

Privacy Policy

Purpose of this privacy notice

Chiesi Limited (collectively referred to as “Chiesi”, “we”, “us” or “our” in this privacy notice) respects your privacy and is committed to protecting your personal data. This privacy notice aims to give you information on how Chiesi collects and processes your personal data.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Chiesi is the controller and is responsible for your personal data.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Chiesi Limited

Name of DPO: Laura Lovell

Email address: ukdpo@chiesi.com

Postal address: 333 Styal Road, Manchester M22 5LG

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the opportunity to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated in May 2025 and historic versions are archived and can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

A. HEALTHCARE PROFESSIONALS, HOSPITAL REPRESENTATIVES AND ATTENDEES AT EVENTS/WEBINARS

1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name and title.
- **Contact Data** includes your work or practice address, email address and telephone numbers.
- **Professional Data** includes your academic title, additional professional qualifications (e.g., postgraduate specialisation diploma, postgraduate master, PhD), professional job title, area of expertise, registration in a professional register and registration date, lectures and publications.
- **Financial Data** includes details provided to us by you to facilitate the payment of certain fees, sponsorship, contributions and expenses. For example, if we pay for your associated travel and accommodation costs in order for you to attend an event.

- **Video and Audio Footage** if using an e-Detailing platform or joining our (or our partner/third party host) webinars.
- **Travel Data** includes passport details and travel itineraries.
- **Engagement Data** includes details of all our engagements with you including emails and notes of meetings/telephone calls.
- **Complaint Data** includes details of a complaint made by you in relation to one of our products.
- **Pharmacovigilance Data** includes details of adverse events which are reported to have arisen as a result of the use of our products. This may include reference to your patient and his/her medical condition.
- **Enquiry Data** includes details of an enquiry made by you in relation to our products and work.
- **Usage Data** includes details of how you use our products.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we will use it to monitor the quantity and frequency of company interactions with Healthcare Professionals. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you fail to provide personal data

Where we need to collect personal data by law or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial, Travel, Engagement, Complaint and/or Enquiry Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Contact us regarding a general enquiry;
 - Contact us with a view to obtaining further medical information regarding our products;
 - Contact us to report an adverse event/side effect;
 - Contact us to report a complaint regarding our products;
 - Enter into an agreement with us to provide certain services to us including speaking at an event or taking part in an advisory board;
 - Engage, set up accounts and work with us through our and our supplier platforms such as PAYCE;
 - Join our or any of our partner/third party host webinars; or
 - Speak with one of our sales representatives who may collect your signature through a tablet or a similar device.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Identity and Contact Data from data brokers or aggregators such as IQVIA Solutions UK Limited, based inside the EU.
 - Identity and Contact Data from publicly available sources such as NHS Service Provider websites.

- Identity and Contact Data from third parties such as webinar hosts, virtual meeting hosts, market research companies, platform suppliers and related organisations.

3. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- With your explicit consent for example: direct consumer promotional/marketing communications.

Generally, we will only ask for your consent to processing if there is no other legal ground to process. In these circumstances, we will always aim to be clear and transparent about why we need your consent and what we are asking it for. Where we are relying on consent to process personal data you have the right to withdraw your consent at any time by contacting us and we will stop the processing for which consent was obtained. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

To process Special Category Data, we rely on additional legal grounds and generally, they are as follows:

- With your explicit consent.
- Necessary for the purposes of preventive or occupational medicine. This may also include monitoring whether the quality of our services are meeting expectations.
- Necessary to establish, make or defend legal claims or court action.
- Necessary for a public interest purpose in line with any laws that are applicable.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To deal with an enquiry made by you in relation to our products including data collected relating to the processing of product orders	(a) Identity (b) Contact (c) Enquiry (d) Usage	(a) Necessary for our legitimate interest in administering and responding to a request made by you for further information made in the context of an enquiry.
To deal with a complaint made by you in relation to our products.	(a) Identity (b) Contact (c) Complaint (d) Usage	(a) Necessary for our legitimate interest in administering and responding to a request made by you for further information made in the context of an enquiry.

		(b) Necessary for reasons of substantial public interest – to comply with our statutory obligation to deal with complaints made in respect of our products pursuant to an EC Directive (2001/83/EC).
To comply with the applicable laws, regulations, or decisions of the competent authorities, in particular in the areas of pharmacovigilance of medical products and drug safety.	(a) Identity (b) Contact	(a) Necessary to comply with a legal obligation
To notify you of about safety warnings and withdrawals of medical products/drugs	(a) Identity (b) Contact	(a) Necessary for reasons of substantial public interest – to comply with our statutory obligation to communicate any withdrawal of our product(s) pursuant to an EC Directive 2001/83/EC as amended and Regulation (EU) No 726/2004 as amended
To deal with a report made by you in respect of an adverse event caused by one of our products.	(a) Identity (b) Contact (c) Pharmacovigilance (d) Usage	(a) Necessary for our legitimate interest in administering and investigating a report made in respect of adverse side effects which may have arisen as a result of the use of our product(s). (b) Necessary for reasons of substantial public interest – to comply with our statutory obligation to deal with reports of adverse side effects which may have resulted from the use of our product(s) pursuant to an EC Directive (2001/83/EC).
To contact you about potential opportunities to work with us at future speaking events, or to join our subject matter webinars and/or or sit on one of our advisory boards.	(a) Identity (b) Contact (c) Professional	(a) Necessary for our legitimate interests (i.e. in providing you with potential opportunities to work with us and/or to join our webinars/events).
To speak with you about potential products which might be of interest to you and your practice. Including to provide you with an E-Detailing Service	(a) Identity (b) Contact (c) Usage	(a) Necessary for our legitimate interests (i.e. contacting you about potential products we feel might be of interest to you and your practice).
Record and monitor our engagements with you in accordance with the ABPI code of practice as regulated by the	(a) Identity (b) Contact (c) Engagement Data (d) Professional	(a) Necessary for our legitimate interest (i.e. to comply with our obligations pursuant to the ABPI code of practice as regulated by

PMCPA or the IPHA code as appropriate.		the PMCPA or the IPHA code as appropriate).
To share your contact details with our platform suppliers such as PAYCE and Shufflr so we may create accounts, engage/work together and provide documentation.	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To use data analytics to improve our, products, customer relationships and experiences.	(a) Technical (b) Usage	(a) Necessary for our legitimate interests (i.e. to define types of customers for our products and services, to develop our business and to inform our marketing strategy).
To maintain a register of key opinion leaders who are deemed to be leaders in their field and who we may wish to contact for potential future engagements.	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (i.e. to keep up-to-date with those individuals who are deemed to be leaders in their respective fields and who we may wish to contact about future collaborative opportunities).
To arrange for travel and accommodation where you attend a conference organised by us, and/or where you are working with us as part of a speaking engagement or advisory board.	(a) Identity (b) Contact (c) Travel	(a) Necessary for the performance of our contract with you.
To arrange for payment of those sums agreed to be paid to you in accordance with your contractual engagement with us	(a) Identity (b) Contact (c) Finance	(a) Necessary for the performance of our contract with you in order to pay you.
Report details of fees paid to you for services rendered to us (e.g. speaking at an event or sitting on an advisory board) to the Association of British Pharmaceutical Industry who publish these details on their disclosure portal.	(a) Identity (b) Contact (c) Finance	(a) Consent – provided by you in the contract.
To provide promotional communication, namely to provide you with information about our	(a) Identity (b) Contact	(a) Consent

pharmaceutical and non-pharmaceutical products (e.g., food supplements), our events, professional training seminars, conferences and courses, as well as to provide you with scientific material not related to pharmaceutical products commercialised by us.	(c) Marketing and Communications	
To evaluate your professional areas of interest, in particular to analyse or predict aspects concerning your professional preferences and interests (e.g., treatment preferences), through our representatives in order to enhance information and promotional activities.	(a) Identity (b) Contact (c) Marketing and Communications	(a) Consent
To provide details to our parent company, a subsidiary, or an affiliate within our Group for internal administrative and management purposes only.	(a) Identity (b) Contact (c) Engagement Data (d) Professional	(a) Necessary for our legitimate interest in transmitting personal data within our Group for internal administrative and management purposes.
To provide you with information about our and/or our Group's initiatives and programs (e.g., corporate social responsibility, scientific research, patients support programs, etc.),	(a) Identity (b) Contact (c) Communications	(a) Necessary for our legitimate interest pursuant to institutional communication purposes and to help manage our relationship with you.
To carry out market research and/or statistical surveys	(a) Identity (b) Contact (c) Professional	(a) Necessary for our legitimate interests (i.e. to develop our business and our products and to inform our marketing strategy).

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional material from us

We may use your Identity, Contact and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us (or on our behalf using our third party event organisers) if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

If you no longer want to receive promotional material

You can ask us or third parties to stop sending you marketing messages at any time by following the links on any marketing message sent to you **or** by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

B. PATIENTS

1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, title, date of birth and gender.
- **Contact Data** includes your address, email address and telephone numbers.
- **Medical Provider Data** includes details of your GP and other health care professional who provides you with medical care.
- **Complaint Data** includes details of a complaint made by you in relation to one of our products.
- **Pharmacovigilance Data** includes details of adverse side effects which are reported to have arisen as a result of the use of our products. This may include reference to you and any details of your medical condition that you may provide to us.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- **Special Category Data** Information about your (or the person you have authority to be contacting us on behalf of) health reported in the context of a complaint, enquiry or a report of adverse events, including any medical condition which may be provided by you or your health care provider.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions** . You may provide us with those categories of personal data listed above, by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Contact us regarding a complaint about one of our products;
 - Contact us to report an adverse event/side effect; or
- **Third parties**. We may receive personal data about you from your health care provider.

3. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- With your explicit consent for example: direct consumer promotional/marketing communications.

Generally, we will only ask for your consent to processing if there is no other legal grounds to process. In these circumstances, we will always aim to be clear and transparent about why we need your consent and what we are asking it for. Where we are relying on consent to process personal data you have the right to withdraw your consent at any time by contacting us and we will stop the processing for which consent was obtained. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

To process Special Category Data, we rely on additional legal grounds and generally, they are as follows:

- With your explicit consent.
- Necessary for the purposes of preventive or occupational medicine. This may also include monitoring whether the quality of our services are meeting expectations.
- Necessary to establish, make or defend legal claims or court action.
- Necessary for a public interest purpose in line with any laws that are applicable.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To deal with a complaint made by you in respect of our product(s).	(a) Identity (b) Contact (c) Complaint (d) Medical Provider Data	(a) Necessary for compliance with legal obligation to which Chiesi is subject – an EC Directive (2001/83/EC). (b) Necessary for reasons of substantial public interest – in the exercise of a function conferred upon Chiesi - an EC Directive (2001/83/EC).

	(e) Special Category Data	
To deal with a report made by you in respect of an adverse side effect which may have resulted from your use of our product(s).	(a) Identity (b) Contact (c) Complaint (d) Medical Provider Data (e) Special Category Data	(a) Necessary for compliance with legal obligation to which Chiesi is subject – an EC Directive (2001/83/EC). (b) Necessary for reasons of substantial public interest – in the exercise of a function conferred upon Chiesi – an EC Directive (2001/83/EC).
To deal with an enquiry made by you or on your behalf in respect of our product(s)	(a) Identity (b) Contact (c) Special Category Data	(a) Necessary for compliance with legal obligation to which Chiesi is subject – an EC Directive (2001/83/EC) (b) Necessary for our legitimate interest in administering and responding to a request made by you and storing our response for auditing purposes. (c) Consent.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

C. VISITORS TO OUR WEBSITE OR PREMISES

1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, title, date of birth and gender.
- **Contact Data** includes your address, email address and telephone numbers.

- **Technical Data** may include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Enquiry Data** includes details provided by you in the course of contacting us with an enquiry.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Image Data** includes visual images captured by our CCTV Cameras operating on our various sites.
- **Car Registration Data** includes number plate details captured by the Automatic Number Plate Recognition system in operation at our Chippenham Site.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

CCTV

Image Data will include **Special Categories of Personal Data**, areas covered by CCTV are clearly signposted and our processing of such data is limited to the extent necessary to maintain security at our sites.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions** . You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Contact us regarding a general enquiry; and
 - Contact us with a view to obtaining further medical information regarding our products.
- **Automated technologies or interactions**. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy, below, for further details.
- **Third parties or publicly available sources**. We may receive personal data about you from various third parties as set out below:
 - Technical Data from analytics providers such as Google based outside the UK/EEA.

3. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

- Where we need to comply with a legal or regulatory obligation.
- with your explicit consent for example: direct consumer promotional/marketing communications.

Generally, we will only ask for your consent to processing if there is no other legal grounds to process. In these circumstances, we will always aim to be clear and transparent about why we need your consent and what we are asking it for. Where we are relying on consent to process personal data you have the right to withdraw your consent at any time by contacting us and we will stop the processing for which consent was obtained. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

To process Special Category Data we rely on additional legal grounds and generally, they are as follows:

- With your explicit consent.
- Necessary for the purposes of preventive or occupational medicine. This may also include monitoring whether the quality of our services are meeting expectations.
- Necessary to establish, make or defend legal claims or court action.
- Necessary for a public interest purpose in line with any laws that are applicable.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or Chiesi Group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services,	(a) Technical (b) Usage	(a) Necessary for our legitimate interests (to define types of customers for our products and services, to keep

marketing, customer relationships and experiences		our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage	(a) Necessary for our legitimate interests (to develop our products/services and grow our business)
To promote the security of employers, visitors, contractors and other parties. Systems we use may record your image and at Chippenham your car registration during your visit	(a) Identity (b) Contact (c) Image (d) Car Registration	(a) Necessary for our legitimate interests in protecting our premises and the security of our employees and guests

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical and Usage to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Chiesi Group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

D. WHOLESALERS, SUPPLIERS, REGULATORS & GOVERNMENT BODIES

We hold the names and contact details of individuals acting in their capacity as representatives of their organisations, across the business. If the interactions relate to suppliers, contracts, buildings management, IT services etc., the legal basis is article 6(1)(c) of the GDPR for any legal obligation or article 6(1)(f) because the processing is within our legitimate interests as a business.

E. EVERYONE

1. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

2. International transfers

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 UK/European Economic Area, such as the US.

3. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

4. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

5. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These are as follows:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Right to raise a complaint you have a general right to complain regarding the handling of your personal data. We take all complaints regarding the handling of your personal data seriously. We will acknowledge receipt of your complaint within 30 days, investigate thoroughly and respond substantively without undue delay. We will keep records of all data handling and data protection complaints we receive, including the nature of the complaint and the actions taken to help improve our services.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

As outlined, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk): Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. We would, however, appreciate the opportunity to deal with your concerns before you approach the ICO so please contact us in the first instance.

6. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the Chiesi Group.

External Third Parties

FOR HEALTHCARE PROFESSIONALS, HEALTHCARE ORGANISATION REPRESENTATIVES, HOSPITAL REPRESENTATIVES AND ATTENDEES AT EVENTS/WEBINARS AND MEMBERS OF THE PUBLIC CONTACTING US:

- Service providers acting as processors based in the UK/EEA who provide IT and system administration services, including the receipt of complaints on our behalf where such complaint is made outside of normal office hours.
- to the competent public and governmental authorities, including judicial courts, when required by the applicable laws or regulations.
- Local manufacturers where it is necessary to inform the manufacture of a complaint reported in respect of our products.
- The European Medicines Agency where we are required to report adverse events relating to our products.
- Third parties responsible for reviewing and reporting on details relating to adverse events to determine the seriousness of such side effects.
- Business partners, suppliers, platform operators and sub-contractors for the performance of any contract we enter into with you.
- Organisations providing IT systems support and hosting in relation to the IT system,
- Third parties responsible for providing services to us, on our behalf or directly to you in relation to webinars, platforms and educational events.
- Our third party marketing agency who is responsible for managing various events that we run (including registration of delegates, sending out communications and invitations on our behalf and arranging travel (where requested to do so by you)).
- Third parties we engage to carry out market research and/or statistical surveys on our behalf.

FOR PATIENTS

- Service providers acting as processors based in the UK/EEA who provide IT and system administration services, including the receipt of complaints and/or enquires on our behalf where such complaint or enquiry is made outside of normal office hours.
- Local manufacturers where it is necessary to inform the manufacture of a complaint reported in respect of our products.
- The European Medicines Agency via its Eudravigilance database) where we are required to report adverse events relating to our products.
- Third parties responsible for reviewing and reporting on details relating to adverse events to determine the seriousness of such side effects

FOR VISITORS TO OUR WEBSITE OR PREMISES

- Service providers acting as processors based in the UK/EEA who provide IT and system administration services.
- Law enforcement service in the event that Image or Car registration Data is relevant to a security or criminal activity.

FOR WHOLESALERS, SUPPLIERS, REGULATORS & GOVERNMENT BODIES

- Service providers acting as processors based in the UK/EEA who provide IT and system administration services.

Cookies Policy

This policy provides information regarding the use of cookies and other similar technologies on the website URL (hereinafter referred to as the "**Website**"). This notice is provided to the user in compliance with European and Italian legislation on the processing of personal data and electronic communications.

The Website is owned by Chiesi Limited, with registered offices in 333 Styal Road, Manchester, M22 5LG (hereinafter referred to as "**Chiesi**" or "**Controller**"), which you may want to contact for any information or request regarding the use of cookies and other similar technologies on this Website.

The Controller designated a Data Protection Officer (DPO), who can be directly contacted at the following contact details: Data Protection Officer – Matthew Wiggetts, email: ukdpo@chiesi.com.

For further information on the processing of personal data, please read the Privacy Policy above.

WHAT ARE COOKIES?

Cookies are text files stored on your computer or mobile device when you use the Website, enabling a faster and more enjoyable online experience. You can control how websites use cookies by configuring your browser's privacy settings (see your browser's help section to learn more about the control of cookies). For clarity, however, you should know that if you completely disable cookies, the Website may not function properly.

Cookies are downloaded from your Internet browser and stored on your device the first time you visit a website. The next time you visit the same website using the same device, the website will recognize that you have seen the website before and adjust the content considering your previous visits. This way, the website experience can be more faithful to your interests and preferences.

Chiesi also uses other technologies like cookies to share the information we collect when you visit the Website. Please also note that Chiesi may include technologies (including but not limited to web beacons and pixel tags) for advertising purposes or to monitor your interaction with the Website.

Web beacon, pixel tag, and embedded scripts

A web beacon is an electronic graphic image embedded in a website or email to identify cookies when you browse the website or read the email. Pixel tags allow sending readable emails to users and finding out whether they have opened the email.

For example, if you receive an email from Chiesi, the email may contain a login URL that links to our web page. If you click on the link, Chiesi will keep track of your visit to learn about your preferences.

Embedded scripts are programming codes of some web pages that measure how you use them, for example, the links you select. This information is used to improve Chiesi-owned websites and online services, to tailor them to your likely interests, and to conduct market research. Users can disable scripting features, such as JavaScript, within the browser settings (see the help feature of your browser). Please note that if you disable scripting functionality, some Chiesi websites and applications may not function properly.

Proprietary and Third-Party Cookies

Proprietary cookies are those implemented by Chiesi and used to interact with you when you browse the Website.

The Website may also offer content from other websites that integrate their cookies (third-party cookies). Third parties provide these cookies. These providers may set their cookies while you are visiting the Website and receive information about your behavior while navigating the Website. Therefore, you should see the websites of these third parties to learn

more about how they use these cookies. Please see the table at the end of this policy for more information about which third-party cookies are used on the Website.

HOW TO CONTROL COOKIES AND SIMILAR TECHNOLOGIES

Chiesi provides tools to facilitate the management of proprietary and partner cookies. You can accept or reject cookies through the cookie banner on the first visit and manage them anytime through the Cookie Settings.

If you decline cookies that require your prior consent, Chiesi will not use those cookies. If you decide to revoke your previous consent, Chiesi will no longer use those cookies and delete the relevant proprietary ones. However, please note that if you refuse and cancel functional or performance cookies, you may not be able to use the full functionality of the Website, and Chiesi may no longer understand what you like and dislike about the Website and improve it.

For clarity, be mindful that refusing or withdrawing your consent to targeted advertising cookies does not mean you will receive less promotional advertising. See the next section for more information on profiling cookies.

Browser controls to cancel cookies

You can set your browser through the dedicated options to automatically refuse the installation of cookies or delete all installed cookies from your computer or mobile device.

The procedure differs depending on the browser in use. Below you can find the links to the support pages of the main browsers:

Google Chrome - [Clear cache & cookies - Computer - Google Account Help](#)

Mozilla Firefox - [Clear cookies and site data in Firefox | Firefox Help](#)

Microsoft Edge - [Manage cookies in Microsoft Edge: View, allow, block, delete and use - Microsoft Support](#)

Safari - [Clear cookies in Safari on Mac – Apple Support \(UK\)](#)

Safari on iPhone - [Clear your cache and cookies on iPhone – Apple Support \(UK\)](#)

Safari on iPad - [Clear your cache and cookies on iPad – Apple Support \(UK\)](#)

You should be aware that any preferences will be lost if you delete cookies. Ironically, this includes where you have opted out from cookies, as this requires an opt-out cookie to be set.

Keep always in mind that disabling and deleting technical cookies could lead to malfunctions in the navigation of the Website.

CATEGORIES OF COOKIES

There are different types of cookies, and each has a specific function that provides you with a better browsing experience in case you are using the same device and browser with which you visited the Website for the first time.

Technical or strictly necessary cookies - default activation

This cookie category is necessary to use the Website and provide essential technical functionality. Using the Website without these cookies would not be possible, and they are generally installed by default. If you reject them, you might not be able to access the site.

Performance cookies - optional activation

Chiesi uses performance cookies to understand user behavior to improve the performance of the Website and to provide a personalized experience. This type of cookie collects information about how you interact with the Website, allowing, for example, Chiesi to have an overview of the pages you visit and the time you spend on them. Please note that this information is collected in a fully aggregated manner and cannot be directly linked to you.

You may choose to disable/enable performance cookies through the Cookie Settings.

For more information about Cookies, please visit <https://ico.org.uk/for-the-public/online/cookies/>.

For general legal information about Chiesi and the use of the Website, please see the "[Terms of use](#)".