DATA PROTECTION NOTICE
MEDICAL INFORMATION AND QUALITY COMPLAINTS

Section 1 - Introduction

This data protection notice (the "**Notice**") is intended for all persons who make requests (i) relating to medical information or (ii) quality complaints to Tillotts Pharma France S.A.S. ("**Tillotts**" - R.C.S. Paris n° 817.483.134, established at 40-48 rue Cambon, 75001 Paris, France), and for which Tillotts, in order to process their request, 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 Information Folder, 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, contact details*)

- data relating to your professional life (*profession, type of practice, speciality, professional contact details*)

- information identifying the product concerned by the application

- any other type of data that you may be asked to provide in connection with your request.

This data is collected insofar as it is strictly necessary to fulfil the purpose for which it was collected. This data is also limited to what we need to know in order to, where applicable, fulfil our legal obligation to process the request you have made to Tillotts (see Section 5).

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

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

- Handling of your requests related to medical information (e.g. questions related to the therapeutic areas in which Tillotts operates, its products (dosage, formulation, interactions, etc), available clinical data)
- Handling of your request related to pharmaceutical complaints (reports concerning the quality, characteristics, presentation or efficacy of a product, unintentional misuse due to a lack of understanding of the information)

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?

The legal basis for processing your requests relating to medical information and quality complaints is the legitimate interest pursued by Tillotts. To this end, Tillotts ensures that it does not infringe your interests or your fundamental rights and freedoms. Tillotts' legitimate interest is to be able to process, manage and respond effectively to requests made to it in order to provide accurate and complete information concerning medical information and quality complaints.

The handling of requests relating to a quality complaint that may involve a risk to public health is based on the legal obligation for Tillotts to process the request (in France, in accordance with article R5124-55 of the Public Health Code (“Code de la santé publique”), in Belgium, on the basis of the rules on compliance and monitoring set out in the Act of 25 March 1964 on medicinal products for human use and the Royal Decree of 14 December 2006 on medicinal products for human use and, in the Netherlands, as provided for in the Medicines Act (“Geneesmiddelenwet”) and the Regulation on the Medicines Act (“Regeling Geneesmiddelenwet”)).

In the event that you provide us with health data as part of your request, the possible collection of this health data as part of the processing of your requests related to medical information and quality complaints is, where appropriate, necessary for reasons of public interest in the field of public health and aims, in particular,

to guarantee compliance with high standards of quality and safety of healthcare and products, in accordance with the provisions of Article 9 of the Regulation (EU) 2016/679 of the European Parliament and of the Council 27 April 2016 (“GDPR”) (and also, with regard to France, Article 66 of the amended Act of 6 January 1978, known as the "Loi informatique et libertés").

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 GDPR.

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?
You have the following rights:

- the right to access and request rectification of your personal data
- the right to object to the processing of your personal data, provided that the processing does not take place to comply with a legal obligation
- 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
- the right to withdraw your consent to the processing at any time, if the legal basis for the processing is your consent

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.