

PRIVACY NOTICE – CHIESI VENDOR PORTAL

October 2020

Welcome to **Chiesi Vendor Portal** (hereinafter “the Portal”). Through this Portal you can qualify as a vendor and participate in tenders and requests for quotation promoted by Chiesi Farmaceutici S.p.A., an Italian company with registered office in Via Palermo 26/A, 43122 Parma, Italy, and the other companies forming part of the Chiesi Group (hereinafter “Chiesi”, “we”, “us”, or “our”).

Your personal data will be processed by Chiesi in compliance with the applicable privacy laws – including but not limited to the Regulation (EU) 2016/679 (the “GDPR”) – and our data protection commitments. This privacy notice is provided under Article 13 of the GDPR and explains what kind of personal information we may collect and how we will use it.

DEFINITIONS

Data Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Personal Data is any information relating to an identified or identifiable (directly or indirectly) natural person.

User is the company, the authorized person and/or individual accessing to the Portal (hereinafter referred to as “User”, “you”, “your”).

CONTENT OF THIS NOTICE

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(1) PERSONAL DATA, PURPOSES AND LEGAL BASIS

Purpose of the processing

Personal Data provided by companies, their authorized persons or individuals when registering to the Portal and/or participating to a tender will be processed for following purposes only: (i) registering and accessing to the Portal; (ii) being listed as a qualified vendor within the vendor register of Chiesi; (iii) participate in the tenders and requests for quotations carried out through the Portal.

Personal data processed

- Contact information (e.g. name, surname, registered address) and access credentials (e.g. username and password) to register and get access to the Portal.
- Contact information (e.g. name, surname, registered address), payment and financial details, judicial data related to criminal convictions and offences (e.g. involvement in investigations for fraud, tax crimes, bribery, etc.) of specific subjects foreseen by the law (e.g. shareholders, directors and legal representatives) to be accepted and listed as a qualified vendor of Chiesi and participate in the tenders and requests for quotation.

Legal Basis for processing

- Performance of pre-contractual and contractual measures to which you are a party, to register and get access to the Portal, be accepted and listed as a qualified vendor of Chiesi and participate in the tenders and requests for quotations.
- Chiesi's compliance with legal obligations to assess your eligibility as qualified vendors and/or to fulfill requests coming from authorities.
- Legitimate Interest to share your information (including your Personal Data) to the companies forming part of Chiesi Group.

Your information (including Personal Data) is essential and mandatory to register to the Portal, qualify as a vendor and participate to the activities carried out through the Portal. In case of incomplete or incorrect information you may not be able to access to the Portal.

Except for judicial data listed in the paragraph above, the processing of special categories of data under Article 9 of the GDPR is expressly excluded. Therefore, in case we will enter into contact with such categories of data it will be immediately redacted.

(2) SUBJECTS INVOLVED & DATA TRANSFER

Your Personal Data will be processed by authorized persons specifically appointed and instructed by the Data Controller, and/or by third parties appointed as data processors under Article 28 of the GDPR. Chiesi may also share your Personal Data in the following cases:

- a) Your Personal Data may be shared with the companies forming part of Chiesi group, in Italy and abroad.
- b) Your Personal Data will be shared with Bravo Solutions Italia S.p.A., the manager of the Portal appointed as a data processor, that will carry out the following activities:
 - Managing and updating the database of the Portal, including verifying User's data to validate their registration.
 - Technical maintenance of the Portal, including back up and implementation of data security measures.

- c) We may share your data with other third parties carrying out activities on our behalf, including consultants, insurance institutions, banks, outside counsels.
- d) We may also share your personal information to defend our position in case of legal disputes or to comply with disclosure request from regulators, courts, and government agencies.

Chiesi will always make sure third parties are meeting severe data privacy standards by entering into data processing agreements providing specific provisions in relation to the technical and organizational measures that must be taken to safeguard your Personal Data.

Your Personal Data will normally be stored on servers based in the EEA. In case the affiliate company and/or the third party are based in a non-EEA country, we will take appropriate contractual measures required to ensure an adequate level of data protection, including entering into agreements based on the standard contractual clauses for transferring data outside of the EEA.

(3) DATA SECURITY

The security of your Personal Data is extremely important for us. We take all the necessary measures to ensure a high level of protection, keep your information secure, and avoid unexpected data incidents like unauthorized accesses and disclosures. We put in place reliable security measures and sophisticated technical means to keep your information confidential:

- a) We only use the information strictly connected to each purpose and retain them for a limited period in compliance with the data minimization principle.
- b) We carefully select business partners and service providers and require them to comply with our data protection requirements. In addition, we conduct audits and other evaluation activities in order to verify compliance with these requirements.
- c) We foster a strong data protection culture among our employees and collaborators by providing trainings and activities to increase their awareness.

(4) DATA RETENTION TIME

Your Personal Data are processed electronically, via IT systems and manually, and they are stored by Chiesi and/or our service providers. Personal data are stored rigorously to the extent required to fulfill our obligations and in the time frame that is required to meet the purposes for which the information has been collected, in accordance with the applicable laws. We will remove your data from our systems or records once it is no longer needed, and/or we will take steps to make sure it remains anonymous so that you can no longer be identified via these means (unless we need to retain your data to comply with legal or regulatory obligations to which we remain subject).

Information (including Personal Data) you have provided to register to the Portal will be stored for the entire period that you are registered and/or listed as a qualified vendor of Chiesi. Upon termination of your account

and/or deletion from our list of qualified vendors, your access data (including your credentials) will be deleted after a period of 3 months, and you will not be able to access to the Portal anymore.

Documentation related to qualification procedures and tenders operated through the Portal will be archived and preserved for 10 years from the conclusion of the qualification process or of the tender, in the last case coincides with the signing of the relevant contract.

Contracts and other relevant documentation relating to the activities carried out through the Portal may be preserved to comply with the legal obligation to retain contracts and administrative data and/or to defend our position within a legal proceeding.

(5) USER RIGHTS

You can contact our Data Protection Officer at any time to obtain an updated list of our data processors (e.g. our service providers), to get the list of subjects to which the data has been communicated, and to exercise the following rights at any time (Article 12 and 15-22 of the GDPR).

You may withdraw the consent you have given for a specific data processing scenario at any time. This withdrawal will not affect the legal implications of any Personal Data processing which has been completed prior to the consent being withdrawn. According to the GDPR, you have the right to:

- a) Access to your Personal Data.
- b) Rectify your Personal Data.
- c) Limit the processing of your Personal Data.
- d) Erase your Personal Data.
- e) Portability of your Personal Data.
- f) Object to the processing of your Personal Data.

If you believe that Chiesi does not process your Personal Data in compliance with this notice or with the applicable law, you can always enforce your rights by lodging a complaint within the local Data Protection Authority.

(6) CONTACT US

Should you have any questions or complaints regarding Personal Data processed by Chiesi, you may contact the Data Protection Officer at any time you wish by writing an email to the following address: dpoit@chiesi.com.

(7) UPDATES TO THIS NOTICE

This notice may be periodically updated. Any update to this notice will become effective at the time of its publication on the Portal.