PRIVACY NOTICE for Speak-Up

23 January 2025

At We, **Zentiva Denmark Aps,** ("**we**", "**us**", or "**our**"), we are committed to maintaining the highest standards of integrity and accountability.

Our speak-up process allows you to report concerns, ask questions and make suggestions about misconduct or violations of laws and company policies in the scope described below. Such concerns and inquiries may be raised using the dedicated Speak-up line ("**Platform**"), verbal face-to-face contact, phone call, e-mail, letter or other suitable means ("**Speak Up Channel**").

This Privacy Notice is meant to address the data privacy aspects implied by the Reporting of Concerns process of Zentiva with respect to Speak-Up, in line with 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 ("**GDPR"**).

Please note that this Privacy Notice does not address processing of personal data in relation to the whistleblowing mechanism, which we have implemented under Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, on the protection of persons who report breaches of the Union law.

(A) How we get your personal data

In the process of receiving, recording, examining, documenting and solving the Reporting of Concerns with respect to Speak-Up, we may process your personal data obtained either directly from you, or indirectly, through any of the Speak Up Channels.

In case you act in relation to us as a reporter, we obtain your personal data directly from you, with the exception of the case where the reporting is made anonymously.

In case you are the person concerned by the reporting, we may obtain your personal data either directly from you, or indirectly, from the reporter.

(B) The purposes of processing for which the personal data are intended, as well as the legal basis for such processing

We process your personal data for the following purposes and based on the following legal grounds, as the case may be:

i. receiving, recording, examining, documenting and resolving the Reporting of Concerns with respect to Speak-Up, where we rely our processing on:
    a) legitimate interest, according to Art 6 (1), letter f) of the GDPR, i.e., prevention, detection and investigation of reported or inquired matters including, without limitation, fraud, misappropriation, theft or misuse of company assets, financial or non-financial fraudulent reporting, corruption, conflict of interests, improper promotion or improper sales practices, harassment, discrimination and workplace violence, privacy breach, protection of confidential and sensitive information, misuse of company's assets, insider trading, anti-competitive behavior, or improper transaction, or
    b) compliance with a legal obligation according to Art 6 (1), letter c) of the GDPR, i.e. obligation to which we are subject arising from applicable legislation relating to the above areas;
ii. documenting your oral report received by us:

a) making a recording of the conversation in a durable and accessible form, where we will rely the processing on your consent, according to Art. 6 (1), letter a) of the GDPR; or
b) making a full and accurate transcript of the conversation, where we will rely the processing on legitimate interest, according to Art 6 (1), letter f) of the GDPR or compliance with a legal obligation according to Art 6 (1), letter c) of the GDPR (please see details under point i. above);

iii. in some cases, disclosure of your identity as a reporter may be based on compliance with a legal obligation, according to Art 6 (1), letter c) of the GDPR, or on your consent, according to Art. 6 (1), letter a) of the GDPR, expressed by completing the consent form provided by us (for further information please see below).

In case you, as reporter, do not express your consent for the documentation of the orally expressed report by recording of the conversation, you will be directed to report the concern in writing using another Speak Up Channel.

(C) Personal data we may process

We may process, in whole or in part, the following categories of personal data concerning you, in relation to the processing purposes herein:

- ✓ **identification data**: name / surname, physical and / or electronic signature, including the electronic signature obtained through electronic devices and / or qualified;
- ✓ **occupational data**: the professional context in which the reported information was obtained (for example, workplace, work / service report, function etc.); information regarding an individual's activity, such as its working relations or behavior;
- ✓ **contact data**: personal / work telephone number, personal / work electronic correspondence (e-mail) address, physical correspondence address, content of physical / electronic communications;
- ✓ data regarding the concerns to which the report refers, including evidence in support thereof;
- ✓ any other categories of personal data useful, relevant and conclusive for solving the report thus received (for example, data regarding reprisals, reparative measures etc.).

(D) The conditions under which we may disclose your personal data

Your Personal Data is intended for use by us, as a personal data controller.

Your identity as reporter and the information that would allow your direct or indirect identification are confidential and are not disclosed to other data controllers, except for the case where:

- ✓ there is your express consent; or
- ✓ we have a legal obligation to disclose your identity to public authorities, in compliance with the conditions and limits stipulated by the applicable law, in which case you will be informed regarding the disclosure of the identity and the reasons for the disclosure of the confidential data in question. Such information will not be provided to you in case the information would endanger the investigations or judicial proceedings.

Besides, to meet the above purposes of your personal data processing, your personal data may be disclosed to the following recipients:

- ✓ you and, where relevant, your appointed representatives;
- ✓ other legal entities that are part of the Zentiva group, if the case (you can view the list of the legal entities part of Zentiva group here: list_zentiva_entities);

- ✓ other (contractual) partners directly or indirectly involved in receiving, recording, examining, documenting and resolving the reports (e.g., providers of operational services like telecommunication, IT, archiving services etc.);
- ✓ our external consultants (e.g., auditors, lawyers etc.).

Our platform for Reporting of Concerns is technically operated by our vendor bound by confidentiality obligations, **FaceUp Technology s.r.o.**, through a cloud solution. The privacy notice of **FaceUp Technology s.r.o. is available here.**

Generally, it is not intended to transfer your personal data outside the European Union and / or the European Economic Area. If we transfer your personal data outside the European Union and / or the European Economic Area, we will do so only by observing the legal provisions in place, by applying adequate protection measures and notifying you when and if appropriate.

Your personal data will not be subject to a decision based on automated processing, including profiling.

(E) The rights you have in relation to your personal data

If not provided otherwise by the applicable legal provisions, you have the following rights in relation with your personal data thus processed:

- ✓ **the right of access**;
- ✓ **the right to rectification**;
- ✓ **the right to erasure / right to be forgotten**;
- ✓ **the right to restriction of processing**;
- ✓ **the right to object**;
- ✓ **the right to data portability**;
- ✓ **the right to lodge a complaint with** with Datatilsynet at https://www.datatilsynet.dk/english;
- ✓ **the right not to be subject to a decision based solely on automated processing, including profiling**.

Where the processing of your personal data is based solely on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal.

Except for the right to file a complaint with Datatilsynet, as set forth above, such rights may be exercised by sending a written request to the Data Protection Officer, using all or any of the contact details listed below:

- ✓ e-mail address: DPO@zentiva.com; and / or
- ✓ at our registered office Fuglevangsvej 11, DK1962 Frederiksberg, Registration number: 41172029

(F) The retention period of your personal data

We will keep your personal data for a period of 5 years from the report registration date. Nevertheless, in case the provisions of special law (e.g., the criminal law, the contravention law, the financial-fiscal law etc.) are applicable to the reported concern, the retention period of your personal data can be extended by the retention period thus provided by the respective special law. Upon the expiry of the said retention period, we will dispose the personal data thus processed, irrespective of their form (paper form or electronic etc.).

(G) The revisions of the present Privacy Notice

We regularly review the Privacy Notice, without prior notice but of immediate effect. We will communicate any revision via update of this Privacy Notice online.