

BRACCO IMAGING S.P.A. - HEALTH CARE PROFESSIONALS PRIVACY NOTICE

1. INTRODUCTION AND SUMMARY

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

This notice includes information about what, why and how data is processed, as well as the rights of individuals.

References to “Bracco”, “group”, “affiliates”, “we”, “us” and “our” are references to Bracco Imaging S.p.A. and its worldwide branches and subsidiaries.

2. INFORMATION WE MAY PROCESS ABOUT YOU

We only keep information about you that is necessary for managing our relationship with you. Depending on the relationship, we may process information about you including:

- a) General information: such as name, postal and/or email address, phone number, date of birth;
- b) Professional information: such as job title, professional qualifications, professional licenses, employer/organisation in which you work, networks and affiliates, programs and activities participated in, board memberships, professional conference and events, influence rankings;
- c) Assessment information: such as internal assessments, feedback, evaluations, classifications or performance ratings of your professional activities and outcomes.

3. SOURCES OF INFORMATION

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 (such as websites, social media and other digital platforms, publication databases, journals, societies, editorial board websites, national registries, professional directories and third party healthcare professionals databases), medical congress organizers, third party vendors and service providers acting on our behalf.

4. WHY WE PROCESS YOUR INFORMATION

We will only process information for purposes permitted by applicable laws, which may vary depending on where you live and where we operate. We may process information about you in order to:

- a) Conduct our business or scientific operations: for example, inviting you to our events or to participate in our activities, advising on activities involving HCPs and other commercial activities such as but not limited to the provision of scientific information, marketing and commercial communications as permitted.

Legal basis of processing: this processing is conditional on you having provided your explicit prior consent (in such case, consent can be withdrawn at any time);

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

Legal basis of processing: the processing is necessary to safeguard vital interests of any individual;

- c) Comply with legal, regulatory, industry best practices and ethical obligations: for example, conducting fraud detection and prevention, reporting interactions with HCPs for transparency purposes, complying with applicable laws, regulations and requests from governmental agencies and reporting obligations; and complying with industry standards and our policies.

Legal basis of processing: the processing is necessary for our compliance with a legal obligation;

- d) Enforce our rights, protect our intellectual property and the confidentiality of our information, and pursue legal remedies or limit the damages that we may suffer.

Legal basis of processing: legitimate interest to protect our tangible and intangible assets and interests.

5. WHERE WE PROCESS YOUR INFORMATION

We have headquarters 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 our affiliates, and selected vendors and partners, globally. 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 of EEA: whenever we transfer your information outside of the EEA or Switzerland, we will take necessary steps to ensure that adequate safeguards are put in place to protect your information. Such safeguards include the use of European Commission approved standard contractual clauses.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

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 Bracco 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 (government, including social and benefits departments), third parties that provide services to us (such as conducting audits, IT services, assisting in health care compliance activities), business partners and collaborators (such as external scientists).

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. CLASSIFICATION, AUTOMATED DECISION MAKING AND YOUR RIGHTS

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. We may also carry out internal assessments, evaluations, classifications or ratings of your activities, and/or your site's performance (where applicable).

Bracco uses an algorithm to tier HCPs according to their scientific or research activity (including publications) and skills (such as years of experience and qualifications). Applicable rates for invitation to our events and/or participation to our activities are set according to the tiering of HCPs but any final decision is taken by an individual.

8. INDIVIDUAL CHOICES: RIGHTS AND ACCESS TO INFORMATION

Access, Revision, Deletion, Objection to Processing, Portability

Under applicable 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.

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.

9. HOW LONG WE RETAIN YOUR INFORMATION

We aim to retain your information for no longer than is necessary for the specific purpose for which it was collected. Information may be retained for a longer duration where applicable laws or regulations require or allow us to do so.

This implies that we will:

- a) In case you have granted your consent to the processing described in point 4, letter a) above, we will delete your information within twelve months after you withdrew your consent, provided that, during that 12-month period, we will not process your information for the above-described purpose;
- b) 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 not process any information about you that are available on those documents for purposes other than those identified in (i) and (ii) of this letter b).

10. PROTECTION OF INFORMATION - SECURITY

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.

11. CHANGES TO PRIVACY NOTICE

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

12. CONTACT US

The data controller in relation to the information processed in accordance with this privacy notice is Bracco Imaging S.p.A., Via Caduti di Marcinelle,13, 20134 Milano (MI), Italy.

If you have any questions about this privacy notice, or to obtain more information about Bracco's privacy practices, or to exercise your rights above, or to make a complaint with us, you can contact us by e-mail to dpo@bracco.com or by postal mail at:

Bracco Imaging S.p.A.
Via Caduti di Marcinelle,13
20134 Milano (MI)
Italia

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