

## PRIVACY NOTICE

06.04.2020

### (A) This Notice

#### Summary – This Notice

We take the protection of your Personal Data very seriously! This Notice explains how we may Process your Personal Data. This Notice may be amended or updated from time to time, so please check it regularly for updates.

This Notice is issued by Zentiva on behalf of itself, its subsidiaries and its affiliates (together, “Zentiva”, “we”, “us” and “our”), and is addressed to individuals outside our organization with whom we interact, including customers, visitors to our Sites, and other users of our products or services (together, “you”). Defined terms used in this Notice are explained in Section (T) below.

For the purposes of this Notice, Zentiva is the Controller. Contact details are provided in Section (S) below.

This Notice may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Notice carefully, and to regularly check this page to review any changes that we might make in accordance with the terms of this Notice.

### (B) Collection of Personal Data

#### Summary – Collection of Personal Data

We may collect or obtain Personal Data about you: directly from you (e.g. where you contact our assistance services and call centers); in the course of our relationship with you (e.g. if you make a purchase); when you make your Personal Data public (e.g. if you make a public post about us on social media); when you visit our Sites; when you register to use any of our Sites, products, or services. We may also receive Personal Data about you from third parties (e.g. from databases of contact details of Health Care Professionals).

**Collection of Personal Data:** We may collect Personal Data about you from the following sources:

- **Data That You Provide:** We may obtain your Personal Data when you provide it to us (e.g. if you contact one of our call centers, we might Process Personal Data that you provide to our operators or our representatives when they visit you; similarly, we might Process your Personal Data if you file a Medical Information Enquiry, or if you contact us by e-mail or by other means).
- **Data That You Provide to Our Assistance Services:** If you contact our assistance services with information about adverse effects of medication, then we will Process this data according to our legal duties (we will submit it to the official European Database about medication), together with relevant information about you as a patient, including your age, date of birth, identification number, age group or gender.
- **Data That a Third Party Provides:** We may collect or obtain your Personal Data from third parties who provide it to us, notably from paid databases of contact details of Health Care Professionals.
- **Relationship Data:** We may collect or obtain your Personal Data in the ordinary course of our relationship with you (e.g. we provide our products to you or to your employer, or if you or your employer supply products or services to us and we keep Personal Data related to this relationship).



- Data That You Make Public: In some cases, we may collect or obtain your Personal Data that you manifestly choose to make public, including *via* social media (e.g. we may collect information from your social media profile(s), if you make a public post about us).
- Site Data: We may collect or obtain your Personal Data when you visit any of our Sites or use any features or resources available on or through a Site.

## (C) Creation of Personal Data

### Summary – Creation of Personal Data

We may create Personal Data about you (e.g. records of your interactions with us).

We may also create Personal Data about you, such as records of your interactions with us, and details of your purchase history or your preferences.

## (D) Categories of Personal Data That We May Process

### Summary – Categories of Personal Data That We May Process

We may Process: your personal details (e.g. your name); demographic data (e.g. your age); your contact details (e.g. your address); records of your consents; purchase details; payment details (e.g. your billing address); information about adverse effects of medication related to you; your medical records; information about our Sites (e.g. the type of device you are using); details of your employer (where relevant); information about your interactions with our content or advertising; any views or opinions you provide to us.

We may Process the following categories of Personal Data about you:

- Personal Details: Given name(s); preferred name; and photograph.
- Demographic Information: Gender; date of birth/age; nationality; salutation; title; and language preferences.
- Contact Details: Correspondence address; shipping address; telephone number; e-mail address; details of Personal Assistants, where applicable; messenger app details; online messaging details; and social media details.
- Consent Records: Records of any consent you may have given, together with the date and time, means of consent and any related information (e.g. the subject matter of the consent).
- Payment Details: Invoice records; payment records; billing address; payment method; bank account number; accountholder name; account security details; BACS details; SWIFT details; IBAN details; payment amount; payment date; and records of checks.
- General Medical Information: Information about: your illnesses; health records, including information about your weight, height, physical pressure and other relevant information; records of your medical procedures; eating habits and lifestyle; consumption of alcohol, tobacco and drugs.
- Medication Records: Records of medication that has been prescribed to you and its effects; information about medication that you have consumed or that you consume; information about your health insurance



- Details about Profession and Specialization: Specialization, profession or professional affiliation and preferences of Health Care Professionals.
- Data relating to reputation and financial background: capital links, financial conditions, offences and convictions, contact and bank details of suppliers and customers.
- Data Relating to Our Sites: Device type; operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a Site; username; password; security login details; usage data; aggregate statistical information.
- Employer Details: Where you interact with us in your capacity as an employee, the name, address, telephone number and e-mail address of your employer, to the extent relevant.
- Content and Advertising Data: Records of your interactions with our online advertising and content, records of advertising and content displayed on pages displayed to you, and any interaction you may have had with such content or advertising (including mouse hover, mouse clicks, any forms you complete (including incomplete forms not submitted) and any touchscreen interactions.
- Views and Opinions: Any views and opinions that you choose to send to us, or publicly post about us on social media platforms.

## (E) Legal Basis for Processing Personal Data

### Summary – Legal Basis for Processing Personal Data

We may Process your Personal Data where: you have given your prior, express consent; the Processing is necessary for a contract between you and us; the Processing is required by applicable law; or where we have a valid, legitimate interest in the Processing.

In Processing your Personal Data in connection with the purposes set out in this Notice, we may rely on one or more of the following legal bases, depending on the circumstances:

- Consent: We may Process your Personal Data where we have obtained your prior, express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way);
- Contractual Necessity: We may Process your Personal Data where the Processing is necessary in connection with any contract that you may enter into with us, e.g. we will rely on this legal basis if we deliver goods to you, or if we would be sending you letters in relation to our contracts;
- Compliance with Applicable Law: We may Process your Personal Data where the Processing is required by applicable law; e.g. we may have a legal duty to retain information about adverse effects of medication, in which case we will retain information about any adverse effects of medication about which you informed us through our call service or otherwise; or
- Legitimate Interests: We may Process your Personal Data where we have a legitimate interest in the Processing. The balancing test that we conduct in each case is as follows:
  - We ensure that the Processing is lawful, proportionate, and conducted in accordance with the terms of this Notice;
  - We ensure that we have a legitimate business need to perform the Processing; and
  - We ensure that there is no material likelihood of any adverse impact on your interests, fundamental rights, or freedoms, as a result of the Processing.



## (F) Sensitive Personal Data

### Summary – Sensitive Personal Data

We do not seek to collect or otherwise Process your Sensitive Personal Data. Where we need to Process your Sensitive Personal Data, such as your medical records or information about adverse effects of medication on your health, we Process it only for a legitimate purpose, and we do so in accordance with applicable law.

We do not seek to collect or otherwise Process Sensitive Personal Data in the ordinary course of our business. Where it becomes necessary to Process your Sensitive Personal Data for any reason, we rely on one of the following legal bases:

- Compliance with Applicable Law: We may Process your Sensitive Personal Data where the Processing is required or permitted by applicable law (e.g. we need to Process data about adverse effects of medication);
- Necessary for Medical Reasons: We may Process your Sensitive Personal Data where it is necessary in order to provide health care or for management of the health care system, or where it is necessary to ensure the high standard of safety of medicinal products (e.g. information about adverse effects of medication can be Processed in order to ensure that it will not cause harm to other patients);
- Necessary for Scientific Purposes: We may Process your Sensitive Personal Data if it is necessary for scientific purposes (e.g. for the development of new, safer and better medicine); or
- Consent: We may Process your Sensitive Personal Data where we have, in accordance with applicable law, obtained your prior, express consent prior to Processing your Sensitive Personal Data (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

If you provide Sensitive Personal Data of any other data subject to us, you must ensure that it is lawful for you to disclose such data to us, including ensuring that one of the legal bases set out above is available to us with respect to the Processing of those Sensitive Personal Data.

## (G) Purposes For Which We May Process Your Personal Data

### Summary – Purposes For Which We May Process your Personal Data

We may Process your Personal Data for the following purposes: providing products and services to you; submission to the European Database of adverse effects of medication; compliance with applicable legal obligations; improving our products and services; ensuring the safety of our customers; operating our Sites; communicating with you; managing our IT systems; financial management; conducting surveys; ensuring the security of our premises and systems; conducting investigations where necessary; and improving our Sites.

We may Process your Personal Data for the following purposes, subject to applicable law:

- Provision of Products and Services: Providing our products, services, or Sites; providing products and services on request; providing promotional items upon request; and communicating with you in relation to those products and services. This may include, e.g. our Processing of your data in order to ship goods that you have bought, in order to send you an invoice, etc.
- Submission of Information regarding Adverse Effects: We are obliged to submit your Personal Data to the European Database when you report adverse effects of medication. If you give us your contact details, we will also report them for follow-up activities.
- Compliance with Laws and Regulations: Adhering to our numerous legal obligations, such as keeping track of contradictions of our medications; keeping your medical files for these



regulatory purposes; using this documentation in case of investigation by relevant authorities or in some other interaction with public authorities.

- Enhancing Cooperation with Health Care Professionals: We Process Personal Data provided to us by Health Care Professionals in order to assess which type of medication we should be offering, preparing special discounts, programs etc.; we also Process Personal Data provided by Health Care Professionals to enhance cooperation with them, e.g. to invite them to some of our conferences, expert panels, etc.
- Conducting bioequivalence studies: We may process your Personal Data when conducting bioequivalence studies together with clinical and contract research organizations.
- To Improve Services for Our Customers: We may use your Personal Data to improve our services; to offer you more relevant goods; to present you with better offers.
- To Provide Customer Service: To provide you with the best service possible; to help you with any issues or problems; to recommend our services and goods.
- To Confirm Your Eligibility: If some of our products or content is only aimed at certain group of our customers (e.g. Health Care Professionals), we have to Process your Personal Data to see if you are eligible.
- Compliance Checks: Fulfilling our regulatory compliance obligations, including 'Know Your Client' checks; and confirming and verifying your identity (including by using credit reference agencies); and screening against government and/or law enforcement agency sanctions lists and other legal restrictions.
- Our Sites: Operating and managing our Sites; providing content to you; displaying advertising and other information to you; communicating and interacting with you *via* our Sites; and notifying you of changes to any of our Sites, our products, or our services.
- Communications: Communicating with you *via* any means (including *via* e-mail, telephone, text message, social media, post or in person), with news items and other information in which you may be interested, subject to ensuring that such communications are provided to you in compliance with applicable law; maintaining and updating your contact information where appropriate; and obtaining your prior, opt-in consent where required.
- Communications and IT Operations: Management of our communications systems; operation of IT security systems; and IT security audits.
- Health and Safety: Health and safety assessments and record keeping; and compliance with related legal obligations.
- Financial Management: Sales; finance; corporate audit; and vendor management.
- Surveys: Engaging with you for the purposes of obtaining your views on our products and services.
- Security: Physical security of our premises (including records of visits to our premises; and CCTV recordings); and electronic security (including login records and access details).
- Investigations: Detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.
- Legal Proceedings: Establishing, exercising and defending legal rights.
- Improving Our Sites, and Products: Identifying issues with our Sites, or our products; planning improvements to our Sites, or our products; and creating new Sites, or products.



## (H) Disclosure of Personal Data to Third Parties

### Summary – Disclosure of Personal Data to Third Parties

We may disclose your Personal Data to: legal and regulatory authorities; our external data Processor and subcontractors of our Processor; our external advisors; any party as necessary in connection with legal proceedings; any party as necessary for investigating, detecting or preventing criminal offences; any purchaser of our business; and any third-party providers of advertising, plugins or content used on our Sites.

We may disclose your Personal Data to other entities within the Zentiva group, for legitimate business purposes (including operating our Sites, and providing products and services to you), in accordance with applicable law. A full list of Zentiva group entities that may have access to the Personal Data is available in Section (S) below.

In addition, we may disclose your Personal Data to:

- you and, where appropriate, your appointed representatives;
- legal and regulatory authorities, when obliged to do so by law or by command of a relevant authority, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- our external data Processor, currently Genpact International Inc., 40 Old Ridgebury Road, Third Floor, Danbury, CT 06810, United States of America who, in turn, arranges for the Personal Data Processing through its subcontractors some of whom may also be located outside the EEA, e.g. in the U.S. and India: Further information about Genpact International Inc. and its subcontractors can be found at: [<http://www.genpact.com/about-us/privacy>];
  - accountants, auditors, lawyers and other outside professional advisors to Zentiva, subject to binding contractual obligations of confidentiality;
  - other third party Processors (such as payment services providers; shipping companies; etc.), located anywhere in the world, subject to the requirements noted below in this Section (H);
  - any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defense of legal rights;
  - any relevant party for the purposes of preventing, investigating, detecting or prosecuting criminal offences or executing criminal penalties;
  - any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of reorganization, dissolution or liquidation); and
  - any relevant third-party provider, where our Sites use third-party advertising, plugins or content. If you choose to interact with any such advertising, plugins or content, your Personal Data may be shared with the relevant third-party provider. We recommend that you review that third party's privacy policy before interacting with its advertising, plugins or content.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) take measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

## (I) Profiling

### Summary – Profiling

The Processing of your Personal Data may include automated decision-making, including Profiling.

The Processing of your Personal Data may include automated decision-making, including Profiling, which is carried out for the following purposes:



| Profiling Activity                     | Logic of Profiling Activity  | Consequences for You   |
|--|--|--|
| Profiling of Health Care Professionals | We analyze our interactions with Health Care Professionals in order to contact them with the most relevant products and in order to provide the most useful offers for them.       | If you are a Health Care Professional, this might affect prices that we charge you, and it might affect the content of our offers for you.   |
| Customized Discounts                   | We analyze the purchasing activity and interests of our customers. This information is analyzed to determine the most appropriate promotions and discounts to offer our customers. | If you are our direct customer, this Profiling activity may mean that you receive discounts that are not available to others, and that others receive discounts that are not available to you. |

**(J) International Transfer of Personal Data**

**Summary – International Transfer of Personal Data**

We may transfer your Personal Data to recipients in other countries. Where we transfer Personal Data from the EEA to a recipient outside the EEA that is not in an Adequate Jurisdiction, we do so on the basis of Standard Contractual Clauses.

Because of the international nature of our business, we may need to transfer your Personal Data within the Zentiva group, and to third parties as noted in Section (H) above (notably to subcontractors of our data Processor, Genpact), in connection with the purposes set out in this Notice. For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located. Typically these transfers would be either to the U.S. or India.

Where we transfer your Personal Data from the EEA to recipients located outside the EEA who are not in Adequate Jurisdictions, we do so on the basis of Standard Contractual Clauses. You may request a copy of our Standard Contractual Clauses using the contact details provided in Section (S) below.

Please note that when you transfer any Personal Data directly to a Zentiva entity established outside the EEA, we are not responsible for that transfer of your Personal Data. We will nevertheless Process your Personal Data, from the point at which we receive such data, in accordance with the provisions of this Notice.

**(K) Data Security**

**Summary – Data Security**

We implement appropriate technical and organizational security measures to protect your Personal Data. Please ensure that any Personal Data that you send to us are sent securely.

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information *via* the Internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Data, we cannot guarantee the security of your data transmitted to us using the Internet



– any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us is sent securely.

## (L) Data Accuracy

### Summary – Data Accuracy

We take every reasonable step to ensure that your Personal Data is kept accurate and up-to-date and is erased or rectified if we become aware of inaccuracies. Please let us know if your Personal Data that we keep is inaccurate or not up-to-date.

We take every reasonable step to ensure that:

- your Personal Data that we Process is accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that is inaccurate (having regard to the purposes for which it is Processed) is erased or rectified without delay.

From time to time, we may ask you to confirm the accuracy of your Personal Data. You can always contact us with a request to rectify or erase inaccurate Personal Data. For more details, please see the section about your legal rights.

## (M) Data Minimization

### Summary – Data Minimization

We take every reasonable step to limit the volume of your Personal Data that we Process to what is necessary.

We take every reasonable step to ensure that your Personal Data that we Process is limited to the Personal Data reasonably necessary in connection with the purposes set out in this Notice.

## (N) Data Retention

### Summary – Data Retention

We take every reasonable step to ensure that your Personal Data is only retained for as long as it is needed in connection with a lawful purpose.

We take every reasonable step to ensure that your Personal Data is only Processed for the minimum period necessary for the purposes set out in this Notice. The criteria for determining the duration for which we will retain your Personal Data are as follows:

---

(1) We will retain copies of your Personal Data in a form that permits identification only for as long as:

- (a) we maintain an ongoing relationship with you (e.g. when you order goods from us, when we provide you with any services, or when we have a long-term, on-going relationship); or
- (b) we are obliged by law to keep your Personal Data (e.g. about adverse effects of medication, your medical data and other records); or
- (c) your Personal Data is necessary in connection with the lawful purposes set out in this Notice (e.g. when you contact our assistance services and we have a legitimate interest in Processing such data in order to provide you with the most valuable help and in order to improve our products and services),

---

**plus:**

(2) the duration of:

---





- (a) any applicable limitation period (i.e. any period during which any person could bring a legal claim against us in connection with your Personal Data, or any authority can initiate legal proceedings in which your Personal Data may be relevant); and
- (b) an additional two (2)-month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that is relevant to that claim, or if any authority initiates proceedings, we will still possess relevant documentation),

**and:**

- (3) in addition, if any relevant legal claims are brought or any other legal procedure is initiated, we may continue to Process your Personal Data for such additional periods as are necessary in connection with that claim or such proceedings.

During the periods noted in paragraphs (a) and (b) above, we will restrict our Processing of your Personal Data to the storage of, and maintaining the security of, such data, except to the extent that such data needs to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data; or
- anonymize the relevant Personal Data.

## (O) Your Legal Rights

### Summary – Your Legal Rights

Under applicable law, you may have a number of rights, including: the right not to provide your Personal Data to us; the right of access to your Personal Data; the right to request rectification of inaccuracies; the right to request the erasure, or restriction of Processing, of your Personal Data; the right to object to the Processing of your Personal Data; the right to have your Personal Data transferred to another Controller; the right to withdraw consent; and the right to lodge complaints with Data Protection Authorities. We may require proof of your identity before we can give effect to these rights.

Subject to applicable law, you may have a number of rights regarding the Processing of your Relevant Personal Data, including:

- the right not to provide your Personal Data to us (however, please note that we may be unable to provide you with the full benefit of our Sites, our products, or our services, if you do not provide us with your Personal Data – e.g. we may not be able to process your orders without the necessary details);
- the right to request access to, or copies of, your Relevant Personal Data, together with information regarding the nature, Processing and disclosure of such Relevant Personal Data;
- the right to request rectification of any inaccuracies in your Relevant Personal Data;
- the right to request, on legitimate grounds:
  - erasure of your Relevant Personal Data; or
  - restriction of Processing of your Relevant Personal Data;
- the right to object, on legitimate grounds, to the Processing of your Relevant Personal Data by us or on our behalf, especially in case of direct marketing;
- the right to have certain Relevant Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;



- where we Process your Relevant Personal Data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and
- the right to lodge complaints regarding the Processing of your Relevant Personal Data with a Data Protection Authority (in particular, the Data Protection Authority of the EU Member State in which you live, or in which you work, or in which the alleged infringement occurred, each if applicable).

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Notice, or about our Processing of your Personal Data, please use the contact details provided in Section (S) below. Please note that:

- we may require proof of your identity before we can give effect to these rights;
- where your request requires the establishment of additional facts (e.g. a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take; and
- where our processing is based on our legal duties, we might not be able to accommodate your request.

## (P) Cookies and Similar Technologies

### Summary – Cookies and Similar Technologies

We may Process your Personal Data by placing or reading Cookies and similar technologies.

When you visit a Site, we may place Cookies (a small data file) onto your device, or read Cookies already on your device, subject always to obtaining your consent, where required, in accordance with the law. We use Cookies to record information about your device, your browser and, in some cases, your preferences and browsing habits. This might include our analysis of the ways visitors engage with our sites in order to improve your experience, to provide you with more relevant content and offer you more relevant goods.

We may Process your Personal Data through Cookies and similar technologies.

## (Q) Terms of Use

### Summary – Terms of Use

Our [www.zentiva.com/gdpr](https://www.zentiva.com/gdpr) govern all use of our Sites.

All use of our Sites, our products, or our services is subject to our <https://www.zentiva.com/gdpr>. We recommend that you review our Terms of Use regularly, in order to review any changes that we might make from time to time.

## (R) Direct Marketing

### Summary – Direct Marketing

We may Process your Personal Data to contact you with information regarding products or services that may be of interest to you. You may unsubscribe for free at any time.

We may Process your Personal Data to contact you *via* e-mail, telephone, direct mail or other communication formats to provide you with information regarding products or services that may be of interest to you. If we provide products or services to you, we may send information to you regarding our products or services, upcoming promotions and other information that may be of



interest to you, using the contact details that you have provided to us and always in compliance with the law.

You may unsubscribe from our promotional e-mail list at any time by simply clicking on the unsubscribe link included in every promotional e-mail that we send. Once you unsubscribe, we will not send you further promotional e-mails, but we may continue to contact you to the extent necessary for the purposes of any products or services you have requested.

## (S) Contact Details

### Summary – Contact Details

You may contact us via post – list of local addresses in Section (U), telephone, or e-mail.

If you have any comments, questions or concerns about any of the information in this Notice, or any other issues relating to the Processing of Personal Data carried out by us, or on our behalf, please contact:

Michal Merta, MBA, MSc., LL.M (Data Protection Officer)

[dpo@zentiva.com](mailto:dpo@zentiva.com)

☎: +420 234 363 666

## (T) Definitions

- “**Adequate Jurisdiction**” means a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.
- “**Cookie**” means a small file that is placed on your device when you visit a website (including our Sites). In this Notice, a reference to a “Cookie” includes analogous technologies, such as web beacons and clear GIFs.
- “**Controller**” means the entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- “**Data Protection Authority**” means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- “**EEA**” means the European Economic Area.
- “**Health Care Professional**” means person who works in the health care sector, medicine sector or related industries. It can be, e.g. a doctor, an employee of a hospital, a pharmacist.
- “**Personal Data**” means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.



- **“Process”, “Processing” or “Processed”** means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **“Processor”** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- **“Profiling”** means any form of automated Processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular, to analyze or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.
- **“Relevant Personal Data”** means Personal Data in respect of which we are the Controller.
- **“Sensitive Personal Data”** means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.
- **“Standard Contractual Clauses”** means template transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission.
- **“Site”** means any website operated, or maintained, by us or on our behalf.

## (U) List of the joint data controllers

| Country | Name and address of the joint data controllers |  | Registration Number |
|---------|--|--|---------------------|
| LU      | Al Sirona (Luxembourg) Acquisition S.à r.l.    | 5, rue des Capucins, L-1313 Luxembourg, Grand Duchy of Luxembourg  | B223382             |
|         | Al Excalibur (Luxembourg) S.à r.l.             | 5 rue des Capucins, L-1313 Luxembourg, Grand-Duchy of Luxembourg   | 242.040             |
|         | Alvogen Balkans Luxembourg S.à r.l.            | 5, rue Heienhaff, L-1736, Senningerberg, Grand Duchy of Luxembourg | B 145518            |
|         | Alvogen IPco S.à r.l. (in liquidation)         | 5, rue Heienhaff, L-1736, Senningerberg, Grand Duchy of Luxembourg | B 149131            |
| CZ      | Al Sirona Bidco s.r.o.                         | U kabelovny 529/16, 102 00 Praha 10 – Dolní Měcholupy              | 07254792            |
|         | Zentiva Group, a.s.                            | U kabelovny 529/16, 102 37 Praha 10 – Dolní Měcholupy              | 07254729            |



|    |                                    |  |                |
|----|------------------------------------|--|----------------|
|    | Zentiva, k.s.                      | U kabelovny 130, 102 37<br>Praha 10 – Dolní<br>Měcholupy   | 49240030       |
|    | Theramex Czech<br>Republic, s.r.o. | Kateřinská 466/40, Nové<br>Město, 120 00, Prague 2,<br>the Czech Republic                          | 04653815       |
| D  | Zentiva Pharma GmbH                | Brüningstr. 50, 65926<br>Frankfurt/ M.   | HRB95544       |
|    | Winthrop Arzneimittel<br>GmbH      | Brüningstr. 50, 65926<br>Frankfurt/ M.   | HRB99575       |
| AT | Zentiva GmbH                       | Rosenbursenstraße 2/15<br>1010 Wien  | FN 129221 g    |
|    | HERBS Trading GmbH                 | Am Belvedere 4, Eingang<br>Karl Popper Straße 4,<br>1100 Vienna, Austria                           | FN 138399 d    |
| CH | Helvepharm AG                      | Walzmühlestrasse 60,<br>CH-8500 Frauenfeld   | CH21701378974  |
| UK | Zentiva Pharma UK<br>Limited       | 12 New Fetter Lane,<br>EC4A 1JP, London  | 02158996       |
|    | Creo Pharma Holdings<br>Limited    | Felsted Business Centre,<br>Cock Green, Felsted,<br>Essex, CM6 3LY                                 | 06096048       |
|    | Creo Pharma Limited                | Felsted Business Centre,<br>Cock Green, Felsted,<br>Essex, CM6 3LY                                 | 06082846       |
| F  | Zentiva France                     | 35 Rue du Val de Marne<br>75013 PARIS  | 407 710 474    |
| IT | Zentiva Italia S.r.l.              | Viale Bodio n° 37/B,<br>20158 - Milan  | MI - 1463705   |
| DK | Zentiva Denmark ApS                | c/o Harbour House<br>Sundkrogsgade 21, 2100<br>KØBENHAVN Ø   | 41172029       |
| PL | Zentiva Polska sp. z. o.<br>o.     | North Gate Buildings,<br>Bonifraterska Street 17,<br>00-203 Warsaw                                 | 0000691403     |
|    | Alvogen Poland sp. z. o.<br>o.     | 01-607 Warszawa, ul.<br>Kniaznina 4a/7, Poland   | KRS 000394178  |
|    | Alvogen Pharma sp.<br>z.o.o.       | 01-607 Warszawa, ul.<br>Franciszka, Kniaznina<br>4a/7, Poland                                      | KRS 0000610747 |
| PT | Zentiva Portugal, Lda              | Alameda Fernão Lopes,<br>n°16, bloco A, 8º Piso,<br>1495-190 Algés –<br>Portugal                   | 503103551      |
| SK | Zentiva, a.s.                      | Einsteinova 24, 851 01<br>Bratislava, Slovenská<br>republika                                       | 31 411 771     |
|    | Zentiva International a.s.         | Einsteinova 24, 851 01<br>Bratislava, Slovenská<br>republika                                       | 35 687 355     |
|    | Zentiva Bulgaria EOOD              | 7, Iskarsko shosse Blvd.,<br>Trade Center Evropa,<br>Building 15, floor 4, 1528<br>Sofia, Bulgaria | PIC205801872   |



|     |                                    |   |                |
|-----|------------------------------------|---|----------------|
| BG  | Alvogen Pharma Bulgaria EOOD       | 86, Bulgaria, Blvd., 1st floor, residential quarter Manastirsky, Livady - West, Vitosha District, Sofia 1680, Sofia Municipality, Sofia (capital), Region, Bulgaria | 201035481      |
|     | Alvogen Pharma Trading Europe EOOD | 86, Bulgaria, Blvd., 1st floor, residential quarter Manastirsky, Livady - West, Vitosha District, Sofia 1680, Sofia Municipality, Sofia (capital), Region, Bulgaria | 201400639      |
| BiH | Alvogen Pharma d.o.o               | Fra Anđela Zvizdovića 1, Sarajevo 71000, Bosna a Hercegovina  | 65-01-0116-10  |
| UA  | Alvogen Ukraine LLC                | 5-I Brovarsky Avenue, Kyiv, 02002, Ukraine  | 38804488       |
| HR  | Alvogen d.o.o                      | Avenija Veceslava Holjevca 40, Zagreb, Croatia  | 080774153      |
| MK  | Alvogen Pharma Macedonia DOOEL     | Boris Kidric bb, Gevgelija, North Macedonia   | 6708072        |
| RU  | Alvogen Pharma LLC                 | 31/4, Novoslobodskaya str., Office 6, Moscow, Russia, 127055  | 1147748135590  |
|     | Dolphin LLC                        | RF, 630108, Novosibirsk reg., Novosibirsk, 1st Parkhomenko alley, 14, Russia  | 1145476019490  |
|     | Bittner Pharma LLC                 | Sushchevsky Val, d.18, Moscow, Russia, 127018   | 1097746360271  |
| RO  | Zentiva S.A.                       | Bulevardul Theodor Pallady nr. 50, sectorul 3, 032266, Bucurest, Romania  | J40/363/1991   |
|     | Solacium Pharma S.r.l.             | Bulevardul Theodor Pallady nr. 50, sectorul 3, 032266, Bucurest, Romania  | J40/23565/2007 |
|     | Be Well Pharma S.r.l.              | Bulevardul Theodor Pallady nr. 50, sectorul 3, 032266, Bucurest, Romania  | J23/4165/2017  |
|     | LaborMed-Pharma SA                 | 44B Theodor Pallady Boulevard, district 3, Bucharest, Romania   | J40/21114/2007 |
|     | Alvogen Romania SRL                | 44B Theodor Pallady Boulevard, 2nd floor, district 3, Bucharest, Romania  | J40/2501/2000  |
| ALB | Alvogen Pharma Albania sh.p.k      | Tirane, Njesia, Bashkiake nr.2, rruga Themistokli, Germenji pallati,  | L61501034A     |



|     |  |  |                       |
|-----|--|--|-----------------------|
|     |  | Ambasador, kati i 1,<br>Albania  |                       |
| LT  | UAB Alvogen Baltic                                   | Uzupio g 30, Vilnius,<br>Lithuania   | 302488462             |
| NL  | EuroGenerics Holding<br>B.V.                         | The Netherlands, Laan<br>Copes Van Cattenburch<br>58, 2585 GC's -<br>Gravenhage, Hague   | 34157118              |
| CY  | Alvogen Cyprus Limited                               | 80 Griva Digheni, Swepeco<br>Court 6, 3101, Limassol,<br>Cyprus  | HE271648              |
|     | Rutengo Investments<br>Limited                       | 80 Griva Digheni, Swepeco<br>Court 6, 3101, Limassol,<br>Cyprus  | HE160948              |
| RS  | Alvogen Pharma d.o.o<br>ZA Promet I Usluge<br>Barice | Pasnjacka bb, Plandiste,<br>Barice, Serbia   | 20607149              |
| RKS | Alvogen Pharma Kosovo<br>SH.P.K.                     | Prishtina-Ferizaj KM7,<br>Kosovo   | 810809410             |
| MT  | Alvogen Malta<br>Operations ROW<br>Holdings Ltd.     | Malta Life Sciences Park,<br>Building 1 Level 4, Sir<br>Temi Zammit Buildings,<br>San Gwann Industrial<br>Estate, San Gwann SGN<br>3000, Malta | C75429                |
|     | Alvogen Malta<br>Operations (ROW) Ltd.               | Malta Life Sciences Park,<br>Building 1 Level 4, Sir<br>Temi Zammit Buildings,<br>San Gwann Industrial<br>Estate, San Gwann SGN<br>3000, Malta | C71197                |
| HU  | Zentiva HU Kft.                                      | 1023 Budapest, Árpád<br>fejedelem útja 26-28,<br>Hungary   | Cg.01-09-876879       |
|     | Alvogen CEE Kft                                      | 1065 Budapest, Bajcsy-<br>Zsilinszky, út 41. 3. em.<br>10, Hungary   | 01-09-979422          |
|     | Rutengo Hungary Kft                                  | 1065 Budapest, Bajcsy-<br>Zsilinszky, út 41. 3. em.<br>10, Hungary   | 01-09-967175          |
|     | Aramis Pharma Kft                                    | 1095 Budapest, Mester<br>utca 28. B., lház. 3. em. 5,<br>Hungary   | 01-09-873136          |
| IN  | ZENTIVA PRIVATE<br>LIMITED                           | A-802, Crescenzo, G<br>Block, Bandra Kurla<br>Complex, Mumbai<br>400051, India.  | U24100MH2019FTC328411 |



## ZENTIVA corporate governance – list of ZENTIVA branches

| Company Name        | Country   | Branch                                | Registration Number | Registered Office (address)   |
|---------------------|-----------|---------------------------------------|---------------------|---|
| Zentiva Group, a.s. | Bulgaria  | ZENTIVA BULGARIA BRANCH               | UIC205052992        | 7, Iskarsko shosse Blvd., Trade Center Evropa, Building 15, floor 4, 1528 Sofia, Bulgaria |
|                     | Estonia   | Zentiva Group, a.s. Eesti filiaal     | -                   | Tartu mnt 13, 10145 Tallinn, Estonia  |
|                     | Latvia    | Zentiva Group, a.s. filiāle Latvijā   | -                   | Ģertrūdes iela 10-10, Rīga, LV 1010, Latvia   |
|                     | Lithuania | Zentiva Group, a.s. Lietuvos filialas | -                   | Jogailos str. 9, Vilnius, Lithuania   |

