

Privacy notice
Proposal of a "Researcher Initiated Study - RIS"

Last updated October 07, 2022

The company Angelini Pharma S.p.A. ("**Angelini**" or "Data Controller"), pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data ("General Data Protection Regulation" or "**GDPR**") and Italian Legislative Decree 196/2003 ("Personal Data Protection Code"), provides you ("**You**" or "Applicant") with the following information on the processing of your personal data, in your capacity as a natural person who proposes to Angelini on behalf of a university/institute/organization/association or other ("**Institution**") to support a non-clinical and non-commercial study conducted by an independent third-party sponsor without the participation of the pharmaceutical industry ("Researcher Initiated Study" or "**RIS**").

1. Identity and contact details of the Data Controller and Data Protection Officer

The Data Controller is Angelini Pharma S.p.A., with registered office in Viale Amelia n. 70, 00181 - Rome (Rome), Italy, email: privacy.italia@angelinipharma.com.

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

2. Purposes of processing and legal basis for the processing

All personal data provided by You is processed in compliance with the provisions of the law in a correct, lawful and transparent manner for the purposes set out below and according to the following conditions of lawfulness (legal basis for processing).

Purposes of the processing	Legal basis for processing data
a) Proper and comprehensive management of a RIS proposal to Angelini [management of the RIS proposal].	The processing of your personal data for this purpose is based on the legitimate interest of Angelini (art. 6.1.f, GDPR) to evaluate the RIS proposal made by the Applicant on behalf of an Institution and — if the proposal is considered of interest to Angelini — to carry out the pre-contractual activities necessary to reach an agreement on the RIS proposed. Therefore, it does not require your consent. At your request, Angelini may provide You with information on the assessment of this legitimate interest made by Angelini. You may exercise your right to object to such activity at any time by notifying Angelini.

3. Categories of data processed

Angelini 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 proposal is made, for the correct identification of the party for which the proposal is made;
- job title, for the identification of your relationship with the Institution;

- contact details (e-mail address and telephone number), to contact You in order, in particular, to (i) acquire any further information about You, your application and the RIS proposed by You, in order to carry out a correct evaluation of the proposal; (ii) give You feedback on the evaluation (positive or negative outcome) of the proposal and (iii) possibly — if the proposal is considered of interest to Angelini — carry out the pre-contractual activities necessary to reach an agreement on the RIS proposed by You;
- your curriculum vitae (CV), for the correct evaluation of the proposal.

4. **Data source**

Your personal data will be obtained by the Data Controller:

- directly from You (in particular, by email and telephone communications);
- from the Institution on behalf of which the proposal is made;
- from the company of Angelini Pharma Group you may have contacted to propose a RIS.

5. **Nature of data provision**

The provision of your personal data for the **management of the RIS proposal** (purpose referred to in paragraph 2) is merely optional: failure to provide it would make it impossible for You to see your application evaluated or correctly evaluated (and possibly accepted) by Angelini.

6. **Processing methods**

Data processing is carried out by 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.

7. **Categories of personal data recipients**

For the management of your proposal (purposes referred to in paragraph 2) above, your personal data may be communicated:

- to persons authorized by the Data Controller to carry out personal data processing operations (employees or collaborators of the Controller);
- to the Data Processors appointed by the Data Controller (suppliers of computer, technological and telematic services);
- to autonomous data controllers (telecommunications service providers; the company that is the licensor/owner of the intellectual property of the medicinal product to which the RIS refers, in order to receive its favourable or unfavourable assessment on the RIS).

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 Data Controller 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 storage 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 rendered irreversibly anonymous.

Your personal data will be stored in accordance with the terms and criteria specified below:

- for the **management of the RIS proposal** (purpose referred to in paragraph 2) for a period of 60 (sixty) days from the receipt of your application/proposal. In the event of a positive evaluation of your proposal, your personal data will be stored for a further period of 12 (twelve) months to carry out the negotiation of the agreement with the Institution related to the RIS.

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. Data transfer outside the EU/EEA

Your personal data will not be transferred to countries outside the European Union (EU) or the European Economic Area (EEA).

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 personal data protection, 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, or, finally, (iv) You have opposed their processing (see below "right to object") and there is no prevailing legitimate reason allowing the Data Controller to proceed with the processing in any case (**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 Data Controller retains 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 Data 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 or (iv) you have objected to their processing (see below "right to object"), pending verification that the legitimate reasons of the Data Controller take precedence over those of the data subject (**right to restriction**).

In addition, you also have the **right to object** as the data subject:

- opposing at any time, for reasons related to your particular situation, the processing of your personal data for the management of the RIS proposal. In this case, the Data Controller will refrain from further processing your personal data unless it proves that there are compelling legitimate grounds for processing, thus overriding the interests, rights and freedoms of the data subject or for establishing, exercising or defending a right in court.

To exercise these rights You can contact the Data Controller 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 or by writing to the Data Protection Officer (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.

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).

The complaint can also be made to a data protection authority other than that of Italian, if said data protection authority is that of the EU Member State 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 privacy notice, we will notify You accordingly.

Roma, 24/10/2022.

Lorella Ragni
GLOBAL R&D PLCM EXECUTIVE DIRECTOR

Firma: _____