



## Privacy Notice for HCPs

Dear Doctor / Health Care Professional,

**We take your privacy very seriously and we commit to respect it to the sector's highest standards.** For this reason we wish to provide up-to-date information as to how A. Menarini Farmaceutica Internazionale Srl (UK registered branch) Menarini House, Mercury Park, Wycombe Lane, Wooburn Green, High Wycombe - HP10 0HH - Buckinghamshire (hereinafter the "Company", or "we") processes your personal data and ensures compliance with the applicable laws, including Regulation 2016/679/EU (the "Regulation").

### 1. What we can do with your Data

Your personal data, which we have collected on occasion of direct contacts with you, or that we may have retrieved from public available sources or specialised services providers (i.e. the IQVIA OneKey@ database - that contractually guarantees us the full compliance of the data collection and use with the Regulation), may be processed by the Company in its capacity of Data Controller for the following purpose:

- (A) "Scientific/Technical Information Activities", which include by way of example, visits by our reps, invitations to conferences, training sessions on our product/services, other related activities, etc.
- (B) Communication pertaining to the company and/or its incentives and products, via digital means (e.g. email).
- (C) Customisation of our Scientific /Technical Information Activities by assessing your needs, preferences and professional interests ("Profiling").

### 2. What Data we collect

The personal data which we may process ("Data") are the following:

**(1) Professional/Academic Title; (2) Name; (3) Surname;** (4) Year of graduation; **(5) Gender; (6) Correspondence and visit address (street, number, city, country,** as well as email and other possible telematic ID account); (7) Visit times; (8) Work phone number; (9) Work mobile number; (10) Work Fax number; **(11) Work sector; (12) Additional academic and professional qualifications/specialisations;** (13) Job position (e.g. Consultant Cardiologist, Manchester Royal Infirmary; Head of Cardiology Unit, Leicester General Hospital); (14) Data pertaining to the use and/or viewing, on your part, of our electronic/digital informational materials; (15) Other information inferred from the preferences you expressed when interacting with us.

Processing your Data is required to enable us to perform our Scientific/Technical information services/activities and for this reason we ask you to provide at least the above data highlighted in **bold fonts**: if you withhold them we will be unable to address any Scientific/Technical information activity to you. Conversely, providing us with all the other data is optional -your refusal/objection will not prevent us from addressing Scientific/Technical information activities/services to you.

We inform you that the legal basis for the data processing operations described above is:

- (A) the company's legitimate interest to perform the "**Scientific/Technical information services/activities, pursuant to art. 6.1.f. of the Regulation.** Specifically, the **legitimate interest** pursued by the company includes the following activities: maintaining company business/professional relationship with HCPs who are pre-existing professional contacts or



have expressed an interest in the service provided or whose data have been provided to us by IQVIA OneKey©; organising the company's plans regarding the scientific and technical information services; tracking /reporting the daily activities of its representatives towards HCPs / drug samples delivery, performing statistical analyses on our scientific/technical information activities.

- (B) your optional consent (in case you choose to confer it) to receive Communications pertaining to the Company and/or its incentives and products via digital means (e.g. email). If you do not consent we will not be able to send you such news regarding the Companies of our Group and our products via digital means.
- (C) your optional consent, (in case you choose to confer it) to receive customised Scientific/Technical Information Activities pursuant to art. 6.1.a. of the Regulation. If you do not consent we cannot tailor our services to your needs, preferences and interests.

Furthermore, your data may also be processed without your consent in order to fulfil obligations stemming from laws, regulations and EU law, as well as to carry out contract with you (e.g. managing your purchases), to enforce or defend a legal right judicially, to pursue legitimate interests (e.g. to share data among Menarini Group Companies) and in all other cases prescribed by arts. 6 and 9 of the Regulation, where these are applicable.

### **3. How we process your Data.**

Data is processed both in paper and electronically and entered into the company system in line with the applicable laws –including the aspects pertaining to data security and confidentiality- and according to the principles of fair and lawful processing. Your Data shall be stored only as long as strictly necessary to fulfil the goals for which they were collected; in any case, the criterion used to determine the length of the storage period takes into due account the need to comply with any relevant legal requirement, the principle of data minimisation and the need to rationally manage the Company's records. We may store your data even after the end of our activities towards you, but only for as long as necessary to fulfil contractual and legal obligations as well as to fulfil the purposes listed above. We update and maintain our databases so as to ensure your Data are always correct and accurate.

### **4. Who can access your Data**

Data may be processed by staff belonging to the following categories: administrative staff, reps, product managers. Data may also be processed by all those other members of staff who may need to do so by reason of their job duties. In addition, pursuant to arts. 6 and 9, Recitals 48 and 52 of the Regulation, Data may be communicated to the Company's parent company A. Menarini IFR Srl, based in Florence (Italy), as well as to other companies of the Menarini Group, including those located in non-EU Countries ("Third Countries") for organisational, administrative, financial and accounting necessities. Based on the legal and regulatory provisions to which we are bound, we may communicate your Data to the Association of the British Pharmaceutical Industry and other similar associations, to national and local Health Authorities, other health centres and universities, other public authorities, association bodies as well as other recipients to whom your Data shall be disclosed pursuant to laws or regulations. In addition, in relation to the above obligations and purposes, data may be communicated to other companies, such as suppliers, sub-suppliers, IT and "Cloud Computing" service providers, agencies and event organisation entities, professional service providers and companies that perform tax/administrative tasks on our behalf, even in Third Countries. Such entities/individuals will act, as the case may be, as data controllers or data processors, for the same purposes listed above and in line with the applicable law. As far as Data transfers to Third Countries are concerned –including transfers to countries which may not guarantee the same protection standards as the applicable privacy laws, we inform you that Data processing will



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take place only in accordance with the provisions set forth by the laws in force, such as, for example, your consent, the adoption of Model Contract Clauses approved by the EU Commission, the selection of commercial partners enrolled in programs for the international free movement of data (e.g. the EU-USA Privacy Shield) or operating in Countries considered safe by the EU Commission.

#### **5. Your Rights to Access and Control your Data**

You may at any time contact us at [gdpr@menariniuk.com](mailto:gdpr@menariniuk.com) as well as to our address in order to exercise the rights afforded by arts. 15-22 of the Regulation, including: knowing whether or not any Data referring to you is being processed by us; access your Data; verify the Data's content, origin, exactness, location (including, where applicable, the Third Countries where the data might be); obtain a copy of the Data; ask that the Data are supplemented, updated, amended; in the circumstances set forth by the law, ask that the processing of Data is restricted, that Data are deleted, anonymised, frozen; oppose to profiling operations and direct contact activities (including restricting contact methods to specific communication media), oppose to the processing of Data for legitimate reasons. Likewise, you may at any time withdraw consent (although this will not impair the lawfulness of the processing operations performed before your consent's withdrawal) and/or notify the Menarini Group's Data Protection Officer ([dpo@menarini.com](mailto:dpo@menarini.com)) any observations you may have on our use of your Data which you consider inappropriate and/or lodge a complaint with Information Commissioner's Office (ICO - <https://ico.org.uk/>)

We may update our Data Privacy Statement from time to time and we will publish these updates here. They become effective upon publication. So we recommend you regularly visit this page to keep yourself informed on possible amendments.

This data privacy statement was last updated on 23rd June 2020.