

4.3 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
<p>1. Processing data based on which benefits to HCPs and HCOs are calculated.</p> <p>The calculation of benefits and the processing of the personal data of the relevant individuals for this purpose are a mandatory condition for the execution of an agreement with the HCP under the industrial and compliance requirements applicable to Egis.</p> <p>When calculating the benefits, Egis takes the HCP’s professional qualifications, expertise, jobs, positions and professional presentations held and other professional publications into consideration, by making use of the related data (for example: number of publications, position held, etc.).</p>	<p>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.</p> <p>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.</p> <p>Legitimate interest: observance of industrial and compliance requirements applicable to Egis, calculation of each benefit component with a transparent method.</p>	<p>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 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</p>	<p>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).</p> <p>Persons who have access within Egis: the competent staff member of the area which is concerned with the execution of the relevant agreement and the competent staff member of the Legal Department General.</p> <p>Corporate members (<i>Arts et Techniques du Progres</i> - FR-45000 Orléans, rue Eugène Vignat 25.) of the parent company of Egis (<i>Servier group</i> - https://servier.com/en/company/governance/) are authorised to request for</p>

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		<p>Group.</p> <p>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.</p> <p>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.</p>	<p>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.</p>
<p>2. Processing the personal data of the relevant individuals as much as necessary for the performance of agreements with HCPs and HCOs.</p>	<p>In the case of agreements to be entered into directly with HCP: Article 6 (1) (b) of the GDPR - data processing is necessary for the performance of the agreement entered into directly with the relevant individual.</p> <p>In the case of agreements to be entered into with the HCO (for example if Egis enters into an</p>	<p>In the case of HCPs: name and contact details of the relevant 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.</p>	<p>Data retention period: 5 years from the termination of the contractual relationship (under Section 6:22 (1) of the Civil Code given that civil law claims lapse in 5 years).</p> <p>Persons who have access within Egis: the competent staff member of the area which is concerned with the execution of the relevant agreement and the competent staff member of</p>

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	<p>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.</p> <p>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.</p>	<p>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.</p> <p>Source of data: data included in the agreement and provided by the relevant HCP or HCO.</p>	<p>the Legal Department General.</p> <p>Corporate members (<i>Servier group - https://servier.com/en/company/governance/</i>) of the parent company of Egis (<i>Arts et Techniques du Progres - FR-45000 Orléans, rue Eugène Vignat 25.</i>) 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 group. Legitimate interest: auditing the benefits and components of benefits in order to guarantee the regularity, accuracy and integrity of benefits.</p>
<p>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</p>	<p>Protocols for the delivery of medicinal products, medical aids and donations of medicinal products and medical aids free of charge for charitable purposes: Performance by Egis of the obligation to issue a protocol on the delivery of samples free of charge and donation in accordance</p>	<p>Name, address, individual ID (stamp) of the healthcare professional, tax number, subject matter and terms and conditions of the agreement.</p>	<p>In the case of protocols: a copy of them is to be stored for 5 years from issuance as required under Section 10 (2) of Decree No 3/2009 (II. 25.) of the Minister of Healthcare.</p> <p>In the case of agreements:</p> <p>Taxation documents: 5 years from the last day of the calendar year in</p>

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	<p>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 business to consumer commercial practice in relation to medicinal products and medical aids</p> <p>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 in order to take steps at the request of the data subject prior to entering into a contract</p> <p>In other cases: Article 6 (1) (f) of the GDPR – 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.</p>		<p>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”).</p> <p>Accounting documents: 8 years (Sections 168-169 of Act C of 2000 on Accounting (“Accounting Act”).</p> <p>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).</p> <p>Persons who have access within Egis: Domestic Sales Directorate.</p>

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<p>4. Decisions on awarding benefits for participation in professional events and conferences.</p> <p>HCPs apply for support from Egis in order to be eligible for the benefits provided by Egis for attending a professional event or conference.</p> <p>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.</p>	<p>Article 6 (1) (f) of the GDPR – legitimate interest of Egis and the HCPs. Legitimate interest: evaluation of the HCP's application for a benefit.</p> <p>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).</p> <p>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 request of the data subject prior to entering into a contract.</p> <p>If Egis denies approval for the benefit, Egis continues to process</p>	<p>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.</p> <p>Name, venue, dates of the relevant event/course.</p> <p>In the case of events abroad, the applicant's social security number, tax number, travel document number, issue and expiration date, travel visa details.</p> <p>Source of data: data provided by the applicant.</p>	<p>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).</p> <p>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).</p> <p>Accounting documents: 8 years (Sections 168-169 of the Accounting Act).</p> <p>Persons who have access within Egis: competent staff member of the area competent in respect of the relevant benefit.</p>

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	<p>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.</p>		<p>Corporate members (<i>Servier group</i> - https://servier.com/en/company/governance/) of the parent company of Egis (<i>Arts et Techniques du Progres</i> - FR-45000 Orléans, rue Eugène 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.</p> <p>In the event of participation in an 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.</p>
<p>5. Planning, arranging, measuring and evaluating the effectiveness of visits to physicians, preparing and keeping up to date the partner</p>	<p>Article 6 (1) (a) of the GDPR – consent of the individual.</p> <p>The legal basis for the processing of personal data related to the</p>	<p>Data of HCPs (physicians): surname, first name, field(s) of specialisation, title, qualification, position, name and address(es) of the workplace(s), identification</p>	<p>The OCE is a so-called customer relationship management system (<i>abbreviated as “CRM”</i>).</p>

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<p>registry required for promotional presentation of medicinal products and maintaining contact with physicians.</p> <p>The purpose of keeping a partner registry is to be able to determine the frequency of visits to physicians, the brands recommended in the course of promotion more easily, to invite the relevant physicians to speak based on their field of expertise and to participate in scientific trials and projects.</p> <p>Based on the data relating to visits to physicians, Egis generates regular reports on and case-by-case analyses (as requested by Egis management) of the activity of sales representatives to the immediate supervisors within Egis in order to present the results of visits made for the promotional presentation of medicinal products.</p>	<p>inclusion of healthcare professionals in the OCE database is ensured by IQVIA AG.</p> <p>Egis carries out any further processing of data in the OCE (see section on scope of data) with the consent of the individuals (healthcare professionals).</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 contact or maintain contact with the individual for the purpose outlined in this row.</p>	<p>code, telephone number, email address, postal address, gender and information specified by laws and external and internal policies in respect of the pharmaceutical activity.</p> <p>During visits to physicians, medical sales representatives record the following data: place, date of the visit, and products and promotional materials presented, personal experience during visits (attitude to treatments, therapeutic preferences, project participation/preference).</p> <p>Further personal data: Employee data of the Medical Sales Representative, Regional Manager (name, email at work, line (therapeutic area), registration number (PIN), evaluation of the visit.</p> <p>Regarding physicians' activity, the external service partner of Egis provides Egis with micro-regional level data on the turnover of medicinal products that cannot be directly linked to specific individuals, regardless of visits to physicians. Egis plans its</p>	<p>The database is developed and operated by IQVIA AG (Dorfplatz 4, 6330 Cham, Switzerland, CHE-106.920.201, office@squarelime.hu).</p> <p>Egis retains the data as long as it is necessary to make visits the HCPs and maintain a promotional and professional relationship with the HCPs.</p> <p>Persons who have access within Egis: competent staff members in the Domestic Sales and IT Directorate, and as much as they are concerned: medical sales representatives, key account manager, regional managers, competent administrators, Department General of Pharmaceutical Information, head of CNS ONKO Business Unit (BU), head of OTC Business Unit, system administrators.</p> <p>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 prepares statistical reports (without personal data) which are accessible to</p>

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		promotional activities based on personal experience during the visits to physicians and micro-regional level anonymous data on the turnover of medicinal products.	the Egis management and the persons designated by the Egis management.
<p>6. Sending promotional materials and newsletters by mail, phone, email or SMS. Sending Egis promotional materials and newsletters by mail, phone, email or SMS. For example: for the purpose of paper based direct marketing campaign, SMS based promotional campaign, newsletter by email, keeping in contact for marketing purposes with the physicians visited and key opinion leaders (“KOL”), forwarding Egis publications (Bekopogtató, Lélekemelő), Egis VIP Pharmacy newsletter (commercial news, notices of promotional sales in pharmacies, new product launches in the market, professional news).</p>	Article 6 (1) (a) of the GDPR – consent of the individual.	Details of healthcare professionals (physicians): name, date of birth, mobile phone number, landline phone number, email address, home address (city, postal code, street/house number), workplace, position.	For the time necessary to keep in contact or until you withdraw your consent (whichever occurs earlier).
<p>7. Sending customized communication - customized</p>	Article 6 (1) (a) of the GDPR – consent of the individual.	Information provided to Egis in connection with the use of www.egismed.hu website,	For the time necessary to maintain contact or until consent is withdrawn

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<p>promotional materials, newsletters and professional communication by mail, phone, email or SMS and customizing the planning of visits to HCPs.</p> <p>Customizing Egis promotional materials, newsletters and other professional communications and visits (e.g. frequency, content).</p>		<p>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.).</p>	<p>(whichever occurs earlier).</p>
<p>8. Keeping records of attendance sheets of events and roundtable talks organized by Egis medical sales representatives.</p>	<p>Article 6 (1) (f) of the GDPR – legitimate interest of Egis.</p> <p>Legitimate interest: keeping records of attendance sheets of events and roundtable talks organized by Egis medical sales representatives. The purpose of the register is to document the circumstances of the event for cost accounting purposes, e.g. for the National Institute of Pharmacy and Food (OGYÉI), the Transparency Committee of the Medicines For Europe, or the National Tax and Customs Authority (NAV).</p>	<p>Data on the attendance sheet of events and roundtables organized by Egis: venue, date, participant’s name, participant’s seal number, participant’s signature and name of the organizing medical sales representative.</p>	<p>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”).</p> <p>Persons who have access within Egis: Domestic Sales Directorate.</p> <p>Competent authorities and industrial organizations, e.g. the National Institute of Pharmacy and Food (OGYÉI), the Transparency Committee of the Medicines For Europe, or the National Tax and Customs Authority (NAV) may request that attendance sheets be made available to them.</p>

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<p>9. Sending out invitations to events and roundtable talks organized by Egis.</p>	<p>Article 6 (1) (f) of the GDPR – legitimate interest of Egis.</p> <p>Legitimate interest: successful and efficient event organization.</p>	<p>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).</p>	<p>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).</p> <p>Persons who have access within Egis: Domestic Sales Directorate.</p>
<p>10. 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.</p> <p>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.</p> <p>Based on the data relating to visits to pharmacies, Egis generates regular reports on and case-by-case analyses (as requested by</p>	<p>Article 6 (1) (a) of the GDPR – 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 is not able to contact or maintain contact with the individual for the purpose outlined in this row.</p>	<p>Data of relevant professional: surname, first name, field(s) of specialisation, title, qualification, position, name and address(es) of the workplace(s), identification code, telephone number, email address, postal address, gender, and information specified by laws and external and internal policies in respect of the pharmaceutical activity.</p> <p>During pharmacy visits, sales representatives record the following data: places, times of visits, personal experience, market demands and orders.</p> <p>Regarding individuals’ activity, the external service partner of Egis provides Egis with micro-</p>	<p>Unless consent is withdrawn, Egis keeps the data for the time necessary to hold pharmacy sales talks and maintain contact with the relevant professionals.</p> <p>Persons who have access within Egis: competent staff member in the Domestic Sales and IT Directorate, and as much as they are concerned: sales representatives, key account manager, regional managers, competent administrators, Department General of Pharmaceutical Information, head of CNS ONKO Business Unit (BU), head of OTC Business Unit, system administrators.</p>

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<p>Egis management) of the activity connected to sales talks with pharmacies to the immediate supervisors within Egis in order to present the results of meetings for commercial and marketing purposes.</p>		<p>regional level data on the turnover of medicinal products that cannot be directly linked to specific individuals, regardless of pharmacy visits. Egis plans its activities in connection with sales talks with pharmacies based on personal experience gained during pharmacy visits and micro-regional level anonymous data on the turnover of medicinal products.</p>	
<p>11. 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 Code”).</p> <p>The Transparency Code is available at http://www.generikusegyesulet.hu/contents/uploads/documents/document_1477041668_734.pdf.</p>	<p>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) 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</p>	<p>Irrespective of the disclosure of the support on the website, Egis processes the following data of the healthcare professional receiving support, in order to track the scope of recipients and amount of the support: name, address, tax identification number, unique identifier (seal number/registration number), name and address of workplace, telephone number, the type and amount of the benefit, their source documents.</p> <p>The following information will be published on the website: name, registered office, unique identifier (seal</p>	<p>5 years.</p> <p>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 data processing described in this row (for the transparency of support provided by Egis).</p> <p>In the case of data processed based on consent, Egis processes the data until consent is withdrawn.</p> <p>Persons who have access within Egis until data are disclosed on the website: competent staff of the Egis Domestic Sales Directorate,</p>

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	<p>professionals (i.e. transparency, the transparency of the support provided by Egis).</p> <p>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 processing based on consent before its withdrawal. If the private individual concerned does not consent to disclosure, the consequence is that he/she will not be named on Egis’ website, Egis only discloses an anonymous, aggregated annual statement of the support provided to these individuals on its website.</p>	<p>number/registration number), amount and type of the benefit.</p>	<p>transparency administrators, central responsible officer, competent in-house legal counsel.</p>
<p>12. Disclosing benefit related information under the EFPIA Transparency Code and the Code for Cooperation with Patient Organizations.</p> <p>Egis supports pharmaceutical</p>	<p>In the case of a disclosure by name of the agreement to be entered into directly with the HCP or benefits provided to the HCP: Article 6 (1) (a) of the GDPR – consent of the individual.</p>	<p>The following benefits fall inter alia within the scope of the transparency obligation:</p> <ul style="list-style-type: none"> • registration fee; • travelling and accommodation costs; 	<p>Data retention period: unless the relevant individual withdraws 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</p>

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<p>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).</p> <p>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.</p> <p>Egis performs its disclosure obligation on the website hu.egis.health.</p> <p>Disclosure means that all of this information are disclosed on a website operated by Egis. The information is published annually and begins with benefits provided from 1 January 2019. This information will then become public and remain available for at least 3 years.</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>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 anonymized form as mentioned above.</p> <p>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)</p>	<ul style="list-style-type: none"> • costs of services; • related expenses comprised in fees paid under service or consultancy agreements. <p>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.</p> <p>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).</p> <p>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.</p>	<p>(„The European Federation of Pharmaceutical Industries and Associations”).</p> <p>Persons who have access within Egis: competent staff member of the area competent in respect of the execution of the relevant agreement.</p> <p>Corporate members (<i>Servier group</i> - https://servier.com/en/company/governance/) of the parent company of Egis (<i>Arts et Techniques du Progres</i> - FR-45000 Orléans, rue Eugène 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 group. Legitimate interest: auditing the benefits and components of benefits in order to guarantee the regularity, accuracy and integrity of benefits.</p>

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	<p>of the GDPR – legitimate interest of Egis.</p> <p>Legitimate interest: compliance with industry rules applicable to Egis to implement a transparent benefit policy.</p>	<p>Source of data: data set out in the agreement and details of benefits actually paid.</p>	