

CHIESI LIMITED GENERAL PRIVACY POLICY (AUGUST 2016)

Chiesi Limited and its group companies ("**Chiesi**", "**we**", "**us**", "**our**") collect certain information about individuals that have dealings with us. You may be a professional in the healthcare industry, an attendee at one of our events, a patient that is making use of our products or a visitor to our UK websites ("**Websites**").

Please take the time to read and understand this privacy policy as it contains important information about the data we collect about you and how we use it.

HEALTHCARE PROFESSIONALS & ATTENDEES AT OUR EVENTS

WHAT INFORMATION DO WE COLLECT?

We may collect:

- **All information you choose to provide to us**, including the information listed in further detail below;
- **Contact information** such as your name, work address, telephone number and email address;
- **Details of any collaboration** between us and you in relation to our business;
- **Any contracts that we enter into** with you for whatever reason;
- **Records of any fees, sponsorship, contributions and expenses** that we may pay to you or on your behalf from time to time. For example, if we pay for your associated travel and accommodation costs in order for you to attend one of our events;
- **Any information which is available about you in the public domain**, such as details about your areas of expertise and qualifications;
- **Copies of all correspondence** that we have with you from time to time, in respect of matters such as our products and issues that have been raised by patients;
- **Transcripts of speeches** that you may make at any of our events;
- **Financial details** including your bank and the sort code and account number, to the extent that you supply it to us for the purpose of making payments to you and your credit card details when you make a payment to us;
- **Passport details** when we book travel on your behalf;
- **Dietary requirements** in the event that you attend one of our events which is serving food and have any particular dietary preferences.

HOW DO WE COLLECT YOUR INFORMATION?

We may collect information about you through:

- Conversations and correspondence between you and us;
- Forms that you complete, whether paper-based or online;
- Registration on our Websites for access to merchandising and/or e-learning areas;
- Our third party event organisers;
- Your colleagues within the healthcare industry;
- Your employer;
- Certain other third parties from time to time.

HOW DO WE USE YOUR INFORMATION?

We may use the information we collect for the following purposes:

- **Administer your attendance at our events**, including the booking of travel and accommodation;
- **Market our products to you** through face-to-face meetings, conversations and correspondence with our sales professionals and other representatives;
- **Verifying your details** (including checking against published registers of healthcare professionals) for the purpose of confirming your registration on our Websites so that you can purchase products and access training materials;
- **Providing training to you**, and assessing your completion of said training along with recording the results of any related tests that you take;
- **Assess your suitability to speak at our events** based on what we know about your qualifications and expertise;
- **Answer queries** that you lodge with us from time to time;
- **Contact you about future events** that we or our partners are hosting;

- **Provide certain disclosures to professional and regulatory bodies**, including the Association of the British Pharmaceutical Industry (ABPI) about transfers of value that we have made to you and these disclosures will form part of a public register which is available on the ABPI's website;
- **Build a profile of you** and your expertise.

WHO DO WE SHARE YOUR INFORMATION WITH?

Your information may be disclosed to:

- **Other companies within our group**. For example, we may share information with our Italian head office from time to time;
- **Organisers of our events**;
- **Travel agencies, airlines and hotels**, in cases where you are or may be undertaking business travel with Chiesi, such as attending one of our events;
- **Technology providers**, including those which host your data on our behalf and provide certain IT support services to us;
- **Our other third party suppliers**, to the extent that they need to process your data in order to provide certain services on our behalf;
- **Prospective buyer(s)** of any of our business assets we intend to sell;
- **Prospective third party buyer(s)** of substantial part of all our business assets;
- **Our bank(s) and payroll administrator**, for the purposes of making salary and any other bonus entitlement payments to you;
- **Our professional advisors** including our lawyers and accountants when they need it to give us their professional advice; and
- **The police, local authorities, Her Majesty's Revenue and Customs (HMRC), the courts** and any other government authority if they ask us to do so or we are obliged to do so as a result of a court order.

PATIENTS

WHAT INFORMATION DO WE COLLECT?

We may collect:

- **All information you choose to provide to us**, including the information listed in further detail below;
- **Your contact details**, including your name, home address, telephone number and email address;
- **Details about who your GP is**, and where their practice is based, along with any other healthcare professionals that are involved in your care;
- **Your health records** that you or your GP has provided to us;
- **Information about your use of our product** and any side effects or other issues that you have experienced when using it.

HOW DO WE COLLECT YOUR INFORMATION?

We may collect information about you through:

- Queries that you submit to us about our products;
- Conversations and correspondence between you and us;
- Your GP or other healthcare professionals that you interact with.

HOW DO WE USE YOUR INFORMATION?

We may use the information we collect for the following purposes:

- **Handling and responding to any query** that you raise with us or any GP or healthcare professional raises with us on your behalf;
- **Research and development** of our products.

WHO DO WE SHARE YOUR INFORMATION WITH?

Your information may be disclosed to:

- **Technology providers**, including those which host your data on our behalf and provide certain IT support services to us;
- **Our other third party suppliers**, to the extent that they need to process your data in order to provide certain services on our behalf;

- **Prospective seller buyer(s)** of any of our business assets we intend to sell;
- **Prospective third party buyer(s)** of substantial part of all our business assets;
- **Our professional advisors** including our lawyers and accountants when they need it to give us their professional advice; and
- **The police, local authorities, Her Majesty's Revenue and Customs (HMRC), the courts** and any other government authority if they ask us to do so or we are obliged to do so as a result of a court order.

VISITORS TO OUR WEBSITES

WHAT INFORMATION DO WE COLLECT?

We may collect:

- **All information you choose to provide to us**, including the information listed in further detail below;
- **Contact information** such as your name, work address, telephone number and email address;
- **All information collected using cookies or similar technologies** pursuant to our Cookie Policy;
- **The IP address** of your device;
- **All additional information** you choose to provide in relation to your application.

HOW DO WE COLLECT YOUR INFORMATION?

We may collect information about you through:

- Conversations and correspondence between you and us, in particular using the info@chiesi.uk.com email address;
- Registration on our Websites for access to merchandising and/or e-learning areas;
- Our third party event organisers;
- Cookies or similar technologies we use on our site.

HOW DO WE USE YOUR INFORMATION?

We may use the information we collect for the following purposes:

- **Operate** our Websites;
- **Verifying your details** (including checking against published registers of healthcare professionals) for the purpose of confirming your registration on our Websites so that you can purchase products and access training materials;
- **Supply** you with any information that you have requested in relation to our site;
- **Respond** to queries, suggestions or complaints about our site that you made (if the queries, suggestions or complaints about our site are made on an anonymous basis they may be passed to us to help us work with our third party to improve our site);
- **Personalise** your experience of our site;
- **Collate and analyse and report** to us on an aggregate, anonymised basis, information about the use of our site to help us improve it;
- **Maintain our business records** and keep a record of all the above activities.

WHO DO WE SHARE YOUR INFORMATION WITH?

Your information may be disclosed to:

- **Our professional advisors** including our lawyers and accountants when they need it to give us their professional advice;
- **Technology providers**, including web developers and those which host your data on our behalf and provide certain IT support services to us, in particular Google;
- **Our other third party suppliers**, to the extent that they need to process your data in order to provide certain services on our behalf;
- **Prospective buyer(s)** of any of our business assets we intend to sell;
- **Prospective third party buyer(s)** of substantial part of all our business assets;
- **Professional and regulatory bodies**, including the ABPI;
- **The police, local authorities, Her Majesty's Revenue and Customs (HMRC), the courts** and any other government authority if they ask us to do so or we are obliged to do so as a result of a court order.

OUR COOKIES

What are cookies and why do we use them?

A cookie is a small text file of letters and numbers that we place on your computer or device when you use our Websites. We use cookies to distinguish you from other visitors and provide you with a good experience browsing our Websites.

What types of cookies do we use?

Some cookies only last until you close your browser or a short time. These are called **session cookies**. Some last longer, for example, to enable a website to recognise you when you return to it. These are called **persistent cookies**. We use both session and persistent cookies to ensure that you get the best experience when using our Websites.

We use several different types of cookies:

- **Strictly necessary cookies:** these are cookies that are required for the operation of our Websites, enabling you to login and use the features of our Websites.
- **Performance cookies:** these are cookies that allow us to recognise and count the number of visitors we have to our Websites and to see how they move around when they are using them. This data helps us to improve the way our Websites work, for example, by ensuring that visitors find what they are looking for easily.

In the table below we set out the individual cookies we use and why we use them:

Cookie name	Type of Cookie	What does it do?
PHPSESSID	first party, session, strictly necessary	Ensures that once you have logged in, you stay logged in throughout your session.
_utma	first party, persistent, performance	Used to distinguish users and sessions.
_utmb	first party, session, performance	Used to determine new sessions/visits.
_utmc	first party, session, performance	Operates in conjunction with the _utmb cookie to determine whether the user is in a new session/visit.
_utmz	first party, persistent, performance	Used to store visitor-level custom variable data.
_utmz	first party, persistent, performance	Used to identify and store the traffic source or campaign that explains how you reached our site.

How can you manage cookies?

If the settings on your browser are adjusted to accept cookies we interpret this, along with your continued use of our Websites, to mean that you agree to our use of cookies.

To manage or block cookies placed on your computer, mobile phone or tablet, you need to alter your browser or device settings. Please consult your browser's guide or visit www.allaboutcookies.org for more information or refer to your device user manual.

Our Websites are designed to use cookies, so if you choose not to allow any cookies at all, you may not be able to access or use all or parts of our site and the functionality may be affected.

Third parties

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be performance cookies or targeting cookies.

If you are concerned about cookies from third parties, you can often opt-out with the provider directly (such as with Google Analytics, please visit <https://tools.google.com/dlpage/gaoptout>). Please note that these providers may use cookies to power their opt-out service, so if you change your browser settings to block all cookies, their opt-out service may cease to work.

Our recruitment website is managed by a third party called Talentia Software UK Ltd. They also use cookies to enable you to get the most from our recruitment website. You can find out more information about the cookies used by Talentia Software UK Ltd at <https://talentia.chiesi.uk.com/hcmcv/CFLibrary/CFCookiePolicy.asp>.

EVERYONE

INTERNATIONAL TRANSFER OF YOUR INFORMATION

Although Chiesi is based in the UK, its parent company is based in Italy and we use suppliers from many parts of the world.

As a result, the information we collect about you may on occasion be transferred to, stored and used at premises in other countries, including those which are outside of the European Economic Area, such as the US.

Updates to this privacy policy

We review the ways we use your information regularly. And in doing so, we may change what kind of information we collect, how we store it, who we share it with and how we act on it.

Consequently, we will need to change this privacy policy from time to time to keep it accurate and up-to-date.

Whenever we change this policy, rest assured we will seek to inform you of those changes. That way, you can check to see if you're still happy. And if, following any changes, you continue to use our Websites, contact us by telephone or otherwise provide information to us (through our stores or social media, for example) we will assume that you agree to those changes.

About us

Our full legal name is Chiesi Limited and our registered address is 333 Styal Road, Manchester, M22 5LG.

We are the 'data controller' of the information you provide us with. This term is a legal phrase used to describe the person or entity that controls the way information is used and processed.