



**A.MENARINI**  
**diagnostics**

## Privacy Notice for HCPs – published on the Company’s Website

Dear Healthcare Professional

**We take your privacy very seriously and we commit to respect it to the sector’s highest standards.** For this reason we wish to provide up-to-date information as to Menarini Diagnósticos S.A., Avda. del Maresme 120, 08918 Badalona (Barcelona) (hereinafter the “Company”, or “we”) processes your personal data and ensures compliance with the applicable laws, including Regulation 2016/679/EU (the “Regulation”).

### **1. What we can do with your Data**

Your personal data, which we have collected on occasion of direct contacts with you, or that we may have retrieved from public available sources or specialised services providers, may be processed by the Company in its capacity of Data Controller for the following purposes:

(A) “Technical and Scientific information” services/activities which include visits of our sales representatives and repair technicians, participation in scientific events organized by us or dispatching via postal mail technical-commercial information;

(B) “Institutional Communication Activities” pertaining to the Company and to its initiatives and products.

The above activities will be performed also via email if you provide your consent.

### **2. What Data we collect**

The personal data which we may process (“Data”) are the following:

**(1) Professional/Academic Title; (2) Name; (3) Surname; (4) Tax Number; (5) Correspondence and visit professional address (street, number, city, county,** as well as professional email address and details of any other digital account); (6) visit times; (7) work phone number; (8) professional mobile phone number; **(9) Work sector;** (10) job position; (11) data related to the Scientific Conferences and other symposia and supported by the Company.

Processing your Data is required to enable us to perform our Technical and Scientific information services/activities and for this reason we ask you to provide at least the above data highlighted in **bold fonts**: if you withhold them we will be unable to address any Technical and Scientific information activity to you. Conversely, providing us with all the other data is optional -your refusal will not prevent us from addressing Technical and Scientific information activities/services to you, although we will be unable to tailor our services to your needs and/or to provide updates on the news regarding the Companies of our Group.

We inform you that the legal basis for the data processing operations described above is:

- the company’s legitimate interest to perform the “Technical and Scientific information” services/activities, pursuant to art. 6.1.f. of the Regulation. Specifically, the legitimate interest pursued by the company includes the following activities: maintaining company business/professional relationship with HCPs who are pre-existing professional contacts or have expressed an interest in the products or service provided; organising the company’s plans



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regarding the technical and scientific information services; tracking /reporting the daily activities of its representatives towards HCPs, performing statistical analyses on our scientific information activities.

- your consent for the use of your email to receive information on our products/services.

Furthermore, your data may also be processed without your consent in order to fulfil obligations stemming from laws, regulations and EU law, as well as to enforce or defend a legal right judicially, to enforce the Menarini Group Code of Conduct and to pursue other legitimate interests (e.g. to share data among Menarini Group Companies), as well as in all other cases prescribed by arts. 6 and 9 of the Regulation, where these are applicable.

### **3. How we process your Data.**

Data are processed both in paper and electronically and entered into the company system in line with the applicable laws –including the aspects pertaining to data security and confidentiality- and according to the principles of fair and lawful processing. Your Data shall be stored only as long as strictly necessary to fulfil the goals for which they were collected; in any case, the criterion used to determine the length of the storage period takes into due account the need to comply with any relevant legal requirement, the principle of data minimisation and the need to rationally manage the Company’s records. We may store your data even after the end of our activities towards you, but only for as long as necessary to fulfil contractual and legal obligations as well as to fulfil the purposes listed above. We update and maintain our databases so as to ensure your Data are always correct and accurate.

### **4. Who can access your Data**

Data may be processed by staff belonging to the following categories: administrative staff, reps, product managers. Data may also be processed by all those other members of staff who may need to do so by reason of their job duties. In addition, pursuant to arts. 6 and 9, Recitals 48 and 52 of the Regulation, Data may be communicated to the Company’s parent company A. Menarini IFR Srl, based in Florence (Italy), as well as to other companies of the Menarini Group, including those located in non-EU Countries (“Third Countries”) for organisational, administrative, financial and accounting necessities. Based on the legal and regulatory provisions to which we are bound, we may communicate your Data to the Agencia Española de Medicamentos y Productos Sanitarios, to national and local Health Authorities, other health centres and universities, other public authorities, association bodies as well as other recipients to whom your Data shall be disclosed pursuant to laws or regulations. In addition, in relation to the above obligations and purposes, data may be communicated to other companies, such as suppliers, sub-suppliers, IT and “Cloud Computing” service providers, agencies and event organisation entities, professional service providers and companies that perform tax/administrative tasks on our behalf, even in Third Countries. Such entities/individuals will act, as the case may be, as data controllers or data processors, for the same purposes listed above and in line with the applicable law. As far as Data transfers to Third Countries are concerned –including transfers to countries which may not guarantee the same protection standards as the applicable privacy laws, we inform you that Data processing will take place only in accordance with the provisions set forth by the laws in force, such as, for example, the adoption of Model Contract Clauses approved by the EU Commission, the selection of commercial partners enrolled in programs for the international free movement of data (e.g. the EU-USA Privacy Shield) or operating in Countries considered safe by the EU Commission.



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#### **5. Your Rights to Access and Control your Data**

You may at any time contact us at [protecciondatos@menarinidiag.es](mailto:protecciondatos@menarinidiag.es) as well as to our address in order to exercise the rights afforded by arts. 15-22 of the Regulation, including: knowing whether or not any Data referring to you is being processed by us; access your Data; verify the Data's content, origin, exactness, location (including, where applicable, the Third Countries where the data might be); obtain a copy of the Data; ask that the Data are supplemented, updated, amended; in the circumstances set forth by the law, ask that the processing of Data is restricted, that Data are deleted, anonymised, frozen; oppose to profiling operations and direct contact activities (including restricting contact methods to specific communication media), oppose to the processing of Data for legitimate reasons. Likewise, you may notify the Menarini Group's Data Protection Officer (dpo at menarini dot com) any observations you may have on our use of your Data which you consider inappropriate and/or lodge a complaint with the Agencia de Protección de Datos C/Jorge Juan, 6 28001 Madrid e-mail: [internacional@agpd.es](mailto:internacional@agpd.es).