

**Information to be provided where personal data are collected
from the data subject
pursuant to art. 13 of EU Regulation 2016/679**

Fulton Medicinali S.p.A. (hereinafter "Fulton" or "Owner"), as Controller, according to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data (hereinafter "GDPR", "General Data Protection Regulation") and Legislative Decree 196/2003 (Privacy Code), informs you with the following information on the processing of your personal data.

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether 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.

Your personal data will be processed in a correct, lawful and transparent way for the purposes indicated below and according to the following lawful assumptions.

The processing of your data will be carried out using automated and non-automated tools, with logic strictly related to the purposes of treatment and, however, with methods and procedures to ensure the security and confidentiality of data.

1. Identity and contact details of the data Controller

The data Controller is **Fulton Medicinali S.p.A.**, with registered office in Via G. Marconi n. 28/9, 20044 - Arese (Milan), Italy, e-mail: fulton@fulton.it.

2. Categories of personal data processed

The Controller will process the following categories of personal data:

- Personal data of the Client, if it is a natural person. In particular, identification data (first name, last name, etc.); contact data, tax and bank data;
- Personal data of the Interested Parties, understood as the referents of the Client legal person. In particular, only data collected within the framework of the existing contractual/pre-contractual relationship and that are necessary for the negotiation, stipulation and execution of the same will be processed, such as the identification data of the legal representative and employees referents of the contractual relationship and contact data for work use (e.g. mobile phone number, e-mail address, other contact data as a referent of the contractual relationships).

3. Data Source

Your personal data will be obtained by the Controller directly from you and your interaction with us.

4. Purposes of the treatments and legal basis of the treatment

Your personal data will be processed in a correct, lawful and transparent way for the purposes indicated below and according to the following lawfulness assumptions (legal basis of the processing):

- a) processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract;
- b) to fulfill specific legal obligations (including with regard to retention) or
- c) to defend a right in court

Legal basis of the processing is respectively:

- a) art. 6 paragraph 1 lett. b) GDPR;
- b) art. 6 paragraph 1 lett. c) GDPR;
- c) art. 6 paragraph 1 lett. f) GDPR.

5. Recipients of the data

For the purposes indicated above, your personal data may be communicated:

- to people authorized by data Controller.
- to data Processors designed by the data Controller (e.g. suppliers of IT, technological services; suppliers of services for management and storage of tax and accounting documents).
- to autonomous data Controllers such as:
 - Consultants: accountants, auditors, lawyers, insurers, bankers, and other outside professional advisors with whom Fulton does business.
 - Service Providers: companies that provide products and services, such as expense management, suppliers and technicians for IT systems, and other service providers.
 - Public and Governmental Authorities: entities that regulate or have jurisdiction over the Company, such as regulators, law enforcement agencies, public agencies, and judicial bodies.
 - Corporate Transactions: third parties relating to any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of assets or shares (including in connection with any bankruptcy or similar proceeding).

Your data may also be transmitted in accordance with the law to the tax authorities, the police and judicial and administrative authorities, for the detection and prosecution of crimes, the prevention and protection against threats to public safety, to allow the Controller to ascertain, exercise or defend a right in court, and for other reasons related to the protection of the rights and freedoms of others.

These recipients, should they process data on behalf of the company, will be designated as data Controllers, by appropriate contract or other legal act. Otherwise, they will operate as autonomous data controllers.

Your contact information also (such as first and last name, company e-mail address, association phone number and company cell phone number) may be communicated to the contact persons (directors, employees, collaborators) of the client/supplier companies, as well as to the various interlocutors of the writing company, with whom you will relate by virtue of your duties and for the performance of the same.

6. Cross border transfer and automated decision-making processes

Pursuant to Article 13(1)(f) of the EU Regulation, you are informed that all data collected will not be transferred to another third country or international organization outside the

European Union. If, during a contractual relationship, your data is processed in another non-EU country, the rights granted to you under EU regulations will be guaranteed and you will be promptly notified.

No automated decision-making processes, including profiling, are carried out.

7. Nature of data provision and consequences of denied consent

The provision of your personal data is optional; failure to provide it would make it impossible for you to establish contractual or pre-contractual relationships with the Controller.

8. Data Retention

Fulton S.p.A. will retain personal data for the period necessary to fulfill the purposes described in this Notice, unless legislation requires or permits a longer retention period.

Specifically, the criteria used to determine the data retention period are:

- duration of the contract;
- period of time for which an ongoing relationship with the customer persists;
- period prescribed by legal and/or contractual fulfillment;
- as long as the purpose for which the information was collected persists;
- any proceedings in which Fulton's involvement is necessary (e.g., litigation or investigation by Authorities).

9. Data subject rights

You have the right to request from the data Controller, at any time, the rights outlined under Art. 15 and following. Notably, you have the right to:

- obtain confirmation of whether your personal data exist;
- obtain information about the origin of your personal data;
- obtain information about the purposes of processing, the categories of personal data;
- information about the logic applied in case of treatment with the aid of electronic instruments;
- the identification details of the data Controller and data Processors;
- obtain the indication of the recipients or categories of recipients to whom the personal data have been or will be disclosed and, where possible, the retention period;
- obtain the updating, rectification or integration of your personal data and limitation of processing;
- right to restriction of processing,
- right to data portability,
- right to object,
- the erasure, transformation into anonymous form or blocking of your personal data, processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected;
- revoking your consent to the processing at any time;
- the right to lodge a complaint with a supervisory authority.

You may contact the data Controller at any time by writing to **Fulton Medicinali S.p.A.**, Via G. Marconi n. 28/9, 20020 - Arese (Milan), Italy, or at the e-mail address: fulton@fulton.it.

Any rectification or erasure or restriction of processing carried out at the request of the data subject - unless this proves impossible or involves a disproportionate effort - will be communicated by the Data Controller to each of the recipients to whom the personal data has been transmitted. The Data Controller may notify the data subject of such recipients if the data subject so requests.

Fulton will provide acknowledgement of your requests were in line with applicable law, within the timeframes required by law. In order to ensure the protection of your data, it may be necessary to verify your identity before processing your requests