

Privacy Notice

on Egis' internal Whistleblowing System

according to Article 13 of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: **GDPR**).

Egis Pharmaceuticals Private Limited Company (hereinafter: „**Egis**”) processes your personal data as follows:

1. The identity and the contact details of the controller and of the controller's representative

Name of the data controller: **Egis Pharmaceuticals Private Limited Company**

Contact details of the data controller: 1106 Budapest, Keresztúri út 30-38., +36 1 803-5555, website: <https://hu.egis.health>, mailbox@egis.hu, regarding data protection issues: gdpr@egis.hu

2. The contact details of the data protection officer

Data protection officer contact: gdpr@egis.hu

3. The purposes of the processing for which the personal data are intended

The purpose of the data processing is to investigate reports received through Egis' internal whistleblowing system (the " Whistleblowing System"), to answer questions and to remedy the conduct that is the subject of the report.

Egis, as an employer, operates an internal Whistleblowing System based on the provisions of Act XXV of 2023 on Complaints, Public Interest Reports and Rules on Whistleblowing (hereinafter referred to as the "**Whistleblower Protection Act**"), where information about illegal or presumed illegal acts, omissions, and other abuses can be reported.

A person as defined in Article 20 (2) - (3) of the Whistleblower Protection Act may be a whistleblower (hereinafter referred to as the "**Whistleblower**"). The Whistleblowing System is designed in such a way that the personal data of the Whistleblower disclosing its identity and of the person(s) concerned by the disclosure cannot be disclosed to anyone other than authorised persons - see Section 6.

Reports can be made on the Whispli© platform (available at: <https://servier.whispli.com/ethicsline>), which platform can also be used for anonymous reporting. The Whispli© platform itself is subject to its own privacy policy. Servier has access to the Whispli© platform as a joint controller.

Other possible ways to make a report:

- a) oral reporting: in person at a pre-arranged time,
- b) written reporting (other than Whispli©): via e-mail (etikaibejelentes@egis.hu).

4. Legal basis for the processing

Data processing is necessary for compliance with a legal obligation to which the controller is subject [Point c) of Article 6 (1) of the GDPR].

The purpose, mandatory nature and scope of data processing are defined in the Whistleblower Protection Act. According to Article 18 of the Whistleblower Protection Act: *"An employer who employs at least 50 persons in employment relationship shall establish an internal whistleblowing system."*

The additional legal basis is Article 9 (2) (b) of the GDPR if the report also contains special categories of personal data.

5. The categories of personal data concerned

In the Whistleblowing System and in the context of the investigation of the report

- a) the Whistleblower's,
- (b) the person's concerned by the report, and
- (c) the person's who may have information about the facts contained in the report (e.g. persons identified as witnesses),

personal data may only be processed if it is indispensable for the investigation of the report and only for the purpose of investigation and remedying the conduct that is the subject of the report.

Personal data of the Whistleblower revealing his/her identity: name, contact details.

The content of the report, the description and any additional personal data provided to Egis in order to investigate, complete, clarify and resolve the facts of the report.

6. Recipients of data processing, the persons entitled to access, data processors

The preliminary review of reports is carried out by the Compliance and Data Protection Department of Egis.

The Ethics Committee is responsible for investigating whistleblowing cases referred by the Compliance and Data Protection Department.

Persons investigating a report may not share information about the contents of the report with any other Egis department or employee until the investigation is complete, except to the extent strictly necessary to conduct the investigation.

Egis will not disclose the Whistleblower's personal data except as necessary to investigate the report or, in the case of disclosure to a competent authority, to conduct proceedings initiated on the basis of or in connection with the report.

If Egis involves an external third party (e.g. whistleblower protection lawyer, expert, consultant) in the investigation of the report, it will inform the data subjects accordingly.

Data processors:

The following data processor supports Egis in the operation of the interface for written communications and the e-mail address service for sending communications:

Microsoft Ireland Operations Ltd (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland).

7. Data retention period

The duration of the processing of personal data relating to the report, the investigation and the measures taken as a result of the investigation:

- Five (5) years from the end of the evaluation or the last investigation or action,

- or the personal data will be kept until the final conclusion of any judicial or official proceedings that may be initiated as a result of the investigation.

8. Your data protection rights and remedies

If you make the report in person, the operator of the Whistleblowing System first will first inform you of the data privacy policy, then record your report in a durable and retrievable format or in writing and provide you with a duplicate copy. You are entitled to review, correct and sign the recording.

You have the right to request from the Egis access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing. Given that the data is not processed in an automated manner, you do not have the right to data portability.

When exercising the right of access to information, if the report concerns a natural person, the personal data of that person shall not be disclosed to the person requesting the information.

The privacy policies of Egis provide you with details of your rights as data subject and any legal remedies. The privacy policies can be reached:

Privacy Policy of Egis Pharmaceuticals PLC. Available at: <https://int.egis.health/gdpr>

9. The right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if You consider that the processing of your personal data infringes the GDPR. In Hungary, the supervisory authority is the Hungarian National Authority for Data Protection and Freedom of Information (<http://naih.hu/>; 1363 Budapest, Pf.: 9.; 1055 Budapest, Falk Miksa utca 9-11., e-mail: dpo@naih.hu, phone number: +36 (1) 391-1400).

10. Data security measures (technical and organisational)

Detailed information on the data security measures adopted by Egis can be found at <https://int.egis.health/gdpr>. Please refer to the section on data security measures (technical and organisational) in the *Privacy Policy of Egis Pharmaceuticals PLC*.