

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

(as amended by Legislative Decree 101/2018)

**I. 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 suppliers with whom Kedrion S.p.A. establishes or intends to establish a contractual relationship aimed at the supply of goods or services (hereinafter simply "Suppliers").

**II. 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)

**III. Types of Data, Purposes of Processing, and Legal Basis of Processing**

**1. PERSONAL DATA PROCESSED BY KEDRION IN RELATIONSHIPS WITH ALL ITS SUPPLIERS:**

- Name/surname of the supplier (individual); name/surname of legal representatives and contacts for suppliers (legal entities);
- Tax code/VAT number, address, email, phone number;
- Data related to criminal convictions or security measures consequently adopted for individual suppliers; for top figures of companies for suppliers (legal entities);
- Curriculum vitae of the individual (including image, if voluntarily provided);
- Data derived from the third-party qualification platform used by the company, including public reputation information;
- Data derived from the qualification information questionnaire completed by the supplier;
- Data necessary to implement the payment process.

Kedrion S.p.A. will process the 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:

Purposes of Processing	Legal basis
Preventive qualification and reputation verification of Suppliers carried out through the qualification platform used by the company, including the verification of the presence of the name of the individual Supplier - or, in the case of a legal entity, the name of the Company, the Legal Representative, and the Directors/Procurators/Managers, Effective Owners, Controlling Shareholders, and Ultimate Global Owners of the same - 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.	Legal Obligation and Legitimate Interest of the Data Controller
Commercial negotiations and contract stipulation	Execution of pre-contractual measures to which the data subject is a party
Execution of the contract and related management for administration, accounting, and invoicing activities, as well as the management of any disputes	Execution of a contract to which the data subject is a party and legal obligation

## 2. PERSONAL DATA PROCESSED BY KEDRION IN RELATIONSHIPS WITH SUPPLIERS TO WHOM IT CONTRACTS THE EXECUTION OF WORKS, PROJECTS, AND/OR SERVICES

In addition to the processing of data mentioned in point 1 above, for the purposes indicated therein, in relationships with Suppliers to whom it contracts the execution of works, projects, and/or services, Kedrion processes the following personal data:

- Data communicated by the Supplier based on the procedures in force at Kedrion for the protection of health, safety, and the environment in the contracting of works and services, including: declaration on the personnel of the Supplier employed in the contract, nominally identified and related declaration of regular employment and regularity of remuneration/contributions/insurance; certificate of health suitability for the job for each worker employed in the contract; safety training certificates and for the use of machines and equipment/working at height/access to confined spaces and anything else necessary to verify considering the object of the contract for each worker employed in the contract; data to demonstrate the regularity of remuneration, contributions, and insurance of the personnel employed in the contract; including: copy of the LUL with reference to each worker employed in the contract (copy of the Unilav in case of new hires).

Kedrion will process the 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:

Purposes of Processing	Legal Basis
Protection of health and safety in the workplace pursuant to Legislative Decree 81/2008	Legal Obligation
Environmental protection	Legal Obligation
Combating irregular work	Legal Obligation

### 3. PERSONAL DATA PROCESSED BY KEDRION IN RELATIONSHIPS WITH CONSULTANT/PROFESSIONAL SUPPLIERS TO WHOM IT CONTRACTS CONSULTANCY OR REQUESTS PROFESSIONAL SERVICES

In addition to the processing of data mentioned in point 1 above, for the purposes indicated therein, in relationships with Consultant/Professional Suppliers to whom it contracts consultancy or requests professional services, Kedrion processes the following personal data:

- Data regarding the existence of relationships with public administration, including employment relationships;
- Data regarding the existence of assignments in the Public Administration;
- Absence of causes of incompatibility and/or conflict of interest concerning the contractual relationship with Kedrion;
- Amounts received by the healthcare professional in the context of relationships with Kedrion, for the publication of the same in compliance with the "transparency" regulations.

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:

Purposes of Processing	Legal Basis
Compliance with legal measures provided for the assignment of tasks to public employees	Legal Obligation
Preventing violations of company principles regarding the fight against corruption as per the company's Code of Ethical Conduct and the organization, management, and control model adopted pursuant to Legislative Decree 231/2001 adopted by the company	Legal Obligation and Legitimate Interest of the Data Controller

Purposes of Processing	Legal Basis
Compliance with the Farmindustria Code of Ethics, the EFPIA Code, and any other regulations concerning declarations of value transfers to healthcare professionals	Legal Obligation and Legitimate Interest of the Data Controller

**IV. 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 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 also deriving from membership;
- Companies involved in administrative, accounting, and business process management (e.g., auditing firms, tax consultants, management consultants, legal consultants);
- Banking institutions for the management of collections and payments;
- Data processing and IT service companies;
- Any and all authorities and/or public entities involved, in any capacity and by law, in the processes related to the treatments described above.

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

#### **V. 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.

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

The provision of data is considered necessary, and failure to provide it will make it impossible for the Data Controller to proceed with the activities related to the main processing, i.e., the impossibility of managing the supply contract and the obligations, including legal ones, arising from the established relationship.

#### **VII. 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.

## VIII. 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.

## IX. 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 particular 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).

## X. 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.