

**INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA  
PURSUANT TO THE REGULATION (EU) 2016/679**

This document provides the following information with reference to the processing of your personal data carried out by Fidia Farmaceutici S.p.A, in the context and for the performance of your contract of consultancy (in the following referred to as the "Contract").

**Data Controller**

Data Controller of the processing of your personal data for the purposes specified in this Privacy Information Notice is Fidia Farmaceutici S.p.A., with registered office in Via Ponte della Fabbrica n. 3/A, Abano Terme (PD) (in the following "Company").

**Modalities of the processing**

The processing of your personal data is carried out with procedures and measures which are appropriate to ensure security, in terms of integrity, confidentiality and accessibility, in compliance with the provisions of the applicable data protection law.

The Company will process your personal data both in paper form and by electronic instruments.

Your name may be included in telephone, fax and e-mail directories of the Company and you may receive periodic communications in paper or electronic form, due to and with reference to the Contract.

**Characteristics of the processing**

| <b>Purposes of the processing</b>   | <b>Legal bases of the processing</b>   | <b>Nature of the provision of personal data and consequences for failure to provide such data</b>   | <b>Data Retention period</b>   |
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| <b>Management of the contractual relationship</b>   |  |   |  |
| Establishment, management and performance of the Contract and compliance with related obligations under the applicable law, including: <ul style="list-style-type: none"> <li>• obligations regarding administration and accounting;</li> <li>• obligations to pay fees and any other remuneration, allowances and/or reimbursements, if provided by the Contract.</li> </ul> | Necessity to establish/perform the Contract and any related fulfilment and/or obligation under the applicable law. | The provision of your personal data for such purpose is a contractual and legal obligation to establish and manage the Contract. In case of failure to provide with such data, the correct establishment and/or the correct continuation of the Contract could be wholly or partly prevented. | Your personal data will be retained for the whole duration of the Contract or for a further period of time, if necessary to comply with the obligations under the applicable law or to exercise and/or defend a right before relevant judiciary authorities, and wherever else is appropriate. |

**Subjects which may become aware of your personal data or to which your personal data may be communicated**

Your personal data will be processed by subjects explicitly authorized by the Company, belonging to business units like HR, Procurement Office, Corporate Office, Administration, finance and audits, and to any other business unit with which you will have relationships due to the Contract.

Where necessary for the above purposes your personal data may be communicated, to subjects which are external of the Company's organization, such as providers of goods and services, including ICT services, commercial partners, labor consultants, other consultants, event planners, hotel managers, tax consultants and legal advisors, insurance institutions, banks and other credit institutions, also abroad.

Where necessary for the above purposes, your personal data may also be communicated to regulators, supervisory authorities and other public authorities.

For the same purposes, your personal data may be communicated to other companies of the Group to which the Company belongs, also abroad.

Where the subject matter of the Contract entails the publication of your personal data, such data may be disseminated in the ways possibly provided under such Contract.

The Company may transfer your personal data to countries not belonging to the European Union which may not ensure the same level of security of your personal data provided by the European law. Such possible transfer of your personal data will be carried out if necessary for the performance of the Contract or for the implementation of pre-contractual measures taken at your request, or as long as the transfer is necessary to ascertain, exercise or defend a right before judiciary authorities or upon your specific consent or to protect your vital interests, where you are physically or legally incapable of giving consent.

In case of possible further transfers of your personal data, the Company will carry out such transfers only:

- towards Third Countries, one or more specific sectors within a Third Country or international organizations for which the European Commission deems that an adequate level of protection of personal data is in place; or
- if the recipient of the data obtained an appropriate certification or adhered to a specific code of conduct ensuring that the processing of personal data is carried out with safeguards which are appropriate under EU law; or
- if the Company implemented appropriate safeguards to protect your personal data, by concluding contracts including the so-called Model Clauses, as prepared by the European Commission or prepared by the national Data Protection Authority and approved by the European Commission.

Further information about the safeguards adopted by the Company for such transfers, and a copy of such safeguards are available by contacting the DPO at the following email address: [dpo@fidiapharma.it](mailto:dpo@fidiapharma.it).

### **Your Rights**

As a Data Subject of the processing of your personal data carried out by the Company, you have, and you are entitled to exercise in any moment, the following rights:

| <b><u>Right</u></b>  | <b><u>Content of the right</u></b>   | <b><u>Possible conditions to exercise the right</u></b>   |
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| Right of access (Art. 15 of the EU Regulation 2016/679)                    | You have the right to obtain confirmation as to whether or not your personal data is being processed and, where that is the case, to require the access to the personal data, and to the information as referred to in Art. 15 of the EU Regulation 2016/679, and to obtain a copy of such personal data.  | In case of request of further copies of your personal data a reasonable fee based on administrative costs may be charged. The request to obtain copy of your personal data shall not adversely affect the rights and freedoms of others.              |
| Right of rectification (Art. 16 of the EU Regulation 2016/679)             | You have the right to indicate the possible inaccuracy of the personal data about you to obtain its rectification. Where necessary you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.   |   |
| Right to erasure (Art. 17 of the EU Regulation 2016/679)                   | You have the right to obtain the erasure of personal data concerning you in cases under Art. 17 of the EU Regulation 2016/679. In such cases, your data will be erased and, if made public, taking account of available technology and the cost of implementation, reasonable steps shall be adopted to inform controllers which are processing the data of your request of erasure. | Your right to erasure may be subject to limitations under national and/or EU Law, such as, e.g., in case of necessity for the Company to process data to comply with legal obligations or to ascertain, exercise and/or defend a right before courts. |
| Right to restriction of processing (Art. 18 of the EU Regulation 2016/679) | Such right provides the marking of your stored personal data with the aim of limiting its processing in the future. Where processing has been restricted in cases under the applicable law, your   | You have the right to restriction of your personal data:<br>a) if you contest the accuracy of personal data, for the necessary period enabling the Company to   |

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|  | <p>personal data shall, with the exception of storage, 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 or for reasons of important public interest of the Union or of a Member State.</p> <p>You have the right to be informed before the restriction of processing is lifted.</p>  | <p>verify the accuracy of the personal data;</p> <p>b) if the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead;</p> <p>c) even though the Company no longer needs the personal data for the purposes of the processing, but personal data is required by you for the establishment, exercise or defense of legal claims;</p> <p>d) you have objected to processing pursuant to Article 21(1) of the EU Regulation 2016/679, pending the verification whether the legitimate grounds of the Company override yours.</p> |
| <p>Right to obtain communication of the recipients made aware in case of a rectification, erasure or restriction to the processing (Art. 19 of the EU Regulation 2016/679)</p> | <p>Such right consists of the possibility to ask and to obtain from the Company the indication of the recipients made aware in case of rectification, erasure or restriction to the processing.</p>  | <p>The communication to recipients will be carried out unless this proves impossible or involves disproportionate effort.</p>   |
| <p>Right to data portability (Art. 20 of the EU Regulation 2016/679)</p>   | <p>You have the right to receive the personal data concerning you, which you have provided to the Company, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance.</p>  | <p>Such right is applicable only if the processing is based on your consent or is necessary for the performance of a contract of which you are a party, or for the implementation of pre-contractual measures taken at your request and if the processing is carried out by automated means and anyway to the extent allowed under art. 20 of the EU Regulation 2016/679.</p>   |
| <p>Right to object to the processing (Art. 21 of the EU Regulation 2016/679)</p>   | <p>You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company or if such a processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party, including profiling based on those provisions.</p> <p>Where personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, which include profiling to the extent that it is related to such direct marketing.</p> | <p>The Company will no longer process your personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of yours or for the establishment, exercise or defense of legal claims.</p>  |
| <p>Rights relating to automated decision making, including</p>   | <p>You have the right to obtain the indication of the existence of automated decision-</p>   | <p>The right not to be subject to a decision based solely on automated processing,</p>  |

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| profiling (Art. 22 of the EU Regulation 2016/679)  | making, including profiling, and, in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing.<br>You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. | including profiling, which produces legal effects concerning you or similarly significantly affects you does not apply within the limits and conditions set forth under art. 22 of the EU Regulation 2016/679. |
| Right of withdrawal (Art. 7, par. 3, Art. 13 par. 2, letter c), of the EU Regulation 2016/679)                             | Where the legal basis of the processing of your personal data is your consent, you have the right to withdraw such consent at any time.  | Your request doesn't affect the lawfulness of the processing based on your consent before its withdrawal.  |
| Right to lodge a complaint with a supervisory authority (Art. 13, par. 2, letter d, Art. 77 of the EU Regulation 2016/679) | Right to lodge a complaint with the relevant data protection supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement. The Italian Supervisory Authority is the Garante per la Protezione dei Dati Personali.   |  |

In case of your request to exercise your rights, the Company may have the necessity to verify your identity and, therefore, it will be necessary that you provide with your identifying data and the contact data essential to identify and contact you with reference to your request.

Limitations to the exercise of the above mentioned rights and to the consequent obligations of the Company can be provided under the applicable law.

#### **Contact details**

For any further information regarding the above rights and their exercise, as well as for any issue relating to the processing of your personal data, you can contact the Data Protection Officer at the following address: Fidia Farmaceutici S.p.A., Via Ponte della Fabbrica n. 3/A Abano Terme (PD); email: [dpo@fidiapharma.it](mailto:dpo@fidiapharma.it)

I declare to have duly read, become acquainted with and aware of the information provided by the Company with this notice, with reference to the processing of my personal data for the above mentioned purposes.

*Policy published on: November 2020*