

GENERAL INFORMATION NOTE ON PROCESSING PERSONAL DATA

I. WHO ARE WE?

ANTIBIOTICE SA (hereinafter referred to as “the Company”) with the registered office in Iași , 1 Valea Lupului St. registered in the Trade Register under the no. J22/285/1991, URC 1973096, processes personal data in accordance with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 (the Regulation) and other applicable legal provisions concerning the processing of personal data.

This informative note describes why and how we process personal data and provides information about your rights. The Company acts as a Data Controller.

II. WHO IS THE RESPONSIBLE FOR DATA PROTECTION?

We have a Data Protection Officer who can be contacted through the [contact details mentioned in the article III.](#)

III. HOW CAN YOU CONTACT US?

YOU CAN CONTACT US TO:

Address: Iasi. 1 Valea Lupului St.

Fax: 0232/209.633

Site (link for the contact form): www.antibiotice.ro

Email: dpo@antibiotice.ro

IV. PERSONAL DATA OR DATA CATEGORIES PROCESSED BY OUR COMPANY

Personal data means any information about an individual that identifies him/her or can lead to his/her identification.

Our policy is to collect only personal data required for the agreed purposes and we ask our clients to communicate personal data only where strictly necessary for these purposes.

Due to the variety of products and services we offer, we can process multiple categories of personal data, depending on the type of product / service / activity / purpose of the processing.

The main

data/ categories of data processed by the Company may, depending on the case and on the purposes associated with the processing, be one or more of the following:

- **General:** such as but not limited to:
 - identity data (surname, first name, serial number and ID / civil status number, etc. except PIN),
 - other data included in the identity documents (age, date and place of birth, citizenship);
 - contact data (e-mail address, home/residence address, telephone number);
 - data related to the profession, status as a representative of a legal person, work place (qualification / profession, position, etc.), data included in CVs (e.g. for medical experts);
 - video images in the areas used by the Company or related to the events organized by the Company (but not the biometric ones);
 - geolocation data;
 - bank accounts;
 - data obtained as a result of your physical or online access to the Company sites (data from the access system within the Company's areas, the on-line identifier of the persons accessing the Company's site processed for the purposes mentioned in the cookies policy (for more information visit www.antibiotice.ro, the potential data received through social networking sites (such as Facebook)
- **Sensitive:** such as the Personal Identification Number (PIN), preferences on types of services and products related to the Company's object of activity, information from criminal records.
- **Special:** such as genetic data, biometric data, health data (voice in the call center, signature, image/video [to the extent that they can uniquely identify the person]) medical data (such as medical history, adverse effects, results of the medical analyses, etc.).

V. SOURCES OF PERSONAL DATA AND IF THEY COME FROM PUBLICLY AVAILABLE SOURCES

We generally collect the personal data from you.

We can also receive personal data from other sources such as:

- personal data or access to these data received from our clients and partners - legal entities (related to the data belonging to their representatives), institutions, third parties or public sources (such as the ONRC portal, ANAF site, social networking sites), the authority in the field - NAMMD, etc.;
- the document for spontaneous reporting of adverse drug reactions may be recorded at our company or may be communicated to us by third parties (NAMMD, pharmacies, doctors, etc.);
- BVB, Central Depository, ASF in relation to investors, as the case may be.

VI. WHAT TYPES OF DATA PROCESSING DO OUR COMPANY?

Our company processes personal data for the purposes stated in the informative note, using for each purpose one or more data processing operations such as collecting, recording, organizing, structuring, storing, altering, retrieving, consulting, using, disclosing by transmission, disseminating or making available in any other way, aligning or combining, restricting, erasure or destruction.

VII. PURPOSES FOR WHICH THE PERSONAL DATA ARE PROCESSED

Our company processes personal data for multiple purposes, and procedures for collection, legal basis of processing, use, disclosure, storage periods, etc. may be different depending on each purpose.

We can use personal data for one or more of the purposes described in this informative note. If the Company subsequently processes your personal data for purposes other than those you have already been informed of and which are incompatible with the purposes for which the data were initially collected, the Company will provide information on that secondary purpose and any additional relevant information.

We mainly use the personal data for the following **purposes**:

- Fulfillment of the Company's object of activity, supply of goods and services , especially the activity of developing and manufacturing pharmaceutical products of human use (production, sale, testing, etc.) as well other related activities.
- Pharmacovigilance activity¹, specific medical documentation;
- Managing our relationships with customers, suppliers, distributors of pharmaceutical products, medical and/or pharmaceutical professionals, etc., enhancing the Company's activity and services in relation to our clients, suppliers and partners, correspondence, offers, negotiations, management of contracts;

We processes personal data in order to fulfill the contractual obligations and commitments assumed to you.

- Managing relationships with our investors in order to meet their needs and requirements, as well as fulfilling the obligations related to the capital market trading requirements;
 - Managing the risks associated with our activity by taking security measures to protect personal data, which involves detecting, investigating and solving security threats. Personal data can be processed as part of physical security monitoring (video data processing) or at the level of computer applications we use. At the same time, we can perform checks on individuals who act as representatives and / or guarantors of some clients or partners, legal entities.
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- In accordance with the law in force, we use our clients' and partners' contact details to provide directly or indirectly information that we consider of interest to them. We can process personal data for organizing dedicated events, congresses, associated activities such as product promotion;
 - If you visit our sites or our social networking pages, it is possible for us to process some information about the visitor's online identifier for the purposes mentioned in the Cookies Policy (for more information visit www.antibiotice.ro) or other personal data potentially received through these sites;
 - Meeting some legal /regulation requirements, such as those of a fiscal nature or those required by special normative acts that regulate our object of activity or, as the case may be, archiving procedure;
 - Economic, financial, administrative management;
 - Ascertaining, exercising or defending a right in court;
 - Internal statistics.

VIII. LEGAL BASIS AND LEGAL CONDITIONS ON WHICH DATA PROCESSING IS BASED

Legal bases of data processing take into account the provisions of the Regulation and the normative acts adopted in Romania regarding the processing of personal data, provisions of the applicable

legislation in the company's field of activity, especially the normative acts governing the development and production of pharmaceutical products, their sale and associated post-sale services / commitments, provisions on the safety of medicines, Civil Code, Fiscal Code and related legislation in the field of taxation, the applicable legislation in the field of trading on the capital market.

The processing shall be based on at least one of the following **conditions of legality of the processing**:

- processing may be necessary to conclude a legal report / contract and / or to execute it;
- processing may be necessary to meet a legal obligation of the Company (for example those related to the management of justifying documents from fiscal viewpoint, those regarding the pharmacovigilance activity or in the field of trading on the capital market);
- processing may be necessary to carry out a task which is of public interest (e.g. those relating to archiving operations);
- processing is necessary for the legitimate interests pursued by the Company or a third party, namely:
 - to manage our activity;
 - to manage the risks related to our activity;
 - to manage our business relationships with the potential clients or business partners, including but not limited to transmitting communications containing information and offers about our services and / or products, as well as those of our partners, under the terms of the law, organization of specialized conferences and presentations of our products;
 - to handle the complaints about our products, in order to be able to resolve any issues raised, namely to improve our products and / or services, to acknowledge, exercise or defense of a right in court;
- processing can be based on your consent, in the cases expressly provided by the Regulation.

IX. HOW LONG DO WE STORE THE PERSONAL DATA?

We store the personal data processed by us only for as long as it is necessary for the purpose for which they were collected (meeting the applicable law or regulation) such as:

- During the performance of the contract / legal relationship for the personal data necessary for its execution, including the personal data with which the Company may enter into contact in the conduct of the legal relationship;
- Until the expiry of the limitation period, in respect of cases in which the Company would have a legitimate interest in retaining certain personal data in connection with a potential litigation that might arise between the parties;
- For the time stipulated by the law in situations where there are applicable normative acts in this respect (e.g. in the case of the mandatory accounting records and the supporting documents that are the basis of the records in the financial accounting, data related to the pharmacovigilance activity, personal data held by the securities issuers in relation to capital market operations and activity, etc.)
- During the management of the relationship with the potential clients / recipients of our products / partners of the Company and their representatives, until the exercise of the opt-out clause, for the transmission of communications containing information and offers regarding our services and / or products , business communications, invitations to events such as symposiums, conferences, presentations, etc .;

- Until the withdrawal of consent for the processing of personal data solely based on consent;
- A 3-year period for pictures generated by the video surveillance system;
- A 3-year period for the call-center recordings;
- A 3-year period for the data stored in the access system in the areas belonging to Antibiotice S.A., as the case may be;
- During the period of archiving in the public interest mentioned by the law or in the applicable policies of the Company, as the case may be, for the data contained in the documents for which the law or the Company required the archiving.

In any other hypothesis or in the absence of specific legal, regulatory or contractual requirements, our reference period for the storage of personal data is at least 3 years from the date of ceasing the relationship / last contact between the Company and the person in question.

Any data may be stored by the Company, by way of exception from the previous provisions, if applicable, until the expiry of the limitation period, as regards the circumstances in which the Company would have a legitimate interest in retaining certain personal data for a potential dispute that may arise between the parties, for example in the context of the possible engagement of the legal liability of the company or of the person targeted by the processing.

In any case, except as provided by applicable law, we will delete your data at the time you request it. The applicable exceptions will be communicated to the applicant through the response submitted by our company to the request for data deletion.

X. YOUR RIGHTS AND THEIR EXERCISE

Our company is responsible for facilitating the exercise of any of your rights listed below.

Any of these rights may be exercised by sending an email to the address dpo@antibiotice.ro or you can submit a written request to us at the registered office of the Company or you can submit it personally to our headquarters in Iasi, 1 Valea Lupului St.

In order to protect your data, to prevent the abuse of bad people who would intend to access your data, our company may require you to go through some identification steps in advance to ensure that you are the person who will exercise your below mentioned rights by means of an application. If we receive a request from you regarding the exercise of any of your rights, we may request you to give us additional information to verify your identity before acting on the basis of your request.

If the targeted person submits an electronic application for exercising his/ her rights, information will also be provided by our company in electronic format where possible, unless the targeted person requests a different format.

We will try to respond promptly to any request from you and, in any case, within the time limits expressly specified by the applicable legal provisions (typically 30 days after the registration of the application). In certain situations expressly specified by applicable law, we may charge an access request that will take into account the administrative costs necessary to meet the request.

In the event that, as a result of applying the legal provisions, our company is not able, in whole or in part, to honour a request of the person targeted by the data processing, the applicable exceptions will be communicated to the applicant through the response sent to him by the company in connection with the application in question.

Access right

You have the access right under Article 15 of the Regulation, namely to obtain from the Company a confirmation that it processes or not personal data that concern you and, if so, you have the right to receive the following information: (a) purposes of the processing; (b)

categories of personal data concerned; (c) recipients or categories of recipients whose personal data have been or is to be disclosed, in particular recipients from third countries or international organizations; (d) where possible, the period for which personal data are to be stored or, if that is not possible, the criteria used to determine that period; (e) existence of the right to request the rectification or erasure of personal data or the restriction of the processing of personal data or of the right to object to processing; (f) right to lodge a complaint with a supervisory authority; (g) if personal data are not collected from you, any available information on their source; (h) the existence of an automated decision making process including the creation of profiles referred to in Article 22 paragraphs (1) and (4) of the Regulation and, at least in those cases, relevant information on the logic used and on the significance and expected consequences of a such processing for the targeted person.

If personal data are transferred to a third country or an international organization, you have the right to be informed of the appropriate warranties pursuant to Article 46 of the Regulation related to the transfer.

Upon your request, the Company provides you with a copy of the processed personal data.

***Right to data
rectification***

You have the right to obtain from the Company, without undue delay, the rectification of inaccurate personal data, in accordance with Article 16 of the Regulation. Taking into account the purposes for which data was processed, you have the right to obtain the completion of personal data, including by providing a supplementary statement.

Whenever possible or necessary, we will make corrections (if applicable) based on updated information and we will inform you about this if necessary.

***Right to delete
data***

You have the right to obtain from the Company the deletion of your personal data, without undue delay, in accordance with Article 17 of the Regulation, except for certain assumptions specified in the Regulation, if one of the following reasons applies:

- a) Personal data are no longer required for the purposes for which they were collected or processed;
- b) You withdraw your consent based on which processing takes place to the extent in which the processing is based solely on consent and there is no other legal basis for the processing;
- c) You object to the processing done for the purposes of a public interest or legitimate interests of the Company or of a third party and there are no legitimate reasons to prevail over your fundamental right/ rights and freedoms as regards the processing or you object to the processing for direct marketing purposes;
- d) Personal data were illegally processed;
- e) Personal data must be erased in order to comply with a legal obligation of the Company under the law of the Union or the domestic law under which it is subject;
- f) Other situations provided by the Regulation insofar as they are applicable

***Right to restrict the
processing***

You have the right to restrict the processing (according to the article 18 of the Regulation) in the following cases:

- a) You contest the accuracy of data for a period that allows the Company to verify the accuracy of data;
- b) The processing is illegal and you oppose the deletion of your personal data by requesting instead restricting their use;

- c) The Company no more need your personal data for processing but you request the company to disclose them for ascertaining, exercising or defending a right in court; or
- d) You objected to data processing in accordance with Article 21 (1) of the Regulation for the period of time during which it is checked whether the legitimate rights of the data controller prevail over those of the targeted person.

Right to data portability

You have the right to receive your personal data (according to the article 20 of the Regulation) you supplied to the company in a structured format, currently used and automatically readable, and to transmit them to another operator, without any obstacles on the part of the Company, if:

- (i) processing is based on your consent under Article 6 para (1) letter (a) or article 9 para (2), letter (a) of the Regulation or on a contract under the article 6, para (1), letter (b) of the Regulation; and
- (ii) processing is automatically carried out.

In the case of exercising the right to the personal data portability, these can be directly sent by the Company to another data controller specifically indicated by you, where this is feasible from a technical point of view.

Right of objection when processing is performed for the legitimate interests pursued by the Company or a third party

At any time, you have the right to object, for reasons related to your particular situation, to the processing carried out for the purposes of a public interest or for the legitimate interests pursued by the Company or a third party, including the creation of profiles. In this case, the Company will no longer process your personal data, unless it proves that it has legitimate and compelling reasons that justify processing and that it has priority over your interests, rights and freedoms, or that the purpose is to establish, exercise or defend a right in court.

Right of objection to processing for direct marketing purposes

When direct processing is aimed at direct marketing, you have the right to object at any time to the processing of your personal data, including profile creation.

Right to withdraw consent

If processing is based on your consent, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing under consent prior to its withdrawal. The withdrawal of consent is not applicable in cases where the data processing is not based on consent.

XI. RIGHT TO SUBMIT A COMPLAINT

If you wish to complain about the use of your personal data, please send an email with the details of your complaint to dpo@antibiotice.ro.

You can also submit your complaint using the details below:

Address: Iasi, 1 Valea Lupului St.

or to the e-mail address: dpo@antibiotice.ro

We will review and respond to any complaint we receive within the legal timeframe.

You also have the right to file a complaint with the National Authority for the Supervision of Personal Data Processing.

XII. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

In principle, the company may transmit / grant access / disclose the personal data to the following categories of entities:

- public authorities and entities (such as the fiscal authorities, NAMMD, CNVM, ASF, BVB, etc);
- commercial partners (distributors of pharmaceutical products, medical and / or pharmaceutical professionals, etc.)
- service providers and / or empowered persons who process personal data on behalf of the Company in accordance with the instructions received from us and comply with this informative note, data protection laws and any other appropriate privacy and security measures (such as specialized event organizers, marketing service providers, access and video monitoring, IT service providers who can access personal data, etc.)

Transfers and disclosures will not be made to entities outside Romania or European Union. If the Company transmits your personal data to a third country or to an international organization, we will ensure ourselves that these are properly protected and that we transmit data in a country that provides an adequate level of protection as assessed by the European Commission or, if it is considered that the country does not have laws equivalent to EU data protection standards, we will require the third party to conclude a legally binding contract / agreement / instrument that reflects these standards or provide other appropriate warranties in this sense.

XIII. CONSEQUENCES OF A REFUSAL TO SUPPLY PERSONAL DATA

If personal data are collected directly from you, we hereby notify you that you are not normally required to provide your personal data to the Company, except when providing them constitutes a legal or contractual obligation or a necessary obligation to conclude a contract. Thus, insofar as you enter into a legal relationship with the Company or otherwise benefit from our services / products, the provision of personal data is a necessity from the perspective of legal requirements and / or our legal relationship, because this information is necessary to meet the obligations assumed by the Company in relation to you or to supply the products and / or services.

So, in certain situations, depending on the data you refuse to provide, it is possible that:

- our company will be unable to sign the contract or continue the contractual relationship with you;
- our company will be unable to partially or fully honor its obligations towards you.

Through this Note, you have taken note of the information provided by Antibiotice S.A. in the light of the Regulation and you have been informed of the rights conferred by the Regulation and by the Romanian Law on the protection of Individuals with regard to the processing of personal data and their free movement.