the protection of natural persons with regard to the processing of personal data, as well as the free movement of such data (hereinafter "**Regulation**"). In the sections of the Site where the personal data of the user are collected, a specific privacy policy is normally published which in any case complements this Privacy Policy.

Identity and contact details of the Data Controller

The Data Controller is Bruno Farmaceutici S.p.A., with registered office in Via delle Ande, 15 - 00144 Rome.

Contact Data of the Data Protection Officer ("DPO")

The DPO appointed by the Company can be contacted at the following addresses:

- by e-mail: dpo@brunofarmaceutici.it
- by post: Bruno Farmaceutici SpA – Via delle Ande, 15 - 00144 Roma.

What data we deal with

They may be subject to treatment:

1) The common personal data possibly provided by the user when he interacts with the functionality of the Site, including navigation data or asks to use the services offered on the Site (registration to any restricted areas/competitions and other initiatives, use of any App , requests for information and reports also through contact forms, etc.), as well as data collected through cookies as specified in the **Cookie Policy**;

2) Sensitive personal data such as those relating to the state of health, or belonging to particular categories of personal data pursuant to art. 9 of the Regulation. If this happens, such processing is carried out on the basis of the user's consent, as well as for the obligations connected to the reporting of adverse events, to fulfil the obligations deriving from the law or regulations or to fulfil contractual or pre-contractual obligations regarding the supply of goods or services (including the request for information on our products and their correct use). In any case, the legal basis for the treatment of particular categories of data is art. 9.2 letters (a), (g) and (i) of the Regulation, namely: consent; or to fulfil legal obligations in a context of diagnosis, assistance or health or social therapy or management of health or social systems and services; or treatments carried out in relation to a public interest in the public health sector.

Why we treat your personal data and how

With the user's consent, the Company may process the user's personal data to allow the use of services and functionalities present on the Site and optimize its operation, to make statistics on visits, to manage requests and reports received through the Site, to register for any restricted areas or initiatives such as competitions and similar, pursuant to art. 6.1 (a) of the Regulation. The Company may also process the personal data of the user in order to comply with obligations deriving from laws, regulations and community legislation: the legal basis of the processing for this purpose is art. 6.1. (C) of the Regulation.

Always with the user's optional consent, the common and/or sensitive data can be processed for the management of applications pursuant to art. 6.1. (a) and art. 9.2. (a) of the Regulation.

The common and sensitive data of the user could also be processed for the management and for the obligations connected to reports of adverse events, pursuant to art. 9.2. letters (a), (g) and (i) of the Regulation.

Furthermore, with the user's optional consent, the common data may also be used for institutional communications (including newsletters) or promotional activities (marketing), i.e. to send promotional material and/or commercial communications relating to the Company's services, at the contact details indicated, either through traditional methods and/or means of contact (such as, paper mail, telephone calls with operator, etc.) or automated (such as, internet communications, fax, e-mail, text messages, applications for mobile devices such as smartphones and tablets – so-called APPS - social network accounts - eg via Facebook - etc.). The legal basis of processing for this purpose is art. 6.1 (a) of the Regulation.

Finally, the user's common and/or sensitive personal data may be processed by the Company to protect their rights in court or for the application of the Bruno Farmaceutici Group Code of Conduct (Articles 6.1. (F) and 9.2. (f) of the Regulation).

The processing of personal data takes place using automated and non-automated tools, with logic strictly related to the purposes of the processing and, in any case, with modalities and procedures suitable to guarantee the security and confidentiality of the data.

Mandatory and optional treatments

The forms to be filled in on this site include data that are strictly necessary to manage the user's communications and requests, marked with the symbol [*], whose non-conferment does not allow to process the requests, and optional conferment data which are not strictly necessary to follow up on the requests of the interested parties. Failure to provide these will not result in any consequence.

Browsing data

The processing of personal data of users who visit only the Site (i.e. without sending communications or using any of the services/functions available) is limited to navigation data, i.e. those for which the transmission to the Site is necessary for the operation of computer systems responsible for managing the Website and Internet communication protocols. This category includes, for example, the IP addresses or the computer domain used to visit the Site and other parameters related to the operating system used by the user to connect to the Site. The Company collects these and other data (such as, for example, the number of visits and time spent on the Site) only for statistical purposes and anonymously in order to control the operation of the Site and improve its functionalities. This is information that is

not collected to be associated with other information about users and to identify them; however, such information by their very nature may allow the identification of users through processing and association with data held by third parties. The navigation data are normally deleted after the treatment in anonymous form but may be stored and used by the Company to ascertain and identify the authors of any computer crimes committed against the Site or through the Site. Save this eventuality and what is specified in the **Cookies Policy** section, the navigation data described above are stored only temporarily in compliance with applicable law.

Links to other sites

The Site may contain links to other sites (co-called third party websites). The Company does not make any access or control over cookies, web beacons and other user tracking technologies **used by third party sites** to which the user can access from the Site; the Company does not carry out any control over contents and materials published by or obtained through third party sites, nor on the relative processing modalities of the user's personal data, and expressly disclaims any related liability for such eventualities. The user is required to verify the privacy policy of third party sites accessed through the Site and to inquire about the conditions applicable to the processing of their personal data. This Privacy Policy applies only to the Site as defined above.

How we store data and for how long

Pursuant to the provisions of art. 5.1 (c) of the Regulation, the information systems and computer programs used by the Company are configured in such a way as to minimize the use of personal and identifiable data; these data are processed only to the extent necessary to achieve the purposes indicated in this Policy; the data will be kept for the period of time strictly necessary to achieve the objectives pursued in practice and in any case, the criterion used to determine the retention period is based on compliance with the terms permitted by applicable laws and the principles of minimization of treatment, limitation of conservation and rational management of archives. In order to determine the appropriate period of storage of personal data memorized by the site on the user's consent, the controller also takes into consideration the following criteria: the specific purposes specified in the information notice for which the site stores personal information; the type of ongoing relationship with the user (how often the user accesses his account; if the user makes requests via contact form; if the user continues to receive newsletters or commercial communications; how often he surfs the site, etc.); any specific request by the user to cancel their data or withdraw consent; the legitimate commercial interest of the data controller.

How we ensure the security and quality of personal data

The Company undertakes to protect the security of the user's personal data and complies with the security provisions of the applicable legislation in order to avoid data loss, illegal or illicit use of data and unauthorized access to the same, with particular but not exclusive reference to articles 25-32 of the Regulation. The Company uses multiple advanced security technologies and procedures to promote the protection of users' personal data; for example, personal data is stored on secure servers located in places with protected and controlled access. The user can help the Company to update and maintain correct their personal data communicating any changes related to their address, qualification, contact information, etc.

Who can access the data

Personal data will be made accessible only to those who, within the Company, and of parent companies, connected to or controlled by Bruno Farmaceutici Group, need it due to their business function or role. These subjects, whose number will be as limited as possible, will be appropriately trained in order to avoid losses, destruction, unauthorized access or unauthorized processing of the data.

Furthermore, data may be disclosed to: (i) institutions, authorities, public bodies for their institutional purposes; (ii) professionals, independent collaborators, also in associated form; third parties and suppliers used by the Controller to provide services of a commercial, professional and technical nature, functional to the management of the Site and related features (e.g. IT service providers and Cloud Computing), in pursuit of the purposes specified above and the services requested by the user; (iii) third parties in case of mergers, acquisitions, sale of company or business unit, audits or other extraordinary transactions; (iv) the company SB, domiciled at the Controller, for the pursuit of its supervisory activities and the application of Bruno Farmaceutici Group Code of Conduct. These subjects will receive only the data necessary for the related functions and will undertake to use them only for the purposes indicated above and to treat them in compliance with the applicable privacy legislation. The data can also be communicated to the legitimate recipients according to the applicable legislation. With the exception of the foregoing, the data are not shared with third parties, natural or legal persons, who do not perform any commercial, professional or technical function for the Controller, and will not be disseminated. The subjects who receive the data treat them as Controllers, Officers or authorized processors, depending on the case, for the purposes indicated above and in compliance with the applicable privacy law.

Regarding the possible transfer of data to Third Countries, including countries that may not guarantee the same level of protection as the applicable legislation, the Data Controller informs that the processing will be in any case according to one of the methods permitted by the Regulation, such as for example the user's consent, the adoption of Standard Clauses approved by the European Commission, the selection of subjects adhering to international programs for the free flow of data, (e.g. EU-USA Privacy Shield) or operating in countries considered safe by the European Commission.

Users rights

The users to whom the personal data refer have the right at any time to obtain confirmation of the existence or otherwise of such data and to know its content and origin, verify its accuracy or request its integration or updating, or the correction, cancellation or limitation, or to oppose their treatment, to lodge a complaint with the supervisory authority pursuant to art. 15 of the Regulation. Furthermore, pursuant to articles 7, 15, 16, 17, 18, 19, 20, 21, 22 and 77 of the same Regulation, each user has the right to request information on the collection and use of their personal data, access, correction, erasure (right to be forgotten), processing limitation, notification in case of rectification or erasure of personal data or processing limitation, data portability, transformation into anonymous form or blocking of data treated in violation of the law, as well as to oppose, in the cases provided for by law, to their treatment, to submit claims concerning the collection and processing of personal information to the competent Garante (Data Protection Authority), to withdraw consent to the processing of personal data at any time except the lawfulness of the treatment carried out up to that time on the basis of the consent revoked.

For any request related to the processing of personal data by the Company, to exercise the rights recognized by applicable law, and to know the updated list of subjects to which the data are accessible, the user can contact the Controller and/or the DPO to the above mentioned addresses.

Changes to this Privacy Policy

In the event that changes are made to this Privacy Policy, the updated version will be contained in this Site. The Company will inform the user of such changes as soon as they are introduced and they will be binding as soon as they are published on the Site. The Company therefore invites the user to visit this section regularly to take cognizance of the most recent and updated version of the Privacy Policy.

This Privacy Policy was updated on 21 May 2018.

Information on the processing of personal data (Reporting undesirable effects)

Pursuant to art. 13 D.Lgs. 30.6.2003 no. 196 (hereinafter, "Privacy Code") and art. 13 EU Regulation no. 2016/679 (hereinafter, "GDPR"), with reference to the treatment performed for the provision of the Pharmacovigilance service for the **Reporting of undesirable effects** (hereinafter "Service"), Bruno Farmaceutici S.p.A. with registered office in Via delle Ande, 15 - 00144 Rome (RM), VAT no. 05038691001 (hereinafter, the "Controller"), as Data Controller, informs you that your data will be processed in the manner and for the following purposes:

1. Object of the Treatment

The Controller processes identifying personal data (for example, name, surname, address, telephone, e-mail, etc.) provided by you for the provision of the Service (hereinafter, "personal data" or even "data").

The Data Controller does not require and does not deal with "sensitive data" (eg those suitable for revealing the state of health). It is possible that, to perform your specific requests concerning the Service, the Data Controller may process such data. The data in question will be used exclusively to execute your requests.

2. Purpose of processing

Your personal data is processed without your prior express consent (article 24 of Privacy Code and article 6 of GDPR), for the following Service purposes:

- manage your requests for information, reports and complaints;
- fulfil the pre-contractual, contractual and tax obligations deriving from existing relations with you;
- fulfil the obligations established by law, by a regulation, by community legislation or by an order of the Authority;
- exercise the rights of the Controller, for example the right to defence in court.

3. Processing methods

The processing of your personal data is performed by means of the operations indicated in art. 4 of the Privacy Code and art. 4 no. 2) of GDPR and more precisely: data collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction. Your personal data are processed with recourse to both paper and electronic and/or automated tools.

The Controller will process the personal data for the time necessary to fulfil the aforementioned purposes

and in any case for no more than 10 years from the termination of the relationship for the purposes of the Service (times required by applicable law).

4. Data access

Your data may be made accessible for the purposes referred to in art. 2:

- to employees and collaborators of the Controller as in charge of data processing and/or internal officers and/or system administrators;

5. Data communication

Without the need for express consent (pursuant to ex art. 24 of Privacy Code and art. 6 of GDPR), the Data Controller may communicate your data for the purposes set out in art. 2 to those subjects to whom the communication is mandatory by law for the accomplishment of the aforementioned purposes. These subjects will process the data as independent data controllers.

Your data will not be disseminated.

6. Data transfer

Personal data are stored on servers located in Italy and will not be transferred abroad in any circumstances.

7. Nature of the provision of data and consequences of a refusal to reply

The provision of data for the purposes referred to in art. 2. is necessary to allow the Controller to process properly your request. In their absence, we cannot guarantee the provision of the Service

8. Rights of the interested party

As interested party, you have the rights set forth in art. 7 of the Privacy Code and art. 15 of GDPR and precisely the right:

- i. to obtain confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
- ii. to obtain the indication of: a) the origin of personal data; b) the purposes and methods of the processing; c) the logic applied in case of treatment carried out with the aid of electronic instruments; d) the identification details of the Controller, the processors and the Officer appointed pursuant to art. 5, paragraph 2 of the Privacy Code and art. 3, paragraph 1, of GDPR; e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it as appointed representative in the territory of the State, officers or processors;
- iii. to obtain: a) the updating, rectification or, when interested, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case when such fulfilment proves impossible or involves a use of means manifestly disproportionate to the protected right;
- iv. to object, in whole or in part: a) for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the

purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and/or through traditional marketing methods by telephone and/or paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the data subject to exercise the right to object even only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or none of the two types of communication.

Where applicable, you also have the rights referred to in articles 16-21 of GDPR (Right of rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object), as well as the right of complaint to the Garante (Data Protection Authority).

9. How to exercise your rights

You can exercise your rights at any time by sending:

- a registered letter A.D. to Bruno Farmaceutici S.p.A., registered office in Via delle Ande, 15 - 00144 Rome (RM).
- an e-mail to the address dpo@brunofarmaceutici.it

Data Protection Officer contact details

The reference e-mail of the "Data Protection Officer" is dpo@brunofarmaceutici.it