

## Information notice on the processing of personal data for healthcare professionals

Effective date: 11/06/2025

### 1. Legal references

Pursuant to current legislation on the protection of personal data, including Regulation (EU) 2016/679 (and its retained version under domestic UK law) ("UK **GDPR**"), as well as the UK Data Protection Act 2018, as amended, ("**DPA**") (collectively referred to as the "**Privacy Legislation**"), **Recordati Pharmaceuticals Ltd.** ("**Recordati**" or the "**Data Controller**"), provides you in your capacity as a healthcare professional ("**HCP**" or the "**Data Subject**") with the following information on the processing (within the meaning of the UK GDPR) of your personal data collected and processed by Recordati as part of the performance of scientific information activities.)

Personal data will be processed in compliance with the Privacy Legislation and the relevant applicable provisions issued by the Data Protection Authority. Please note that we have a separate information notice which specifically applies to the processing of personal data of healthcare providers for the purposes of complying with our obligations under the ABPI Code of Practice in relation to transfers of values and this separate information notice can be accessed in Recordati web page or by contacting us.

### 2. Who processes your personal data

- **Data Controller:**  
The data controller is Recordati Pharmaceuticals Ltd., Breakspear Park, Hemel Hempstead HP2 4TZ (United Kingdom).
- **Data Protection Officer** (*hereinafter* referred to as "**DPO**"): Recordati has appointed a DPO, who can be contacted at the following e-mail address: [groupDPO@recordati.com](mailto:groupDPO@recordati.com).

### 3. Types of personal data processed

The personal data that will be processed are:

- a. **Personal and identification data of the Data Subject** (name and surname, date of birth, gender, tax code, professional title of the Data Subject, registration in the register of doctors);
- b. **Contact details of the Data Subject** (telephone number, e-mail address, address where the Data Subject carries out the professional activity);
- c. **Further information relating to the HCP profile** (such as, by way of example, interests, aptitude and approach in the scientific, technological or research fields, with respect to (i) technological applications and platforms at the service of medicine, (ii) therapeutic behaviours, (iii) the use of digital communication channels and (iv) interests in pharmaceutical products) that Recordati may acquire from the Data Subject during visits and/or interviews with its medical representatives;
- d. **Data relating to the Data Subject's interaction with Recordati services** (such as, for example, opening of emails, whether certain medical-scientific and web content is displayed and for how long, interactions of the Data Subject with e-mail, links and content, the duration of the Data Subject's "engagement" on Recordati web pages and web content, participation in webinars, etc.).

The Data Controller collects personal data from the following sources:

- From the Data Subject directly, for example when carrying out scientific information activities via in-person meeting, we collect the information listed at a) to c) above
- From your interaction with our online services and digital properties. We collect the information listed at b) and d) above in this way.
- From third party service providers, which provides publicly available information, such as your address, and/or market research results, and/or information listed in c. above.

#### 4. The purposes, legal bases for the processing and the period of storage of personal data

Recordati will process the Data Subject's personal data for the following purposes (the "Purposes"):

Purpose of the processing	Legal basis	Categories of personal data and nature of the provision of data	Retention period
<p>a) <b>Carry out scientific information activities on drugs and products marketed by the Recordati Group and related activities</b> (such as, by way of example, the presentation of medicines, the collection of requests and the supply of samples, as well as activities aimed at planning visits, orientation, guidance and monitoring of scientific information activities), in clinics, doctors' offices and hospitals where HCPs carry out their professional activity.</p>	<p><b>Art. 6, paragraph 1, lett. f) of the UK GDPR:</b></p> <p>legitimate interest of the Data Controller to plan and carry out and optimize scientific information activities.</p>	<p>For this purpose, we process the categories of personal data indicated in par. 3, lett. a. and b. above.</p>	<p>Unless the Data Subject exercises the right to object, personal data will be stored for this purpose for a period of <b>five (5) years</b> from collection and recording within Recordati's systems.</p>
<p>b) <b>Carry out profiling activities based on the needs, interests and professional characteristics of HCPs</b> in the scientific, technological and/or research fields for (i) internal analysis, management and planning of scientific information activities, and (ii) preparing personalized scientific information communications on the drugs and products marketed by the Recordati Group.</p> <p>In the event of refusal to provide data for personalized scientific information communications or objection to the processing, we inform you that the HCP may still receive general medical and scientific information and content from Recordati where done in compliance with Privacy Legislation and industry codes.</p>	<p><b>Art. 6 (1) (f) UK GDPR:</b></p> <p>legitimate interest of the Data Controller to plan, improve the effectiveness and carry out targeted and personalized scientific information activities in favour of HCPs.</p>	<p>For this purpose, we process the categories of personal data indicated in par. 3, lett. a., c. and d. above.</p>	<p>Unless the Data Subject exercises the right to object, personal data will be stored for this purpose for a period of <b>five (5) years</b> from collection and recording within Recordati's systems.</p>
<p>c) To send <b>scientific information communications</b> on drugs, products, and contact HCPs for promotional purposes and material marketed by the Recordati Group through e-mail, phone or other digital or <i>web-based communication tools</i></p>	<p><b>Art. 6 (1) (a) UK GDPR:</b></p> <p>consent of the Data Subject.</p>	<p>For this purpose, we process all the categories of personal data indicated in par. 3 above.</p>	<p>Personal data will be stored for this purpose until the Data Subject exercises the right to withdraw the consent given, which may take</p>

(including sending invitations to participate in congresses, conferences or medical-scientific meetings, planning visits and supplying samples, webinars and training events organized or sponsored by Recordati).			place at any time by contacting the Data Controller and/or the DPO and, in any case, for a period of <b>five (5) years</b> from the moment of expression of consent.
<p>d) <b>Share HCP data</b> with the other companies belonging to the Recordati Group for the performance of their independent medical, scientific and promotional information purposes on the drugs and products marketed by them.</p> <p>The list of Recordati Group companies in each country is available on our website <a href="http://www.recordati.com">www.recordati.com</a> or accessible <a href="#">here</a>.</p>	<p><b>Art. 6 (1) (a) GDPR:</b></p> <p>explicit consent of the Data Subject.</p>	<p>For this purpose, we process the categories of personal data indicated in par. 3, lett. a. and b. above.</p>	<p>Personal data will be stored until the Data Subject exercises the right to withdraw the consent given, which may take place at any time by contacting the Data Controller and/or the DPO and, in any case, for this purpose for a period of <b>five (5) years</b> from the moment of expression of consent.</p>

Unless indicated otherwise, the provision of personal data processed for the purposes indicated above is optional. In the event of refusal to provide your data, objection to processing or withdrawal of the consent previously given, Recordati will not be able to carry out the scientific information activities towards the HCP or the communications and sharing of data, as described above.

At the end of the storage periods identified above, the personal data of the Data Subjects will be deleted, unless there are further legitimate interests of the Data Controller and/or legal obligations that make their storage necessary, subject to minimization.

The Data Controller also informs the Data Subject that at the time of collection and on the occasion of sending each communication made for the pursuit of the aforementioned Purpose, he/she has the possibility to: (i) **withdraw**, at any time, any consent given (see point 9 below as to how consent can be withdrawn), it being understood that the withdrawal of consent does not affect the lawfulness of the processing based on consent before the withdrawal; (ii) **object** to the processing of their personal data based on the legitimate interest of the Company, in the manner better described in point 9 below.

## 5. Profiling

The Data Controller informs the Data Subjects that, with reference to the Purpose referred to in Paragraph 4 letter b) above (i.e. profiling activities), this activity has the sole purpose of identifying, on the basis of specific parameters identified by Recordati, in a precise and effective manner the professional and scientific profiles of the Data Subjects, as well as their specific professional needs so as to allow the same to optimize the performance of the activity of scientific information and the distribution of its contents.

Through profiling, the Company will serve the scope to avoid addressing the recipient HCP with massive medical-scientific communications that may not be of interest to the Data Subject by and *spamming* to Data Subjects and to encourage restricting them only to a personalized communication system that is more relevant and adherent to the needs, interests and professional characteristics of the Data Subjects. Personalized communications may also be

indirectly of benefit for the patients of the individual Data Subjects since they help increasing the Data Subject's awareness about relevant specific areas of diseases or medical practices.

In any case, the profiling mentioned above:

- will not take place on the basis of an automated decision-making process from which legal or similarly significant effects derive for the Data Subjects pursuant to art. 22 of the GDPR;
- will not affect the rights of the Data Subjects;
- will not have any prolonged and permanent impact for Data Subjects, considering that the personal data collected by the Company through its medical representatives are periodically updated.

This is without prejudice to the right of the Data Subject to object to the performance of profiling activities at any time, in accordance with the procedures better described in point 9 below.

Please see section 4 above for more information.

## 6. Recipients

The Data Controller informs the Data Subjects that their personal data may be communicated or made accessible for the Purposes listed above, and according to the legal bases listed above, to the following recipients or categories of recipients, as independent data controllers or, where necessary, data processors specifically selected and appointed pursuant to Article 28 of the UK GDPR, which include:

- suppliers of platforms for customer *relationship management* (CRM) and related technical assistance and maintenance services (all categories of personal data are shared);
- companies that carry out market analyses/research (the categories of personal data shared are those indicated in par. 3, lett. a. above)
- communication agencies and/or event organization (the categories of personal data shared are those indicated in par. 3, lett. a. above);
- competent authorities, regulatory, prosecuting, law enforcement, tax or governmental authorities by virtue of UK law (all categories of personal data may be shared);
- in connection with a corporate transaction, a merger, consolidation, reorganisation, financing, change in control or acquisition of all or a portion of the Data Controller's business by a third party (all categories of personal data may be shared);
- other companies of the Recordati Group, subject to the consent of the Data Subject (the categories of personal data shared are those indicated in par. 3, lett a. and b. above).

The complete list of recipients, including more details on their headquarters, is kept at the Data Controller's registered office and can be consulted upon request to be sent to the addresses set out in Section 2 of this notice.

## 7. Transfer of Data abroad

The Data will not be transferred outside the UK or the European Economic Area. Where Personal Data is transferred within from the EEA to the United Kingdom, or vice versa, this is done on the basis of an EU Commission or UK adequacy decision.

Any transfer of Personal Data of the Data Subjects to other countries that may happen in the future, will only take place within the terms and with the guarantees provided for by the Privacy Legislation. In the event such a transfer takes place, this information notice will be updated.

## 8. The rights of the Data Subject

The Data Controller informs the Data Subjects that they will always have the right to withdraw their consent at any time, where consent has been given.

Data subjects may also exercise any of the following rights (collectively, the "**Rights**"):

- a) the "**right to access**" and specifically obtain confirmation as to whether or not personal data concerning them are being processed, including information on the purposes of processing, categories and recipients of personal data, as well as a copy of personal data;

- b) the **"right to rectification"**, i.e. the right to correct inaccurate personal data;
- c) the **"right to erasure"**, i.e. the right to request deletion and erasure;
- d) the **"right to restriction of processing"**, i.e. the right to obtain from the Data Controller the restriction of the processing in certain cases provided for in accordance with the Privacy Legislation;
- 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 withdraw"** consent at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent before the withdrawal;
- g) the **"right to object"**, i.e. the right to object, in whole or in part:
  - to 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 direct marketing or profiling purposes;
  - the **right to make a complaint under s.164A of the Data (Use & Access) Act** – if you wish to exercise this right, we will provide a complaint form for you to complete.

It is expressly understood, as provided for in Article 21 of the UK GDPR, that in the event of the exercise of the right to object by the Data Subject, the Data Controller will refrain from further processing the personal data unless the Data Controller demonstrates the existence of compelling legitimate reasons for proceeding with the processing that prevail over the interests, rights and freedoms of the Data Subject or for the ascertainment, the exercise or defence of a right in court.

These rights may be limited, for example, if fulfilling a request would reveal personal data about another person, or if the Data Subject asks to delete information which the Data Controller is required by law or has a compelling legitimate interest to keep.

In any case, the Data Subjects can freely contact the DPO for all matters relating to the processing of their personal data and/or if they wish to exercise their Rights:

- by ordinary mail, to the address of the registered office of Recordati Pharmaceuticals Ltd., Breakspear Park, Hemel Hempstead HP2 4TZ
- by e-mail to the DPO: [groupDPO@recordati.com](mailto:groupDPO@recordati.com).

## 9. Complaint

The Data Controller informs the Data Subject that, pursuant to the Privacy Legislation, the Data Subject has the right to lodge a complaint with the competent Supervisory Authority if the Data Subject is of the opinion that their personal data has been processed in a way which infringes the UK GDPR. In the UK, this is the Information Commissioner's Office.

## 10. Update and revision

This information notice may be subject to amendments and additions at any time. In some cases, an additional notice may be provided and be communicated to the Data Subject from time to time in a manner chosen by the Data Controller.