

Notice on processing of Health Care Professionals personal data

Dear

our company is firmly committed to respecting the privacy of the subjects interfaced during its activity. For this reason, we are providing you the information on how OFFHEALTH SPA process your personal data in accordance with art. 13 of the General Data Protection Regulation (EU) 2016/679 ("Regulation or GDPR").

Primary purposes of the treatment

Your personal data, already provided by you to OFFHEALTH SPA, or which will be provided in the future or will be updated and integrated with other personal data that you will communicate to us, are processed for the following purposes:

"Activities of Scientific Information": these activities are permitted by article 113 of Legislative Decree 219/2006 "Community Code concerning medications for human use" and by the legislation on the "National system of continuing education in medicine -ECM- "(Legislative Decree 502/1992 and following additions), also by transmission of the related material through electronic communication means (eg e-mail) where conferred.

Secondary purposes of the treatment

"Institutional communication activities" relating to the Company, to its initiatives and products; these communication may take place in several forms, such as paper and ordinary mail, but also through electronic means (such as e-mail, short messages, push notifications - where the relative addresses are conferred), and may include direct marketing activities of OFFHEALTH SPA and trading partners.

Data processed

Your personal data("Data") that may be processed are the following (and not limited to): professional title; personal details, address and contact details of the professional practice or hospital structure, working sector; any specializations; appointment / qualification held inside the hospital or similar organizations; convention with the NHS; data relating to the methods of use and/or viewing of our information material; other information regarding your profession and preferences in relation to the services we provide you.

Provision of personal data

We also inform you that your consent is the legal basis of the processing, pursuant to art. 6.1 lett. a) of the GDPR. In addition, your data may be processed even without your prior consent to fulfil legal obligations, regulations and european community legislation, to assert or defend rights in court, pursuing legitimate interests) and in all cases provided for by Articles. 6 and 9 of the Regulations, where applicable.

It is specified that consent to the processing of data for the primary purposes is necessary; your eventual refusal will not allow us to provide the activities of scientific information.

For the secondary purposes, your consent is optional; your refusal to provide it will not have any consequence on the activity of Scientific Information, but it would not allow us to provide you with service that specifically meet your needs and / or to update you on the news from our company.

Data Retention

The processing will be carried out manually or with automated tools, in line with the security measures set forth in art. 32 of the Regulation, by authorized persons, in line with the provisions of Article 29 of the GDPR.

In line with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 of the Regulation, the retention timing of your personal data for the primary purposes is established for a period that's not exceeding the achievement of the purposes for which they are collected and processed and in any case for a maximum of five years, while for secondary purposes the retention period is set up for a maximum of 24 months.

Communication of data

The processing activities related to the primary purposes will be performed only by persons authorized to process the data, such as our employees belonging to the categories of the administrative, scientific informants, doctors and product managers and other subjects who need to process them in the performance of their duties. Pursuant to the laws and regulations to which we are subjected, we may need to communicate data to the Italian Medicines Agency,

Farindustria, Health Authorities, Local Health Authorities and other health or other organizations, to other Authorities and Associations as well as to legitimate recipients pursuant to law and regulation. Also, respect to the obligations and purposes indicated above, the data may be disclosed to third-party companies, such as suppliers, sub-suppliers, IT services providers and "Cloud Computing", agencies and organizational secretariats, professional offices and companies that carry out or tax or administrative activities on our behalf. As applicable, these subjects will act as Data Controllers or Data Processor for the same purposes indicated above and according to the applicable law. With regard to the eventual transfer of data to third countries, including countries that may not guarantee the same level of protection as the applicable legislation, we inform you that processing will only take place on the basis of one of the methods permitted by the applicable law, such as your consent, the adoption of Standard Clauses approved by the EU Commission, the selection of objects belonging to international programs for the free circulation of data (eg EU-USA Privacy Shield) or operating in Countries considered safe by the EU Commission.

For secondary purposes, if you have given your consent, your data will be communicated to external parties who are accountable for carrying out on behalf of OFFHEALTH SPA information activities, market research and / or statistical surveys.

Transfer of personal data

Your personal data are stored in paper files and/ or are recorded in electronic storages located at the OFFHEALTH SPA headquarters and at the Company's peripheral structures and in remote storage archives, using the so-called "cloud" technology allocated on servers installed inside the European Union.

Data Subject's right

At any time, you may exercise, according to articles 15-22 of the Regulations, the right to:

- a. ask and confirm the existence or not of personal data;
- b. obtain information on the purposes of the processing, the categories of personal data, recipients or categories of recipients to whom the personal data have been or will be communicated and, when possible, the retention period;
- c. obtain rectification and erasure;
- d. obtain the restriction of the processing;
- e. to obtain data portability, i.e. to receive them from a data controller, in a structured format, of common use and legible by an automatic device, and to transmit them to another data controller without hindrance;
- f. oppose the processing at any time and also in the case of treatment for direct marketing purposes;
- g. to oppose an automated decision - making process concerning individuals, including profiling.

How to exercise your rights

You can exercise your rights with a written request sent to OFFHEALTH SPA Via Giovanni Paisiello 8/10/12, Florence or sending a mail to the following address: [off health @ legalmail.it](mailto:offhealth@legalmail.it).

Data Controller

The data controller is OFFHEALTH SPA Via Giovanni Paisiello 8/10/12, Florence.

An updated list of data processors is kept at the registered office of the Data Controller of Rome.

OFFHEALTH SPA

Date

Rome on

DECLARATION OF CONSENT

I, the undersigneddeclare to have read and understood the processing notice supplied to me pursuant to art. 13 of Regulation (EU) 2016/679 by OFFHEALTH SPA, fully aware that in the absence of consent OFFHEALTH SPA cannot proceed with the provision of the requested services,

A) **I give my consent** - **I do not give my consent**

through the signature at the bottom of the agreement for the purpose of scientific information

B) **I give my consent** - **I do not give my consent**

through the signature at the bottom, to the treatment of such for secondary purposes of treatment, as indicated in the above notice;

Signature _____