

**Bracco Imaging Deutschland
GmbH**

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 includes information about what, why and how personal data are processed, as well as the rights granted to HCPs, in line with the provision of the EU General Data Protection Regulation (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 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 drawn up 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).

In other cases, we also process inferred and derived information from our system that concern you such as information generated through the analysis of your interactions with us across our channels, platforms, events, programs and initiatives (including digital tools, applications, websites and communication activities), as well as your behaviors, preferences and professional activities, including interests, engagement levels and other derived insights used to support our activities and tailor communications.

3. WHY DO WE PROCESS YOUR INFORMATION?

We will only process information for purposes permitted by applicable laws and for the legitimate purposes listed 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 to Article 6(1)(f) GDPR) pursued by Bracco in the framework of the scientific and commercial 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 into a contract (pursuant to 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 to Article 6(1)(a) GDPR) - which you may withdraw at any time.
- d) Organize our Healthcare Professional's database dividing it into clusters to identify specific groups by e.g. age, professional specialty, geographical location, to support the development of targeted marketing initiatives (see the purpose described above under letter a)) for identified groups of HCPs.
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, behaviours and engagement across Bracco channels, platforms, programs and activities, both digital and in-person, in order to create and use specific detailed profiles relating to your professionals interests, expertise, engagement and potential collaborations, including through the analysis of your interactions and performance in such activities, with the aim of enables the creation of personalized communication journeys, targeted marketing efforts, event optimization, and the assessment of Key Opinion Leaders' expertise and fair market value, to support effective collaboration and spread the relationship management.
Legal basis for this processing purpose: your explicit and separate consent pursuant to Article 6(1)(a) 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 obligations: for example, conducting fraud detection and prevention, reporting interactions or any type of transfer of value with HCPs for transparency purposes, complying with applicable laws, regulations and requests from governmental agencies and reporting obligations (including Pharmacovigilance), and complying with our policies.
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 confidentiality of our information, and pursue legal remedies or limit the damage that we may suffer.
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 ensuring of proper 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 and protected by appropriate safeguards, including, if outside European Economic Area, Standard contractual clauses.
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 apps, special programs, activities, events or promotions or may sponsor clinical studies ("Initiatives") that may have unique or additional specific terms, privacy notices and/or consent forms that explain how any information you provide will be processed in connection with the Initiatives.

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 Imaging Deutschland GmbH, Max-Stromeyer-Straße 116, 78467 Konstanz-Petershausen-West, Germany 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 Imaging Deutschland GmbH act as independent Data Controllers.

For the purposes letter c), d), and e) Bracco Imaging S.p.A. and Bracco Imaging Deutschland GmbH 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 Imaging Deutschland GmbH, 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, please refer to Bracco Imaging S.p.A. DPO's contact: dpo@bracco.com, or to Bracco Imaging Deutschland GmbH DPO's contact: dpo.bid@bracco.com

5. WHERE DO WE PROCESS YOUR INFORMATION?

The headquarters of the Bracco Group are in Italy, with operations through our branches and subsidiaries in Europe, Asia, North America and South America. Information about individuals may be accessible to our headquarters in Italy, and to some of the Bracco Group affiliates, and as well as to selected vendors and partners, globally.

Accordingly, certain recipients may be in any country worldwide. You must anticipate your data to be transmitted to any country in which the Bracco Group is represented by affiliates, branches or other office as well as to other countries in Europe and the USA where our service providers are located.

Where we process information in countries that may not provide the same level of protection as an individual's own country, we will implement reasonable and appropriate legal and security measures to protect your information from unauthorized access, use or disclosure including, but not limited to, maintaining binding contracts that require appropriate protection of information about individuals. For residents in the European Economic Area (EEA), UK and Switzerland, whenever we transfer your information outside of the EEA, we will take necessary steps to ensure that adequate safeguards are put in place to protect your information. Such safeguards may include, without limitation, the use of European Commission approved standard contractual clauses.

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 set forth in section 12 of this notice.

6. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We disclose individual information where this is reasonably required to pursue our legitimate business aims and as required by law. Information will be disclosed only in accordance with applicable laws, and appropriate safeguards will be established, where possible, to protect your information. We may disclose information within the Bracco Group and its worldwide affiliates.

In order to conduct our business, we may also disclose information to third parties such as public/regulatory authorities/governmental bodies (governments, including health, social and benefits departments), third parties that provide services to us (such as conducting audits, IT services and programmes, assisting in health care compliance activities), business partners and collaborators (such as external scientists), third party that support us in event or congresses' organization. If Bracco or all or part of its assets are acquired by a third party, personal information held by us about individuals will be included as transferred assets.

We may also disclose information to enforce any agreements we have with you or to protect our rights or the rights, property or safety of our employees, patients or others (e.g. visitors to Bracco stands/premises).

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 carry out activities aimed at improving your engagement journey with our interaction, content and communications through the use of technologically advanced tools used to analyse and process personal data for the purposes described above in this privacy notice (e.g. Artificial Intelligence tools), in compliance with the provisions of Article 22 of the GDPR, based on your expressed and separate consent by implementing appropriate safeguards to protect your rights.

8. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We use appropriate technical and organizational measures to protect information. When handling the information of HCPs, we take reasonable steps to protect it from loss, misuse, unauthorized access, disclosure, alteration or destruction.

9. HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?

We aim to retain your information 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 implies that we will retain the documents that we reasonably believe to (i) demonstrate that we have accurately performed our legal obligations and/or (ii) are instrumental to enforce our rights, for a period of time equal to the statute of limitation under applicable law, provided that we will adopt suitable security measures and we will not process any information about you that are available on those documents for purposes other than those identified in (i) and (ii) above.

With respect to the purposes based on your explicit consent provided, we will consider your consent valid for a period of 3 years from the date of your last interaction with us, unless you withdraw your consent- before this. Upon expiration of this period, we will ensure that your consent remains valid and current.

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. These rights may be subject to limited legal and regulatory restrictions.

In certain circumstances, you can formally object to processing of your information, 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.

Lodging a Complaint with Data Protection Authorities

You may 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/> <https://www.edoeb.admin.ch/edoeb/en/home.html>)

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 specified in Section 4 of this notice, 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 Imaging Deutschland GmbH, Max-Stromeyer-Straße 116, 78467 Konstanz-Petershausen-West, Germany.

You may contact the Bracco Imaging Deutschland GmbH DPO's contact: dpo.bid@bracco.com for any questions relating to the processing of your personal data. 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.

Last Update: July 2026