

**DATA PROCESSING NOTICE OF GEDEON RICHTER PLC.  
ON THE PROCESSING OF PERSONAL DATA OF BUSINESS PARTNERS, CONTACTS, COLLABORATORS,  
SUBCONTRACTORS AND SUB-PROCESSORS**

The purpose of this Notice is to provide you with information about how and what personal data Gedeon Richter Plc. (registered office: 1103 Budapest, Gyömrői út 19-21.; company registration number: 01-10-040944; hereinafter referred to as "**Richter**"; contact details of the Data Protection Officer: [dataprotection@richter.hu](mailto:dataprotection@richter.hu)) processes about you while contracting in general and during business relations.

**I. Data Subjects**

In this Data Processing Notice (hereinafter referred to as „**Notice**”), Richter provides information on the processing of personal data by Richter regarding natural person business partners (hereinafter also referred to as „**Natural Person Contracting Party**”), Richter’s natural person subcontractors, sub-processors, and other collaborators (hereinafter collectively referred to as "**Collaborators**") used by its business customers with the consent of Richter, as well as their contact persons and representatives.

**II. Richter processes the personal data of its business partners and the contacts of its business partners for the following purposes and in the following manner:**

**A. Establishment and monitoring of contractual relationships**

Detailed description of the purpose of the processing	Richter's fundamental economic and operational objective and interest are to enter into contracts with third parties within the scope of its economic activities, and to monitor the performance of procurements, tenders, and contracts with business partners.
Data Subjects	Natural Person Contracting Party  Contact person, representative of a contracting partner who is not a natural person.
The categories of personal data concerned	For natural person contracting parties: name; contact information; address; billing information (account number); registration number; financial and economic data and performance-related information (currency of performance, revenue, taxable income, outstanding liabilities); if the type of contract requires: other professional information (professional competence, references).  For non-natural person contracting partner contacts or representatives: name; position; phone number; email address.
The legal basis for the processing	Natural person contracting party: contractual legal basis [Article 6(1)(b) GDPR]  Contact person or representative of a non-natural person contracting party: legitimate interest of Richter [Article 6(1)(f) GDPR]  Richter has a legitimate interest in concluding contracts with third parties in the context of its economic activities and in monitoring the performance of procurements, tenders and contracts with business partners and in doing so, processes personal data for this purpose.

## B. Management of payments

Detailed description of the purpose of the processing	Management of payments and disbursements related to the business relationship with you or the company you represent, corporate resource management.
The categories of personal data concerned	For natural person contracting party: subject matter of the contract and description of the economic event, payment details such as bank account number, tax number, payment details, and possibly claim information such as amount of claim, due date.  For non-natural person contracting partner contacts or representatives: name; position; contact information.
The legal basis for the processing	The legitimate interest of Richter [Article 6(1)(f) GDPR].  Richter has a legitimate interest in monitoring and fulfilling its payment obligations and monitoring and asserting claims arising from its contractual relations and in taking the necessary steps within Richter's organization to do so.

## C. Communication

Detailed description of the purpose of the processing	Communication with you or the company you represent.
The categories of personal data concerned	For natural person contracting party: name; contact information, typically including: email address; home/ mailing address; phone number.  For non-natural person contracting partner contact/representative: name; position; workplace address; name of the workplace; workplace email address and phone number.
The legal basis for the processing	The legitimate interest of Richter [Article 6(1)(f) GDPR].

## D. Fulfillment of Richter's accounting and tax-related legal obligations related to payments.

The categories of personal data concerned	For natural person contracting party: name; place and date of birth; address; tax number; signature; information regarding the economic event and performance, including the timing and due dates of performances.  For non-natural person contracting partner contact/representative: name, position, signature.
The legal basis for the processing	To comply with Richter's legal obligation [Article 6(1)(c) GDPR]:  - Article 77(1); Article 78(1), (3); Article 202 of Act CL of 2017 on the Rules of Taxation (in Hungarian: Az adózás rendjéről szóló 2017. évi CL. törvény) (" <b>Art.</b> ")

	- Act C of 2000 on Accounting (in Hungarian: A számvitelről szóló 2000. évi C. törvény) (" <b>Act on Accounting</b> "), § 165 (1); § 166 (1); § 169 (2).
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#### E. Enforcement of claims

Detailed description of the purpose of the processing	For this purpose, Richter only processes your personal data if there is a disruption in the performance of contractual obligations during the contractual relationship, necessitating the assertion of Richter's claims, including potentially through legal means, and the presentation of legal claims related to the claim.
The categories of personal data concerned	For natural person contracting party: name; mailing address; phone number; email address; description of the subject matter of the contract and the economic event; payment-related data: bank account number, tax number, payment details; information regarding the claim: amount of claim, due date; and any other data available to Richter during the contractual relationship that is necessary for submission and enforcement of legal claims.
The legal basis for the processing	The legitimate interest of Richter [Article 6(1)(f) GDPR].

#### III. Richter processes the personal data of Collaborators for the following purposes:

Detailed description of the purpose of the processing	To fulfill their contractual obligations with Richter, Richter's business partners may engage Collaborators with the prior consent of Richter, depending on the type of contract. In each contract, Richter and its business partners specify the Collaborators approved by Richter, with the aim that Richter's business partners may only engage Collaborators approved by Richter for the performance of their contractual obligations, and Richter can verify this during the existence of the contractual relationship.
The categories of personal data concerned	Name, phone number, email address, postal address of natural person Collaborators.
The legal basis for the processing	The legitimate interest of Richter [Article 6(1)(f) GDPR].  Richter has a legitimate interest in its business partners engaging Collaborators for the performance of contractual obligations, about whom Richter has been able to verify the identity, qualities, and suitability before the commencement of contract performance by the business partner.

#### IV. Retention period of personal data

Richter only processes and stores personal data for as long as necessary for the fulfillment of its services and obligations, and only for as long as necessary to achieve the purpose for which Richter processes the data.

If a claim or other legal action arising from the legal relationship is brought either by Richter or by you or the company you represent, Richter will process the personal data until the assertion of the claim or other legal rights.

If the data must be retained pursuant to Section 165(1) and Section 166 of the Accounting Act, then the data will only be deleted after **8 (eight) years** following the end of the business year in which the contractual relationship ceased, as per Section 169(19) of the Accounting Act. In practice, this is the case if the data are part of the documents supporting the accounting. Personal data stored in contracts, communications and business correspondence are subject to statutory retention requirements, which prescribe a minimum retention period of 8 (eight) years for accounting documents.

Tax-related data must be retained until the end of the **5th (fifth) tax year** following the payment of the tax; therefore, personal data will only be deleted after the expiration of the retention obligation. [Section 78(3) and 202 of Art.]

#### **V. Source of Personal Data, if not provided by You to Richter**

Your personal data, if not provided by you, may originate from the following sources:

- Provided by the contact person designated by you,
- Provided by your employer,
- Provided by the representative/authorized person designated by you.

#### **VI. Recipients of Personal Data**

**Service Providers:** In relation to the data processing purposes outlined in points I. A-D., Richter utilizes IT services and systems provided by third parties. For this purpose, the following **data processors** are engaged:

- **SAP Hungary Kft.** (registered office: 1031 Budapest, Záhony utca 7. Graphisoft Park, company registration number: 01-09-667656) provides cloud services hosted from the EU behind SAP systems.
- **DOQSYS Business Solutions Zrt.** (registered office: 1131 Budapest, Babér utca 1-5; company registration number: 01-10-048955) provides consulting and support services during the utilization of SAP systems.
- **Gedeon Richter Romania S.A.** (address: 540306 Târgu Mureş, 99–105 Cuza Vodă street, Romania), a subsidiary of Richter in Romania, handles registration and invoicing in the partner registry system. In this regard, Richter notes that it has a legitimate interest as a member of the Richter Gedeon corporate group to ensure efficient and resource-saving internal administration (and workload distribution) at the group level. Therefore, Gedeon Richter Romania S.A. is engaged as a data processor.
- **Onespire Zrt.** (registered office: 1123 Budapest, Alkotás utca 53; company registration number: 01-10-049612) handles administrative tasks related to the management of incoming invoices for Richter, such as registering invoices, providing them with unique identifiers, digitizing them if necessary, forwarding invoices to the invoicing system, authenticating invoices, and archiving them.

**Consultants, Lawyers:** Richter only transmits personal data to them in the event of asserting a claim or other legal rights arising from the legal relationship, either by Richter or by you/ the company you represent.

**National Tax and Customs Administration:** If a financial transaction occurs between Richter and you or the company you represent, resulting in Richter's obligation to pay VAT, Richter provides the data related to the financial transaction to the National Tax and Customs Administration in accordance with the legal obligation under Section 257/G(1) of Act CXXVII of 2007 on Value Added Tax ("VAT Act") as per the requirements of Annexes 4/A and 10 of the VAT Act.

#### **VII. Exercisable data subject rights**

In accordance with 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 and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as "GDPR"), you are entitled to exercise the following data subject rights in relation to your personal data processed by Richter in the course of contracting in general and in the course of business relations, by sending a request to [dataprotection@gedeonrichter.com](mailto:dataprotection@gedeonrichter.com):

Data subject right/legal basis	The performance of a contract	Legal obligation	Legitimate interest
<b>Right of Access</b> GDPR Article 15	Can be exercised	Can be exercised	Can be exercised
<b>Right to Rectification</b> GDPR Article 16	Can be exercised	Can be exercised	Can be exercised
<b>Right to Erasure</b> GDPR Article 17	Can be exercised	Can be exercised (Not applicable under GDPR Article 17(3)(b))	Can be exercised
<b>Right to Restriction of Processing</b> GDPR Article 18	Can be exercised	Can be exercised	Can be exercised
<b>Right to Data Portability</b> GDPR Article 20	Can be exercised	Cannot be exercised	Cannot be exercised
<b>Right to Object</b> GDPR Article 21	Cannot be exercised	Cannot be exercised	Can be exercised

The following table explains in detail the exact legal basis and content of the above data subject rights.

Data subject right	Content
<b>Right of Access</b> GDPR Article 15	You are entitled to be informed whether your personal data is being processed, and if so, to access your processed personal data based on your request.
<b>Right to Rectification</b> GDPR Article 16	You are entitled to have your incomplete personal data completed and inaccurate personal data corrected upon request.
<b>Right to Erasure</b> GDPR Article 17	You have the right to request the erasure of your personal data if one of the conditions listed in the referenced article of the GDPR applies.
<b>Right to Restriction of Processing</b> GDPR Article 18	You have the right to request the restriction of processing of your personal data if one of the conditions listed in the referenced article of the GDPR applies.
<b>Right to Data Portability</b> GDPR Article 20	You have the right to receive your personal data provided by you in a structured, commonly used, and machine-readable format and to transmit this data to another controller without hindrance, if the processing is based on consent or contractual basis and the processing is carried out by automated means.
<b>Right to Object</b> GDPR Article 21	You have the right to object at any time, for reasons relating to your particular situation, to the processing of your personal data based on Article 6(1)(e) and (f) of the GDPR, including profiling based on those provisions.

## VIII. Remedies

If you, as a data subject, consider that Richter, as data controller, has acted unlawfully in processing your data, you have the following legal remedies.

Type of remedy	Content
Right to administrative redress (Article 77 GDPR)	You have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH) without prejudice to any other administrative or judicial remedy if the processing of your personal data violates the GDPR. You can contact the NAIH at the following addresses: Mailing address: 1363 Budapest, Pf. 9.; Headquarters: 1055 Budapest, Falk Miksa utca 9-11.; Email: <a href="mailto:ugyfelszolgalat@naih.hu">ugyfelszolgalat@naih.hu</a> ; Phone numbers: +36 (30) 683-5969; +36 (30) 549-6838; +36 (1) 391 1400; Fax: +36 (1) 391-1410; Website: <a href="http://www.naih.hu">www.naih.hu</a>

<p>Right to judicial remedy (Article 79 GDPR)</p>	<p>You have the right to seek effective judicial remedy, without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority under Article 77 GDPR, if you believe that the processing of your personal data does not comply with the GDPR and has infringed your rights under the GDPR. Proceedings against the Data Controller or the Data Processor shall be brought before the courts of the Member State where the Data Controller or Data Processor has an establishment.</p> <p>The court shall act with expediency in such matters. You may choose to bring the action before the courts of your habitual residence or the place of alleged infringement, or the courts of the Member State where the Data Controller's establishment is located. You can find the courts of your habitual residence or place of alleged infringement on the website <a href="http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso">http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso</a>. The Metropolitan Court of Budapest (in Hungarian: Fővárosi Törvényszék) has jurisdiction over proceedings against Richter based on its registered office."</p>
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*We recommend and kindly ask that before pursuing the administrative or judicial remedy, you contact the Richter Data Protection Officer at [dataprotection@richter.hu](mailto:dataprotection@richter.hu) or by post at 1103 Budapest, Gyömrői út 19-21., addressing the letter to the Richter Data Protection Officer. Through this consultation, we will have the opportunity to examine, assess, and resolve the identified situation, providing you with full information, as Richter has the information on the processing.*