

## PRIVACY POLICY

01.07.2021

Dears,

In the context of the entry into force on 25.05.2018 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“**General Data Protection Regulation**” – **GDPR**),

We Zentiva Group, a.s., with its registered seat at U kabelovny 529/16, 102 00 Praha 10 – Dolní Měcholupy, Czech Republic, Registration number: 07254792 (hereinafter individually referred to as the "**Company**")

legal entity or entities which is/are of Zentiva group of companies, together with the other legal entities itemized under Section (P) of this Privacy Policy (hereinafter generically and collectively referred to as "**Zentiva**" and/or "we" and/or the "**Affiliates**"), as (Joint) Controllers,

pursuant to art. 13 and 14 of GDPR, would like to detail herein the guidelines applicable to processing of personal data (that is any information relating to an identified or identifiable natural person) entrusted to us, respectively:

- ✓ how we obtain your Personal Data;
- ✓ the (categories of) Personal Data that we may Process;
- ✓ the purposes of the Processing for which the Personal Data are intended, as well as the legal basis for the Processing;
- ✓ the conditions under which we may disclose your Personal Data;
- ✓ privacy policy for children;
- ✓ the international transfer of Personal Data;
- ✓ how we keep your Personal Data secure;
- ✓ how we keep the Personal Data accurate;
- ✓ minimization of Personal Data;
- ✓ the retention period of your Personal Data;
- ✓ the rights you have in relation with your Personal Data;
- ✓ direct marketing;
- ✓ the contact details;
- ✓ the definitions of the terms listed under this Policy;
- ✓ the revisions of this Policy;
- ✓ the list of the Joint Controllers and the corporate governance of Zentiva – list of Zentiva’s branches;

### (A) How we obtain your Personal Data

As a general rule of thumb, we obtain Personal Data directly from you. Similarly, there may be situations when we automatically obtain your Personal Data as a result of your visit on our Site. Please visit our cookie policy: <https://www.zentiva.com/cookie-policy> for details.



There may also be situations when we obtain your Personal Data from other sources. Therefore, within the framework of our activity, we may obtain your Personal Data in any manner (e.g.: face-to-face discussions, telephone or written conversations, on electronic and/or paper based format) from:

- ✓ other legal entities, which are part of the Zentiva group (you may view under Section (P) below, the list of legal entities which are part of Zentiva group); and / or
- ✓ other public or private legal entities, with or without legal personality (e.g.: your employer, or other central / local public institutions / authorities, in the exercise of their legal duties, including of control and investigation, or from our commercial partner etc.); and / or
- ✓ as a result of a merger, asset acquisitions or assignments of debt; and / or
- ✓ following disclosure from other individuals (e.g.: people who have reported Zentiva side effects suspected by you, individuals involved in car accidents who do not own the vehicle involved in the accident etc.); and / or
- ✓ public sources (e.g.: literature).

In case your Personal Data is disclosed to us by a third-party individual, we will consider that you have previously authorized the use and disclosure of your Personal Data. It is the duty of this third-party individual, to make sure that it has the necessary authorization to use and disclose Us your Personal Data, prior to doing so. Likewise, in case you disclose Us Personal Data of a third-party individual, we will consider that you have already been authorized by the related third-party individual to do so. Also, in case we Process your Personal Data obtained from a third-party legal entity, the latter is required to provide you with the necessary information pertaining to Processing of your Personal Data, including on disclosure to us. In case such third-party legal entity, does not provide you with the necessary information pertaining to Processing of your Personal Data, including on disclosure to us, please contact that third-party legal entity, directly.

## **(B) The (categories of) Personal Data that we may Process**

Within the framework of our activity, we may collect your Personal Data in physical and / or electronic format, which we will hold, record, use and Process in any other way, in accordance with the legislation applicable to Us and the guidelines set out in this Privacy Policy.

The general rule of thumb is to collect and request the transmission of only that Personal Data that is adequate, relevant and limited to what it is required within the framework of our activity, depending on the nature of our relationship with you.

The general rule of thumb is also not to collect those categories of Personal Data, considered to be special, such as: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation (“**Sensitive Personal Data**”), except in specific and limitative circumstances and forms, provided for in the Personal Data protection legislation (e.g. ensuring high standards of quality and safety of pharmaceutical products for human use or medical devices).

Therefore, in case:

- **You will decide to visit our Site** for any reason (even for your information purposes only) and accept all our cookies: <https://www.zentiva.com/cookie-policy>, we will Process only those Personal Data that concern you and which relate to your authentication on the internet, such as:
  - ✓ IP address;
  - ✓ type of browser you use;
  - ✓ language settings;
  - ✓ access sessions;



- **You will decide to contact Us** for any reason and therefore you fill in the "Contact form" available on our Site, or you contact Us in any other way, we will Process those Personal Data that concern you and you decide to disclose to us, such as:
  - ✓ identification data (name, surname);
  - ✓ contact data (e-mail address) / (personal / professional) telephone number, postal address – if applicable;
  - ✓ content of communication (physical and / or electronic);
  - ✓ physical and / or electronic signature;
  - ✓ field / occupation / profession / place of work / title / specialty / professional degree / academic title – if applicable.
- **You will decide to subscribe to our newsletters**, we will Process those Personal Data that concern you, such as at least the following information:
  - ✓ identification data (name, surname);
  - ✓ contact data (personal / professional e-mail address);
  - ✓ content of communication (physical and / or electronic, including, but not limited to your consent – grant and / or withdrawal);
- **You will decide to report to Us**, in any way and on any path, **a suspected adverse event**, we will Process Personal Data concerning you as a reporter (that is the person who reports a suspected adverse event), such as at least the following information:
  - ✓ identification data (name, surname);
  - ✓ contact data (postal address or mailing address (e-mail) or personal / professional telephone number);
  - ✓ your qualification (in case you are a Healthcare Professional);
  - ✓ initials of the person who experienced the suspected adverse event and / or other identifiers, such as: date of birth, age / age category, gender, period of pregnancy (if applicable);
  - ✓ description of the suspected adverse event, such as the signs and symptoms experienced, the date on which the suspected adverse event occurred and the effect of the suspected adverse event;
  - ✓ voice (in case you report the suspected adverse event by means of the pharmacovigilance service dedicated land line);
  - ✓ signature (physical and / or electronic – if applicable);
  - ✓ content of communication (physical and / or electronic);
  - ✓ name of the concerned product.
- **You will decide to send Us**, in any way and on any path, **a product quality complaint**, we will Process Personal Data concerning you as a claimant (that is the person who submits a product quality complaint), such as at least the following information:
  - ✓ identification data (name, surname);
  - ✓ contact data (postal address or mailing address (e-mail) or personal / professional telephone number);
  - ✓ your qualification (in case you are a Healthcare Professional);
  - ✓ description of the quality complaint;
  - ✓ signature (physical and / or electronic – if applicable);
  - ✓ content of communication (physical and / or electronic);
  - ✓ name of the concerned product.
- **You want to become an employee of Zentiva** and therefore you fill in the "Application Form" available on our Site or contact us in any other way, either upon our previous request or upon your own initiative, we will Process Personal Data concerning you, such as:
  - ✓ identification data (name, surname);
  - ✓ contact data (telephone number, mailing address (e-mail));
  - ✓ content of communication (physical and / or electronic);
  - ✓ data on the desired occupation / department / city;



- ✓ data on education, training and professional experience (the data you decide to disclose in your resume);
- ✓ signature (physical and / or electronic – if applicable);
- ✓ other data: the data you understand to present in your resume and / or the letter of intent.

To conduct the recruitment and selection process **we do not need any other Personal Data**, such as (but not limited to):

- ✓ image (photo);
  - ✓ copies of identity documents;
  - ✓ copies of education degrees;
  - ✓ information on criminal record;
  - ✓ information on your health condition etc.
- **In case you legally or conventionally represent a legal entity** (public or private, with or without legal personality) **on behalf of which you act against our Company**, for any reason, in any way and manner, we will Process Personal Data concerning you, such as:
- ✓ identification data (name, surname);
  - ✓ contact data (mailing / billing address, e-mail address, telephone number (personal / professional));
  - ✓ content of communication (physical and / or electronic);
  - ✓ field / occupation (workplace, title, business card);
  - ✓ signature (physical and / or electronic – if applicable).
- **In case you decide to be part of a contract with Us**, we will Process Personal Data concerning you, such as:
- ✓ identification data (name, surname, tax identification number / national ID);
  - ✓ contact data (home / billing address, telephone number (personal / professional), e-mail address);
  - ✓ domain / occupation – if applicable (workplace, profession, title, specialty, professional degree, academic title, as appropriate);
  - ✓ signature (physical and / or electronic);
  - ✓ documents / evidence in relation with the performance of the contract.
- **In case You are a Healthcare Professional** we interact with, we will Process Personal Data concerning you, such as:
- ✓ identification data (name, surname, professional ID – if applicable);
  - ✓ contact data (telephone number (personal / professional), e-mail address (personal / professional));
  - ✓ domain / occupation (workplace, profession, title, specialty, professional degree, university title);
  - ✓ content of communication (physical and / or electronic);
  - ✓ signature (physical and / or electronic);
  - ✓ image (event photos – if applicable);
  - ✓ voice (testimonials – if applicable).
- **You will decide to purchase goods offered for sale by Us** (e.g. electronic appliances, furniture, cars, waste etc.), we will Process Personal Data concerning you, such as:
- ✓ identification data (name, surname, tax identification code / national ID);
  - ✓ contact details (home / billing address);
  - ✓ content of communication (physical and / or electronic);
  - ✓ signature (physical and / or electronic);
- **You will decide to visit our premises**, for any reason, we will Process Personal Data concerning you, such as:
- ✓ identification data (name, surname, ID (read only) vehicle registration number (without the option of registration number recognition), place of work, title, data resulting from the internal training questionnaire in relation with the good



- ✓ manufacturing practices and health and safety at work (*where applicable*), arrival / departure time, destination, image (without the option of facial recognition), electronic holographic signature);
- ✓ general data on the state of health (temperature, symptoms of COVID-19, exposure to COVID-19);
- **You are involved in a car accident**, the vehicle involved in the car accident is in our property or use and the car accident is **amicably resolved**, we will Process Personal Data concerning you, such as:
  - ✓ identification data, being given your capacity of driver involved in the car accident and / or owner of the vehicle involved in the car accident or eyewitnesses thereto, as the case may be (name, surname, date of birth, driving license – series, number, category, validity, as appropriate);
  - ✓ contact data, being given your capacity of driver involved in the car accident and / or owner of the vehicle involved in the car accident or eyewitnesses thereto, as the case may be (full postal address, personal / professional telephone number or e-mail address, as appropriate);
  - ✓ data on the accident (date, location and place of the car accident, circumstances of the car accident, sketch of the car accident);
  - ✓ vehicle data involved in the car accident (mark, type, registration number, country of registration);
  - ✓ data on insurance (insurance policy (civil liability / green card), insurance company (agency or insurance broker), number and validity of insurance policy, insurance policy damage coverage);
  - ✓ signature;
  - ✓ content of communication (physical and / or electronic);
- **In case You, as either whistle-blower, or wrongdoer, or witness, or third party, decide to whistle blow a corruption case, or any other case**, We will process Personal Data concerning you, such as:
  - ✓ Identification data (name, surname, work and residence permit number (if applicable), signature, disciplinary measures / actions);
  - ✓ Contact data (personal phone number, personal e-mail address, content of communication, contact details of a close person for emergencies ).

Notwithstanding the foregoing, we reserve the right to request you other Personal Data necessary for the fulfilment of our legal and / or contractual duties and / or obligations, strictly in accordance with the legal provisions applicable to Us.

In case you do not agree to provide us with your Personal Data, we will not be able to accomplish the activities mentioned herein or those that fall within the scope of our legal and / or contractual obligations.

## **(C) The purposes of the Processing for which the Personal Data are intended, as well as the legal basis for the Processing**

### **(C.1.) The Purposes of Processing for which the Personal Data are intended**

Depending on the nature of our relationship with you, we, as a (Joint) Personal Data Controller, Process your Personal Data in accordance with the legal provisions applicable to Us, with a view to normally conduct our business, which may be resumed as follows, as the case may be:

- ✓ management of public and / or commercial relations, communication, business development;
- ✓ management of the registration, manufacture, import, export and / or distribution system of our products and / or of the products manufactured and / or distributed by our Company;
- ✓ management of the quality system;
- ✓ management of the pharmacovigilance system;



- ✓ recruitment and management of human resources, of occupational health and safety and of emergency situations, including but not limited to protection against serious cross-border threats to health – COVID-19;
- ✓ safeguarding high standards of quality and safety of health care and of medicinal products or medical devices;
- ✓ management of commercial contracts;
- ✓ management of financial / accounting documents and of financial resources;
- ✓ management of IT resources;
- ✓ legal assistance and / or representation;
- ✓ management of documents and of archiving system;
- ✓ management of physical security, security and protection of individuals and of property and security of operational activities associated with the means of Processing and communication of information;
- ✓ management of compliance with legal provisions applicable to Us, including within the context of control and investigation actions and cooperation with the public (central and / or local) competent institutions / authorities;
- ✓ protection of Zentiva's assets, or of Zentiva's customers and supplier's assets;
- ✓ management of our internal registrations / entries / internal records;
- ✓ legal reporting;
- ✓ corporate governance;
- ✓ event organization and sustainment.

## **(C.2.) The legal basis for the Processing**

Depending on the nature of our relationship with you, we Process Personal Data concerning you if we have your consent (pursuant to art. 6, paragraph (1), letter a) of GDPR); and / or in case the Personal Data are required to perform a contract (pursuant to art. 6, paragraph (1), letter b) of GDPR); and / or in case the Personal Data are required in order for Us to comply with a legal obligation (pursuant to art. 6, paragraph (1), letter c) of GDPR); and /or to satisfy a certain legitimate interest that does not prevail over your fundamental rights and freedoms (pursuant to art. 6, paragraph (1), letter f) of GDPR).

In case we Process your Personal Data based only on your consent (for example: in case you apply for a vacancy within Zentiva), you will be able to withdraw your consent at any time, free of charge, without affecting the legality of the Processing made on the basis of consent prior to its withdrawal.

Without prejudice to your fundamental rights and freedoms, we may Process your Personal Data in order to satisfy a certain legitimate interest, such as:

- ✓ prevention, detection and investigation of misdemeanour, including conflict of interest, anti-bribery, fraud and money laundering or financing of terrorist acts;
- ✓ business development;
- ✓ analysis and management of commercial risks;
- ✓ protection or pursuit of a legal or contractual right or obligation belonging to us, to a legal entity belonging to the Zentiva group or to another (contractual) partner (you can see all the legal entities which are part of Zentiva group under Section (P) below);
- ✓ management of our internal registrations / entries / internal records;
- ✓ management of organizational resources;
- ✓ protection / security of Zentiva's assets or of Zentiva's customer's and supplier's assets;
- ✓ in relation with any claim, action or procedure (including, but not limited to: drafting and reviewing documents; drafting the necessary documentation for the conclusion of a transaction; obtaining legal advice and facilitating settlements);
- ✓ compliance with any rules, laws and regulations applicable to our activity, including cooperation with competent central and / or local public institutions / authorities.



## **(D) The conditions under which we may disclose your Personal Data**

Your Personal Data is intended for use by Zentiva, as a (Joint) Personal Data Controller.

In order to facilitate the pursuit of Zentiva's activities related to the purposes of the Processing, where appropriate and limited to a legal and specific purpose, your Personal Data may be disclosed to:

- ✓ you and, where appropriate, your appointed representatives;
- ✓ other legal entities that are part of the Zentiva group (you can view the list of the legal entities part of Zentiva group under Section (P) below);
- ✓ other (*contractual*) partners (e.g.: (contractual) partners directly or indirectly involved in the conclusion, performance, amendment and / or termination of our contract);
- ✓ banking institutions, in relation with any type of transfer of funds;
- ✓ central and / or local competent public institutions / authorities;
- ✓ providers of operational services (e.g.: receivables management and recovery service providers, couriers, telecommunications, IT, archiving etc.);
- ✓ our external consultants (e.g.: auditors, lawyers etc.);
- ✓ any relevant third-party provider, where our Sites use third-party advertising, plugins or content, if the case;
- ✓ business partners, investors, assignees (current or potential) with a view to facilitate business asset transactions (which may include but not be limited to mergers, acquisitions, assignment of claims or sale of assets),

pursuant with the legal provisions applicable for the previously specified categories of recipients.

## **(E) Privacy policy for children**

Our Site(s) is (are) directed at an adult audience.

We do not purposely Process Personal Data of any individual we know to be under 16 years of age. The Personal Data of the individuals under 16 years of age shall be Processed only with the prior consent of the parent or holder of parental responsibility. Such legal representative shall be entitled, upon request, to view the information provided by the individuals under 16 years of age and / or to exercise the rights provided for under Section (K) herein.

## **(F) The international transfer of Personal Data**

Because of the international nature of our business, we may need to transfer your Personal Data within Zentiva group, and to the third parties as noted above, in connection with the purposes set out in this Privacy Policy. 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.

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 following contact details:

- ✓ post: U kabelovny 529/16, 102 00 Praha 10 – Dolní Měcholupy; and/or
- ✓ email: DPO(at)zentiva.com.

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 Privacy Policy.

You will not be subject to a decision based on automated Processing of your Personal Data, including profiling.



## **(G) How we keep your Personal Data secure**

Zentiva Processes your Personal Data in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful Processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

We have a framework of policies, standard operating procedures and trainings to cover the protection, confidentiality and security of Personal Data, and regularly review the suitability of the measures we have in place, so as to preserve the security of the Personal Data that we hold.

However, since 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 Personal 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.

## **(H) How we keep your Personal Data accurate**

We take reasonable steps to ensure that your Personal Data that we Process is accurate and, where necessary, kept up to date and the Personal Data that we Process that is inaccurate or uncomplete (having regard to the purposes for which it is Processed) is erased, rectified or completed 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, complete or erase your inaccurate or incomplete Personal Data. For more details, please see the section (K) about the rights you have in relation with your Personal Data.

## **(I) Minimization of Personal Data**

We take reasonable steps 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 Privacy Policy.

## **(J) The retention period of your Personal Data**

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

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

(a) we maintain an ongoing relationship with you (e.g. we have a long-term, ongoing relationship); or

(b) we are obliged by law to keep your Personal Data (e.g. in relation to obligations arising from social security and pension matters); or

(c) your Personal Data is necessary in connection with the lawful purposes set out in this Privacy Policy (e.g. in relation to the occupational health and safety matters),

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**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 to identify any Personal Data that is relevant to that claim, or if any authority initiates proceedings, we will still possess relevant documentation),

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**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.

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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.

### **(K) The rights you have in relation with your Personal Data**

Unless the law otherwise provides, you have the following rights:

- ✓ **the right of access**, meaning the right to obtain a confirmation from our part as to whether or not your Personal Data are being Processed, and, where that is the case, access to your Personal Data and information on the Processing;
- ✓ **the right to rectification**, meaning the right to have, without undue delay, the rectification of your inaccurate Personal Data and / or the completion of your incomplete Personal Data, including by means of providing a supplementary statement;
- ✓ **the right to erasure/right to be forgotten**, meaning the right to obtain from us the erasure of your Personal Data without undue delay where: your Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise Processed; *or* you withdraw the consent on which the Processing is based and there is no other legal ground for the Processing; *or* you object to the Processing and there are no overriding legitimate grounds for the Processing; *or* your Personal Data have been unlawfully Processed; *or* your Personal Data have to be erased for compliance with a legal obligation applicable to us; the above mentioned grounds shall not be applicable to the extent that Processing is necessary: for exercising the right of freedom of expression and information; *or* for compliance with a legal obligation which requires Processing by law to which we are subject *or* for the performance of a task carried out in the public interest *or* in the exercise of official authority vested in us; *or* for reasons of public interest in the area of public health; *or* for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure/right to be forgotten is likely to render impossible or seriously impair the achievement of the objectives of that Processing; *or* for the establishment, exercise or defense of legal claims;
- ✓ **the right to restriction of Processing**, meaning the right to obtain from us the restriction of Processing where: you contest the accuracy of your Personal Data, for a period enabling us to verify the accuracy of your Personal Data; *or* the Processing is unlawful and you oppose the erasure of your Personal Data and request the restriction of their use, instead; *or* we no longer need your Personal Data for the purposes of the Processing, but you require them for the establishment, exercise or defense of legal claims; *or* you have objected to Processing, pending the verification whether our legitimate grounds override yours;



- ✓ **the right to data portability**, meaning the right to receive your Personal Data which you have provided to us, in a structured, commonly used and machine-readable format and the right to have those data transmitted to another Controller, without hindrance from us, where technically feasible and where the Processing is based on consent *or* on a contract and the Processing is carried out by automated means;
- ✓ **the right to object**, meaning the right to object on grounds relating to your particular situation, at any time, to Processing of your Personal Data which is based on the performance of a task carried out in the public interest *or* in the exercise of official authority vested in us *or* on our legitimate interests, including profiling based on these, which triggers the cease of the Processing of your Personal Data, unless we can demonstrate compelling legitimate grounds for the Processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims;
- ✓ **the right to withdraw your consent** at any time, without affecting the lawfulness of Processing based on consent before its withdrawal, when the legal ground for our Processing is your consent;
- ✓ **the right to lodge a complaint with respective Data Protection Authority;**
- ✓ **the right not to be subject to a decision based solely on automated Processing**, including profiling, which produces legal effects concerning you or similarly significantly affects you, except for the case where such Processing is necessary for entering into, or performance of, a contract between us *or* is authorized by the law to which we are subject and which also lays down suitable measures to safeguard your subject's rights and freedoms and legitimate interests, *or* is based on your explicit consent.

Except of the right to lodge a complaint with respective Data Protection Authority as mentioned above, these rights may be exercised by sending a written request to:

- ✓ e-mail address [dpo@zentiva.com](mailto:dpo@zentiva.com)
- ✓ at Company's headquarters in U kabelovny 529/16, 102 00 Praha 10 – Dolní Měcholupy

As a rule of thumb, we can not accept verbal requests from you (by telephone or face to face) since we cannot immediately respond, without first analysing your request and securely identifying you. We will provide without undue delay and in any event within one month of the request receipt date information on actions we take following receipt of such request. This period may be extended by two months where necessary, in which case we will inform you of any such extension within one month of request receipt date, and of the reasons for the delay.

**You are not the subject of a decision based exclusively on the automatic Processing of your Personal Data, including profiling.**

#### **(L) Direct Marketing**

You can unsubscribe from our e-mail address list at any time, by contacting the Data Protection Officer whose contact details are listed in Section (M) below.

#### **(M) The contact details**

Any questions or concerns you may have about this Privacy Policy or on how we Process your Personal Data may be addressed to the Data Protection Officer at:

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

e-mail address: [dpo@zentiva.com](mailto:dpo@zentiva.com)

at the Company's headquarter at U kabelovny 529/16, 102 00 Praha 10 – Dolní Měcholupy



## (N) The definition of the terms listed under this Policy

- ✓ **“Adequate Jurisdiction”** means a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.
- ✓ **“Affiliate”** shall mean any person that at such time is Controlled by or is under common Control of AI Sirona (Luxembourg) Acquisition S.a.r.l, Company No. B223382, with its seat at 2-4 rue Beck L-1222 Luxembourg, Grand Duchy of Luxembourg see (U). It being understood that, for the purposes of this document, the term “Control” (and its grammatical variations) shall mean (i) possession, direct or indirect, through one or more intermediaries, of the power to direct the management or policies of a person, whether through ownership of voting securities, by contract relating to voting rights or otherwise, or (ii) ownership, direct or indirect, through one or more intermediaries, of more than fifty percent (50%) – or any other percentage as per any applicable law which enables to exercise the Control – of the outstanding voting securities or other ownership interest of such person.
- ✓ **“Cookie”** means a small file that is placed on your device when you visit a website (including our Sites). In this Privacy Policy, 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.
- ✓ **“Healthcare 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).
- ✓ **“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.
- ✓ **“Site”** means any website operated, or maintained, by the Company / Zentiva or on Company’s / Zentiva’s behalf.
- ✓ **“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.

## (O) The revisions of this Privacy Policy

We regularly review the Privacy Policy, with no prior notice. We encourage you to periodically visit the Privacy Policy, in order to be informed about how we Process your Personal data.



**(P) The list of the Joint Controllers and the corporate governance of Zentiva – list of Zentiva's branches**

**ZENTIVA CORPORATE GOVERNANCE – LIST OF ZENTIVA ENTITIES**

Company Name	Registration Number	Registered Office (address)	
AL	Zentiva Pharma Albania sh.p.k	L61501034A	Rr. „Themistokli Gërmenji” Pall. Ambasador 1, kati 1, Tirane, Albania
AT	Zentiva GmbH	FN 129221 g	Rosenbursenstraße 2/15, 1010 Wien, Austria
	HERBS Trading GmbH	FN 138399 d	Am Belvedere 4, Eingang Karl Popper Straße 4, 1100 Wien, Austria
BA	Zentiva Pharma d.o.o.	65-01-0116-10	Fra Andela, Zvizdovića 1, Sarajevo, Bosnia and Herzegovina
BG	Zentiva Bulgaria EOOD	205801872	7, Iskarsko shosse Blvd., Trade Center Evropa, Building 15, floor 4, 1528 Sofia, Bulgaria
	Alvogen Pharma Bulgaria EOOD	201035481	Floor 1, 86 Bulgaria blvd, Manastirski Livadi, Vitosha region, Sofia, 1680, Bulgaria
	Alvogen Pharma Trading Europe EOOD	201400639	Floor 1, 86 Bulgaria blvd, Manastirski Livadi, Vitosha region, Sofia, 1680, Bulgaria
CY	ALVOGEN CYPRUS LIMITED	HE 271648	Omonoias 52, TROODOS COURT, Floor 1, Flat 3, 3052-Limassol, Cyprus
	RUTENGO INVESTMENTS LIMITED	HE 160948	Omonoias 52, TROODOS COURT, Floor 1, Flat 3, 3052-Limassol, Cyprus
CZ	Zentiva Group, a.s.	072 54 792	U kabelovny 529/16, 102 00 Praha 10 – Dolní Měcholupy, Czech Republic



	Zentiva, k.s.	492 40 030	U kabelovny 130, 102 37 Praha 10 – Dolní Měcholupy, Czech Republic
	Theramex Czech Republic s.r.o.	046 53 815	Kateřinská 466/40, 120 00 Praha 2 – Nové Město, Czech Republic
D	Zentiva Pharma GmbH	HRB95544	Brüningstr. 50, 65926 Frankfurt/ M., Germany  <i>(corresp. address: Linkstraße 2, D- 10785 Berlin, Germany)</i>
	Winthrop Arzneimittel GmbH	HRB99575	Brüningstr. 50, 65926 Frankfurt/ M., Germany  <i>(corresp. address: Linkstraße 2, D- 10785 Berlin, Germany)</i>
DK	Zentiva Denmark ApS	41172029	c/o Harbour House Sundkrogsgade 21, 2100 KØBENHAVN Ø, Denmark
F	Zentiva France	407 710 474	35 Rue du Val de Marne 75013 PARIS, France
HR	Zentiva d.o.o.	080774153	Avenija Većeslava Holjevca 40, 10 000, Zagreb, Croatia
HU	Zentiva HU Kft.	01-09-876879	



			1023 Budapest, Árpád fejedelem útja 26-28, Hungary
	Rutengo Hungary Investments Kft.	01-09-967175	Bajcsy-Zsilinszky út 41., Budapest 1065, Hungary
	Aramis Pharma Kft	01-09-873136	1095 Budapest, Mester utca 28. B. lház. 3. em. 5, Hungary <i>(corresp. address: 1097 Budapest, Könyves Kálmán krt. 11/C. A. épület 3. Emelet, Hungary)</i>
CH	Helvepharm AG	CHE-105.859.562	Walzmühlestrasse 60, CH-8500 Frauenfeld, Switzerland <i>(corresp. address: Walzmühlestrasse 48, CH-8500 Frauenfeld)</i>
IN	Zentiva Private Limited	U24100MH2019FTC32 8411	A-802, 8th Floor, Crescenzo, C/38-39, G-Block, Bandra Kurla Complex, Mumbai 400051, Maharashtra, India
IT	Zentiva Italia S.r.l.	MI - 1463705	Viale Bodio n° 37/B, 20158 – Milan, Italy
LT	UAB Alvogen Baltics	302488462	Vilniaus m. sav. Vilniaus m. Užupio g. 30, Lithuania
LU	AI Sirona (Luxembourg) Acquisition S.à r.l.	B223382	5, rue des Capucins, L-1313 Luxembourg, Grand Duchy of Luxembourg
		B242040	



	AI Excalibur (Luxembourg) S.à r.l.		5, rue des Capucins, L-1313 Luxembourg, Grand Duchy of Luxembourg
	Alvogen IPco S.à r.l. ( <i>in liquidation</i> )	B149131	5, rue Heienhaff, L-1736, Senningerberg, Grand Duchy of Luxembourg
	Alvogen Balkans Luxembourg S.à r.l.	B145518	5, rue Heienhaff, L-1736, Senningerberg, Grand Duchy of Luxembourg
M	Alvogen Malta Operations ROW Holdings Ltd.	C75429	Malta Life Sciences Park, Building 1 Level 4, Sir Temi Zammit Buildings, San Gwann Industrial Estate, San Gwann SGN 3000, Malta
	Alvogen Malta Operations (ROW) Ltd.	C71197	Malta Life Sciences Park, Building 1 Level 4, Sir Temi Zammit Buildings, San Gwann Industrial Estate, San Gwann SGN 3000, Malta
M K	Zentiva Pharma Macedonia DOOEL Skopje	6708072	Jordan Mijalkov No. 48-1/1-2 Skopje, North Macedonia
NL	EuroGenerics Holding B.V.	34157118	Locatellikade 1, 1076 AZ Amsterdam, Netherlands
PL	Zentiva Polska Sp.z.o.o.	KRS: 691403 (REGON: 368094510)	North Gate Buildings, Bonifraterska Street 17, 00-203 Warsaw, Poland
	Alvogen Pharma Sp.z.o.o.	KRS: 610747 (REGON: 364124728)	North Gate Buildings, Bonifraterska Street 17, 00-203 Warsaw, Poland
	Alvogen Poland Sp.z.o.o.	KRS: 394178 (REGON: 301740600)	North Gate Buildings, Bonifraterska Street 17, 00-203 Warsaw, Poland



PT	Zentiva Portugal, Lda	503103551	Alameda Fernão Lopes, nº16, bloco A, 8º Piso, 1495-190 Algés – Portugal
RO	Zentiva S.A.	J40/363/1991	Bulevardul Theodor Pallady nr. 50, sectorul 3, 032266, Bucurest, Romania
	SOLACIUM PHARMA S.R.L.	J40/23565/2007	50 Theodor Pallady Blvd., Administration Building, C15, Area A, 3rd floor, District 3, Bucharest, Romania
	BE WELL PHARMA S.R.L.	J23/4165/2017	50 Theodor Pallady Blvd., Administration Building, C15, 3rd floor, Area B, Office no. 2, District 3, Bucharest, Romania
	LaborMed-Pharma SA	J40/21114/2007	032266 Bucharest, 44B Th. Pallady Blv., 3rd district, Romania
	Labormed Pharma Trading SRL	J40/2501/2000	032266 Bucharest, 44B Th. Pallady Blv., 2nd floor, 3rd district, Romania
RS	Zentiva Pharma d.o.o	20607149	Milentija Popovica 5v, 2nd floor, Beograd – Novi Beograd, Serbia
RU	Zentiva Pharma LLC	1147748135590	Novoslobodskaya st., 31 / building 4 premises VI, Moscow, 127005, Russia  <i>(corresp. address: 12 Presnenskaya naberezhnzya (embankment), 45 floor, office 2, Vostok Federation Tower, 123112 Moscow)</i>





	Bittner Pharma LLC	1097746360271	18 Suschevsky Val street, Moscow, 127018, Russia
SK	Zentiva, a.s.	31 411 771	Einsteinova 24, 851 01 Bratislava, Slovakia
	Zentiva International a.s.	35 687 355	Einsteinova 24, 851 01 Bratislava, Slovakia
UA	Zentiva Ukraine LLC	38804488	Brovarsky avenue, 5-I, 02002, Kyiv, Ukraine
UK	Zentiva Pharma UK Limited	02158996	12 New Fetter Lane, EC4A 1JP, London, United Kingdom  <i>(corresp. address: Felsted Business Centre, Felsted, Essex, UK CM6 3LY)</i>
	Creo Pharma Holdings Limited	06096048	Felsted Business Centre, Cock Green, Felsted, Essex, CM6 3LY, United Kingdom
	Creo Pharma Limited	06082846	Felsted Business Centre, Cock Green, Felsted, Essex, CM6 3LY, United Kingdom
XK	ALVOGEN PHARMA KOSOVO SH.P.K.	810809410	LLAPNASELLË, Magjistralja Prishtinë-Ferizaj KM 7, Kosovo

#### 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
Zentiva Pharma d.o.o.	Montenegro	Zentiva Pharma d.o.o. – dio stranog društva u Podgorici	30/31-10724-4	Kritskog odreda 4/1 ,81000 Podgorica, Monetenegro
	Macedonia	Zentiva Pharma d.o.o. – Pretstavništvo Skopje	4080011519677	Kozara 13A, Skopje, Macedonia
	Albania	Alvogen – Zyre Perfaqesimi Tirane (dormant)	L11817003	Rruga Themistokli Germenji,Kulla Ambasador,Kati 3, Ap.1,Tirane,Albania
LaborMed-Pharma SA	Moldavia	Reprezentanta “Labormed-Pharma SA” Moldova	1007600076302	MD-2004, 40 Lazo S. Str., 7th floor, office no. 4, Chisinau, Rep. Of Moldavia
Zentiva Pharma Macedonia DOOEL	Montenegro	Alvogen Pharma Makedonija export-import DOOEL Gevgelija dio stranog drustva u Crnoj Gori	60013042	Janka Djinovica family kvart 2/12, Podgorica, Montenegro
Alvogen Pharma Trading Europe EOOD	Kazakhstan	Representative Office of Alvogen Pharma Trading Europe EOOD – Kazakhstan  (Представительство „Алвоген Фарма Трейдинг Юроп ЕООД“)	120142012696	241,Bogenbay batyr Street, Business Centre Ordabasy, 050026, Almaty, Kazakhstan
	Ukraine	Representative Office of Alvogen Pharma Trading Europe EOOD – Ukraine	26628492	5-I, Brovarskyi Avenue, 0200, Kyiv, Ukraine



		(ПРЕДСТАВНИЦТВО "АЛВОГЕН ФАРМА ТРЕЙДИНГ ЮРОП ОТОВ")		
Zentiva International a.s.	Romania	ZENTIVA INTERNATIONAL A.S. HLOHOVEC SUCURSALA BUCURESTI	J40 /2438/2006	50 Th. Pallady Bld., 3rd District, Bucharest, Romania
Alvogen Malta Operations (ROW) Ltd.	Kazakhstan	PREDSTAVITELSTVO KOMPANII "ALVOGEN MALTA OPERATIONS (ROW)" LTD V RESPUBLIKE KAZAKHSTAN (Representative office of the company "Alvogen Malta Operations (ROW)" LTD in the Republic of Kazakhstan).	160242006543	ALMATY, ALMALINSKY DISTRICT, STREET AUEZOVA, 48, KV OFFICE 3/3
	Ukraine	Representative office of Alvogen Malta Operations (ROW) Ltd	26550287	02002 Ukraine Kyiv, Brovarsky Ave, 5-I
HERBST Trading GmbH	Kazakhstan	PREDSTAVITELSTVO KOMPANII "KHERBS TREIDING GMBKH" V RESPUBLIKE KAZAKHSTAN" (Representative office of the company "Herbs Trading GMBH in the Republic of Kazakhstan).	111242013222	ALMATY, TURKSIB DISTRICT, MICRODISTRICT KAZAKHFILM, 53, FLOOR 2

