

**Privacy Notice**  
**Application for participation in the "Angelini Pharma IIT Program"**

Last updated April 17, 2023

Pursuant to the applicable personal data protection legislation, You are provided with the following information on the processing of your personal data, in your capacity as a subject submitting an application to the "Angelini Pharma IIT Program", proposing an "Investigator Initiated Trial" (hereinafter "IIT").

**1. Joint Data Controllers, DPOs, Joint-Controllership Agreement and Contact Point**

**1.1 Joint Data Controllers and Data Protection Officers (DPOs)**

The Joint Data Controllers are:

- Angelini Pharma S.p.A. (hereinafter "Angelini"), with registered office in Viale Amelia n. 70, 00181 - Rome (Rome), Italy, email: [privacy.italia@angelinipharma.com](mailto:privacy.italia@angelinipharma.com), which also operates in Switzerland through Angelini Pharma S.p.A., Rom, Zweigniederlassung Zug, 6301 Zug, email: [privacy.ch@angelinipharma.com](mailto:privacy.ch@angelinipharma.com).

Angelini has appointed a Data Protection Officer (DPO), who can be contacted directly at the following addresses: Data Protection Officer - DPO c/o Angelini Pharma S.p.A., Viale Amelia n. 70, 00181 - Rome (Rome), Italy, email: [dpo.italia@angelinipharma.com](mailto:dpo.italia@angelinipharma.com);

- together with its affiliate established in the country of the applicant or of the university/institute/organization/association or other (hereinafter "Institution") on behalf of which the application is made (hereinafter "Angelini's Affiliate").

The Angelini's affiliates and related DPOs are:

- a) Angelini Pharma Bulgaria EOOD, with registered office in Blvd. 10, Asen Yordanov 1592, Sofia, Bulgaria, email: [office@angelini.bg](mailto:office@angelini.bg).  
Angelini Pharma Bulgaria EOOD has appointed a Data Protection Officer (DPO), who can be contacted directly at: [dpoangelini@deloitte.com](mailto:dpoangelini@deloitte.com).
- b) Angelini Pharma Ceska Republika s.r.o., with registered office in Palachovo náměstí 799/5, 625 00, Brno, Czech Republic, email: [privacy.czech@angelinipharma.com](mailto:privacy.czech@angelinipharma.com).  
Angelini Pharma Ceska Republika s.r.o. has appointed a Data Protection Officer (DPO), who can be contacted directly at: [dpo.angelini@weinholdlegal.com](mailto:dpo.angelini@weinholdlegal.com).
- c) Angelini Pharma Deutschland GmbH, with registered office in Elsenheimerstr. 45 - 80687 München, Germany, email: [datenschutz@angelinipharma.de](mailto:datenschutz@angelinipharma.de).  
Angelini Pharma Deutschland GmbH has appointed a Data Protection Officer (DPO), who can be contacted directly at: [datenschutz@angelinipharma.de](mailto:datenschutz@angelinipharma.de).
- d) Angelini Pharma España S.L.U., with registered office in C/Antonio Machado, 78, 08840, Viladecans (Barcelona), Spain, email: [lopd@angelini.es](mailto:lopd@angelini.es).  
Angelini Pharma España S.L.U. has appointed a Data Protection Officer (DPO), who can be contacted directly at: [lopd@angelini.es](mailto:lopd@angelini.es).
- e) Angelini Pharma France SAS, with registered office in 55 Avenue de Colmar 92500 Rueil-Malmaison, France, email: [privacy.france@angelinipharma.com](mailto:privacy.france@angelinipharma.com).  
Angelini Pharma France SAS has appointed a Data Protection Officer (DPO), who can be contacted directly at: [dpo.france@angelinipharma.com](mailto:dpo.france@angelinipharma.com).
- f) Angelini Pharma Hellas S.A., with registered office in Agiou Konstantinou 59-61, Green Plaza Building C, - 151 24 Marousi, Greece, email: [privacy.greece@angelinipharma.com](mailto:privacy.greece@angelinipharma.com).  
Angelini Pharma Hellas S.A. has appointed a Data Protection Officer (DPO), who can be contacted directly at: [privacy.greece@angelinipharma.com](mailto:privacy.greece@angelinipharma.com).

- g) Angelini Ilac Sanayi ve Ticaret A.Ş, with registered office in RSD 4, Nispetiye Mah. Aytar Cad. Fecri Ebcioğlu Sok. No: 4, Ground Floor, 34340, Levent, Beşiktaş, İstanbul, Turkey, email: info@angelini.com.tr.  
Angelini Ilac Sanayi ve Ticaret A.Ş has appointed a Data Protection Officer (DPO), who can be contacted directly at: sinem.dilmen@angelinipharma.com.
- h) Angelini Pharma Magyarország KFT, with registered office in Dakya Gabor utca 3.214-215.i, 1118 Budapest, Hungary, email: privacy.hungary@angelinipharma.com.  
Angelini Pharma Magyarország KFT has appointed a Data Protection Officer (DPO), who can be contacted directly at: dpo.hungary@angelinipharma.com.
- i) Angelini Pharma Nordics AB, with registered office in Birger Jarlsgatan 6D, 114 34 Stockholm, Sweden, email: privacy.nordics@angelinipharma.com.  
Angelini Pharma Nordics AB has appointed a Data Protection Officer (DPO), who can be contacted directly at: dpo.nordics@angelinipharma.com.
- j) Angelini Pharma Österreich GmbH, with registered office in Brigittenauer Lände 50-54 (Pier 50), Stiege 2, 6th floor, 1200, Wien, Austria, email: privacy.austria@angelinipharma.com.  
Angelini Pharma Österreich GmbH has appointed a Data Protection Officer (DPO), who can be contacted directly at: dpo.austria@angelinipharma.com.
- k) Angelini Pharma Polska Sp. z o.o., with registered office in Adgar Park West, Aleje Jerozolimskie 181B, 02-222 Warszawa, Poland, email: angelini@angelini.pl.  
Angelini Pharma Polska Sp. z o.o. has appointed a Data Protection Officer (DPO), who can be contacted directly at: daneosobowe@angelini.pl.
- l) Angelini Pharma Portugal Unipessoal LDA, with registered office in Quinta dos Palhas, Rua João Changas, N° 53, Piso 3 - 1495 Cruz Quebrada, Portugal, email: protecao.dados@angelini.pt.  
Angelini Pharma Portugal Unipessoal LDA has appointed a Data Protection Officer (DPO), who can be contacted directly at: protecao.dados@angelini.pt.
- m) Angelini Pharmaceuticals Romania S.r.l., with registered office in Str. Dr. Carol Davila, nr. 9, Sector 5, 050451, Bucuresti, Romania, email: dataprotection@angelini.ro.  
Angelini Pharmaceuticals Romania S.r.l. has appointed a Data Protection Officer (DPO), who can be contacted directly at: dataprotection@angelini.ro.
- n) Angelini Pharma Rus LLC, with registered office in Trekhpudny lane, 9, bld. 2, room 501 - 516, 23001, Moscow, Russia, email: privacy.russia@angelinipharma.com.  
Angelini Pharma Rus LLC has appointed a Data Protection Officer (DPO), who can be contacted directly at: natalia.pyreskina@angelinipharma.com.
- o) Angelini Pharma Slovenska Republika S.r.o., with registered office in Junova 33 - 831 01, Bratislava 3, Slovenia, email: office@angelini.sk.  
Angelini Pharma Slovenska Republika S.r.o. has appointed a Data Protection Officer (DPO), who can be contacted directly at: dpo@krockapartners.sk.
- p) Angelini Pharma UK-I Limited, with registered office in 6th Floor Napier House 24 High Holborn, London, United Kingdom, WC1V 6AZ, email: privacy.UK-i@angelinipharma.com.  
Angelini Pharma UK-I Limited has appointed a Data Protection Officer (DPO), who can be contacted directly at: dpo.UK-i@angelinipharma.com.

### 1.2 Joint-Controllership Agreement

The Joint Data Controllers have signed an agreement to determine their respective responsibilities according to the current legislation on the protection of personal data ("Joint-Controllership Agreement"), the main issues of which are summarized in the following table:

<b>Joint Data Controllers (Respective Responsibilities)</b>	
<b>Angelini Pharma S.p.A.</b>	<b>Angelini's Affiliate</b>
<ul style="list-style-type: none"> <li>✓ IT tools management (in particular, the platform used for the online form)</li> <li>✓ Data subject's requests management (Contact point)</li> <li>✓ IIT proposal evaluation and approval (together with the Angelini's Affiliate)</li> </ul>	<ul style="list-style-type: none"> <li>✓ IIT proposal evaluation and approval (together with Angelini)</li> </ul>

**1.3 Contact point**

For any request relating to the processing of your personal data and the exercise of your rights, You can write to Angelini (acting as the "contact point" of the Joint Data Controllers) at the dedicated email address set forth in paragraph 1.1 above.

**2. Purpose of processing and legal basis for the processing**

Your personal data will be processed in compliance with the legal provisions in a correct, lawful and transparent manner for the purpose set out below and according to the following condition of lawfulness (legal basis for processing).

<b>Purpose of the processing</b>	<b>Legal basis for processing data</b>
<p>Proper and comprehensive management of your application for participation in the "Angelini Pharma IIT Program" [<b>management of your application for participation in the "Angelini Pharma IIT Program"</b>].</p>	<p><u>For the IIT proposal submitted by You (as applicant), on your own behalf:</u>                      the processing of your personal data for this purpose is necessary for the execution of a <b>contract</b> or the execution of <b>pre-contractual measures</b> and therefore does not require your consent.</p> <p><u>For the IIT proposal submitted by You (as applicant), on behalf of an Institution:</u>                      The processing of your personal data for this purpose is based on the <b>legitimate interest</b> of the Joint Data Controllers to manage and evaluate the application of the Institution with whom You (as applicant) are contractually bound.                      At your request, Angelini may provide You with information on the assessment of this legitimate interest made by the Joint Data Controllers.                      You may exercise your right to object to such activity, at any time, by contacting Angelini.</p>

**3. Categories of data processed**

The Joint Data Controllers will process the following categories of your personal data:

- first and last name, for your correct identification;

- name and address of the Institution on behalf of which the application for participation in the "Angelini Pharma IIT Program" is submitted, for the correct identification of the party for which the application for participation is submitted;
- contact details (e-mail address and telephone number), to contact You in order, in particular, to (i) request and receive confirmation — by means of a dedicated link — of the application sending (so-called "double opt-in"); (ii) acquire any further information about You, your application and the IIT proposed by You, in order to carry out a correct evaluation of your application; (iii) give You feedback on the evaluation (positive or negative outcome) of your application and (iv) possibly — if your application is considered of interest to Angelini — carry out the pre-contractual activities necessary to reach an agreement on the IIT proposed by You;
- your curriculum vitae (CV) and data related to your ability to carry out the IIT proposed by You, for the correct evaluation of your application.

#### 4. Data source

Your personal data will be obtained by the Joint Data Controllers directly from You by filling out the appropriate online form on the website [www.angelinipharma.com](http://www.angelinipharma.com) or by email and telephone communications.

#### 5. Nature of data provision

The provision of your personal data for the **management of your application for participation in the "Angelini Pharma IIT Program"** (purpose as per paragraph 2):

- for the IIT proposal submitted by You (as applicant), on your own behalf, is a contractual obligation. Failure to provide it would make it impossible for You to see your application for participation in the "Angelini Pharma IIT Program" evaluated or correctly evaluated by the Joint Data Controllers;
- for the IIT proposal submitted by You (as applicant), on behalf of the Institution, is mandatory. Failure to provide or your objection to their processing would make it impossible for You to see the application for participation in the "Angelini Pharma IIT Program" evaluated or correctly evaluated by the Joint Data Controllers.

#### 6. Processing methods

Data processing is carried out using both automated and non-automated tools, with logic strictly related to the purposes of the processing and, in any case, with methods and procedures able to ensure the security and confidentiality of the data.

The IIT proposal may be submitted through the website [www.angelinipharma.com](http://www.angelinipharma.com) by filling out the online form and clicking on the "virtual button" to send. You will receive an email to confirm - by means of a special link - the sending of the application for participation (so called "double opt-in"); such application will be considered received by Angelini when, after clicking on said link, the message confirming that the procedure has been correctly completed will be displayed on the appropriate web page and will be received by You by email.

#### 7. Categories of personal data recipients

For the management of your application to participate in the "Angelini Pharma IIT Program" (purposes referred to in paragraph 2, letter a) above, your personal data may be communicated:

- to persons authorized by the Joint Data Controllers to carry out personal data processing operations (employees or collaborators of the Joint Data Controllers);
- to the Data Processors appointed by the Joint Data Controllers (suppliers of computer, technological and telematic services);
- to autonomous data controllers (such as telecommunications service providers, and the Licensor or Marketing Authorization Holder (MAH) of the licensed product involved in the IIT proposal for which Angelini or its affiliates are not the Licensor or MAH, in order to receive by them merely a

favourable opinion on the IIT proposal already assessed ethically and scientifically to the Joint Data Controllers).

Your data may also be transmitted in accordance with the law to tax authorities, police and judicial and administrative authorities, for the assessment and prosecution of crimes, prevention and protection from threats to public security, to allow the Joint Data Controllers to ascertain, exercise or defend a right in court, as well as for other reasons related to the protection of the rights and freedoms of others.

#### 8. Data retention period

We store your personal data for a limited period of time depending on the purpose of processing. After the expiry of this period, your data will be permanently deleted or in any case irreversibly anonymized. Your personal data will be stored in accordance with the terms and criteria specified below:

- for the **management of your application for participation in the "Angelini Pharma IIT Program"** (purpose referred to in paragraph 2, letter a) for a maximum period of 8 (eight) weeks from the receipt of your application for participation in the "Angelini Pharma IIT Program". In the event of a positive evaluation of your application, your personal data will be stored until full and correct conclusion with You of the of the IIT agreement negotiation which must take place no later than 12 (twelve) months after the positive evaluation of your proposal.

For technical reasons, the termination of the processing and the consequent deletion of your personal data will take place within 30 (thirty) days from the terms indicated above.

This is without prejudice to cases where retention for a longer period is required for any litigation, requests by the competent authorities or under applicable law.

#### 9. Transfer outside the EU/EEA

Your personal data will process in the European Union (EU) or the European Economic Area (EEA).

Your personal data may be transferred in countries outside the EU/EEA if the Angelini's Affiliate (Joint Data Controller) is established in a country outside the EU/EEA.

You can contact Angelini or the Angelini's DPO at the addresses indicated above (paragraph 1) to request the complete and updated list of transfers to countries outside the EU/EEA, as well as know the specific warranties adopted and request a copy if necessary.

#### 10. Rights of the data subject

The data subject, i.e. You, may exercise, in relation to the processing of the data described herein, the rights provided for by the applicable legislation on the protection of personal data, including the right to

- have confirmation as to whether or not personal data concerning You are being processed and, if so, to obtain access to the data and related information (in particular, the purposes of the processing; categories of personal data processed; recipients or categories of recipients to whom the data have been or will be communicated; the period of retention of the data or the criterion for determining it; the existence of the right to rectify or erase the data or to limit or oppose the processing; the right to lodge a complaint with a supervisory authority; the origin of the data; the possible existence of an automated decision-making process, including profiling and, in such cases, significant information on the logic used and the importance and expected consequences of such processing for the data subject; the appropriate safeguards in case of transfer of personal data outside the EU/EEA), as well as a copy of such personal data, provided that this does not harm the rights and freedoms of others (**right of access**);
- correction of your personal data, i.e. to obtain the correction, modification or updating of any inaccurate or no longer correct data, as well as to obtain the supplement of incomplete personal data, including by providing an additional statement (**right to rectification**);
- request the deletion of your personal data when these, in particular, (i) are no longer necessary for the purposes for which they were collected or processed, or (ii) have been processed unlawfully, or (iii) must be deleted in order to fulfill a legal obligation (**right to be forgotten**). Cancellation may

not be carried out if, in particular, the processing is necessary for the fulfillment of a legal obligation or for the establishment, exercise or defense of a right in court;

- to obtain a restriction on the processing of your personal data, i.e. that the Joint Data Controllers retain such data without being able to use them. This right can be exercised only when, in particular, (i) the accuracy of the personal data is contested, for the period necessary for the Controller to verify the accuracy of such data, or (ii) the processing of the data is unlawful and a restriction on the use of the data is requested, instead of their deletion, or (iii) although the Controller no longer needs them for the purposes of processing, the personal data are necessary for the data subject to ascertain, exercise or defend a right in court (**right to restriction**);
- to obtain from the Joint Data Controllers your personal data, in a standard format, and that they are transferred, where technically possible, directly to a third party indicated by You (**right to data portability**).

In addition, as data subject, You also have the **right to object**, this means to:

- object at any time for reasons connected to your particular situation, to the processing of your personal data for the management of your application for participation in "Angelini Pharma IIT Program" when the IIT proposal is submitted by You (as applicant), on behalf of an Institution (purpose pursuant to paragraph 2). In this case, the Joint Data Controllers will refrain from further processing your personal data unless it demonstrates the existence of legitimate binding reasons to proceed with the processing that override the interests, rights and freedoms of the data subject or for the assessment, the exercise or defense of a right in court.

To exercise these rights, You can contact the Joint Data Controllers at any time, by writing to Angelini Pharma S.p.A., viale Amelia n. 70, 00181 - Rome (Rome), Italy or at the email address [privacy.italia@angelinipharma.com](mailto:privacy.italia@angelinipharma.com) or by writing to the Angelini's DPO c/o Angelini Pharma S.p.A., viale Amelia n. 70, 00181 - Rome (Rome), Italy, or to the email address [dpo.italia@angelinipharma.com](mailto:dpo.italia@angelinipharma.com).

## 11. Complaint

If You believe that your personal data has been processed unlawfully, You have the **right to lodge a complaint** with the data protection authority (in Italy, the *Garante per la protezione dei dati personali*, for more information [www.garanteprivacy.it](http://www.garanteprivacy.it)).

The complaint can also be made to a data protection authority other than Italian one, if said data protection authority is that of the country in which You have your habitual place of residence or of the place where the alleged breach took place.

## 12. Changes to this notice

The constant evolution of our activities could lead to changes in the characteristics of the processing of your personal data described above. As a result, this privacy notice may be subject to changes and additions over time, which may also be necessary with regard to new legislation on the protection of personal data.

In the event of significant changes to this notice, we will notify You accordingly.

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