

Privacy Policy for Healthcare Professionals

The protection of your personal data is particularly important to us, and we take your rights to privacy and data protection very seriously. For this reason, we process your data in accordance with the EU General Data Protection Regulation ("GDPR") and any local data protection provisions. With this privacy policy, we are happy to inform you about what data we process about you, for which purposes and about your rights as a data subject ("HCP").

CONTROLLER:

AOP Orphan Pharmaceuticals GmbH
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1190 Vienna
Tel.: + 43 1 503 72 44
(„we“, „us“)

DATA PROTECTION OFFICER:

Alona Klammer
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1. PERSONAL DATA, PURPOSES AND LEGAL BASIS

1.1. Contact

When you contact us – e.g. by e-mail, telephone or via the contact form – we process the personal data provided: Typically, this is your name, contact details (e.g. telephone number and/or email-address) and the content of your request. The processing is necessary in order to deal with your enquiry and to reply to you. It is therefore carried out within the framework of our (pre-) contractual obligations towards you pursuant to Art 6 Para 1 lit b GDPR. The processing of this data is not legally required. However, we cannot properly process and respond to your enquiries without this information.

If you send us any material (e.g. scans of documents, invoices or images) when contacting us, we will also process the personal data contained therein. If these documents contain data of third parties, it is your responsibility to inform the respective data subject about the disclosure of the data and to ensure that the transmission is based on an appropriate legal basis.

1.2. Customer Relationship Management

In the course of interacting with you, we may record and store the personal data you provide in our Customer Relationship Management (CRM) system. This data is either directly received from you, the HCP, or obtained via a third party customer data base (eg the OneKey provided by IQVIA Information Solutions GmbH or an alternate provider) ("CRM-Database"). We have access to a personal data pool of HCPs specialized in a particular area (eg internal medicine), as it is provided by the CRM-Database. This pool of data can be processed for statistical market analysis. However, for our own purposes, we actively process only personal data of individuals with whom we are in active professional contact, as well as those who we think are relevant for potential future professional communications. The data we process may include:

- Personal Data: Name, title, gender, year of birth.
- Professional Contact Details: Preferred address, telephone, fax (if available), personal contact details, institution's opening hours, website, and email address.
- Professional Information: Specializations, professional qualifications, subspecialties, role or function, active/inactive status, category (e.g., "private practitioner," "consulting physician"), pharmacy (if applicable), and any insurance relevant information.

In case your data was already recorded in the CRM Database, you have been informed by its provider directly about the processing in the database. If we receive this data directly from you, we will provide your data to the CRM Database provider to ensure data consistency and accuracy. Also in this case the CRM Database provider will inform you about the separate processing in their systems.

The processing of CRM data is necessary for the management of our relationships with HCPs and further professional contacts and is based on our legitimate interests in ensuring the proper documentation and organization of interactions with healthcare professionals pursuant to Art 6 Para 1 lit f GDPR.

Any HCP recorded in the CRM Database has the right to object to such processing (either expressly by AOP or by the CRM Database provider in general). If any HCP does not want us to access their data via the CRM Database, they can contact the provider directly to restrict access to their data. However, if any HCP contacts us directly regarding such a request, we will forward the request to the provider on their behalf and will stop processing the relevant data until the matter is resolved.

1.2.1. Segmentation for Enhanced Support

We also may use a segmentation system to enhance our understanding of the professional interests and preferences of individuals we communicate with. This system allows us to categorize individuals based on attributes such as: areas of interest, professional focus, engagement with specific therapeutic fields, familiarity with our products, and the types of patients they treat. This helps us provide more relevant and customized information that aligns with their professional activities and the needs of the patients they care for.

The processing of segmentation data is also based on our legitimate interests in optimizing our interactions with healthcare professionals and providing them with targeted and relevant information and support, pursuant to Art 6 Para 1 lit f GDPR.

You have the right to object the processing for the segmentation purposes at any time eg by contacting us via e-mail.

1.3. Newsletter and Marketing

With your consent, we process the CRM and segmentation data to provide you with tailored newsletters and marketing communications via e-mail and other digital channels as described in the respective consent form. These communications may include the latest information on our products and services, educational opportunities, scientific topics, studies, and event invitations. The content may be customized to match the specific interests of each recipient.

Additionally, we use a tracking pixel in the newsletters to analyze how they are consumed. This allows us to conduct statistical evaluations of interaction and delivery data, such as the delivery status, open rate, click rate, and any feedback from the recipient. The purpose of this analysis is to optimize future communications and ensure the relevance of the information we provide.

The processing of your data for marketing purposes is based on your explicit consent, pursuant to Art 6 Para 1 lit a GDPR. You may withdraw your consent at any time, without giving reasons eg via e-mail without affecting the lawfulness of processing based on consent before its withdrawal.

1.4. Reporting of Adverse Drug Reactions

In case you report to us an adverse drug reaction (ADR) we will process the personal data you provide us and, in some cases, further data that we require to document the ADR: Name, contact details, occupation, firm (if applicable) of the reporter and the relationship to the patient concerned; further details about the drug and the ADR. In addition, we process the patient's data relevant for the respective report. It can include sex, age, height and weight, ethnicity, and relevant patient history. Since we do not require any personal data like name or contact details we kindly ask not to provide us such data. We are legally required to process this data due to our pharmacovigilance duties based on the directive 2001/3/EC on the Community code relating to medicinal products for human use and IR 520/2012 on the performance of pharmacovigilance activities. The processing is thus based on Art 6 Para 1 lit c GDPR if you are the reporter and Art 9 Para 2 lit I GDPR if you are the patient.

If you report an ADR on behalf of a patient, please make sure that this patient is informed about the reporting and information you provide us.

2. DATA RETENTION

We process your data only as long as it is necessary for the fulfilment of the respective purpose. We retain data in connection with your enquiries for a period of six months to be able to respond to any follow-up questions. CRM, marketing and newsletter data is processed in our system for three years after our last interaction.

Data from adverse drug reaction reports is retained as long as the respective product is authorised and for at least 10 years after the marketing authorization has ceased to exist according to Art 12 IR 520/2012. The name of the patient is anonymized as soon as it is not required for any possible queries.

We may further process this data if there are indications that the data is required for the assertion or defense of our claims in a particular case. The retention of data in this regard is subject to statutory warranty periods or periods of limitation. This retention beyond the original purpose is carried out in based on our legitimate interests in accordance with Art 6 Para 1 lit f and, if applicable, Art 9 Para 2 lit f GDPR.

3. DATA TRANSFER

3.1. Processors

If required in the course of our activities, we transfer your personal data to the following external recipients:

- a) IT service provider, cloud services, data hosting and processing or similar services;
- b) providers of software solutions and tools that support us in our activities.

Our processors are carefully selected and regularly audited. They process the data based on processing agreements exclusively on our behalf and on the basis of our documented instructions.

3.2. Controller

In addition, we transmit your personal data - insofar as necessary - to the following recipients, who act as independent data controllers:

- a) CRM Database providers for the purpose of recording new HCPs or updating data;
- b) external third parties who advise and support us to the extent necessary on the basis of our legitimate interests (e.g. legal representatives and insurance companies, auditors and consultants, etc);
- c) courts, authorities and other public bodies to the extent required by law or on a case-by-case basis (e.g. local drug and health authorities; tax authority, data protection authority, civil courts, etc).

3.3. Recipients outside of the European Union

When providing our services, your personal data may be transferred to recipients who are either located or process data outside the European Union. If there is no adequacy decision pursuant to Art 45 GDPR for the respective third country, we implement suitable guarantees to maintain the level of data protection according to Art 44 GDPR. This usually involves the conclusion of standard contractual clauses pursuant to Art 46 Para 2 lit c GDPR or the existence of binding corporate rules due to Art 47 GDPR. If necessary due to legal conditions in the respective country, we also implement supplementary measures in order to take

the special data protection situation into account. Upon your request, we will gladly provide you with a copy of the respective appropriate guarantees with a specific data recipient.

If no such appropriate guarantees are available for the data transfer, we can base the processing on your express consent in individual cases pursuant to Art 49 GDPR. In this case, we will inform you separately.

4. DATA SUBJECT RIGHTS

As a data subject, you have the **right to information** about the personal data processed about you. Furthermore, you have the **right to rectification, erasure** and **restriction of processing** or to **data portability**. You also have the right to **object** to the processing of your personal data if this results from your particular situation or if your personal data is processed for direct marketing purposes. If the processing is based on your voluntary consent, you can **withdraw this consent** at any time, free of charge and without giving reasons, with effect for the future, e.g. by sending an email to data-protection@aoporphan.com.

Furthermore, you have the right to **lodge a complaint** to the competent supervisory authority. In Austria, it is the Austrian Data Protection Authority, accessible at www.dsb.gv.at.

However, before you contact the authority, if you want to exercise your data protection rights or have any other questions about data protection, **please contact us directly** using the contact details listed above. We will be happy to provide you with advice and answers at any time.