

Privacy Policy
Application for participation in the "Angelini Pharma IIT Program"

Last updated 15 July 2020

The company Angelini S.p.A. (hereinafter "**Angelini**" or "**Data controller**"), pursuant to 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 (hereinafter "GDPR", "General Data Protection Regulation") and Legislative Decree 196/2003 (Privacy Code), provides you with the following information on the processing of your personal data, in your capacity as a party submitting your application to the "Angelini Pharma IIT Program", proposing to Angelini an "Investigator Initiated Trial" (hereinafter "IIT").

1. Identity and contact details of the Data Controller and Data Protection Officer

The Data Controller is Angelini S.p.A., with registered office in Viale Amelia n. 70, 00181 - Rome (Rome), Italy, email: privacy.italia@angelinipharma.com.

The Data Controller has appointed a Data Protection Officer (DPO), who can be contacted directly at the following addresses: Data Protection Officer - DPO c/o Angelini S.p.A., Viale Amelia n. 70, 00181 - Rome (Rome), Italy, email: dpo.italia@angelinipharma.com.

2. Purposes of processing and legal basis for the processing

All personal data provided by you is processed in compliance with the provisions of the law in a correct, lawful and transparent manner for the purposes set out below and according to the following conditions of lawfulness (legal basis for processing).

Purposes of the processing	Legal basis for processing data
a) Correct and complete management of your application for participation in the "Angelini Pharma IIT Program" [management of your application for participation in the "Angelini Pharma IIT Program"].	The processing of your personal data for this purpose is necessary for the execution of a contract or the execution of pre-contractual measures (art. 6.1.b, GDPR) and therefore does not require your consent.

3. Categories of data processed

The Data Controller will process the following categories of your personal data:

- first and last name, for your correct identification;
- name and address of the headquarter of the university/institute/organization/association or other ("Institution") on behalf of which the application for participation in the "Angelini Pharma IIT Program" is made, for the correct identification of the party for which the application for participation is made;
- e-mail address, to request confirmation — by means of a dedicated link — of the application sending (so-called "double opt-in");
- contact details (e-mail address and telephone number), to contact you in order, in particular, to (i) acquire any further information about you, your application and the IIT proposed by you, in order to carry out a correct evaluation of your application; (ii) give you feedback on the evaluation (positive or negative outcome) of your application and (iii) possibly — if your application is considered of interest to Angelini — carry out the pre-contractual activities necessary to reach an agreement on the IIT proposed by you;
- your curriculum vitae (CV) and data related to your ability to carry out the IIT proposed by you, for the correct evaluation of your application.

4. Data source

Your personal data will be obtained by the Data Controller directly from you by filling out the appropriate online form on the Data Controller's website (www.angelinipharma.com) or by email and telephone communications.

5. Nature of data provision

The provision of your personal data for the **management of your application for participation in the "Angelini Pharma IIT Program"** (purpose as per paragraph 2) is merely optional: failure to provide it would make it impossible for you to see your application for participation in the "Angelini Pharma IIT Program" evaluated or correctly evaluated (and possibly accepted) by the Data Controller.

6. Processing methods

Data processing is carried out using both automated and non-automated tools, with logic strictly related to the purposes of the processing and, in any case, with methods and procedures able to ensure the security and confidentiality of the data.

7. Categories of personal data recipients

For the management of your application to participate in the "Angelini Pharma IIT Program" (purposes referred to in paragraph 2, letter a) above, your personal data may be communicated:

- to persons authorized by the Data Controller to carry out personal data processing operations (employees or collaborators of the Controller);
- to the Data Processors appointed by the Data Controller (suppliers of computer, technological and telematic services);
- to autonomous data controllers (telecommunications service providers).

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

8. Data storage period

We store your personal data for a limited period of time depending on the purpose of processing. After the expiry of this period, your data will be permanently deleted or in any case rendered irreversibly anonymous.

Your personal data will be stored in accordance with the terms and criteria specified below:

- for the **management of your application for participation in the "Angelini Pharma IIT Program"** (purpose referred to in paragraph 2, letter a) above) for a maximum period of 12 (twelve) weeks from the receipt of your application for participation in the "Angelini Pharma IIT Program" (after filling in the online form and clicking on the "virtual button" to send it, you will receive an email to confirm — by means of a special link — the sending of the application for participation; the application for participation will be considered received by Angelini when, after clicking on said link, the message confirming that the procedure has been correctly completed will be displayed on the appropriate web page). In the event of a positive evaluation of your application, your personal data will be stored until full and correct conclusion with you of the negotiation of the IIT agreement proposed by you which must take place no later than 12 (twelve) months after the receipt of your application.

For technical reasons, the termination of the processing and the consequent deletion of your personal data will take place within 30 (thirty) days from the terms indicated above.

This is without prejudice to cases where retention for a longer period is required for any litigation, requests by the competent authorities or under applicable law.

9. Transfer outside the EU/EEA

Your personal data will not be transferred to countries outside the European Union (EU) or the European Economic Area (EEA).

10. Rights of the data subject

The data subject, i.e. you, may exercise, in relation to the processing of the data described herein, the rights provided for by the applicable legislation on the protection of personal data, including the right to

- have confirmation as to whether or not personal data concerning you are being processed and, if so, to obtain access to the data and related information (in particular, the purposes of the processing; categories of personal data processed; recipients or categories of recipients to whom the data have been or will be communicated; the period of retention of the data or the criterion for determining it; the existence of the right to rectify or erase the data or to limit or oppose the processing; the right to lodge a complaint with a supervisory authority; the origin of the data; the possible existence of an automated decision-making process, including profiling and, in such cases, significant information on the logic used and the importance and expected consequences of such processing for the data subject; the appropriate safeguards in case of transfer of personal data outside the EU/EEA), as well as a copy of such personal data, provided that this does not harm the rights and freedoms of others (**right of access**);
- correction of your personal data, i.e. to obtain the correction, modification or updating of any inaccurate or no longer correct data, as well as to obtain the supplement of incomplete personal data, including by providing an additional statement (**right to rectification**);
- request the deletion of your personal data when these, in particular, (i) are no longer necessary for the purposes for which they were collected or processed, or (ii) have been processed unlawfully, or (iii) must be deleted in order to fulfill a legal obligation (**right to be forgotten**). Cancellation may not be carried out if, in particular, the processing is necessary for the fulfillment of a legal obligation or for the establishment, exercise or defense of a right in court;
- to obtain a restriction on the processing of your personal data, i.e. that the Data Controller retains such data without being able to use them. This right can be exercised only when, in particular, (i) the accuracy of the personal data is contested, for the period necessary for the Controller to verify the accuracy of such data, or (ii) the processing of the data is unlawful and a restriction on the use of the data is requested, instead of their deletion, or (iii) although the Controller no longer needs them for the purposes of processing, the personal data are necessary for the data subject to ascertain, exercise or defend a right in court (**right to restriction**);
- to obtain from the Data Controller your personal data, in a standard format, and that they are transferred, where technically possible, directly to a third party indicated by you (**right to data portability**);
- lodge a complaint with the supervisory authority (in Italy, the Personal Data Protection Supervisory Authority, for more information www.garanteprivacy.it) in case of a breach of data protection rules (**right to lodge a complaint**).

To exercise these rights you can contact the Data Controller at any time, by writing to Angelini S.p.A., viale Amelia n. 70, 00181 - Rome (Rome), Italy or at the email address privacy.italia@angelinipharma.com or by writing to the Data Protection Officer (DPO) c/o Angelini S.p.A., viale Amelia n. 70, 00181 - Rome (Rome), Italy, or to the email address dpo.italia@angelinipharma.com.

11. Changes to this notice

The constant evolution of our activities could lead to changes in the characteristics of the processing of your personal data described above. As a result, this privacy policy may be subject to changes and additions over time, which may also be necessary with regard to new legislation on the protection of personal data.

In the event of significant changes to this policy, we will notify you accordingly.

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