

PRIVACY NOTICE
MEDICAL INFORMATION SCIENTIFIC SERVICE
(MEDINFO)

Gedeon Richter Plc. (registered office: 1103 Budapest, Gyömrői út 19-21; company registration number: Cg. 01-10-040944; mailing address: 1475 Budapest Pf. 27; hereinafter referred to as the „Company” or „Richter”) as the data controller operates a medical information scientific service (hereinafter referred to as “**MedInfo**”) to answer medical questions via telephone, email and postal mail.

The Company operates a **telephone medical information service**, during which calls are recorded both during working hours (8 AM - 5 PM) and on-call hours.

In addition, the Company receives medical professional questions via the **email address** medinfo@richter.hu or **by postal mail** addressed to 1103 Budapest, Gyömrői út 19-21.

The Company provides the following information to the data subjects (hereinafter referred to as "You" or "Data Subject") regarding the data processing carried out during telephone, email, and postal inquiries related to the medical information service.

I. Data controller, Data Protection Officer (DPO)

Gedeon Richter Plc. (Gyömrői út 19-21, H-1103 Budapest, Hungary; hereinafter referred to as “**Richter**”, Data Protection Officer: dataprotection@richter.hu)

II. Information on data processing by purpose

II.1. Medical Information Service

Purposes of data processing	<p>Richter operates a medical information service based on EU regulations and guidelines¹.</p> <p>To answer medical questions, Richter maintains a 24/7 telephone information line, where calls received during working hours (8 AM - 5 PM) are answered by an operator, and calls received during on-call hours are directed to voicemail. Richter records calls to accurately document, investigate, and respond to inquiries.</p> <p>Additionally, Richter receives medical professional questions via the email address medinfo@richter.hu or by postal mail addressed to 1103 Budapest, Gyömrői út 19-21, for the purpose of investigating and responding to inquiries.</p>
What personal data do we process about you?	<p><u>In the case of a telephone inquiry:</u></p> <ul style="list-style-type: none">a) Data Subject's phone number, the start and end time of the call, the direction of the call (incoming/outgoing); the call identification number;b) Data Subject's voice;c) Any information shared by the Data Subject over the phone (including, in particular, the Data Subject's name, age, purchased products, medications, any conclusions that can be drawn from these; reported side effects experienced; questions asked; concerns shared; opinions; etc.). <p><u>In the case of an email inquiry:</u></p> <ul style="list-style-type: none">a) Data Subject's email address, name (if it is evident from the email address);b) Any information shared by the Data Subject in the email (see above).

¹ Directive 2001/83/EC of the European Parliament and of the Council of 6 November 2001 on the Community code relating to medicinal products for human use; EMA/541760/2011 Guideline on good pharmacovigilance practices (GVP) (22 June 2012)

	<p><u>In the case of a postal inquiry:</u></p> <p>a) Data Subject's postal address, name (if indicated on the letter);</p> <p>b) b) Any information shared by the Data Subject in the postal letter (see above).</p>
<p>Legal basis for processing your personal data</p>	<p>According to Article 6(1)(c) of the GDPR, the legal basis for processing is the fulfillment of a legal obligation to which the Company is subject – Compliance with the obligations related to the establishment and operation of the service under Article 98 and Recital 40 of Directive 2001/83/EC on the Community code relating to medicinal products for human use.</p> <p>If the inquiry contains health data, the legal basis for data processing is provided by Article 9(2)(i) of the GDPR (public interest in ensuring high standards of quality and safety of medicinal products and medical devices).</p> <p>The recording of calls is based on the legitimate interest of the Company according to Article 6(1)(f) of the GDPR.</p> <p>The legitimate interest of the Company is to handle medical inquiries received in accordance with Union regulations. In the case of telephone inquiries, it is necessary to record calls for this purpose, and in the case of email and postal inquiries, to process and investigate the written inquiries.</p>
<p>How long will we keep your personal data?</p>	<p>Richter deletes voice recordings 1 year after they are made.</p> <p>Richter records the content of the voice recordings, as well as email and postal inquiries, in the Trackwise system, where personal data is deleted after 5 years. Richter stores inquiries exclusively in digital form.</p>
<p>Other participants in data processing</p>	<p>The Company uses the following <u>data processors</u> to carry out its activities:</p> <ul style="list-style-type: none"> • Geomant-Algotech Zrt. (registered office: 1123 Budapest, Alkotás utca 50.): implementation and support of the telephone information system • Sparta Systems, Inc. (registered office: 2000 Waterview Drive, Suite 300, Hamilton, NJ 08691 USA): inquiries received through any channel (telephone, email, postal mail) related to the medical information service are recorded in the Trackwise system, which is provided by Sparta. • Microsoft Corporation (Microsoft Ireland Operations, Ltd., One Microsoft Place South County Business Park Leopardstown Dublin 18, D18 P521, Ireland): Platform provider for email correspondence <p>The delivery of postal inquiries and correspondence is carried out by Magyar Posta Zrt. (registered office: 1138 Budapest, Dunavirág utca 2-6.) as an <u>independent data controller</u>.</p>
<p>Guarantees for data transfer to third countries</p>	<p>Richter applies the standard contractual clauses adopted by the European Commission in contracts with data processors pursuant to Article 46(2)(c) of the GDPR.</p> <p>The Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council is available at: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj</p>

II.2. Adverse Event Reporting (pharmacovigilance)

If you make or attempt to make a report that is considered an adverse event report through any channel of the information service, the Company will act in accordance with the rules prescribed for receiving adverse event reports. Detailed information on the data processing carried out in this context can be found at www.gedeonrichter.com/en/data-protection in the data protection notice prepared specifically for the dedicated interfaces for reporting adverse events.

III. Exercisable Data Subject Rights and Remedies

Based on Regulation (EU) 2016/679 of the European Parliament and of the Council (April 27, 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: "GDPR"), you are entitled to exercise the following data subject rights concerning the personal data processed by data controller by sending a request to dataprotection@gedeonrichter.hu e-mail address.

The following table explains in detail the content of the above-mentioned data subject rights:

Name of data subject right	Content
Right of Access	You have the right to be informed, upon request, whether your personal data is being processed, and if so, to access your processed personal data.
Right to Rectification	You have the right to request the completion of incomplete personal data and the correction of inaccurate personal data.
Right to Erasure	You have the right to request the deletion of your personal data if any of the conditions listed in the referenced article of the GDPR are met.
Right to Withdraw Consent	You have the right to withdraw your consent to the processing of your personal data at any time, and we will delete the personal data processed on this basis. However, the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
Right to Restriction of Processing	You have the right to request the restriction of the processing of your personal data if any of the conditions listed in the referenced article of the GDPR are met.
Right to Data Portability	You have the right to receive the personal data you have provided in a structured, commonly used, and machine-readable format, and to transmit those data to another controller without hindrance, if the processing is based on consent or contractual grounds and the processing is carried out by automated means.
Right to Object	You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on GDPR Article 6(1)(e) and (f), including profiling based on those provisions.

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

Name of remedy	GDPR	
Right to lodge a complaint with a supervisory authority	Article 77 of the GDPR	<p>Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.</p> <p>Hungarian Data Protection and Freedom of Information Authority (address: 1055 Budapest, Falk Miksa utca 9-11.; website: www.naih.hu; telephone: +36-1-391-1400; email: ugyfelszolgalat@naih.hu; fax: +36 1 391 1410).</p>
Right to an effective judicial remedy against a controller or processor	Article 79 of the GDPR	<p>Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority pursuant to Article 77, each data subject shall have the right to an effective judicial remedy where he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data in non-compliance with this Regulation.</p> <p>The case is being dealt with out of turn by the court. You are free to choose whether to bring your action in the court of your domicile (permanent address) or your place of residence (temporary address), or in the court of the court where Richter is based. You can find the court of your domicile or residence at http://birosag.hu/ugyfelkapcsolati-portal/birosag-kereso. The Metropolitan Court of Budapest has jurisdiction to hear the case where Richter is domiciled.</p>