

GENERAL PRIVACY NOTICE

Swixx Biopharma OÜ, registry code 12741121, address Pärnu mnt 139e/2, 11317 Tallinn, Estonia, e-mail address estonia.info@swixxbiopharma.com, tel. +372 640 1030 (hereinafter - Swixx Biopharma), is committed to respecting the privacy of every individual, as well as to the highest standards of personal data processing, and therefore aims to inform you about the processing of your personal data under this General Privacy Notice (hereinafter - Privacy Notice).

Please note that Swixx Biopharma may provide separate information about the processing of personal data in certain situations, such as for employees, project participants, etc., which may not be specified in this Privacy Notice, or which may be more detailed than specified in this Privacy Notice. In such case, please refer to the privacy notice provided to you personally.

The information contained in the Privacy Notice includes:

Definitions.....	2
Who is the controller of your personal data?	2
What personal data, for what purpose, on what legal basis and for how long can Swixx Biopharma process your personal data?	2
How do we get your personal data?	12
Who can be the recipient of your personal data?	12
Can your data be transferred to a third country or an international organisation?	12
What rights do you have as a data subject?.....	13
How do I contact the Data Protection Officer?	13



Definitions

A contract is an oral or written agreement between two or more persons.

An HCP is a healthcare professional (doctor, nurse, pharmacist, etc.).

Counterparty means a legal entity with which Swixx Biopharma has or intends to have a contractual legal relationship.

Data subject means a natural person whose data is or may be processed by Swixx Biopharma. In this Privacy Notice, the data subject may be referred to as "you", "your", etc.

GDPR is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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).

Personal data means any information relating to an individual which enables that individual to be identified, directly or indirectly.

Product means a medicinal product, medical device, food supplement or cosmetic product represented by Swixx Biopharma.

Product safety means information that is provided in the form of a side effect report, quality complaint or request for medical information about a Product.

Reporter means a person who contacts Swixx Biopharma to report a side effect of a Product, to make a quality complaint or to obtain medical information about a Product.

Service Provider means a natural person who provides the agreed services under a contract with Swixx Biopharma. A service provider may be referred to as a consultant, advisor, speaker, author, etc. in different contracts.

Swixx Biopharma Group of Companies is a group of legal entities whose list and contact details are available on the Website (<https://www.swixxbiopharma.com/en/countries/>).

Swixx Biopharma Partner means a legal entity whose Products are represented by Swixx Biopharma and may be listed on the Website.

Website - the website at www.swixxbiopharma.com.

Who is the controller of your personal data?

Swixx Biopharma is the controller of your personal data and can be contacted using contact details published here: <https://www.swixxbiopharma.com/en/countries/cee/estonia/#estonia>.

In case you submit a side effect report, quality complaint or request medical information about a specific Product, the controller of your personal data is the marketing authorization holder or manufacturer of the relevant Product. In this case, Swixx Biopharma is the data (sub)processor.

What personal data, for what purpose, on what legal basis and for how long Swixx Biopharma process your personal data?

In order to provide easily accessible information, you can select a category of data subject to see what personal data Swixx Biopharma may process, for what purpose and on what legal basis and for how long, from the list below:

1. [Candidate for a vacancy](#)
2. [HCP](#)
3. [Service provider, who is not an HCP](#)



4. [The ultimate beneficiary, representative or employee of the Counterparty](#)
5. [Event/meeting participant](#)
6. [The person who reports on the safety of the Product](#)
7. [A person who communicates with Swixx Biopharma or with whom Swixx Biopharma communicates on matters other than Product Safety](#)

CANDIDATE FOR A VACANCY

Categories of personal data processed:

- Information you provide when applying for a specific vacancy, such as your name, email address, telephone number, education, professional experience, language and other skills, or any other information you provide on your CV or at interview.
- Information provided by you or your previous employer, i.e. name, job title, period of employment and any other information specified in your previous employer's reference. We may only ask your previous employer for a reference/recommendation about you if you have given your consent to this.
- A record of your progress in our recruitment process, i.e. your name, the role you applied for, the time of the interview and any other personal data obtained from you that may be used in our records.
- Your feedback on the recruitment process, i.e., your full name, the position you applied for, the stage of the recruitment process you reached, your assessment of the recruitment process, suggestions for improving the recruitment process, and other information you provide in the evaluation questionnaire.

Purposes of processing personal data:

- Assessment of the qualifications and skills required for the proposed job.
- Communicating with you about the recruitment process (emails, phone calls, SMS).
- Completing questionnaires and tests.
- Verification of recommendations.
- Storing your personal data in our database so that we can assess in future whether you meet the requirements for the vacancy and contact you if we think that you are a suitable candidate.
- Collect feedback on participation in the recruitment process.
- Assess candidates' satisfaction with the recruitment process.

The legal basis for processing personal data is your consent. By applying for a vacancy, you consent to the processing of your personal data. In the event that Swixx Biopharma wishes to contact your former or current employer and/or store your personal data in a database for the purpose of contacting you in the event of a future vacancy, we will ask for your separate consent.

We will process your personal data related to the evaluation of the recruitment process on the basis of our legitimate interest in improving the recruitment process and its organization to better meet the expectations of candidates and improve the individual experience of interaction with Swixx Biopharma.

Retention period of personal data:

- If you accept the offer of employment, all relevant personal data collected during the recruitment process will become part of the employee's personal file and the data collected during the recruitment process will be kept for 6 months after the termination of the employment contract.
- If we do not recruit you, your personal data will be retained beyond the period during which you may lodge a complaint with the competent authority about the recruitment process in accordance with applicable law.
- If we do not recruit you but you consent to us storing your personal data for the purposes of assessing your suitability and contacting you in the event of a vacancy, your personal data will be stored for as long as your consent is valid. However, personal data may be stored even after you withdraw your consent if such personal data is necessary for Swixx Biopharma to establish, exercise, or defend legal claims.



Please note that if you accept the offer of employment, we will ask you to complete a conflict-of-interest form in order to prevent conflicts of interest, identify potential conflicts of interest and address them in accordance with applicable national and international laws and the Swixx Biopharma Group Code of Business Conduct.

After you have completed the questionnaire, we will process the following personal data about you:

- Full name.
- Information about received gifts, even a minor one, excessive entertainment or substantial favours from any outside Swixx Biopharma or individual that does or is seeking to do business with Swixx Biopharma, or it is competitor, that appears to be given with an expectation of reward or influence.
- Information about involvement in any associations with any other companies or organizations.
- Information about serving a director, consultant, agent or employee of any enterprise that seeks to compete with Swixx Biopharma.
- Information about serving a director, consultant, agent or employee of any enterprise that seeks to conduct business with Swixx Biopharma.
- Information about having second job.
- Information about serving director or board member in the Board of Directors of any other company or organization, including non-profit organization.
- Information about having any ownership interest, substantial interest in any concern that conducts or seeks to conduct business with Swixx Biopharma, whether as a supplier, dealer or customer, or as a competitor (except in the case of a publicly owned corporation whose securities are traded on the open market).
- Information about having an ownership interest in a company or organization that operates with the Government or in a company that delivers products or services to Swixx Biopharma.
- Information about having relationship with the renowned person in the healthcare area at the national or the regional level.
- Information about employment in any outside concern or individual that has or seeks a business with Swixx Biopharma (customer, supplier), or it is competitor or any government entity that regulates or oversees Swixx Biopharma activities (e.g. regulatory body, health fund).
- Information about being a former government employees and military officers in last 5 years.
- Information about relationship with Swixx Biopharma employee, competitor or supplier or work with the family member at the same department.
- Information about taken advantage of or benefit from any business opportunity that are discovered through the use of corporate property or confidential information or position for personal gain; or for the benefit of a person with whom you have a close personal relationship or organization with whom you or your family member has a non-financial or financial interest; or compete with Swixx Biopharma.

The legal basis for processing personal data is the legitimate interest of Swixx Biopharma, i.e. ensuring the independence, integrity and impartiality of Swixx Biopharma employees in the performance of activities that fall within the scope of the employee's functions, protecting Swixx Biopharma's proprietary information from being used for purposes other than Swixx Biopharma's interests and ensuring fair competition rules in Swixx Biopharma's relevant markets. This personal data will become part of your personnel file as an employee and will be retained for 6 months after termination of employment.

HCP

Categories of personal data processed:

- Name and surname.
- Personal code.
- Sole proprietor number.
- VAT code.
- Address.



- Phone number.
- Email.
- Bank account number.
- Tax regime.
- The amount of the fee payable for the services provided and information on additional costs related to the provision of your services, such as transport, accommodation, etc.
- Type, amount, event details (date, location, title), accommodation details (date, location), route to/from the event.
- Your image, your voice.
- Signature.
- Licence number.
- Job title.
- Workplace/employer.
- Specialisation.
- City and country.
- Education/degree and academic qualifications.
- Years of clinical experience (professional experience in relevant specialties).
- Information on research experience/clinical trial experience.
- Number of publications in indexed journals in the last 4 years.
- Speaking experience at local/city, national/regional or international events.
- Membership of a national or international treatment guidelines committee.
- Recognition (local, national, regional, international) of the scientist and/or medical expert.
- Role in a national, regional or international association (faculty/scientific committee member, leader in therapeutic area, etc.).
- Membership of the editorial board of peer-reviewed journals.
- Additional vocational training (specialised training) certificates acquired, duration and organiser of the training.
- Appointments and professional interests, including appointments to any committees (e.g. member of a tender panel, member of a compensation panel, member of other formulary committees, including private practice, etc.).
- Interests in a company or other organisation that cooperates with the Government, the Ministry of Health, the National Health Insurance Fund, the Medicines and/or Medical Devices Agency or any other organisation whose activities are related to healthcare (except shares of less than 0.1% in state-owned companies).
- Duties related to making, advising or influencing decisions on the prescription, procurement and dispensing of medicines, vaccines or over-the-counter medicines, or on the financing or provision of healthcare services.
- Duties related to carrying out regulatory inspections or issuing permits or licences on behalf of the government or public authorities.
- Duties of your close family members in relation to making, advising or influencing decisions about the prescription, purchase or dispensing of medicines, vaccines or over-the-counter medicines or the financing or provision of healthcare that could conflict with the services you provide to Swixx Biopharma.
- An HCP's or close family member's ownership interest in a company or organisation that does business with the government or in a company that provides products or services to Swixx Biopharma.
- Status as a public official.
- Relationship with current or former owners of the Swixx Biopharma Group of Companies.

Purpose and basis of the personal data processed:

- Prevention, identification, resolution and management of conflicts of interest in the relationship with the HCP, as well as determining whether the HCP is qualified to provide the services or to be



sponsored and determining the fair market value of the services provided by the HCP to Swixx Biopharma in accordance with the rules and guidelines set out in self-regulatory codes such as EFPIA, MedTech, etc. This personal data is processed on the basis of Swixx Biopharma's legitimate interest, which is to ensure an ethical, transparent and legally compliant relationship with HCP while protecting the interests of both Swixx Biopharma and the data subjects, including reputation, confidential information and fair dealing.

- Preparation and execution of the contract with the HCP, e.g. sending the invitation to sign the contract by email, paying the remuneration, recording and publishing the lecture prepared by the HCP in accordance with the contract, keeping the proof of execution of the contract, etc. Please note that the provision of certain personal data (e.g. your identification, contact details, bank account details, etc.) is necessary for the conclusion and performance of the contract and that if you do not provide such data, Swixx Biopharma will not be able to conclude or perform the contract.
- Performance of legal obligations, including but not limited to (a) bookkeeping, withholding and payment of taxes from remuneration for the HCP, filing of tax returns as regulated by the Accounting Act, Taxation Act, Income Tax Act, Social Tax Act, Unemployment Insurance Act, Funded Pensions Act. Please note that the processing of certain of your personal data (for example, your identification data, applicable taxation regime) is necessary for the fulfilment of legal obligations, if you do not provide the necessary personal data, Swixx Biopharma will not be able to conclude a contract with you as it will not be able to properly fulfil its legal obligations.
- Disclosure of transferred values within the calendar year to you in the Website pursuant to the Code of Conduct of Association of Pharmaceutical Manufacturers in Estonia based on your given consent. You may withdraw your consent at any time. If your consent is withdrawn the information about transferred value will be disclosed in aggregated manner. Also, if you will not give a consent to publicly disclose transferred values to you, the information will be disclosed in aggregated manner.
- Publicity / presentation of Swixx Biopharma and its activities, communication with the HCP by providing promotional, scientific, educational, pharmaceutical information about the Products and/or feedback on the tested treatment methods, effectiveness of the Products, inviting to participate in events organized by Swixx Biopharma, Swixx Biopharma Group of Companies, Partners, disclosing personal data to Partners or the Swixx Biopharma Group of Companies in order to obtain confirmation to conclude a contract or providing information on participation in an event, opinions on the Product, treatment methods and treatment method preferences, morbidity rates and other statements or professional beliefs. This purpose is only fulfilled with your consent, which you may withdraw at any time.
- Collection of feedback on your interaction with Swixx Biopharma, for example how you rate the process of entering into a contract with Swixx Biopharma, and to evaluate your satisfaction with your interaction with Swixx Biopharma, for example, whether entering into a contract with Swixx Biopharma was easy, quick, and clear. Personal data is processed based on our legitimate interest in improving the interaction process to better meet HCP expectations and improve the individual experience of interacting with Swixx Biopharma.

Retention period of personal data:

- Personal data processed on the basis of your consent is kept for as long as your consent is valid, but Swixx Biopharma may decide to delete it earlier when it is no longer needed by Swixx Biopharma or personal data may also be stored even after you withdraw your consent if such personal data is necessary for Swixx Biopharma to establish, exercise, or defend legal claims.
- Personal data processed on other grounds shall be kept for the period specified in the Accounting Act or until the legal regulation allows a legal action/complaint to be brought before a court.

It should be noted that in accordance with the Code of Conduct of Association of Pharmaceutical Manufacturers in Estonia, the values transferred to you will be published on the Website for at least 3 years.

SERVICE PROVIDER, WHO IS NOT AN HCP



Categories of personal data processed:

- Name and surname.
- Personal code.
- Sole proprietor number.
- Tax regime.
- VAT code.
- Address.
- Phone number.
- Email address.
- Remuneration.
- Bank account number.
- Signature.
- Image, voice.
- Special categories of personal data, such as personal data related to your health: diagnosis, symptoms, disease challenges, etc., are processed when Swixx Biopharma contracts you for a specific project related to raising awareness of a disease, etc.
- The information you provide in your feedback on your interaction with Swixx Biopharma, for example the type of interaction with Swixx Biopharma, your feedback on the interaction, suggestions for improving the interaction.

Purpose and legal basis for processing personal data:

- Preparing, concluding and executing a contract with you (for example, sending you an invitation to sign the contract electronically, paying you a remuneration, recording the result of the service in video or audio recordings or photographs and publishing them as provided for in the contract). *If Swixx Biopharma processes special categories of data, such as data relating to your health, such personal data will only be processed with your consent, which you may withdraw at any time.* Please note that the provision of certain personal data (such as your identification data, contact details, bank account details, etc.) is necessary for the conclusion and performance of the contract and that if you do not provide the data, Swixx Biopharma will not be able to conclude or perform the contract.
- Performance of legal obligations, including but not limited to bookkeeping, submission of tax returns as regulated by the Accounting Act, Taxation Act, Income Tax Act, Social Tax Act, Unemployment Insurance Act, Funded Pensions Act. Please note that the processing of certain of your personal data (for example, your identification data) is necessary for the fulfilment of legal obligations, if you do not provide the necessary personal data Swixx Biopharma will not be able to conclude a contract with you as it will not be able to fulfil its legal obligations properly.
- The publicity / presentation of Swixx Biopharma and its activities or the recording of the provision of a service, where your capture in photographs, video or audio recordings is not the subject of a contract, such personal data is processed only with your consent, which you may withdraw at any time.
- Collection of feedback on your interaction with Swixx Biopharma, for example how you rate the process of entering into a contract with Swixx Biopharma, and to evaluate your satisfaction with your interaction with Swixx Biopharma, for example whether entering into a contract with Swixx Biopharma was easy, quick, and clear. Personal data is processed on the basis of legitimate interest, which is to improve the interaction process to better meet your expectations and improve your individual experience in your interaction with Swixx Biopharma.

Retention period of personal data:

- If your personal data is processed on the basis of your consent, such personal data will be kept for as long as your consent is valid. However, personal data may be stored even after you withdraw your consent if such personal data is necessary for Swixx Biopharma to establish, exercise, or defend legal claims.



- Personal data processed on other legal grounds shall be kept for the period specified in the Accounting Act or until the legal regulation permits a legal proceeding to be started.

THE COUNTERPARTY'S ULTIMATE BENEFICIARY, REPRESENTATIVE OR EMPLOYEE

Categories of personal data processed:

- Name and surname.
- Duties and basis for counterparty representation.
- Workplace.
- Contact email address.
- Contact phone number.
- Details of the ultimate beneficiaries of the legal entity: name, country of residence, percentage of ownership exceeding 25%.
- Details of directors, managers, officers or other key personnel of the legal entity: name, title, nationality, country of residence.
- Information on the current or former civil servant status of the final beneficiaries, managers, directors, officers, their family members or household members.
- Information on business relationships of final beneficiaries, directors, managers, officers or their family members or household members with public officials or government-related entities.
- Information on the position (direct or indirect) of the final beneficiary, director, manager, officer or member of their family/household which enables them to exercise or influence a decision taken by any public or state-owned or controlled entity (e.g. government-owned organisation), including positions of authority in a political party.
- Information on final beneficiaries, directors, managers, officers or other key personnel subject to international or national sanctioning bodies.
- Signature.
- Information about any owner with at least a 10% ownership, director, executive or officer conviction, charges or the subject of any investigation with respect to the following acts or similar offense: criminal conspiracy/participation in criminal organization, corruption or bribery, fraud, fraudulent trading or theft, tax evasion or other tax-related offences, anti-trust, terrorist financing, money laundering, financial statement fraud, securities fraud, other criminal activity or been a subject to censure or financial penalties from any of national or international sanctions authorities.
- Information you provide in feedback on your interaction with Swixx Biopharma, for example the type of interaction with Swixx Biopharma, feedback on the interaction, suggestions for improving the interaction.

Purpose of processing:

- Assess whether the final beneficiaries, directors, managers and other key personnel are subject to national or international sanctions related to the legal entity concerned and have good reputation, and whether a conflict of interest would arise if relatives of the final beneficiaries, directors, managers and other key personnel hold or have held positions in the public service or in a political party.
- Draft and conclude the contract.
- Establish and maintain contact with the person responsible for the conclusion, performance of the contract and similar matters.
- Collect feedback about your interaction with Swixx Biopharma, e.g. how you rate the process of entering into a contract with Swixx Biopharma and evaluate your satisfaction with your interaction with Swixx Biopharma, e.g. whether entering into a contract with Swixx Biopharma was easy, quick, and clear.

Basis for processing personal data:



- Consent given to process personal data related to criminal convictions and offenses. We treat that consent is given if in the questionnaires are provided an information about criminal convictions and offences.
- The performance of a legal obligation as provided by the General Part of the Civil Code Act, the Commercial Code in contracts shall be indicated who represents the entity, as well as for the performance of a task carried out in the public interest related to the implementation of sanctions as regulated by the International Sanctions Act, the Council Regulations imposing economic, financial and other sanctions on natural and legal persons and to be implemented by all natural and legal persons. Please note that the processing of certain of your personal data (for example, your identification data) is necessary for the performance of legal obligations and that if you do not provide the necessary personal data, Swixx Biopharma will not be able to conclude a contract as it will not be able to properly perform its legal obligations.
- Swixx Biopharma has a legitimate interest in (a) ensuring that its business relationships with legal persons, their ultimate beneficiaries, directors or other relevant persons do not expose it to legal, financial or reputational risks, in particular in relation to national or international sanctions and the assessment of reputation, thereby protecting Swixx Biopharma transparency, compliance, and reliability in Swixx Biopharma operations; (b) being able to establish, exercise or defend legal claims; (c) improvement of the interaction process to better reflect the expectations of the Counterparty you represent and enhance the individual experience of interaction with Swixx Biopharma.

The retention period of personal data shall be determined in accordance with the Accounting Act or in accordance with the limitation periods for legal proceedings laid down in legal acts.

EVENT/MEETING PARTICIPANT

Categories of personal data processed:

- Full name.
- Position and workplace.
- Specialisation (only for the HCPs).
- Arrival and departure time, flight/bus/train number, travel itinerary.
- Location of accommodation.
- Date, time, place of event/meeting.
- Email address and phone number.
- Dietary requirements.
- Signature (only for the HCPs).
- Information you provide in your feedback on the event/meeting, e.g. whether you were a speaker at the event/meeting, how many days you participated in the event/meeting, how you rate the organization of the event/meeting, what suggestions you have for improving the event/meeting and its organization, etc.

Purpose of processing:

- Arrange transportation, accommodation, meals and other services and/or goods related to participation in the even/meeting, depending on the number of participants.
- Secure attendance of the participant.
- Register participants.
- Report the expenses in accordance with Swixx Biopharma's internal rules and/or fiscal obligations.
- Present/publicise Swixx Biopharma and its activities and events/meetings.
- Get feedback on the event/meeting and assess whether participants were satisfied with the event/meeting.

Grounds for processing personal data:



- Your consent to the processing of personal data relating to dietary requirements. Consent considered as obtained if you specify any dietary requirements, such as vegetarianism, lactose intolerance, nut allergies, etc. You may also be photographed, filmed or otherwise recorded during the event with your consent, unless such recording is carried out in a public place without requiring the consent of the individual (in which case your personal data is processed on the basis of Swixx Biopharma's legitimate interest, which is to present and publicise Swixx Biopharma and its activities). In the event that you do not consent to being filmed, photographed or otherwise recorded during the event, Swixx Biopharma may ask you to wear a sign informing about the prohibition to be filmed, photographed or otherwise recorded during the event/meeting. Please note that you may withdraw your consent to the processing of personal data at any time.
- Compliance with legal obligations related to bookkeeping as stipulated by the Accounting Act, Taxation Act, Income Tax Act and other relevant legislation, and to recording of expenses related to events intended for HCPs to the participants of the event pursuant to Medicinal Products Act.
- Swixx Biopharma' legitimate interest in (a) organising the event in accordance with the number of participants, i.e. organising accommodation, catering, transfers, activities, using Swixx Biopharma's funds in a reasonable manner, and reporting the expenses in accordance with the Swixx Biopharma Group of Companies internal rules; (b) ensuring transparency of hospitality provided at a business-related event/meeting and ensuring the reasonableness of the use of Swixx Biopharma's financial resources; (c) improving the organisation of events/meetings in order to better reflect the expectations of the participants in the future.

Retention period of personal data:

- If your personal data is processed on the basis of your consent, such personal data will be retained for as long as your consent is valid, but Swixx Biopharma may decide to delete it before it is no longer needed by Swixx Biopharma or personal data may also be stored even after you withdraw your consent if such personal data is necessary for Swixx Biopharma to establish, exercise, or defend legal claims.
- Personal data processed on other legal grounds shall be kept for the period specified in the Accounting Act or until the legal regulation permits a court action/complaint.

THE PERSON WHO NOTIFIES THE SAFETY OF THE PRODUCT

Categories of personal data processed:

- Status of the Reporter: the HCP, patient/consumer or representative of patient/consumer, etc.
- Name and surname.
- Position and place of work (only for the HCPs or legal entities' employees).
- Address.
- Email.
- Phone number.
- Information about the person experiencing side effects: age, gender, weight, height, medical history, information about the Product used (duration, dose, other products/devices used), features of side effects.
- The voice when leaving a voice message.
- Other information provided by the Reporter relating to the safety of the Product.

Purpose of processing:

- Register notifications.
- Assess side effects, quality inconsistency.
- Contact the Reporter for further questions or to submit a reply to the Reporter.
- Report side effects, quality non-conformities to the competent authorities.
- Keep information on the notifications in accordance with the law.



- Collect feedback on your interaction with Swixx Biopharma, such as how you rate the reporting process and evaluate your satisfaction with communication with Swixx Biopharma, e.g., the reporting process, the speed and clarity of responses.

Legal bases for processing personal data:

- By submitting a notification, you provide a consent to the processing of your personal data by Swixx Biopharma. However, Swixx Biopharma may ask your consent for follow-up questions.
- Legal obligation arising from the Medicinal Products Act, the Commission Implementing Regulation (EU) No 520/2012 of 19 June 2012 on the performance of pharmacovigilance activities provided for in Regulation (EC) No 726/2004 of the European Parliament and of the Council and Directive 2001/83/EC of the European Parliament and of the Council, the Regulation (EU) 2017/745 of the European Parliament and of the Council of 5 April 2017 on medical devices amending Directive 2001/83/EC, Regulation (EC) No 178/2002 and Regulation (EC) No 1223/2009 and repealing Council Directives 90/385/EEC and 93/42/EEC 87, 30 November 2009. Regulation (EC) No 1223/2009 of the European Parliament and of the Council on cosmetic products, Good Manufacturing Practice and Good Distribution Practice and other applicable legislation, processing is necessary for reasons of public interest in the field of public health or processing is necessary for important reasons of public interest in accordance with Union or Member State law.
- Swixx Biopharma has a legitimate interest in being able to establish, exercise or defend legal claims, also improvement of to improve the interaction process to better reflect expectations and enhance individual experience with Swixx Biopharma.

The retention period for personal data shall be as laid down in the Medicinal Products Act, the Commission Implementing Regulation (EU) No 520/2012 of 19 June 2012 on the performance of pharmacovigilance activities provided for in Regulation (EC) No 726/2004 of the European Parliament and of the Council and Directive 2001/83/EC of the European Parliament and of the Council, the Regulation (EU) 2017/745 of the European Parliament and of the Council of 5 April 2017 on medical devices amending Directive 2001/83/EC, Regulation (EC) No 178/2002 and Regulation (EC) No 1223/2009 and repealing Council Directives 90/385/EEC and 93/42/EEC 87, 2009. 30 November 2009 of Regulation (EC) No 1223/2009 of the European Parliament and of the Council on cosmetic products, i.e. for the duration of the Product's registration/marketing and for at least 10 years after the expiry of the Product's registration/marketing period or until such time as the legal framework allows for legal action/complaint.

Further information on the processing of personal data in the case of Product security is always available on the Website.

A PERSON WHO COMMUNICATES WITH SWIXX BIOPHARMA OR SWIXX BIOPHARMA COMMUNICATES WITH A PERSON ON MATTERS OTHER THAN PRODUCT SAFETY

Categories of personal data processed:

- Name and surname.
- Job title.
- Workplace.
- Address.
- Email.
- Phone number.
- Any other information provided in communication/correspondence.

Purposes of processing personal data:

- To prepare a request or any other document to the data subject relating to the exercise of the legal interests of Swixx Biopharma.
- To respond to requests you make.



- To store correspondence/communication for the defence in the event of a dispute.
- To collect feedback on your interaction with Swixx Biopharma, such as how you rate the communication process and assess your satisfaction with communication with Swixx Biopharma, e.g., communication was quick and clear.

Legal basis for processing personal data:

- Your consent when you contact Swixx Biopharma.
- The processing is necessary for the performance of a contract to which the data subject is a party or to act at the request of the data subject prior to entering into a contract.
- The legal obligation to store correspondence as laid down in the Accounting Act, Employment Contracts Act or other legal acts.
- Swixx Biopharma's legitimate interest, which is the ability of Swixx Biopharma to establish, exercise or defend legal claims and improve communication to better reflect the expectations and enhance individual experience when interacting with Swixx Biopharma.

Personal data shall be kept for the period specified in the Accounting Act, Employment Contracts Act or other relevant laws, or until the legal regulation permits a court action/complaint.

How do we get your personal data?

We usually receive your personal data directly from you when you provide your personal data to enter into a contract, contacting Swixx Biopharma, completing questionnaires etc.

In certain cases, your personal data may be obtained from other persons, such as your employer, representative, courts, insolvency administrators, bailiffs or other state and municipal authorities.

Who can be the recipient of your personal data?

Your personal data may be transferred/disclosed to following categories of recipients or processors:

- Swixx Biopharma Group of Companies.
- Swixx Biopharma Partners.
- IT, PR, accounting, legal services, auditors, travel agencies, hotels, logistic companies, event organisers, photographers, cameramen, etc.
- State and municipal bodies and institutions, such as Estonian Tax and Custom Board, Social Insurance Board, State Agency of Medicines, etc., as well as law enforcement authorities, courts, insolvency administrators, bailiffs, etc.

Can your data be transferred to a third country or an international organisation?

For the purposes of Swixx Biopharma's activities, as well as for the performance of the contract concluded with you, Swixx Biopharma may transfer your personal data to third countries or to an international organisation. Transfers of personal data to Andorra, Argentina, Canada (only applicable to commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Republic of Korea, Switzerland, United Kingdom under GDPR and LED, United States (only applicable to commercial organisations participating in the EU-US Data Privacy Framework), Uruguay are based on the relevant European Commission decision on adequate protection of personal data (the specific decision is available here: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en?prefLang=lt). Transfers of personal data between persons that are not established in the territory of European Economic Area and for which there is no European Commission decision on adequate protection of personal data are based on the Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for transfers of personal data to third countries under Regulation (EU) 2016/679 of the European Parliament and of the Council ("SCC") or in accordance with other adapted safeguards and methods as set out in Chapter 5 of the GDPR.



For a copy of the appropriate or adapted safeguards and methods, please contact data@swixxbiopharma.com or estonia.info@swixxbiopharma.com.

What rights do you have as a data subject?

- To be informed about the processing of personal data. Swixx Biopharma exercises this right by providing you with this Privacy Notice.
- Access to personal data processed.
- Rectify personal data processed.
- To be forgotten and to withdraw your consent at any time, without prejudice to the lawfulness of the processing of personal data based on consent until its withdrawal.
- Restrict the processing of personal data.
- To transfer the personal data processed in accordance with your request (right to data portability).
- Object to the processing of personal data.

Please note that the exercise of certain rights may be restricted in accordance with the legal regulation. All of the above rights may be exercised by sending a request to Swixx Biopharma at Pärnu mnt 139e/2 11317 Tallinn, Estonia or by email to estonia.info@swixxbiopharma.com or data@swixxbiopharma.com. Swixx Biopharma undertakes to respond to your request within 1 calendar month.

- File a complaint if your rights have been violated. This right must be exercised in accordance with the procedures laid down by the Data Protection Inspectorate and can be found on the website www.aki.ee.

How do I contact the Data Protection Officer?

You can contact the Data Protection Officer of Swixx Biopharma at data@swixxbiopharma.com.

