DATA PROTECTION NOTICE
HEALTHCARE PROFESSIONALS

Section 1 - Introduction

This data protection notice (the "**Notice**") is intended for all healthcare professionals in relation to whom Tillotts Pharma France S.A.S. ("**Tillotts**" - R.C.S. Paris no. 817.483.134, established at 40-48 rue Cambon, 75001 Paris, France) processes some of their personal data. Tillotts is the data controller in relation to this personal data.

We respect the privacy rights of individuals and are committed to processing personal data responsibly and in accordance with applicable laws. This Notice details the personal data we may collect and process about you, the purposes of the processing and the rights you have in relation to that data.

If you have any questions about this Policy, please contact us using the details provided in Section 8 below.

Section 2 - What types of personal data are collected?

Tillotts may process various types of personal data, including:

- data relating to your identity (*surname, first name, photograph, gender, date and place of birth, nationality, personal contact details, identity document*)

- data relating to your professional situation (*type of practice/status, place of work, professional contact details, professional identification number (such as the RPPS number in France, the INAMI number in Belgium or the UZI or BIG number in the Netherlands), job held, title, specialty, honours, publications, curriculum vitae*)

- electronic identification and tracking data *(IP address, log files, data from cookies (see our cookie policy), online identifiers)*

- financial/accounting data *(national insurance number, URSSAF certificate (for France), bank account identification, VAT number, payment information*)

- data relating to your interactions with Tillotts (*electronic or paper mail, dates of visits/calls, reports of visits/calls (transcripts), participation in events organised or supported by Tillotts, contractual relations)* as well as your areas of interest *(your uses, preferences with regard to our products and services)*, data relating to your practice *(for example during market research)*

- any other type of data that you may communicate to us in response to your requests for information or in general during our interactions.

This data is collected insofar as it is strictly necessary to fulfil the purpose for which it was collected. Without the collection of some of this data, we may not be able to fulfil some of our legal obligations (insofar as the processing is based on the need to comply with a legal obligation), not be able to perform a contract to which you are a party (to the extent that processing is based on the need to perform a contract between you and us) or not be able to further proceed with pre-contractual measures taken at your request (to the extent that processing is based on the need to perform such pre-contractual measures) – hence we need you to provide us with some of this data.

In general, the personal data we collect is collected directly from you. In some cases, however, we may collect personal data about you from third parties (e.g. via social networks, the internet, third-party service providers).

Section 3 - What are the purposes of processing your personal data?

Your personal data may be collected and processed for the following purposes:

- As part of the customer relationship management and to optimise our interactions with you in the course of our activities
- In order to offer you services or in connection with the performance of such services and in order to analyse your use of our services
- In the context of our pre-contractual or contractual relationship, in particular to ensure its management, and to proceed, among others, if applicable, with the payments arising from it
- As part of the communications we carry out, whether promotional or non-promotional
- To respond to your requests for information, in particular about our products and services
- To carry out research, studies and evaluations on our products and services, the therapeutic areas in which we operate, or in the health sector in general, or as part of our Corporate Social Responsibility (CSR) initiatives
- To meet our reporting obligations, in particular in terms of pharmacovigilance and pharmaceutical complaints, transparency or under the system for monitoring benefits and, more generally, any legal obligations to which we may be subject
- In order to respond to any request from an authorised state authority
- To ensure our defence in the event of claims or disputes
- In the context of restructuring, sales, mergers or acquisitions of all or part of our activities

Section 4 - With whom do we share your data?

We grant access to your personal data only to authorised persons who need to have access to it in order to carry out their duties.

Certain third parties may also have access to your personal data, such as Tillotts' service providers or partners.

Whenever we allow a third party to access your personal data we implement appropriate measures to ensure that (i) the personal data is used in accordance with this Notice and (ii) the security and confidentiality of the data is maintained.

Your personal data may also be accessed by, or transferred to, any regulatory body, state authority, court or national and/or international public body, where we are required to do so by law or regulation, or at their request.

The personal data we collect about you may also be processed, accessed or stored in a country outside the country where Tillotts is located, which may not offer the same level of protection for personal data.

If we transfer your personal data to companies located in other jurisdictions outside the European Economic Area, we will ensure that we protect your personal data by i) applying the level of protection required by the applicable data protection law to which Tillotts is subject, ii) acting in accordance with our internal policies and standards and, iii) only transferring your personal data on the basis of an adequacy decision adopted by the European Commission (where such a decision exists) or standard contractual clauses approved by the European Commission (available on request), unless otherwise specified. With regard to transfers of personal data to other companies in the group, the Tillotts group has adopted internal rules designed to guarantee effective levels of personal data protection in the event of data transfers, notably outside the European Economic Area.

Section 5 - What is the legal basis for processing your personal data?

Tillotts relies on various legal bases when processing your personal data. These can be the following:

- Your free, specific, informed and unambiguous consent (for example, in the context of promotional or non-promotional communications sent to you)
- The performance either of a contract to which you are a party or of pre-contractual measures taken at your request (for example when you provide services to us or in the course of collaborations)
- To comply with a legal obligation incumbent on Tillotts (for example to meet our reporting obligations)
- The fulfilment of the legitimate interest pursued by Tillotts, provided that this does not infringe your interests or your fundamental rights and freedoms (our legitimate interests are (i) to be able to process and respond to your requests for information in connection with our products and services, (ii) to optimise our interactions with healthcare professionals such as you in connection with our activities and (iii) to be able to manage, structure, develop and promote our activities, products and services).

Section 6 - How long will your data be kept?

Your personal data is kept for the period necessary to implement the purposes referred to herein. These retention periods are either in accordance with the legal provisions in force, where they exist, or determined independently by Tillotts in accordance with the provisions of Article 5-1-e of Regulation (EU) 2016/679 of the European Parliament and of the Council 27 April 2016.

Section 7 - How is the security and confidentiality of your personal data ensured?

Tillotts takes all necessary precautions with regard to the risks presented by its processing to ensure the security of personal data and, in particular, at the time of collection, during transmission and storage, to prevent it from being distorted, damaged or accessed by unauthorised third parties. Tillotts also ensures that authorised third parties with access to personal data provide security guarantees equivalent to those of Tillotts.

Section 8 - What are your rights and how can you exercise them?

Healthcare professionals have the following rights:

- the right to access and request rectification of your personal data
- the right object to the processing of your personal data, provided that the processing does not take place to comply with a legal obligation, is not necessary for the performance of a contract and is not based on your consent
- if the legal basis for the processing is your consent, the right to withdraw your consent to the processing of your personal data at any time
- the right to limit the processing of your personal data
- the right to portability of your personal data, provided that the processing does not take place to comply with a legal obligation and is not based on legitimate interest
- the right to have your personal data deleted, provided that the processing does not take place to comply with a legal obligation

When exercising your rights, Tillotts may, if necessary, ask you to provide proof of identity to verify your identity. This information will only be kept for as long as is necessary for this purpose.

If you have any questions about the protection of your data or wish to exercise your rights, you can contact us at the following address: dataprivacy@tillotts.com. In the event of a complaint, you are free to make a request to the supervisory authority in your country of residence:

- In France, this is the Commission nationale de l'informatique et des libertés ("CNIL" - http://www.cnil.fr/ - Place de Fontenoy 3, TSA 80715, 75334 PARIS CEDEX 07).

- In Belgium, this is the Autorité de Protection des Données ("APD" - https://www.autoriteprotectiondonnees.be/ - Rue de la Presse, 35, 1000 Brussels).

- In the Netherlands, this is the Autoriteit Persoonsgegevens ("AP" - https://www.autoriteitpersoonsgegevens.nl/ - Hoge Nieuwstraat 8, 2514 EL Den Haag).

Section 9 – Update of the Notice

This Notice may be updated periodically to reflect necessary changes in our privacy practices. In this case, where necessary, we will inform you and indicate the most recent update date at the top of the Notice.