



## PRIVACY NOTICE

This privacy notice is provided by Chiesi Farmaceutici S.p.A. ("Chiesi" or "we" or "us"), as Data Controller, in compliance with the provisions of Regulation (EU) 679/2016 ("GDPR") as well the applicable privacy regulation, and is aimed at informing the reporting and interested individuals on how we process the information contained in reports submitted.

"Personal Data" is any information that relates to an identified or identifiable living individual. It also constitutes different pieces of information, which taken together can lead to the identification of a person.

"Processing of Personal Data" covers a wide range of operations performed on personal data, including manual or automated means. It includes the 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 of personal data.

"User" is the individual who submits a report through the platform (hereinafter "SpeakUp&BeHeard" or "Platform") or by calling the hotline.

"Reported subject" is the individual who is concerned by a report submitted through the platform or by calling the hotline.

### (1) GENERAL INFORMATION

#### PURPOSES:

The SpeakUp&BeHeard platform and the hotline allow any individual, including, but not limited to, Chiesi employees, contractors, and vendors, to report suspected violations or concerns regarding the infringement of laws, regulations, and internal policies. Reports may include conducts allegedly infringing the Group Code of Conduct, the Anti-bribery Policy, anti-bribery laws, criminal laws, and any other violation that may affect the business and financial integrity of the company (e.g., corruption, conflict of interest, unfair behaviors, frauds, insider trading, accounting issues), environmental safety or animal welfare.

Chiesi will process your Personal Data for the following purposes only:

- Enabling and managing the whistleblowing Platform and the related reports;
- Managing the lifecycle of the report, carrying out the investigations (i.e., audit of laptops/PCs, mobile devices and e-mail correspondence) with the relevant stakeholders, including public authorities;
- Prevent and act against unlawful conducts, applying disciplinary measures if necessary;
- Safeguard the interests of the company, as well as the rights of its employees and third parties involved.

#### CATEGORIES OF PERSONAL DATA:

The provision of Personal Data is optional. In case the User voluntarily decides to provide their personal data, the following categories of data may be processed by the relevant Data Controller:

- Identification data of the User: name, surname, and email address;
- Personal data of the Reported subject or other parties mentioned in the report or obtained by the Data Controller during the investigations (e.g., job title; type of relationship with Chiesi);
- Information relating to the reported violation;
- Phone number (via the hotline);
- Your voice (via the hotline).



Please be mindful that the information included in some reporting may involve special categories of personal data. According to Article 9 of the GDPR “special data” is considered data that may reveal the racial or ethnic origin, religious, philosophical beliefs, political opinions, membership to parties or trade unions, data relating to health and sexual life.

#### **LEGAL BASIS OF THE PROCESSING:**

Legal obligation: to comply with applicable laws and regulations and fulfill the requests received by competent Authorities.

Legitimate interest: we will also retain your Personal Data based on the legitimate interest to prevent and investigate the alleged violations outlined in the PURPOSES section, defend its rights in (or file) a legal proceeding accordingly.

#### **(2) HOW WE PROCESS YOUR PERSONAL DATA**

Your report will be processed only by specifically appointed internal and external personnel, based on the need-to-know principle.

The Personal Data may also be shared with, or accessed by other companies or individuals, including the service provider of the Platform. The provider will only access the data for system maintenance purposes or to provide technical support to the User.

Chiesi ensures the protection of your Personal Data and the legitimacy of such processing by appointing the relevant parties as data processors through appropriate data processing agreements. All our processors shall therefore comply with applicable privacy laws and implement appropriate security measures.

In certain circumstances, we might need to share the information of your report, including your Personal Data, to public authorities and courts requiring disclosure to investigate or decide on the case, and legal counsel providing support to Chiesi during the management of the report.

Be mindful that the identity of the User, acting as reporting individual, will be disclosed only upon legal obligation, disclosure request previously mentioned, or to guarantee the right of defense of the reported individual.

#### **How We Protect Your Personal Data**

Chiesi implements appropriate security measures to safeguard your Personal Data against unauthorized access, disclosure, or loss, including:

- Reasonable measures to ensure that Personal Data is collected in compliance with the minimization and purpose limitation principles. We retain your Personal Data for a limited time as specified in the following section (3) unless an extension of the retention period is required or permitted by law;
- A range of technologies to ensure the confidentiality of Personal Data, ranging from encryption, strong passwords, and two-factor authentication to firewalls and dedicated software to protect servers from external attacks;
- Selection of our business partners and service providers based on strict qualification criteria and obligation to comply with our data protection standards secured through specific contractually binding provisions. In addition, we perform audits and other assessments to verify their compliance with the above requirements;
- Privacy and data protection training tests to verify knowledge, and other activities to improve the awareness of privacy among employees and contractors.

#### **International Data Transfers**

Your Personal Data referred to in section (1) is stored on the Platform provider’s server (specifically appointed as a data processor) located in Italy or within the European Union. Based on the specific



features and content of your report, your Personal Data may be transferred to other countries, including non-EU ones. Chiesi Group has assessed the impact of international transfers falling within the scope of reports and implemented appropriate guarantees, including signing the standard contractual clauses with the relevant stakeholders.

### **(3) RETENTION PERIOD OF YOUR PERSONAL DATA**

We retain your Personal Data for the time necessary and consistent with the necessities that may arise during the management of your report (e.g., lawsuit, proceeding before the public authorities), in compliance with the minimization, purpose limitation principles, and according to the applicable regulations.

Report assessed/closed will be anonymized by replacing personal data through specific key words no later than two (2) months after the end of the investigation.

If the internal checks on the report do not raise any concern (unfounded report), your data will be immediately erased.

Your Personal Data will be processed according to the terms set out above or for a shorter period if you decide to exercise one of the rights listed in the following sections (4) and (5). Upon the expiration of the term, your Personal Data will be deleted or anonymized in accordance with our internal procedures, unless otherwise required by legal obligations or in case your Personal Data are necessary to protect our rights before any judicial or other relevant authority.

Be advised that – without prejudice to section (5) - if you ask to delete your Personal Data, we may not be able to address your report or conclude the investigation.

### **(4) DATA SUBJECT RIGHTS**

Access, rectification, cancellation, data portability, restriction of processing, objection to processing, and revocation of consent.

Chiesi provides dedicated contacts for the enforcement of your right to access, modify, object, or limit the processing of your Personal Data, to request their cancellation, portability (if applicable), or revoke your consent in situations specified in the GDPR or other relevant regulations.

We invite you to contact the Data Protection Officer (DPO) to obtain additional information and require the enforcement of your rights at [dpo@chiesi.com](mailto:dpo@chiesi.com).

If you believe that Chiesi is not processing your Personal Data in accordance with the principles explained in this notice or with the applicable laws, be advised that you have the right to lodge a complaint with a Data Protection Authority.

### **(5) DATA SUBJECTS' RIGHTS – REPORTED SUBJECT(S)**

If you are a Reported subject, please be aware that the exercise of the rights set forth above might be limited in order to guarantee the confidentiality of the User as well to prevent any act which might compromise any ongoing investigation.

Please be informed of the following:

- **Right to be informed**  
Right to be informed pursuant to articles 12 to 14 of the GDPR is limited due to confidentiality and secrecy obligations imposed by the applicable regulations as well as the risk to make impossible or to prejudice seriously the achievement of the purposes of the processing related to the reports under the whistleblowing system (see Article 14(5)(b) and (d) of the GDPR).
- **Other data subjects' rights**  
The data subjects' rights set forth by the GDPR from article 15 to 22 might be subject to limitation,



even whit regards to the source of the information contained in the report, where a serious prejudice against the confidentiality of the User's identity and/or compliance with the applicable regulation may arise (please see art. 2-undecies of the Italian Privacy Code – D. Lgs. n. 196 of 2003 and subsequent amendments – and art.23 of the GDPR).

In particular, any Reported subject is informed that the exercise of such rights:

- will be carried out in compliance with legal provisions and applicable regulations;
- may be delayed, limited, or excluded with reasoned notice without delay, unless such communication is likely to compromise the purpose of the limitation, for such time and to the extent that this constitutes a necessary and proportionate measure, having regard to the fundamental rights and legitimate interests of the data subject, to protect the confidentiality of reporting person's identity;
- where appropriate, in such cases, the data subject's rights might also be exercised through the Data Protection Authority.

#### **(6) INFORMATION ON AUTOMATED DECISION MAKING AND UPDATES TO THIS NOTICE**

Your Personal Data are not subject to the automated decision-making process (including profiling). This notice may be updated from time to time. Any update to this notice will become effective at the time of its publication on the Platform.