

#### 4.7 Data processing for marketing purposes, data processing for professional and communications training, media appearances, events

Purpose of data processing	Legal basis of data processing	Scope of processed data	Data retention period, access rights, recipients of data transfers
<p><b>1. Sending promotional materials and newsletters by mail, phone, email or SMS.</b> For example: paper based direct marketing campaign, SMS based promotional campaign, email newsletter, keeping in contact with visited physicians and key opinion leaders (“KOL”), other professionals for marketing purposes, distribution of Egis publications (Bekopogtató, Lélekemelő), sending Egis VIP Pharmacy Newsletter (commercial news, notices of promotional sales in pharmacies, new product launches in the market, professional news).</p>	<p>Article 6 (1) (a) of the GDPR – voluntary consent of the individual.</p> <p>Under Section 6 (1) of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (“<b>Business Advertising Act</b>”) the express prior consent of the relevant individual.</p> <p>The individual has the right to withdraw his or her consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>Without consent, Egis cannot send promotional materials, marketing communications, newsletters and publications to the relevant individuals.</p>	<p>Name, date of birth, mobile phone number, landline phone number, email address, workplace, position, address (city, postal code, street/house number) of the recipient (e.g. visited physician/COL).</p> <p>If applicable, the name, address and email address of the recipient pharmacy (if it contains the name of a private individual).</p> <p>Source of data: apart from the relevant individuals, websites of authorities (pl.: <a href="http://www.ogyei.gov.hu">www.ogyei.gov.hu</a>)</p>	<p>Until withdrawal of consent (for the time necessary to keep in contact or until unsubscription).</p> <p><b>Persons who have access within Egis:</b></p> <p><b>Organization unit:</b> CNS and Oncology Business Unit (BU), Domestic Marketing Department (Egis Sales Center, “Sales House”) - liaising with visited physicians and key opinion leaders for marketing purposes, assistant to the manager of the Domestic Coordinating Department General - Egis VIP Pharmacy Newsletter and other promotional materials and newsletters.</p> <p>All employees have access to the data they collect - medical sales representative, product managers (PM), business unit (BU) manager, field force manager (FFM).</p> <p>The technical tasks and assistance related to sending out newsletters are carried out by <b>Promenade</b></p>

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			<p><b>Publishing House Kft.</b> (1125 Budapest, Tusnádi utca 19.; jager.istvan@promenade.hu) as a data processor.</p> <p>The editing and posting of the address list of VIP Pharmacy newsletter and newsletter contents (commercial news, notices of pharmacy promotions, new product launches in the market, professional news) are carried out by <b>Masterholding Trust Befektetési Kft.</b> (1125 Budapest, Tusnádi utca 19.; magyar.dora@promenade.hu; <a href="mailto:gyarmati.edina@promenade.hu">gyarmati.edina@promenade.hu</a> as a data processor.</p>
<p><b>2. Professional communication with decision-makers and decision-promoters of authorities (in person, by phone, email).</b></p>	<p>Article 6 (1) (f) of the GDPR – legitimate interest of Egis.</p> <p>Legitimate interest: to strengthen professional knowledge, compliance and social responsibility of Egis.</p>	<p>Name, mobile phone number, landline telephone number, email address, workplace, position of the decision-makers and decision promoters of authorities.</p> <p>Source of data: apart from the relevant individuals, websites of authorities (pl.: <a href="http://www.ogyei.gov.hu">www.ogyei.gov.hu</a>)</p>	<p>As long as the contact is maintained.</p> <p><b>Persons who have access within Egis:</b></p> <p><b>Organization unit:</b> CNS and Oncology Business Unit (BU), Domestic Marketing Department General (Sales House).</p> <p>All employees have access to the data they collect - medical sales</p>

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			representative, product managers (PM), business unit (BU) manager, field force manager (FFM).
<p><b>3. Providing support for the scientific training of physicians in order to participate in professional congresses.</b></p>	<p>Article 6 (1) (a) of the GDPR (voluntary consent of the individual).</p> <p>The individual has the right to withdraw his or her consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>Without consent Egis cannot provide support for the scientific training of physicians and participation in professional congresses.</p>	<p>Name, stamp number, mother's name upon birth, place and date of birth, address, telephone number, email address, name and address of workplace, position, education/qualification, language skills, professional corporate membership of the physicians affected by the support, the training centre of which he/she is a member.</p>	<p>Until consent is withdrawn.</p> <p>If consent is not withdrawn, in respect of the fulfilment of tax liabilities (if any): <b>5 years</b> from the last day of the calendar year in which the tax or data concerned should have been declared or reported or, in the absence of such declaration or report, the tax should have been paid (Sections 78 (3) and 202 (1) of the Taxation Act).</p> <p><b>Accounting documents: 8 years</b> (Sections 168-169 of the Accounting Act).</p> <p><b>Organization unit:</b> CNS and Oncology Business Unit (BU), and Department of Health Relations (National Institute of Pharmacy and Nutrition (OGYÉI) for making reports and congressional registration).</p> <p><b>Persons who have access within Egis:</b></p>

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			<p>Competent medical sales representative, regional manager (TV), Business Unit (BU) manager, field force manager (FFM), assistant.</p> <p>Egis transfers the data to the organizers of congresses so that the organizers of congresses can ensure the attendance of the relevant individuals in the congress. Individuals will be informed in advance of the identity and contact details of the organizer.</p>
<p><b>4. Managing speaker, article writing and Advisory Board agreements with private entrepreneurs.</b></p> <p>The SAP system that keeps a registry of agreements is operated by companies that are data processors.</p>	<p>Article 6 (1) (b) of the GDPR (for the performance of the agreement entered into directly with the relevant individual). Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p>	<p>Telephone number, email address of private entrepreneurs with speaker, article writing and Advisory Board agreements and other details included in speaker agreements (such as professional area of the individual).</p>	<p><b>5 years</b> from the termination of the contractual relationship (Section 6:22 (1) of the Civil Code).</p> <p><b>In respect of the fulfilment of tax liabilities: 5 years</b> from the last day of the calendar year in which the tax concerned should have been declared or reported or, in the absence of such declaration or report, the tax should have been paid (Sections 78 (3) and 202 (1) of the Taxation Act ).</p> <p><b>Accounting documents: 8 years</b></p>

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			<p>(Sections 168-169 of the Accounting Act).</p> <p><b>Persons who have access within Egis:</b></p> <p>CNS and Oncology Business Unit (BU), and Department of Health Relations, PM, Business Unit (BU) manager, assistant, Sales House, Facility Management Department (LGO) (having access to invoices).</p> <p>Data processors:</p> <p><b>SAP Hungary Kft.</b> (1031 Budapest, Záhonyi u. 7.; <a href="mailto:ralph.van.uden@sap.com">ralph.van.uden@sap.com</a>)</p> <p><b>EasyCon Tanácsadó Kft.</b> (1138 Budapest, Váci út 135-139. Building C; <a href="mailto:info@easycon.hu">info@easycon.hu</a>)</p> <p><b>DXC Technology Enterprise Services Kft.</b> (1114 Budapest, Bartók Béla út 43-47.)</p> <p><b>Itelligence Hungary Informatikai Kft.</b> (1117 Budapest, Neumann János u. 1. Infopark, Building A; <a href="mailto:info@itelligence.hu">info@itelligence.hu</a>).</p>

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<p><b>5. Giving notice of events to the National Institute of Pharmacy and Nutrition (OGYÉI) - for compliance with the transparency requirements imposed by law.</b></p> <p><b>For example: Egis organized event, CNS (Central Nervous System) club, hospital meeting (an event held in a hospital for physicians), roundtable (event at an external venue for physicians).</b></p>	<p>The obligation to give notice of events under Section 14 (10)-(13) of Act XCVIII of 2006 on the General Provisions Relating to the Reliable and Economically Feasible Supply of Medicinal Products and Medical Aids and on the Distribution of Medicinal Products (“<b>Medicines Thrift Act</b>”).</p>	<p>Name of the participant (healthcare professionals, physicians) of the event and the amount of support.</p>	<p>The data of participants shall be processed for <b>1 year</b> from the implementation of the event (Section 16 (2) f) of the Medicines Thrift Act).</p> <p><b>Persons who have access within Egis:</b></p> <p>CNS and Oncology Business Unit (BU), and Department of Health Relations, medical sales representatives, regional manager (TV), field force manager (FFM), Business Unit (BU) manager, assistant.</p> <p>The data (preliminary report) are uploaded to the website of the National Institute of Pharmacy and Nutrition (OGYÉI) at <a href="http://www.ogyei.gov.hu">www.ogyei.gov.hu</a>.</p>
<p><b>6. Verifying attendance of the event in order to meet transparency requirements imposed by law.</b></p> <p><b>For example: verifying attendance of Egis’ own event, CNS club, hospital meeting, roundtable talks</b></p>	<p>The obligation to give notice of events under Section 14 (10)-(13) of the Medicines Thrift Act.</p>	<p>Name, stamp number, workplace of the persons participating in the event (HCPs, physicians), the name of the event, the amount of the supports granted in connection with the event and the name of the sponsor of the event.</p>	<p>The data of participants shall be processed for <b>1 year</b> from the implementation of the event (in compliance with the disclosure obligation on the website of a government body for pharmaceuticals under Section 16 (2) f) of the Medicines Thrift Act).</p> <p><b>Persons who have access within</b></p>

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			<p><b>Egis:</b> CNS and Oncology Business Unit (BU), and Department of Health Relations, Facility Management Department (invoicing).</p> <p>Egis transfers the data to OGYÉI.</p>
<p><b>7. Registration on a professional website</b> (<a href="http://www.szakmai.nyugodtlekkel.hu">www.szakmai.nyugodtlekkel.hu</a>)</p>	<p>Article 6 (1) (a) of the GDPR (voluntary consent of the individual).</p> <p>The individual has the right to withdraw his or her consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>Without consent Egis cannot register relevant individuals on the professional website.</p>	<p>Name, stamp number or registration number, email address of the person registering on the professional website.</p>	<p>Until the relevant individual unsubscribes from the website (withdrawal of consent).</p> <p><b>Egis does not take possession of any personal data, Egis does not carry out any operation affecting personal data.</b></p> <p>Data are collected and the website is developed by Square Lime Solutions Kft. (1037 Budapest, Mátyáshegyi köz 9.; <a href="mailto:office@squarelime.hu">office@squarelime.hu</a>) as a data processor.</p>
<p><b>8. Keeping records of stakeholders – stakeholder mapping</b></p>	<p>Article 6 (1) (f) of the GDPR – legitimate interest of Egis.</p> <p>Legitimate interest: in the case of market launches of new products and in other cases where authorities have to be contacted, mapping stakeholders and keeping records of the contact details in order to</p>	<p>Stakeholder - name, position, landline or mobile telephone number, email address of the points of contact at authorities (“stakeholder”).</p> <p>Source of data: from public websites and business cards</p>	<p>For the time necessary to keep in contact (while the relevant person holds the relevant position during the existence of the contact).</p> <p><b>Persons who have access within Egis:</b> CNS and Oncology Business Unit (BU), Domestic Marketing Department General,</p>

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	comply with legal requirements concerning product launches as soon as possible.	received by the employees of Egis during business contacts.	PM, Business Unit (BU) manager, market access manager, international marketing manager.
<b>9. Recommending centres and investigators for clinical trials to the Egis Medical Directorate.</b>	<p>Article 6 (1) (f) of the GDPR – legitimate interest of Egis.</p> <p>Legitimate interest: it is the legitimate interest of Egis that the clinical trials necessary for the marketing authorisation of any new medicinal product should be conducted by relevant professionals in the relevant areas.</p>	<p>Name, position, landline and mobile telephone number, email address of investigators affected by recommendations.</p> <p>Source of data: market knowledge of Egis, knowledge of the public professional track-records of reputable professionals recognised in the relevant area.</p>	<p>As long as necessary to select clinical trial centres and physicians and to get in contact.</p> <p><b>Persons who have access within Egis:</b> CNS and Oncology Business Unit (BU), Domestic Marketing Department General, Business Unit (BU) Manager, PM, Medical Science Directorate, Domestic Marketing Department General (selection of clinical trial centres and physicians, getting in contact).</p>
<b>10. In the case of products containing biological active substances (biosimilar - i.e. replicas of medicinal products containing authorized biological active substances), delivering educational materials to the patient's medical specialist and its verification to OGYÉI.</b>	<p>Requirement of the European Medicines Agency: in the case of Remsima, a biosimilar product: EMA/CHMP/589317/2013 Public Assessment Report (EPAR) <a href="http://www.ema.europa.eu/docs/en_GB/document_library/EPAR_-_Public_assessment_report/human/002576/WC500151486.pdf">http://www.ema.europa.eu/docs/en_GB/document_library/EPAR_-_Public_assessment_report/human/002576/WC500151486.pdf</a></p> <p>Egis is required to develop an educational program for a biosimilar product called Remisma,</p>	<p>Name, signature of the specialist physician treating the patient (to whom the educational materials are handed over) and the name of his/her workplace.</p>	<p>Egis shall keep a sample or electronic draft of the commercial communication and documentation specifying the original size or extent of the communication depending on its type, its target group, the method of distribution and the date of commencement of distribution for <b>5 years</b> (Section 11 (2) of Decree No 3/2009 (II. 25.) of the Minister of Healthcare).</p> <p>Otherwise the data needs to be</p>



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	<p>so that physicians who prescribe these products to their patients are aware of the associated risks and adverse reactions, including without limitation infections e.g. the risk of tuberculosis (TB), the risk of certain reactions and complications (e.g. hypersensitivity reaction, lymphoma) and the increased risks to the health of children.</p>		<p>retained until the delivery is verified to OGYÉI.</p> <p><b>Persons who have access within Egis:</b> CNS and Oncology Business Unit (BU)</p> <p>Egis transfers the data to the National Institute of Pharmacy and Nutrition (OGYÉI).</p>
<p><b>11. Registration of professionals (physicians) registered on www.egismed.hu and identification of their usage rights.</b></p> <p>On the basis of the user rights, Egis can forward professional materials through the website and enable the completion of Accredited Continuing Education tests (medical education - organization and support of medical online (continuing) training). The detailed terms and conditions of data processing can be found in the Privacy Notice at www.egismed.hu.</p>	<p>Article 6 (1) (a) of the GDPR (voluntary consent of the individual).</p> <p>The individual has the right to withdraw his or her consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>Without consent, registration will not be possible and Egis cannot forward professional materials through the website and cannot allow completing Accredited Training Tests on the website.</p> <p>Legal basis for the organization of on-line further training of physicians: Section 6 (1) and</p>	<p>Surname, first name, email address, occupation (healthcare professional, physician, pharmacist), stamp number/registration number, area of specialization (optional), gender, user name, password.</p> <p>In relation to Accredited Continuing Education Tests: fact of successful examination, continuing education score.</p>	<p>Until withdrawal of consent which the relevant individual does primarily by deleting his/her registration.</p> <p>The law requires that Accredited Continuing Education Tests be kept. Underlying law: Section 14 (5) of Decree 63/2011 (XI. 29.) of the Minister of National Resources and Section 10 (5) of Decree 64/2011 (XI. 29.) of the Minister of National Resources. Accordingly, the documents serving as the basis for determining the score are to be retained by the organizer/provider of training for a period of 10 years from the determination of the score.</p> <p><b>Persons who have access within Egis:</b></p>

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	<p>Section 7 (1) of Decree 63/2011 (XI. 29.) of the Minister of National Resources on the rules of further training of healthcare professionals and Section 4 (1) (a) and 5 (1) of Decree 64/2011 (XI. 29.) of the Minister of National Resources on continuing education of the persons with degrees of tertiary education in healthcare in the relevant field.</p>		<p>Domestic Marketing Department General Product Manager (PM) and Promotional Manager</p> <p>The technical tasks and assistance related to registrations are carried out by <b>Promenade Publishing House Kft.</b> (1125 Budapest, Tusnádi utca 19.; jager.istvan@promenade.hu) as a data processor.</p> <p>Egis will send a notice of the successful passing of the exam taken on the website by transferring the following data to <a href="http://www.oftex.hu">www.oftex.hu</a> /<a href="http://www.gyoftex.hu">www.gyoftex.hu</a>: name, registration number, further training score.</p> <p>Oftex.hu is a portal for the continuous education of physicians and gyoftex.hu is a portal for the continuing education of pharmacists. Through this portal, medical universities supervising the continuing education record the continuing education scores the participants have acquired and then issue a certificate of completion for</p>

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			an effective continuing education cycle.

Some third parties may send newsletters to private individuals for promotional purposes. Newsletters may include Egis content (e.g. professional articles, video interviews, congress reports, trial summaries, Egis products). However, the list of recipients of newsletters is compiled by a third party as an independent data controller who also sends out the newsletters. Egis has no control over this data processing, is not familiar with the personal data and the terms and conditions of data processing are governed by the privacy notice of that third party.

Below for your information we list the most important third parties who can provide information about their terms and conditions of data processing:

- **New Promenade Kft.** (1125 Budapest, Tusnádi utca 19., [magyar.dora@promenade.hu](mailto:magyar.dora@promenade.hu), [gyarmati.edina@promenade.hu](mailto:gyarmati.edina@promenade.hu), [www.promenade.hu](http://www.promenade.hu))
- **Life Time Media Kft.** (1021 Budapest, Hűvösvölgyi út 75/A, [biro.andrea@lam.hu](mailto:biro.andrea@lam.hu), [www.lifetimemedia.hu](http://www.lifetimemedia.hu), [www.elitmed.hu](http://www.elitmed.hu))
- **Cassis Hungary Kft.** (1053 Budapest, Képiró u. 6., [titkarsag@mail.webdoki.hu](mailto:titkarsag@mail.webdoki.hu), [www.webdoki.hu](http://www.webdoki.hu))
- **eVisit Kft.** (1033 Budapest, Tanuló u. 1., [info@evisit.hu](mailto:info@evisit.hu), [www.evisit.hu](http://www.evisit.hu))
- **MOK Lapkiadó Kft.** (1068 Budapest, Szondi utca 100., [suha.diana@weborvos.hu](mailto:suha.diana@weborvos.hu), [www.mok.hu](http://www.mok.hu))
- **Galenus Kft.** (1146 Budapest, Dózsa György út 19., [vegh.agnes@galenus.hu](mailto:vegh.agnes@galenus.hu), [www.galenus.hu](http://www.galenus.hu))
- **Vidal Next Kft.** (1087 Budapest, Könyves Kálmán krt. 76., email address: [a.hegybiro@pharmindex.hu](mailto:a.hegybiro@pharmindex.hu))