**Processing of the data of healthcare professionals ("HCPs") and representatives and contact persons of healthcare organizations ("HCOs"), calculation of benefits to be provided by Egis, performance and keeping records of agreements, data processing related to visits to physicians, sales talks with pharmacies, transparency obligations**

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| **1. Processing of the data used as the basis for calculating benefits to HCPs and HCOs**<br><br>The calculation of benefits and the processing of the personal data of the relevant individuals for this purpose are a mandatory condition for entering into an agreement with the HCP, having regard to the industry and compliance requirements applicable to Egis, including the Code of Conduct, the EFPIA HCP Code and the Ethical Code for Pharmaceutical Communication, hereinafter collectively referred to as the "Compliance Rules".<br><br>When calculating the benefits, Egis takes the HCP's professional qualifications, expertise, jobs, positions and | **In the case of agreements to be entered into directly with HCP**: Article 6 (1) (b) of General Data Protection Regulation (EU) No 2016/679 of the European Parliament and of the Council ("**GDPR**") - 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.<br><br>Provision of the data is a contractual requirement. If the data are not provided, Egis will not be able to calculate the benefits in a lawful manner.<br><br>**In the case of agreements to be entered into with the HCO** (for example if Egis enters into an agreement with the business in which the relevant HCP holds an | **In the case of HCPs**: Name, area of specialization, research, occupation/practice area (country) of the relevant HCP, name and address of his/her workplace/practice area, job/position, other public professional mandates, organizational membership (e.g. member/chairperson of the professional committee), number of publicly available publications, lectures and other relevant information relating thereto (including, in particular, the title, language, content, date of appearance of the publication or lecture, name of the relevant journal or periodical, conference or forum providing a frame for the lecture), public resume or curriculum vitae submitted to Egis, and the amount of the benefit calculated and the ID of the HCP used | **Data retention period:** if the calculation of the benefit is followed by the execution of an agreement, it is **5 years** from the date of the execution of the agreement or otherwise from the receipt of the offer for the execution of an agreement by the recipient or the express rejection of the offer, or in the absence of an offer, from the last communication (under Section 6:22 (1) of Act V of 2013 on the Civil Code ("**Civil Code**") given that civil law claims lapse in 5 years).<br><br>**Persons who have access within Egis:** the competent staff members of the business area concerned by the execution of the relevant agreement, the competent staff members of the Legal Department where legal involvement is required, and Compliance staff exclusively where required in |

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| professional presentations held and other professional publications into consideration, by making use of the related data (for example: number of publications, position held, etc.). | interest): Article 6 (1) (f) of the GDPR – legitimate interest of Egis.<br><br>Legitimate interest: observance of industrial and compliance requirements applicable to Egis, calculation of each benefit component with a transparent method. | when the benefit is calculated or the related data is processed, as well as the recording by Egis of these data in the form provided by the Servier Group.<br><br>**In the case of the representatives and contact persons of HCOs**: name and contact details of the relevant representative, contact person (including in particular email address, telephone number, position as much as necessary for addressing him/her), in the event of the HCP's membership, the HCP's data indicated above and the amount of benefit calculated.<br><br>**Source of data**: the basis for calculating the benefit may be the personal data collected from public sources and made available by the HCP or HCO concerned. | connection with a compliance matter or investigation.<br><br>Corporate members (*Arts et Techniques du Progres* - FR-45000 Orléans, rue Eugéne Vignat 25.) of the parent company of Egis (*Servier group* - https://servier.com/en/company/governance/) are authorised to request for the personal data recorded in the forms from Egis in order to audit the benefits and process such data as long as the audit is conducted. In the case of such audits, the legal basis of data transfer is Article 6 (1) (f) of the GDPR - legitimate interest of Egis and the corporate members of the Servier group. Legitimate interest: auditing the benefits and components of remuneration in order to guarantee the regularity, accuracy and integrity of benefits. |
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| **2. Processing of personal data to the extent necessary for the** | **In the case of agreements to be entered into directly with HCP**: | **In the case of HCPs**: name and contact details of the relevant | **Data retention period: 5 years** from the termination of the |

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| **performance of agreements entered into with HCPs and HCOs**<br><br>Provision of the data is a prerequisite for entering into the agreement. If the data are not provided, Egis will not be able to perform its contractual obligations. | Article 6 (1) (b) of the GDPR - data processing is necessary for the performance of the agreement entered into directly with the relevant individual.<br><br>**In the case of agreements to be entered into with the HCO** (for example if Egis enters into an agreement with the business in which the relevant HCP holds an interest): Article 6 (1) (f) of the GDPR – legitimate interest of Egis and the HCO.<br><br>Legitimate interest: Fulfilment of contractual obligations and exercise of rights in accordance with compliance rules applicable to Egis and industry rules applicable to Egis and the HCO. | individual (including in particular email address, telephone number, position as much as necessary for addressing him/her), the amount of his/her benefit and billing data and any other data indicated in the agreement.<br><br>**In the case of the representatives and contact persons of HCOs**: name and contact details of the relevant representative, contact person (including in particular email address, telephone number, position as much as necessary for addressing him/her), the amount of his/her benefit and billing data and any other data indicated in the agreement.<br><br>**Source of data:** data included in the agreement and provided by the relevant HCP or HCO. | contractual relationship (under Section 6:22 (1) of the Civil Code given that civil law claims lapse in 5 years).<br><br>**Persons who have access within Egis:** the competent staff member of the business area concerned by the execution of the relevant agreement, the competent staff member of the Legal Department where legal involvement is required, and Compliance staff exclusively where required in connection with a compliance matter or investigation.<br><br>Corporate members (*Servier group* - https://servier.com/en/company/governance/) of the parent company of Egis (*Arts et Techniques du Progres* - FR-45000 Orléans, rue Eugéne Vignat 25.) are authorised to request for the personal data from Egis in order to audit the benefits and process such data as long as the audit is conducted. In the case of |

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| | | | such audits, the legal basis of data transfer is Article 6 (1) (f) of the GDPR - legitimate interest of Egis and the corporate members of the Servier group. Legitimate interest: auditing the benefits and components of benefits in order to guarantee the regularity, accuracy and integrity of benefits. |
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| **3. Keeping records of agreements in a digital database. For example: protocols and agreements in relation to charitable donation of medicinal products and delivery of samples** | **Protocols for the delivery of medicinal products, medical aids and donations of medicinal products and medical aids free of charge for charitable purposes**:<br>Performance by Egis of the obligation to issue a protocol on the delivery of samples free of charge and donation in accordance with Section 7 (3) and Section 9 (2) of Decree No 3/2009 (II. 25.) of the Minister of Healthcare on the detailed rules on the promotional presentation of medicinal products for human use and medical aids and keeping records of persons engaged in promotional presentation and the | Name, address, individual ID (stamp) of the healthcare professional, tax number, subject matter and terms and conditions of the agreement. | In the case of **protocols:** a copy of them is to be stored for **5 years** from issuance.<br><br>In the case of **agreements:**<br><br>**Taxation documents: 5 years** 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 Act CL of 2017 on the Rules of Taxation ("**Taxation Act**")).<br><br>**Accounting documents: 8 years** (Sections 168-169 of Act C of 2000 |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| | business to consumer commercial practice in relation to medicinal products and medical aids<br><br>**Agreements to be entered into directly with healthcare professionals:** Article 6 (1) (b) of the GDPR – Processing is necessary for the performance of a contract to which the data subject is party or<br>in order to take steps at the request of the data subject prior to entering into a contract<br><br>The legal basis for keeping the documents in a digital database is Article 6(1)(f) GDPR, the legitimate interest of Egis. The legitimate interest of Egis: digitalization of the agreements and related documentation (by scanning). Digitalization and archiving serve the easier storage and managability of documents within the organization of Egis. | | on Accounting ("**Accounting Act**").<br><br>**In all other cases: 5 years** from the termination of the agreement in relation to the enforcement of a claim or performance of an obligation under the civil law (Section 6:22 (1) of the Civil Code).<br><br>**Persons who have access:** staff members of the Domestic Sales Directorate and staff members of the Legal Department where legal involvement is required. |
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| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| **4. Decisions on awarding benefits relating to participation in professional events and conferences and the preparation and performance of the related support agreement**<br><br>HCPs apply for support from Egis in order to be eligible for the benefits provided by Egis for attending a professional event or conference.<br><br>Without processing the personal data related to the above, Egis cannot evaluate the application and arrange for the support for HCP's participation in a professional event/conference. | Article 6 (1) (f) of the GDPR – legitimate interest of Egis. Legitimate interest: evaluation of the HCP's application for a benefit.<br><br>If the support is approved, Egis will continue to process personal data to prepare and implement (perform) a support agreement to be entered into with the HCP (Article 6 (1) (b) GDPR).<br><br>Under the support agreement to be entered into with HCP, in order to ensure the HCP's participation in the event or course, Egis transfers the personal data provided in the application (e.g. contact details) to the organizer of the relevant event and the accommodation provider in accordance with Article 6 (1) (b) of the GDPR – processing is necessary directly for the performance of a contract to which the data subject is party or in order to take steps at the | Applicant's name, stamp number/registration number, mother's name upon birth, place and date of birth, address, telephone number, email address, name and address of workplace, position, education, qualification, languages spoken, professional membership, membership in the continuing education centre, application for support and its justification.<br><br>Name, venue, dates of the relevant event/course.<br><br>In the case of events abroad, the applicant's social security number, tax number, travel document number, issue and expiration date, travel visa details.<br><br>**Source of data:** data provided by the applicant. | **Data retention period:** if the application is followed by the execution of an agreement (approval of support documentation), the duration of the data processing is **5 years** from the execution of the agreement (date of the documentation on the decision to grant support), or otherwise from the receipt of the application by Egis (Section 6:22 (1) of the Civil Code given that civil law claims lapse in 5 years).<br><br>**In respect of the fulfilment of tax liabilities: 5 years** 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).<br>**Accounting documents: 8 years** (Sections 168-169 of the Accounting Act).<br><br>**Persons who have access within** |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| | request of the data subject prior to entering into a contract.<br><br>If Egis denies approval for the benefit, Egis continues to process the personal data under Article 6 (1) (f) of the GDPR. Legitimate interest of Egis: answering questions (if any) regarding the denial of the application for the benefit and managing disputes. | | **Egis:** the competent staff member of the business area concerned by the relevant benefit and Compliance staff exclusively where required in connection with a compliance matter or investigation.<br><br>Corporate members (*Servier group* - https://servier.com/en/company/governance/) of the parent company of Egis (*Arts et Techniques du Progres* - FR-45000 Orléans, rue Eugéne Vignat 25.) are authorised to request for the relevant personal data from Egis in order to audit the benefits and process such data as long as the audit is conducted. In the case of such audits, the legal basis of data transfer is Article 6 (1) (f) of the GDPR - legitimate interest of Egis and the corporate members of the Servier group. Legitimate interest: auditing the benefits and components of remuneration in order to guarantee the regularity, accuracy and integrity of benefits.<br><br>In the event of participation in an |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| | | | event or course, out of the data provided in the application Egis transfers the data (e.g. contact details) required to ensure participation in the event or course to the event organizer and the accommodation provider. |
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| **5. Planning, arranging, measuring and evaluating the effectiveness of visits to physicians, preparing and keeping up to date the partner registry required for promotional presentation of medicinal products and maintaining contact with physicians.**<br><br>The purpose of the partner registry is to manage professional relationships with healthcare professionals; plan and document visits; determine visit frequency and the brands to be presented during promotional activities more efficiently; and invite healthcare professionals, on the basis of their fields of | Article 6 (1) (a) of the GDPR – consent of the individual.<br><br>The legal basis for processing personal data in connection with the inclusion of healthcare professionals in the database is provided by IQVIA AG.<br><br>Any subsequent processing carried out by Egis in the Trueblue/AiDEA CRM System, as described under the categories of data, is based on the consent of the relevant healthcare professionals.<br><br>The individual has the right to withdraw his or her consent at any time. The withdrawal of consent will not affect the | **The categories of data relating to healthcare professionals include:**<br>• surname and first name;<br>• field or fields of specialisation;<br>• title and qualifications;<br>• role and professional position;<br>• name, address and identification code of the workplace or workplaces;<br>• professional registration number;<br>• telephone number;<br>• email address;<br>• postal address;<br>• preferences regarding communication channels; | The **Trueblue/AiDEA CRM System** is provided and operated by **Trueblue S.p.A**., Viale del Lavoro 33, 37135 Verona, Italy, dpo@truebluecorp.com, acting as a **data processor.**<br><br>The CRM System is based on the **Microsoft Dynamics** technological environment; consequently, Microsoft and its duly appointed sub-processors may also be involved in providing the service.<br><br>Egis retains the personal data until the data subject withdraws their consent or for a **maximum period of three years** from the date of the last documented professional visit or interaction, whichever occurs earlier. |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| expertise, to participate as speakers, in scientific research or in other professional projects.<br><br>For the management of the partner registry, medical representative visits and related professional interactions, Egis uses the unified **Trueblue/AiDEA customer relationship management system** provided by Trueblue S.p.A. (the "**CRM System**").<br><br>The CRM System is used to record professional data and contact details relating to healthcare professionals; plan and document medical representative visits and other professional interactions; manage communication preferences; and measure and analyse the activities of the relevant contact persons.<br><br>On the basis of visit-related data, Egis prepares predefined reports and ad hoc analyses for the | lawfulness of processing based on consent before its withdrawal.<br><br>Without consent, Egis cannot contact or maintain contact with the data subject for the purposes described in this section, plan or organise visits involving the data subject, measure the effectiveness of such visits or maintain the data subject in the partner registry. | • professional, product or brand interests indicated by the data subject; and<br>• information required by applicable legislation, external rules, including the Compliance Rules referred to in Section 1, and internal policies, including information concerning target groups and visit frequency.<br><br>During visits, the relevant contact persons record the place and date of the visit, the products and promotional materials presented, and personal experience obtained during the visit, including treatment attitudes, therapeutic preferences and preferences relating to participation in projects. Where a low-value gift or a free medicinal product sample is provided, its description and the quantity provided are also recorded.<br><br>Egis does not record in the CRM | Processing beyond the three-year retention period may take place only where justified by a specifically identified and documented legal, regulatory, audit, compliance or legal-claims requirement.<br><br>**Persons who have access within Egis:** the competent staff members of the Commercial Directorate and IT Directorate and, to the extent necessary for their respective duties, contact persons, key account managers, regional managers, competent administrators, the Specialty Business Unit, Cardiometabolic Business Unit, the heads of the OTC and Pharmacy Business Units and system administrators.<br><br>In order to measure the activity of medical sales representatives and enhance their efficiency, **IFUA HORVÁTH & PARTNERS Kft.** (Cg. 01-09-063411, 1119 Budapest, Fehérvári út 79.) as data processor have access to the data stored in the OCE system. The data processor |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| purpose of monitoring medical representative and contact-person activities, measuring the effectiveness of visits, planning resources and supporting commercial activities. Access to these reports and analyses within Egis is limited to duly authorised staff members to the extent necessary for the performance of their duties. | | System any data that enable patients to be identified, patient health data or information covered by medical confidentiality.<br><br>A service provider engaged by Egis provides Egis with micro-regional data concerning the turnover of medicinal products, independently of visits, which cannot be directly linked to specific individuals. Egis plans its promotional activities on the basis of personal experience obtained during visits and anonymous micro-regional data concerning the turnover of medicinal products.<br><br>**Personal data may originate from:**<br>• the healthcare professional directly;<br>• professional visits, communications or other professional interactions between Egis and the healthcare professional; | prepares statistical reports (without personal data) which are accessible to the Egis management and the persons designated by the Egis management. |

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| | | • the healthcare professional's registration for or participation in a professional event, programme or project;<br>• an external HCP database provider lawfully used by Egis, including in particular the IQVIA OneKey database;<br>• publicly available professional registers maintained under applicable law; and<br>• registers or CRM systems previously used by Egis, provided that the continued processing is lawful, the data remain accurate and up to date, the purpose continues to apply and the retention period has not expired. | |
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| **6. Group-level KPI monitoring, reporting and analytics in connection with** | The legal basis of the processing is Article 6(1)(f) GDPR, the legitimate interest of Egis. | **The categories of personal data may include in particular:** | **Retention period:** event-level data are retained for **no longer than three years** from the relevant professional |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| **the Trueblue/AiDEA CRM System.**<br><br>Egis uses a defined subset of data recorded in the CRM System in connection with medical representative visits and other professional interactions to calculate group-level KPIs, prepare consolidated reports and statistics, analyse business trends, support strategic decision-making and harmonise Egis' operations and business processes.<br><br>The processing is intended exclusively to produce group-level, consolidated and comparable business analyses, reports and statistics. It is not intended to assess, evaluate, classify or profile individual healthcare professionals. | Egis has a legitimate interest in obtaining a consistent, accurate and comparable group-level view of medical representative and related professional activities across countries, consistently measuring KPIs, identifying business trends, supporting strategic decision-making and efficient resource allocation and harmonising its business processes.<br><br>The legitimate interest assessment concluded that the processing is necessary and proportionate. Egis staff members performing group-level business, analytics and reporting duties may access only predefined and purpose-limited reporting views. They do not have direct access to the underlying raw data tables and may not perform individual analyses or drill down to the level of individual healthcare professionals or interactions. | • pseudonymised healthcare professional identifiers;<br>• data relating to the occurrence, date, period and channel of a visit or other professional interaction;<br>• data relating to the products or brands presented and the professional context of the interaction;<br>• country, professional specialisation, target group or segment;<br>• target, coverage and reference data necessary for KPI calculation; and<br>• technical data necessary for access control, secure operation and auditability of the system.<br><br>Detailed event-level data may need to be processed technically for the calculation of KPIs. Such data are not, however, made available to Egis staff members | visit or interaction. A longer retention period may be applied only where justified by a documented legal, regulatory, audit, compliance or legal-claims requirement.<br><br>The GDPR does not apply to properly anonymised KPI and statistical data that no longer enable the identification of data subjects.<br>Access to group-level reports is limited to duly authorised Egis business, analytics and reporting staff through predefined reporting views.<br><br>More detailed data may be accessed only by duly authorised local staff members and, where justified and strictly necessary for the performance of their tasks, designated Egis IT support staff for system operation, troubleshooting or incident management purposes.<br><br>The CRM System is provided and operated by **Trueblue S.p.A**., Viale del Lavoro 33, 37135 Verona, Italy, |

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| | The processing is limited to professional data, does not include patient data and, where possible, is performed using pseudonymised or aggregated data.<br><br>The data subject may object to the processing at any time on grounds relating to their particular situation. | performing group-level business, analytics or reporting duties for individual-level analysis.<br><br>The names and direct contact details of healthcare professionals are not displayed in group-level reports.<br><br>**Source of the data:** a defined and filtered subset of data recorded in the Trueblue/AiDEA CRM System during the local management of medical representative visits and other professional interactions. | dpo@truebluecorp.com, acting as a **data processor.**<br><br>The system is based on the **Microsoft Dynamics** technological environment; consequently, Microsoft and its sub-processors appointed in accordance with the applicable data processing terms may also be involved in providing the service.<br><br>The CRM System and Egis' analytical database are operated within the European Economic Area. |
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| **7. Processing of data recorded in protocols relating to low-value gifts provided to healthcare professionals who are not recorded in the Trueblue/AiDEA CRM System and are not visited by Egis contact persons**<br><br>Egis intends to ensure that, in situations such as the period of | The legal basis of the processing is Article 6(1)(f) GDPR, the legitimate interest of Egis.<br><br>The legitimate interest is to demonstrate compliance with the Compliance Rules referred to in Section 1 and the industry rules applicable to Egis during a potential regulatory inspection. | The categories of data include the data recorded in the handover protocol, such as the healthcare professional's name, professional stamp or registration number, description, quantity and value of the gift, date of receipt and the signatures of the person delivering and the person receiving the gift. | **Retention period:** five years, corresponding to the general limitation period under the Civil Code, as the protocol enables Egis to demonstrate the circumstances of the provision of a low-value gift during a potential inspection by the National Center for Public Health and Pharmacy ("NNGYK") under Section 19 of the Act on the |

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| protection against COVID-19, healthcare professionals who are not normally visited by Egis contact persons may also receive low-value protective equipment, such as masks or disinfectants.<br><br>By doing so, Egis intends to support the work of healthcare professionals.<br><br>Since the items provided to these professionals cannot be recorded in the Trueblue/AiDEA CRM System because those professionals are not visited by Egis contact persons, the circumstances of the transfer must be recorded in a protocol in order to ensure the lawfulness and accountability of the procedure. | In addition, providing protective equipment supports the work and health of healthcare professionals and contributes to the sustainability of the healthcare system. Egis considers the processing proportionate to the purpose pursued. | | Economical Supply of Medicinal Products.<br><br>**Persons authorised to access the data within Egis:** competent staff members of the Domestic Sales Directorate and IT Directorate and, to the extent necessary for their duties, contact persons, key account managers, regional managers, competent administrators, the Department of Pharmaceutical Information, the Specialty Business Unit, Cardiometabolic Business Unit, the heads of the OTC and Pharmacy Business Units and system administrators.<br><br>The relevant business unit represented by the contact person retains the protocols securely for the applicable retention period. The competent authority may also access the protocols during a regulatory inspection. |
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| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| **8. Sending promotional materials and newsletters by post, telephone or email**<br><br>Egis may provide promotional, professional and commercial content, newsletters and publications to healthcare professionals through the communication channels authorised by them in advance.<br><br>The processing may include in particular:<br>• sending electronic direct marketing messages, promotional materials and newsletters by email, including eDM campaigns;<br>• sending promotional and professional publications by post where Egis uses this communication channel and the data subject has provided the appropriate consent;<br>• marketing communications by | The legal basis is Article 6(1)(a) GDPR, the data subject's consent, and Section 6(1) of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities ("Advertising Act"), namely the data subject's prior, unambiguous and explicit consent.<br><br>The data subject may withdraw consent at any time in respect of all or individual communication channels. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.<br><br>Following withdrawal, Egis will no longer send promotional or direct marketing content through the relevant communication channel. | The categories of data include the healthcare professional's name, date of birth, mobile and landline telephone numbers, email address, residential address, including city, postcode, street and house number, workplace and position. Egis uses the workplace and position to select the type of promotional material relevant to the data subject. | **Retention period:** until withdrawal of consent or for as long as necessary for marketing communications, but **no longer than five years** from the last relevant activity, whichever occurs earlier.<br><br>**Persons authorised to access the data within Egis:** competent staff members of the Domestic Sales Directorate and IT Directorate, competent administrators, the Medical Representative Network Support Department and its Advertising and Logistics Unit, sales and marketing staff of the Cardiometabolic, Specialty, OTC and Pharmacy Business Units and system administrators.<br><br>The CRM System is operated by **Trueblue S.p.A**., Viale del Lavoro 33, 37135 Verona, Italy, dpo@truebluecorp.com, acting as a data processor.<br><br>The CRM System is based on the **Microsoft Dynamics** technological environment; consequently, |

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| telephone on the basis of the data subject's explicit consent;<br>• presenting or providing professional, promotional or commercial content during personal visits or meetings;<br>• presenting professional or promotional content through remote communication, including video calls, and, with the data subject's consent, sending the related materials simultaneously or subsequently by email; and<br>• sending newsletters and publications, including Egis publications and the Egis VIP Pharmacy newsletter.<br><br>Egis does not currently use SMS to send promotional content. SMS communications are used | | | Microsoft and its approved sub-processors may also be involved in providing the service. |

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| exclusively to organise visits and meetings, in particular for scheduling purposes. Such organisational SMS communications do not constitute promotional materials or newsletters.<br><br>Egis processes contact details, marketing consents, communication preferences and relevant professional and communication data in the Trueblue/AiDEA CRM System. The CRM System supports the management of recipients, authorised communication channels and consents and the organisation of professional and marketing communications.<br><br>Examples include paper-based direct marketing campaigns, email-based promotional campaigns and newsletters, marketing communications with visited physicians and key opinion leaders ("KOLs"), Egis publications, including | | | |

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| Bekopogtató and Lélekemelő, and the Egis VIP Pharmacy newsletter containing commercial information, pharmacy promotions, information about new product launches and professional news. | | | |
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| **9. Personalised communications, including personalised promotional materials, newsletters and professional messages sent by post, telephone or email, and personalisation of the planning of medical representative visits**<br><br>Egis personalises promotional materials, newsletters, other professional communications and visits, including their frequency and content.<br><br>For personalisation purposes, Egis takes into account the data subject's field of specialisation, professional interests, | The legal basis is Article 6(1)(a) GDPR, the data subject's consent, and Section 6(1) of the Advertising Act, namely the data subject's prior, unambiguous and explicit consent. | Information provided to Egis in connection with the use of www.egismed.hu website, answers given to market research questions, feedback during visits, etc., other publicly available data related to professional interests (scientific publications, communiqués, presentations on congresses, professional corporate membership etc.).<br><br>Where the data subject has consented, Egis may transfer certain activity data relating to the use of egismed.hu or another Egis HCP portal to the CRM System and use them to | Retention period: for as long as necessary to maintain contact, unless consent is withdrawn, but no longer than five years from the last activity, unless a longer retention period is required by law.<br><br>**Persons authorised to access the data within Egis:** competent staff members of the Domestic Sales Directorate and IT Directorate, competent administrators, the Medical Representative Network Support Department and its Advertising and Logistics Unit, sales and marketing staff of the Cardiometabolic, Specialty, OTC and Pharmacy Business Units and system administrators. |

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| communication preferences, previous professional interactions and experience obtained during visits.<br><br>The purpose is to determine what professional or promotional content may be relevant to the data subject, through which communication channel and with what frequency.<br><br>Decisions relating to personalisation are made by Egis staff members. No solely automated decision-making takes place. | | personalise communications. Such data may include the frequency of visits to the portal, the categories of professional content viewed and data concerning the use of individual content.<br><br>The processing does not involve solely automated decision-making and does not result in decisions producing legal effects concerning the data subject or similarly significantly affecting them. | The CRM System is operated by **Trueblue S.p.A**., Viale del Lavoro 33, 37135 Verona, Italy, dpo@truebluecorp.com, acting as a data processor. |
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| **10. Keeping records of attendance sheets of events and roundtable talks organized by Egis medical sales representatives.** | The legal basis is Article 6(1)(c) GDPR, compliance with a legal obligation applicable to Egis.<br><br>Under Section 14(11) of the Act on the Economical Supply of Medicinal Products, Egis is required to maintain the relevant records in order to complete the mandatory notification to the | The categories of data recorded on an attendance sheet are the name, venue, date and programme of the event, the participant's name, professional stamp number and signature, and the name of the organising contact person. | Data retention period: **5 years** from the last day of the calendar year of the event (Sections 78 (3) and 202 (1) of Act CL of 2017 on the Rules of Taxation ("**Taxation Act**")).<br><br>**Persons who have access within Egis:** Domestic Sales Directorate.<br><br>The attendance sheets may be |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| | competent authority. Egis would not be able to meet this notification obligation without keeping attendance records.<br>The records also document the circumstances of the event for cost-accounting purposes, including for the NNGYK and the National Tax and Customs Administration ("NAV"), and for disclosure purposes under the applicable industry codes:<br>• Medicines for Europe Code of Conduct<br>• EFPIA Disclosure Code | | requested by competent authorities and industry organisations, including the NNGYK, Medicines for Europe, the European Federation of Pharmaceutical Industries and Associations ("EFPIA") or NAV. |
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| **11. Sending out invitations to events and roundtable talks organized by Egis.** | Article 6 (1) (f) of the GDPR – legitimate interest of Egis.<br><br>Legitimate interest: successful and efficient event organization.<br><br>The processing is not mandatory, and the data subject may request at any time that Egis cease processing their contact details for this purpose. | The contact details of the individuals intended to be invited by Egis: the names of the prospective participants and the organization they represent, any other attendance related information they provide (e.g. arrival time, preferred presentation, etc.) and contact details (address, telephone number, email address). | If the data subject does not object to the processing of his/her data, the contact data may be used to send invitations to events and roundtable discussions organized by Egis and to get in touch. Egis keeps the data until it is in contact with the recipient (e.g. physician, pharmacy).<br><br>**Persons who have access within Egis:** Domestic Sales Directorate. |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| **12. Planning, organizing and measuring the success of pharmacy sales talks, compiling and keeping up to date the partner registry necessary for the sales representation of Egis in pharmacies and keeping in touch with the professionals concerned.**<br><br>The purpose of the partner registry is to determine the frequency of visits to pharmacies and the scope of themes of the commercial discussions with pharmacies more easily.<br><br>For the management of the pharmacy partner registry, pharmacy visits and related professional, commercial and other business interactions, Egis uses the unified **Trueblue/AiDEA CRM System** provided by Trueblue S.p.A.<br><br>The CRM System is used to | Article 6 (1) (a) of the GDPR – consent of the individual.<br><br>Egis carries out the processing described in this section, including inclusion of the relevant professional in the partner registry, documentation of pharmacy visits and discussions, professional and commercial communications and management of communication preferences, on the basis of the data subject's consent.<br><br>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.<br><br>Without consent, Egis is not be able to contact or maintain contact with the individual for the purpose outlined in this section. | The categories of personal data include:<br>• surname and first name;<br>• field or fields of specialisation;<br>• title;<br>• qualifications;<br>• position;<br>• name, address and identification code of the workplace or workplaces;<br>• telephone number;<br>• email address;<br>• postal address;<br>• communication-channel preferences;<br>• professional, product or brand interests indicated by the data subject;<br>• professional and commercial information relating to the classification of the data subject into a partner or target group, where such classification is applied; and | The **Trueblue/AiDEA CRM System** is provided and operated by **Trueblue S.p.A**., Viale del Lavoro 33, 37135 Verona, Italy, dpo@truebluecorp.com, acting as a **data processor.**<br><br>The CRM System is based on the **Microsoft Dynamics** technological environment; consequently, Microsoft and its duly appointed sub-processors may also be involved in providing the service.<br><br>Egis retains the personal data until withdrawal of consent or for a maximum period of three years from the date of the last documented professional visit or interaction, whichever occurs earlier.<br><br>Processing beyond three years may take place only where justified by a specifically identified and documented legal, regulatory, audit, compliance or legal-claims requirement. |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| record the professional data and contact details of the relevant professionals, plan and document pharmacy visits and discussions, manage communication preferences, and measure and analyse contact-person and commercial activities.<br><br>On the basis of pharmacy-visit data, Egis prepares predefined reports and ad hoc analyses to monitor pharmacy sales and contact-person activities, measure the effectiveness of visits and discussions, plan resources and support commercial and marketing activities.<br><br>Access to the reports and analyses within Egis is limited to duly authorised staff members to the extent necessary for the performance of their duties. | | • information required by applicable legislation and external and internal policies.<br><br>During pharmacy visits, sales representatives record the place and date of the visit, personal experience, market needs, orders and other appropriate and relevant information necessary for the performance and follow-up of the visit or interaction.<br><br>Egis does not record in the CRM System data enabling patients to be identified, patient health data or information covered by pharmacist-patient or medical confidentiality.<br><br>A service provider engaged by Egis provides anonymous micro-regional data concerning the turnover of medicinal products, independently of pharmacy visits, which cannot be directly linked to specific individuals. Egis plans its pharmacy-related | **Persons authorised to access the data within Egis:** competent staff members of the Domestic Sales Directorate and IT Directorate and, to the extent necessary for their respective duties, medical representatives, key account managers, sales staff, account managers, regional managers, competent administrators, the relevant Cardiometabolic, Specialty, OTC and Pharmacy Business Units and system administrators. |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| | | commercial activities on the basis of personal experience obtained during pharmacy visits and anonymous micro-regional data concerning the turnover of medicinal products.<br><br>The personal data may originate from:<br>• the relevant professional directly;<br>• pharmacy visits, professional or commercial discussions, communications or other interactions between Egis and the relevant professional;<br>• the relevant professional's registration for or participation in a professional or commercial event, programme or project;<br>• the pharmacy, pharmacy chain or other organisation employing or engaging the relevant | |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| | | professional;<br>• an external professional or partner database provider lawfully used by Egis;<br>• publicly available professional or official registers maintained under applicable law; and<br>• registers or CRM systems previously used by Egis, provided that the continued processing is lawful, the data remain accurate and up to date, the purpose continues to apply and the retention period has not expired. | |
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| **13. Complying with disclosure obligations on the Egis website under the Generic Pharmaceutical Transparency Code for the Disclosure of Benefits to Healthcare Professionals and Healthcare Organizations ("Transparency** | **In the case of data subjects other than private individuals, if the data subject is identifiable (for example Egis processes the names of the contact persons of the companies, physicians acting on their behalf):** Article 6 (1) (c) | **Data disclosed on the website in the case of an HCP:** name, place and address of professional practice, unique identifier where available, type of engagement or service, such as a professional presentation or professional | **5 years.**<br><br>In addition personal data will be available on the Egis website (en.egis.health) from 30 June 2018. Data will be available on the website for **3 years** from the date of disclosure to ensure the purpose of |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| **Code").**<br><br>The Transparency Code is available at http://www.generikusegyesulet.hu/contents/uploads/documents/document_1477041668_734.pdf. | of the GDPR (compliance with a legal obligation to which Egis is subject) and Articles 7.1 and 7.4 of the Transparency Code. Egis voluntarily joined Medicines for Europe, which is a European organization of generic pharmaceutical manufacturers. The purpose of the disclosure requirement is to ensure transparency of the financial and non-financial support to healthcare organizations and professionals (i.e. transparency, the transparency of the support provided by Egis).<br><br>**In the event of private individuals:** Egis requests consent from the relevant individuals for disclosure on the website – Article 6 (1) (a) of the GDPR – voluntary consent of the individual. In this case the individual has the right to withdraw his/her consent at any time. The withdrawal of consent will not affect the lawfulness of | article, and the total amount of the benefit.<br><br>**In the case of an HCO, Egis processes the following data irrespective of website publication:** name, tax number, registered office, type and amount of the benefit and the underlying source documents.<br><br>**Data disclosed on the website in the case of an HCO:** name of the healthcare provider or organisation, place and address of its activities, type of benefit, such as expert services or consultancy, and the total amount of the benefit. | data processing described in this row (for the transparency of support provided by Egis).<br><br>In the case of data processed based on consent, Egis processes the data until consent is withdrawn.<br><br>**Persons who have access within Egis until data are disclosed on the website:** competent staff members of the Domestic Sales Directorate, transparency administrators, the central responsible officer, the competent staff member of the Legal Department where legal involvement is required, and Compliance staff exclusively where required in connection with a compliance matter or investigation. |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| | processing based on consent before its withdrawal.<br><br>Where the private individual does not consent to name-based publication or withdraws their consent, the individual will not be named on Egis' website. Egis will publish only an anonymised, aggregated annual statement of the support provided to such individuals.<br><br>Irrespective of whether the data are disclosed on the website, Egis processes the following data relating to the HCP receiving support in order to monitor the recipients and amounts of support: name, unique identifier, professional stamp or registration number, name and address of workplace, type and amount of the benefit and the underlying source documents. | | |
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| **14. Disclosing benefit related information under the EFPIA** | **In the case of a disclosure by name of the agreement to be** | The following benefits fall inter alia within the scope of the | **Data retention period:** unless the relevant individual withdraws |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| **Transparency Code and the Code for Cooperation with Patient Organizations.**<br><br>Egis supports pharmaceutical initiatives to promote transparency of financial transactions with HCPs and HCOs in all countries of Europe in line with the objectives of the European Federation of Pharmaceutical Industries and Associations (EFPIA).<br><br>In order to apply the EFPIA Transparency Code, Egis is required to disclose what benefits it has provided (paid or reimbursed), directly or indirectly, to HCPs/HCOs.<br><br>Egis performs its disclosure obligation on the website hu.egis.health.<br><br>Disclosure means that all of this information are disclosed on a website operated by Egis. The information is published | **entered into directly with the HCP or benefits provided to the HCP:** Article 6 (1) (a) of the GDPR – consent of the individual.<br><br>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.<br><br>In the absence of consent, Egis will disclose benefit details (such as the amount paid to the affected HCP) in an aggregated, anonymous manner, without specifying the names of the relevant individuals and other data that would make the individual identifiable (including the total amount of the benefit and the period covered). In the event of withdrawal of consent, Egis deletes the disclosed data and, instead, ensures that benefit details are disclosed in an | transparency obligation:<br>• registration fee;<br>• travelling and accommodation costs;<br>• costs of services;<br>• related expenses comprised in fees paid under service or consultancy agreements.<br><br>**In the case of HCPs**: name, position, ID, address of primary place of work of the individual, amount and title of the benefit paid and indication of the calendar year concerned.<br><br>**In the case of the representatives and contact persons of HCOs**: name and contact details (if any) of the relevant representative, contact person (including in particular email address, telephone number, position as much as necessary for addressing him/her). | consent, the term of disclose is **3 years** under Article 2 of the Transparency Code (https://www.efpia.eu/media/25837/efpia-disclosure-code.pdf) of EFPIA („*The European Federation of Pharmaceutical Industries and Associations*").<br><br>**Persons who have access within Egis:** competent staff member of the area competent in respect of the execution of the relevant agreement.<br><br>Corporate members (*Servier group* - https://servier.com/en/company/governance/) of the parent company of Egis (*Arts et Techniques du Progres* - FR-45000 Orléans, rue Eugéne Vignat 25.) are authorised to request for the personal data from Egis in order to audit the benefits and process such data as long as the audit is conducted. In the case of such audits, the legal basis of data transfer is Article 6 (1) (f) of the GDPR - legitimate interest of Egis and the corporate members of the Servier |

| Purpose of data processing | Legal basis of data processing | Scope of processed data | Data retention period, access rights, recipients of data transfers |
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| annually and begins with benefits provided from 1 January 2019. This information will then become public and remain available for at least 3 years. | anonymized form as mentioned above.<br><br>**If HCP does not consent to disclosure by name or in the event of agreements to be made with HCOs or patient organizations** (for example, if Egis enters into an agreement with a company in which the HCP in question holds an interest) **and in the case of aggregate disclosures related to R&D**: Article 6 (1) (f) of the GDPR – legitimate interest of Egis.<br><br>Legitimate interest: compliance with industry rules applicable to Egis to implement a transparent benefit policy. | Egis annually updates the disclosed data, and if rectification is required (for example, wrong number, misspelling) or, in the case of HCPs if the relevant individual withdraws consent, Egis modifies the data already disclosed.<br><br>**Source of data:** data set out in the agreement and details of benefits actually paid. | group. Legitimate interest: auditing the benefits and components of benefits in order to guarantee the regularity, accuracy and integrity of benefits. |