

Bracco UK Ltd

Health Care Professional

Privacy Notice

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At Bracco we recognize the importance of, and we are fully committed to, protecting the privacy of information related to Health Care Professionals (HCPs) and other medical professionals with whom we interact (all together hereinafter “HCPs”).

This Privacy Notice provides information about how we collect, use, disclose, store and otherwise process personal data, as well as the rights available to Healthcare Professionals (HCPs) in relation to their personal data, in accordance with the GDPR.

1. WHAT INFORMATION DO WE PROCESS ABOUT YOU?

We only collect and process Common Personal Data about you that is necessary for managing our relationship with you. We do not collect or process special categories of personal data as referred to in Article 9 GDPR, nor data relating to criminal convictions and offences as referred to in Article 10 GDPR.

Depending on the relationship, we may process the following personal data:

- a) **General common information and contact details** such as name, surname, postal and/or email address, phone number, date of birth, country of residence.
- b) **Professional information** such as job title, employer/Healthcare Organization (HCO) for which you work with, qualifications and licenses, specialty, professional experience (including years of experience), board memberships, participation in professional programs, organizational, institutional and governmental affiliations, scientific publications, conference presentations and contributions, recognition or awards, previous collaborations and related outcomes.
- c) **Communication and preference data** such as preferred communication channels, preferred contact frequency and content preferences.
- d) **Interaction and engagement data** such as your prescribing of our products, the agreements you have with us, and information relating to your interactions with our initiatives and/or channels, (e.g. participation in events, programs or training initiatives - including, where applicable, our “Bracco Global Academy” - interaction history, website visits, digital content access or downloads, communication interactions – including email opens and click-throughs with tracking pixel - feedback, evaluations or survey responses collected during our activities).

2. WHERE DO WE COLLECT YOUR INFORMATION FROM?

In most cases, we will collect information directly from you, although sometimes we will obtain information about you from alternative sources including, but not limited to: publicly accessible sources (e.g. websites, social media and other digital platforms, publication databases, journals, scientific societies, editorial board websites, national registries, professional directories and third party healthcare professionals databases, medical congress organizers).

We may also process inferred and derived information relating to generated through the analysis of your interactions with us across our channels, platforms, websites, events, programmes and initiatives (including digital tools and applications) and communication activities, This may include information about your behaviors, preferences and professional activities, including interests, engagement levels and other derived insights which we use to support our business activities, improve our services and tailor our communications

3. WHY DO WE PROCESS YOUR INFORMATION?

We will process personal information only where permitted by applicable laws and for the purposes described below.

- a) Conduct advertising activities of medicinal products and medical devices, for example: advising on activities about Bracco's medical products involving HCPs and other scientific activities such as, but not limited to, conducting medical-scientific information visits at clinics, medical practices, and hospital facilities where you carry out your professional activities, providing scientific information, participating in meetings with internal and external experts, and other similar activities aimed at supporting the clinical development and use of Bracco's drugs and medical devices in compliance with the rules of ethical Codes for the promotion of medicinal products and medical devices.
- Bracco could also provide non-promotional materials specifically for HCO administrative staff, such as sales catalogues and price lists, without any information about the medicines.

Legal basis for this processing purpose: in accordance with local practice, your data may be processed for the purposes of the legitimate interests (pursuant Article 6(1)(f) GDPR) pursued by Bracco in the framework of the scientific and relationship between life sciences companies and HCPs.

- b) Performance of contract or pre-contractual measures, with you for possible engagements as a Key Opinion Leader or experts, or collaborating with you for an event, congress or any type of business/commercial collaboration based on a legal contract.

Legal basis for this processing purpose: in accordance with local practice, your data may be processed for the purposes of the performance of a contract to which you are party of, or to take steps, at your request, prior to entering a contract (pursuant Article 6(1)(b) GDPR).

- c) Sending of marketing and commercial communications, including promotional email communications with product information and materials (only if permitted by applicable law for your professional healthcare role), invitations to in-person events, congresses, digital webinars and sponsored events, as well as e-mail communication aimed at promoting educational corporate platforms like Bracco Global Academy, and communications aimed at conducting survey or market research.

Legal basis for this processing purpose: The processing of your data is based primarily on your explicit and separate consent (pursuant Article 6(1)(a) GDPR) - which you may withdraw at any time.

- d) Analyse and segment our Healthcare Professionals (HCP) database into categories based on characteristics such as age, medical specialty and geographic location, in order to support the planning and implementation of targeted marketing initiatives (see the purpose described above under letter a)) and to ensure communications are relevant to the intended audience.

Legal basis for this processing purpose: legitimate interest pursuant to Article 6(1)(f) GDPR to enable Bracco's targeted promotional initiatives and communications towards HCP and

therefore does not require your consent. Bracco has carried out a balancing test (Legitimate Interest Assessment - LIA) to ensure that its interests do not override your fundamental rights and freedoms.

- e) Analyse your interactions, behaviors and engagement across Bracco's channels, platforms, programmes and activities, whether digital or in-person, to develop profiles relating to your professional interests, areas of expertise, level of engagement and potential collaboration opportunities. This may include analysis of your participation and performance in such activities. The purpose of this processing is to support the creation of personalised communication journeys, targeted marketing initiatives, event planning and optimisation, and the assessment of Key Opinion Leaders' expertise and fair market value, thereby facilitating effective collaboration and relationship management.

Legal basis for this processing purpose: your explicit and separate consent pursuant to Article 6(1)(a) and 22 GDPR

- f) Ensure a safe environment at our events, facilities and networks: we identify who attends them to address safety risks.

Legal basis for this processing purpose:

the processing is necessary either for our compliance with a legal obligation (pursuant to Article 6(1)(c) GDPR) and for the purposes of our legitimate interest (pursuant to Article 6(1)(f) GDPR) to ensure safety at our events, facilities and networks.

- g) Comply with legal, regulatory, and industry best practices and ethical obligation. This includes for example, conducting fraud detection and prevention activities, reporting interactions with HCPs and any transfers of value for transparency purposes; complying with applicable laws, regulations, industry codes and requests from governmental or regulatory authorities, complying with reporting obligations including those relating to pharmacovigilance), and ensuring compliance with our internal policies and procedures.

Legal basis for this processing purpose: depending on the relevant country, the processing is necessary for our compliance with a legal obligation (pursuant to Article 6(1)(c) GDPR) or for the performance of a task carried out in the public interest (pursuant to Article 6(1)(e) GDPR), or on your explicit and separate consent (pursuant Article 6(1)(a) GDPR), or for the purposes of our legitimate interest (pursuant to Article 6(1)(f) GDPR) to comply with legal, regulatory, industry best practices and ethical obligations.

- h) Enforce our rights, protect our intellectual property and the confidential information and business interests, and establish, exercise or defend legal claims including pursuing legal remedies where necessary and mitigating any actual or potential losses or damages that we may incur.

Legal basis for this processing purpose: legitimate interest (pursuant to Article 6(1)(f) GDPR) to protect our tangible and intangible assets and interests.

- i) Your personal information may be transferred to and processed by Bracco Group headquarter located in Italy, as well as by other Bracco Group affiliates and subsidiaries

operating in Europe, Asia, North America, and South America. Such transfers are necessary to share your personal data within the Bracco Group for internal administrative purposes, including the coordination of group-wide operations, the provision of consistent service delivery, and the implementation of effective governance and compliance with applicable laws across all jurisdictions in which the Group operates. Your personal data will be processed in accordance with applicable Data Protection laws. Appropriate safeguards will be implemented to protect your personal data, including the use of Standard Contractual Clauses or other legally recognized transfer mechanisms, where required.

Legal basis for this processing purpose: legitimate interest (pursuant to Article 6(1)(f) GDPR) to share personal data within the Bracco Group for internal administrative purposes.

Moreover, Bracco may offer applications, programmes, activities, events promotions or may sponsor clinical studies (collectively, "Initiatives") which may be subject to separate or supplementary terms and conditions, privacy notices and/or consent forms. These documents will provide specific information about how your personal data will be collected, used, shared and otherwise processed in connection with the relevant Initiative.

4. WHO ARE THE DATA CONTROLLERS FOR THE PROCESSING OF YOUR PERSONAL DATA?

The processing of your personal data described in this Privacy Notice is carried out by Bracco Imaging S.p.A., Via Egidio Folli, 50, 20134 Milano (MI), Italy, (also "Bracco Global"), and by Bracco UK Ltd, Robert Robinson Avenue, Oxford, OX4 4GA (UK) as Data Controllers.

For all purposes letter a), b), f), g), h) and i) described in the previous paragraph "3. WHY DO WE PROCESS YOUR INFORMATION?" Bracco Imaging S.p.A. and Bracco UK Ltd act as independent Data Controllers.

For the purposes letter c), d), and e) Bracco Imaging S.p.A. and Bracco UK Ltd act together as Joint Controllers under a Joint controllership Agreement pursuant to Article 26 of Regulation (EU) 2016/679 ("GDPR").

In this context, Bracco Imaging S.p.A. and Bracco UK Ltd, jointly determine the purposes and means of such processing activities on HCPs personal data and jointly collect consents.

Should you need further information about the Joint Controllership agreement or any aspect of the processing of your personal data, please refer to Bracco Imaging S.p.A. DPO's contact: dpo@bracco.com, or to Bracco UK Ltd DPO's contact: dpouk@bracco.com

5. WHERE DO WE PROCESS YOUR INFORMATION?

Bracco Group is headquartered in Italy and operates through affiliates branches and subsidiaries located across Europe, Asia, North America and South America. As a result, the personal data of individuals may be accessed and processed by Bracco Group companies, including our headquarters in Italy, and to some of the Bracco Group affiliates, and as well as authorised service providers, business partners and selected vendors acting on our behalf globally.

Accordingly, your personal data may be transferred to and processed in any country where the Bracco Group maintains operations, including countries within and outside the European Economic Area (EEA), the United Kingdom and Switzerland, as well as in countries where our service providers and business partners are located.

Where personal data is transferred to or processed in a country that may not provide the same level of protection equivalent to that of your country of residence, we will implement appropriate legal technical and organisational measures to safeguard your personal data and protect it from unauthorised access, use, disclosure, alteration or destruction. Such measures may include entering into contractual arrangements that require recipients to maintain appropriate standards of data protection and security, including, but not limited to, maintaining binding contracts that require appropriate protection of information about individuals. For individuals located in the European Economic Area (EEA), UK or Switzerland, where personal data is transferred outside those jurisdictions, we will ensure that appropriate safeguards are in place in accordance with applicable data protection laws. These safeguards may include, where applicable, the use of Standard Contractual Clauses approved by the European Commission, the UK International Data Transfer Addendum, or other legally recognised transfer mechanisms.

Should you require additional information regarding such safeguards, you may contact the Global Data Protection Officer or your Local Data Protection Officer using the contact details provided in this Privacy Notice.

6. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We may disclose personal data where such disclosure is necessary to support our legitimate business activities, fulfil contractual obligations, or comply with applicable legal and regulatory requirements. Personal data will only be disclosed in accordance with applicable data protection laws and will be protected by appropriate technical, organisational and contractual safeguards. We may share personal data with Bracco Group companies and affiliated entities located worldwide for the purposes described in this Privacy Notice.

In order to conduct our business, we may also disclose information to third parties such as public authorities, regulatory bodies and governmental agencies (such as health, social care and benefits departments), service providers that support our operations (including auditors, IT service providers, healthcare compliance providers and other professional advisers); business partners and collaborators (such as external scientists, researchers and consultants); and third parties that assist with the organisation and management of events, congresses and other professional activities.

We may also disclose personal data where necessary to enforce our contractual rights and any agreements we may have with you or to protect the rights, property, safety or security of Bracco, our employees, patients, customers, visitors to our premises or exhibition stands, and other individuals.

7. DO WE USE ANY CLASSIFICATION OR AUTOMATED DECISION-MAKING, AND WHAT DOES IT MEAN FOR YOU?

Your personal data may be combined with other information we may already have about you or obtained through public means such as scientific and medical publications, national registries and the Internet.

In addition, we may undertake activities designed to enhance and personalise your engagement with our interactions, content and communications using advanced technologies, including artificial intelligence (AI) and other analytical tools. These technologies may be used to analyse and process personal data for the purposes described in this Privacy Notice. Where such processing involves automated decision-making or profiling falling within the scope of Article 22

GDPR, it will only be carried out with your explicit and separate consent, where required by law, and subject to appropriate safeguards to protect your rights, freedoms and legitimate interests.

8. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We implement appropriate technical and organizational measures to protect personal data. When processing the personal data of Healthcare Professionals (HCPs), we take reasonable steps to ensure security and confidentiality and to prevent misuse, unauthorised access, disclosure, alteration or destruction.

9. HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?

We retain your personal data for no longer than is necessary for the specific purpose for which it was collected (e.g., three years after the last interaction with you for the provision of scientific information). Data may be retained for a longer duration where applicable laws or regulations require or allow us to do so.

This means that we may retain documents and related information where that we reasonably consider to: (i) demonstrate compliance with our legal and regulatory obligations and/or (ii) establish, exercise or defend our legal rights and claims. Such documents will be retained for the duration of the applicable statutory limitation period or any longer period required by law. During this retention period, we will implement appropriate technical and organisational measures to safeguard the information and will restrict its use to the purposes described in points (i) and (ii) above.

Where processing is based on your consent, we will consider that consent to remain valid for up to three (3) years following your most recent interaction with us, unless you withdraw your consent earlier. Before continuing any consent-based processing beyond that period, we may seek to refresh or reconfirm your consent after three (3) years from your last interaction with us to ensure that it remains informed, valid and up to date.

10. WHAT ARE YOUR RIGHTS AND CHOICES REGARDING YOUR PERSONAL DATA?

Access, Revision, Deletion, Objection to Processing, Portability

Under applicable data protection/privacy law, you have a right to request a copy of your information held by us.

You also have the right to revise, correct, or delete such information.

In certain circumstances, you can formally object to processing of your personal data, you may have the right to restrict aspects of the processing of your information, and you may have the right to ask for a copy of your data to be provided to you, or a third party as Data Controller, in a digital format.

These rights are not absolute and may be subject to legal and regulatory restrictions.

Lodging a Complaint with Data Protection Authorities

You have the right to lodge a complaint directly with the relevant data protection authority or supervisory authority if you believe that we have processed information in a manner that is unlawful or breaches your rights under applicable data privacy law.

- For residents in EU: You can find the relevant Supervisory Authority's name and contact details under http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.
- The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home.html>)
- The competent data protection authority of UK is the Information Commissioner's Office (ICO) (<https://ico.org.uk/>). In accordance with applicable UK data protection laws, individuals who believe that their data protection rights have been infringed may submit a complaint to Bracco UK Ltd. We will acknowledge and investigate such complaints in accordance with our complaints procedure. If you remain dissatisfied following our response, you may refer the matter to the Information Commissioner's Office (ICO)

Without limiting any rights to complain directly to an authority, we are committed to protecting personal information, and complaints may be made directly with us.

11. HOW WILL WE INFORM YOU ABOUT CHANGES TO THIS PRIVACY NOTICE?

We may update this notice from time to time by posting any revisions on our websites. Where any material revisions are made, we may directly notify individuals to do so or may place a prominent notice on our websites Please regularly refer to this page for updates.

12. HOW CAN YOU CONTACT US?

As said above, the Data Controller in relation to the personal data processed in accordance with this privacy notice is Bracco Imaging S.p.A., Via Egidio Folli, 50, 20134 Milano (MI), Italy, and Bracco UK Ltd, Robert Robinson Avenue, Oxford, OX4 4GA (UK).

You may contact the Bracco UK Ltd DPO's contact: dpouk@bracco.com for any questions relating to the processing of your personal data including complaints. In relation to processing activities carried out under joint controllership, you may also contact Bracco Imaging S.p.A. DPO's contact: dpo@bracco.com.

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