

**INFORMATION NOTICE FOR ACTUAL AND POTENTIAL CUSTOMERS**

**PURSUANT TO ART. 13 OF EU REGULATION 679/2016 AND THE PRIVACY CODE**

(as amended by Legislative Decree 101/2018)

**Introduction**

For Kedrion S.p.A., your privacy and the security of your personal data are particularly important. Therefore, we collect and process such data with the utmost care and attention, adopting specific technical and structural measures to ensure full security of the processing. We inform you, pursuant to Art. 13 of the European Regulation 2016/679 (hereinafter "Regulation") and the Privacy Code as amended by Legislative Decree 101/2018, that the processing of your personal data is carried out in a manner appropriate to ensure the security and confidentiality of your data; the processing is carried out using IT and/or telematic means, as detailed in this information notice. This information notice concerns the processing of personal data of actual and potential customers with whom Kedrion S.p.A. establishes or intends to establish a contractual and/or commercial relationship.

**Data Controller**

The processing of your personal data is carried out by Kedrion S.p.A., as the Data Controller, pursuant to and for the purposes of EU Regulation 2016/679 and the Privacy Code as amended by Legislative Decree 101/2018.

For any questions or requests related to the processing of your personal data, you can send a request to the following contacts:

Kedrion S.p.A.

Registered office address: Loc. Ai Conti Castelvechio Pascoli (LU)

Email contact: [privacy@kedrion.com](mailto:privacy@kedrion.com)

The Data Controller has appointed a Data Protection Officer (DPO) who can be contacted regarding the policies and practices adopted in the field of personal data protection.

The contact details of the Data Protection Officer are as follows:

[DPO@Kedrion.com](mailto:DPO@Kedrion.com)

**Types of Data and Purposes of Processing**

The personal data that Kedrion S.p.A. processes are as follows:

- Name/surname of legal representatives and contacts;
- Tax code/VAT number, address, email, phone number;
- Data related to criminal convictions or security measures consequently adopted, limited to distributors and wholesalers for the top figures of the companies, where provided by the preliminary qualification phase and monitoring of the qualification status, and any other data contained in the related qualification report;
- Data derived from the third-party qualification platform as well as the questionnaire completed by the potential customer;

- Identification code assigned with the loading of the master data into the system;
- Other information necessary for the opening of the master data and for payments.

Kedrion S.p.A. will process your data in compliance with the conditions of lawfulness provided by Art. 6 of EU Regulation 2016/679 and to the extent strictly necessary to fulfill the following purposes:

- Management of preliminary activities – preventive qualification and reputation verification on the third party where operating; negotiations;
- Verification of the presence of the Company's Name, Legal Representative, Directors/Procurators/Managers, Effective Owners, Controlling Shareholders, and Ultimate Global Owners of the Company in the lists of persons, entities, and groups subject to restrictive measures issued by the European Union, the United Nations, the UK government, OFAC (Office of Foreign Assets Control), and more generally by any country/government entity promoting restrictions on Export Control and international economic sanctions;
- Execution of the contract and related administrative and accounting management;
- Compliance with legal obligations related to civil, fiscal, accounting, and other special pharmaceutical sector regulations.

### **Communication and Dissemination of Personal Data**

The collected data may be communicated to recipients, appointed pursuant to Art. 28 of EU Regulation 2016/679, who will process the data as external Data Processors of Kedrion S.p.A. and/or to third parties acting as independent Controllers for the fulfillment of contractual and/or regulatory obligations. Specifically, your data may be communicated to:

- Financial Administrations and Public Entities in compliance with regulatory obligations;
- Companies involved in administrative, accounting, and business process management (e.g., Auditing Firms, Tax Consultants, Management Consultants, Legal Advisors, etc.);
- Banking institutions for the management of collections and payments;
- Data processing and IT service companies;
- Debt collection/factoring companies;
- Insurance companies.

It is specified that the updated list of external Data Processors is available at the company's offices.

### **Transfer of Data to a Third Country and/or International Organization**

Personal data may be transferred abroad (in EU and non-EU countries) to companies belonging to the Kedrion group, in compliance with the guarantees provided by the applicable legislation (existence of an adequacy decision or standard contractual clauses). It is specified that the use of IT storage systems may also involve the transfer of data abroad (both EU and

non-EU), always in compliance with the applicable legal provisions and, in any case, ensuring maximum security.

## **Mandatory or Optional Nature of Providing Personal Data**

The provision of personal data for the above purposes is optional but necessary. The partial or total failure to provide data will result in the impossibility of proceeding with the processing related to the management of the contract and services and, therefore, the impossibility of establishing any contractual and/or commercial relationship.

## **Legal Basis of Processing**

The legal bases of the processing in question are the fulfillment of contractual and pre-contractual obligations, compliance with legal obligations to special pharmaceutical sector regulations, and the legitimate interest of the Data Controller.

## **Methods of Processing and Storage of Personal Data**

The processing of data is carried out through paper supports or IT applications by internal subjects specifically authorized and trained. These subjects are allowed access to your personal data to the extent and within the limits necessary for the performance of the processing activities concerning you. The data are stored in paper, IT, and telematic archives located within the European Economic Area and may be transferred to non-EU countries, with full assurance of the guarantees provided by European legislation.

## **Retention Period or Criteria Used to Determine Such Period**

The personal data processed by the Data Controller are kept for the time necessary to complete the activities related to the management of the contract with the Data Controller and in accordance with the company's data retention policy.

## **Rights of Data Subjects and Methods of Exercising Them**

Your rights are those provided by the EU Regulation in Articles 15-22 and those provided by the Privacy Code as amended by Legislative Decree 101/2018, including but not limited to:

- Access;
- Rectification;
- Erasure;
- Withdrawal of consent;
- Restriction of processing;
- Objection to processing;
- Portability.

These rights are guaranteed to you without charges and with no formalities for their exercise, which is essentially free of charge. For any further information and, in any case, to send your request, you can contact the Data Controller at the address [privacy@kedrion.com](mailto:privacy@kedrion.com).

## **Right to Lodge a Complaint**

Without prejudice to any other administrative or judicial action, you may file a complaint with the supervisory authority as provided by EU Regulation 2016/679 and the Privacy Code, as amended by Legislative Decree 101/2018.