

Information on the use of your personal data pursuant to art. 13 and 14 of the Regulation (UE) 679/2016 ("GDPR")

We are committed to protecting your personal data and complying with applicable data protection laws and would therefore like to inform you about the processing of your personal data by:

- Menarini Stemline BeNeLux (NA/SA) with registered office at De Kleetlaan 3, 1831 Machelen, Belgium (hereinafter: "*Menarini Stemline*" or "*us*"), acting as Data Controller under the GDPR.

The Data- Protection -Officer ("DPO") of the Data Controller can be contacted at the following address: dpo@menarini.com

1. What data do we process and what are the purposes of the data processing?

a. *Personal data:* We process your name, practice or business address, contact details (e.g. telephone number) academic degree, specialization / professional qualification, as well as any additional data about you that is published on the web (e.g., publications, collaborations, posts on social network, etc.). We collect some of this data ourselves from you or from publicly available sources, and some we receive from our service provider Veeva. IQVIA also provides information on the number of patients treated by the facility in which you operate. All this data is necessary to enable:

- i. the exchange of medical-scientific information including, for example, the proactive sharing of data and insights related to clinical practice, as well as factual and non-promotional information related to the company pipeline or related to new product access activities;
- ii. in the case of products authorized for marketing and distributed by *Menarini Stemline*, the performance of scientific information activities.

The above-mentioned activities are carried out by the *Menarini Stemline's* field-staff belonging respectively to the Medical or Commercial area and can take place both in traditional mode (e.g., via in-person visit) and in remote mode (e.g., via video call).

This data is necessary for the fulfillment of contracts with you (legal basis: art. 6.1 b) GDPR) and furthermore for the fulfillment of a legal obligation (legal basis: art. 6.1 c) GDPR). Furthermore, the aforementioned data is necessary to protect the following legitimate interests: maintaining our business- relationship with you as well as for purposes of scientific information, marketing purposes and market research (legal basis: art. 6.1 f) GDPR).

b. *Information in connection with visits by our field- staff:* We process the date and content of the visits made by our field staff, as well as preferred visiting times, and any content (e.g., visuals) you select during the visit. In addition, we may also keep track in our systems of other information about you as a professional that is captured by our field-staff in their contacts with you, such as your level of knowledge of our products, your experience as a speaker at conferences, your affiliations/collaborations with other physicians, etc. This data is necessary to protect the following legitimate interests: maintaining our business relationship with you, managing our field-staff, and for information and marketing purposes (legal basis: art. 6.1 f) GDPR).

c. *Information for the fulfillment of contracts with you:* If we conclude a contract with you (e.g. on the performance of speaker or consultant activities or in relation to your participation in events), we process the information required for the performance of the contractual services or for the performance of pre-contractual measures, e.g. your contact data, account data, travel data, etc. (legal basis: art. 6.1 b) GDPR). We also process booking-related data collected in connection with the performance of a contract (invoices, transfers made, etc.) to fulfill legal obligations on the basis of art. 6.1 c) GDPR in conjunction with the relevant tax laws. If we conduct studies in collaboration

with you or handle requests for therapeutic uses, under applicable local laws, we will process your name, contact information, and the type and amount of compensation actually paid to you in connection with the concerned study.

d. Information to comply with a legal obligation: We may process the date and content of the dear doctor letter sent to you, where applicable. In addition, we process your name and contact details if you inform us of possible side effects or quality defects with regard to our products or – in case you request - unsolicited medical information about our company products, including via digital means (legal basis: fulfillment of a legal obligation and/or the pursuit of a public interest in the field of public health pursuant to artt. 6.1 (c) and 9.2 (i) GDPR).

e. Further information if you have given us your consent to do so: Should you provide your consent, we may:

i **send you unsolicited scientific and promotional materials (e.g., published scientific articles, slide kits) through digital means (e.g., email, text message, etc.).** Please note that some of these communications may in some cases contain "Pixel Tags", through which Menarini Stemline detects certain information (e.g. if and when you opened and/or deleted the email, which links in the communication you clicked, your email client, whether the email was opened by more than one IP address, as well as some anonymous and aggregate information about the geographical areas of the users, etc.) Menarini Stemline processes this information to verify the effectiveness of its communications (legal basis for processing: your consent Art. 6. 1 (a) GDPR) ;

ii **deliver to you scientific and promotional contents that are tailored to the professional interests, needs and preferences demonstrated in the contacts with us** (e.g., preference to discuss specific content with our field-staff, willingness to learn more about certain topics contained in our visuals and/or digital communications, your usage behaviors in relation to email and our websites, interest in attending certain conferences/events or specialty courses etc.). As part of this process, you may be classified within our systems based on your level of interest, clinical practice and knowledge of our products to determine the frequency of our communications with you. To do this, we may use the data above under 1.a to 1.c as well as the professional preferences collected by you to automatically infer your preferences and attribute them to your profile ("**profiling**"). This will enable us to personalise the information, content and communications based on what is much in your interest, with the aim to improve the effectiveness of our medical-scientific exchange and/or scientific information activities with you (legal basis for processing: your consent Art. 6. 1 (a) of the GDPR).

2. To whom is personal data disclosed?

Within *Menarini Stemline*, our employees have access to your data only to the extent necessary to fulfill the purpose in question. For organizational, accounting or other internal management purposes, or to the extent necessary to fulfill the relevant purpose, your data may also be disclosed to *Menarini Stemline's* parent company, A. Menarini IFR Srl, Florence, as well as to other companies of the Menarini Group, including those in third countries outside the EEA area.

We also use external service providers for data processing who support us in the implementation of our marketing measures (e.g. in the operation of our websites, the certification of address and contact data and in the sending of invitations and newsletters). These service providers process data only in accordance with *Stemline's* instructions and under *Stemline's* control and exclusively for the purposes described in this privacy notice.

We also use service providers located in third countries outside the EEA for the processing of your data.

If your data is transferred to countries outside the EEA, we ensure an adequate level of data protection through appropriate guarantees, such as the so-called standard- data protection -clauses provided by the EU Commission or an EU adequacy decision. You can request a copy of the standard data protection clauses or the other relevant guarantee(s) using the contact details below. However, we would like to inform you that if your data is to be transmitted to non-EU public authorities responsible for pharmacovigilance, it may not be possible to sign the above standard data protection clauses; in such cases, your data will be processed in accordance with the laws applicable in the country of destination and strictly for the purpose of public interest in the field of public health that is to ensure a high level of drug quality, as also enshrined by the European Law; in such case, it may not always be possible to exercise the right to access, rectify or object to the processing of the data to the same extent as guaranteed by the GDPR. Be reassured that, where possible, your data will be transmitted without your first and last name.

3. How long do we store your data?

We store your data as long as this is necessary to fulfill a purpose of data processing described under point 1 (e.g. an existing contract with you or a legal obligation).

4. Your rights

You can request information about your data and/ or exercise your privacy rights under art. 15-22 GDPR by writing dplbenelux@menarini.be. Among your rights, you can ask for the correction of incorrect data or, under the legal conditions, the deletion, blocking, restriction of processing and transfer of your data. You also have the right to object to the processing of your data at any time. If you have given us your consent, you can revoke it at any time with effect for the future. For further questions and doubts and/or if you are not satisfied with the handling of your requests, you may always contact the Menarini Group's data protection officer (dpo@menarini.com). In addition, you have the right to lodge a complaint with the competent supervisory authority. A list with the contact details of all European national data protection authorities can be found at

https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

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