

PRIVACY NOTICE

(Last updated: 4th March 2019)

Gedeon Richter Plc. (hereinafter “we”, “us” or “Company”) is committed to protecting the privacy of individuals. This Privacy Notice informs you about the processing of personal data collected by us from the users (hereinafter collectively "Data Subjects") of our website's (hereinafter “Website”). Data Subjects below the age 16 (hereinafter “Minors”) are not eligible to use our services and we ask that minors do not submit any personal data to the Company.

Please read this Privacy Notice in conjunction with our general [Terms of Use](#) and [Cookie Notice](#).

We may revise the Privacy Notice at any time by updating this posting and we will obtain your consent to the changes when necessary. You can determine when the Privacy Notice was last revised by referring to the "last updated" legend at the top of this Privacy Notice.

WHO WILL BE THE DATA CONTROLLER?

The Website is maintained and operated by Gedeon Richter Plc. (Registered seat: H-1103 Budapest, 19-21 Gyömrői út, Hungary; Company Registration Number: Cg. 01-10-040944; hereinafter: “we”, “us” or “Company”).

The data controller is the Company. Your data will be processed by the Company in compliance 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 (General Data Protection Regulation or “GDPR”), and the national laws especially the Act CXII of 2011 on Informational Self-determination and Freedom of Information applicable to this Website.

WHO WILL BE THE DATA PROCESSOR?

On behalf of the Company Progressive Studio Kft. (Registered seat: 1066 Budapest, Nyugati tér 1. VI. em.; Company Registration Number: 01 09 877715; acts as data processor (hereinafter “Data Processor”). The Data Processor based on the Company’s instructions executes the following technical activities: website maintenance, development, hosting.

WHAT IS THE PURPOSE OF DATA PROCESSING?

We handle personal data in order to provide you with our services you request.

The personal data collected from you as Data Subject will be handled by our employees, kept confidential and used by us for lawful and relevant purposes for providing our services to you.

Purposes of personal data processing and such use of your personal data may be

a) connected to our Services such as

- carrying out your requests submitted through our Website, respond to your inquiries or requests;
- providing a communication channel for the notification of adverse reactions to us for pharmacovigilance purposes. By clicking on the button “adverse event reporting” you are redirected to another webpage which is available under the following link: <http://www.richter.hu/en-US/contact/Pages/Adverse-event-reporting.aspx>. The content of the redirected webpage has its own Terms of Use which is placed on that webpage and applicable for Data Subjects regarding their notification of adverse reactions;
- the calculating of the test results on “How much time I still have to take an Escapelle Aftersex pill” which is available under the function of “I need emergency contraception right now”;
- helping for find a pharmacy;
- helping for contact a gynecologist;

(hereafter jointly referred to as “Services”).

- (b) identification of Data Subjects using our Services;
- (c) protect against and prevent fraud, misuse, and providing security of communications at our Website.
- (d) to provide you with customer support; or
- (e) the handling of complaints and enforcement of our general Terms of Use, Privacy Notice and Cookie Notice.

We may also process your personal data for purposes previously communicated to you from time to time, as long as such other purposes are directly relating to and compatible with the purposes indicated in this Privacy Notice and Cookie Notice.

WHAT IS THE LEGAL BASIS OF DATA PROCESSING?

Unless otherwise indicated to you in this Privacy Notice, processing of your personal data is voluntary and based on your freely given consent. You have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Failure to provide the requested personal data may result in us being unable to provide to you our Services.

In relation to adverse effect notifications, the legal basis of data processing is is our legal requirement to comply with European and national pharmacovigilance laws, with the following process: by clicking on the button “adverse event reporting” you are redirected to another webpage which is available under the following link: <http://www.richter.hu/en-US/contact/Pages/Adverse-event-reporting.aspx>. The content of the redirected webpage has its own Terms of Use which is placed on that webpage and applicable for

Data Subjects regarding their notification of adverse reactions.

WHAT PERSONAL DATA MAY WE COLLECT?

In the course of our activities and for the purposes indicated above, we process (collect) the following personal data of Data Subjects:

- **Name** (Family name and Surname): this information allows us to identify you.
- **Language preferences:** this information allows us sending communications to you in languages you understand.
- **Email address:** this information allows us to identify you and sending communications to you.
- **Adverse reactions information:** this information is necessary for us to process, investigate and notify the adverse reactions to the regulator. Your notification must include the name of the reporting person, your phone and email address; your profession; patient information; patient's initials; date of birth of the patient; age of the patient; sex of the patient; adverse event description, including the symptoms experienced; description of the side effects, adverse conditions, the patient's medical history, other diseases with free text; adverse events observed, such as death; immediate threat to life; necessary treatment; persistent or significant deterioration of health, or loss of function; developmental or birth defects occurred; medicines Information; start and end date of medication; medicines/drugs taken. The process is the following: by clicking on the button "adverse event reporting" you are redirected to another webpage which is available under the following link: <http://www.richter.hu/en-US/contact/Pages/Adverse-event-reporting.aspx>. The link may be varied. The content of the redirected webpage has its own Terms of Use which is placed on that webpage and applicable for Data Subjects regarding their notification of adverse reactions. The data controlling is also managed by the Company regarding adverse reactions information on the redirected webpage.
- **Message information:** we will keep records of our communications with you, including any complaints you submit including any read receipt information in order to provide you with customer support and the handling of complaints.
- **General usage information:** information that informs us on how you use our Services when you use our Website, including search behavior and preferences, a record of the searches that you make on our Website and browsing activity (including: IP address, time of visit, visited pages, on-page interactions, limited detail location information, device and software of the user, first-time or repeated visits, traffic source information), furthermore information on your country data (regarding the gynecologist finder on the Website) and your city data (regarding the pharmacy finder on the Website). We use this information to measure our Services to you, as well as to identify improvement areas of the quality of our Services.

Our Services are primarily not aimed at collecting sensitive personal data from Data Subjects, but you can give such sensitive personal data on our Website for the following purposes:

- adverse reactions information (health data) for pharmacovigilance purposes;
- calculating of the test results on "How much time I still have to take an Escapelle Aftersex pill" which is available under the function of "I need emergency contraception right now".

DO WE USE COOKIES?

Our Website may use cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you are browsing our Website and also allows us to improve our Website.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

For more information regarding the use of cookies on our Website, please read our separate [Cookie Notice](#) here.

WHERE IS THE INFORMATION STORED AND WHO WILL SEE THE INFORMATION?

Only those authorized persons and departments within the Company and the Data Processor will have access to your personal data who have an essential need to know that data for the fulfilment of their activities. We will not disclose any of your personal data to third parties, any external bodies or organizations unless you consent to data transfer or the data transfer is required or permitted by law.

In case of information provided in the course of adverse reaction notification, we will disclose that information for the National Institute for Pharmacy and Nutrition (H-1051 Budapest, Zrínyi utca 3.; phone: +36 1 886 9300; fax: +36 1 886 9460; www.ogyei.gov.hu) who will process personal or other data connected to adverse event as a sole data controller besides the Company based on legal obligations addressed to this authority.

HOW LONG WILL PERSONAL DATA BE RETAINED?

We keep personal data for no longer than is necessary for us to fulfil the purposes for which such personal data was processed (collected) unless we are specifically required to process personal data longer by applicable law.

We will delete and erase personal data if

- (i) you withdraw consent on which the data processing is based and there is no other legal ground for the processing;
- (ii) if you object to the data processing and there are no overriding legitimate grounds for the data processing, or you object to the processing for purposes of direct marketing;
- (iii) the personal data have been unlawfully processed; and
- (iv) the personal data have to be erased for compliance with a legal obligation to which the Company is subject.

Deletion shall not apply to the extent that processing is necessary for compliance with a legal obligation which requires data processing by the Company or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company (if any); for

archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or for the establishment, exercise or defense of legal claims of the Company.

WHAT INTERNATIONAL DATA TRANSFERS OCCUR?

In case of your habitual residence is in a Member State of European Union we do not transfer your personal data to a country or territory outside the European Economic Area unless we inform you otherwise in this Privacy Notice or in any other communication of ours.

In case of your habitual residence is outside of the Territory of the European Economic be aware that your personal data will be processed in the European Union.

HOW DO WE ENSURE DATA INTEGRITY?

All practicable and reasonable steps will be taken to ensure that personal data held by us is accurate. Please, keep your personal data up to date, and to inform us of any changes to such personal data you provide to us.

HOW DO WE PROTECT PERSONAL DATA?

We will take all necessary steps to ensure security of the personal data and to avoid unauthorized or accidental access, collection, use, disclosure, copying, modification, disposal, erasure or other unauthorized use. Please note that electronic transmission of information cannot be entirely secure. We use Secure Sockets Layer (“SSL”) and password encryption in order to protect the security of information that we process. Please note that you have the affirmative duty to keep your password information safe and not to share this data with third persons.

Any information we receive about possible adverse events related to our products, will only be accessible to a restricted number of personnel who are in the need of having access to such data in order to perform their employment duties with such data, and the data are protected by appropriate technical and organizational measures.

WHAT ARE YOUR RIGHTS AND REMEDIES?

You have the right to have incomplete, incorrect inappropriate or outdated personal data deleted or updated, marked or blocked. If you believe any of the personal data we hold about you is incomplete, incorrect or outdated, you can contact us and we will make the necessary corrections within twenty-five (25) days. All practicable and reasonable steps will be taken to ensure that personal data held by us is accurate. We will mark personal data if you dispute its correctness or up-to-date status and such claim cannot be verified beyond doubt. You may request that we delete your personal data, but we may be required by law to keep such information and not delete it (or to block or mark this information for a certain time, in which case we will comply with the deletion request only after having fulfilled such requirements).

You have the right to be informed what personal data is processed about you. We will respond to such request for access to personal data as soon as possible, but within twenty-five (25) days from its submission at the latest. We may request the provision of additional information necessary to confirm your identity. You are also entitled to object to the processing of your personal data if processing or transfer of personal data is necessary solely for the performance of a contractual obligation, necessary for the enforcement of the legitimate interest of ours, a data recipient or any other third person (except if the data processing is compulsory); as well as if permitted by law. Such objection will be investigated by us within fifteen (15) days of filing the objection. If you do not agree with our decision as regards any objection, you are entitled to initiate court proceedings within thirty (30) days after receipt of the decision refusing such objection.

If you consider that your privacy and data protection rights have been infringed, you may contact the relevant data protection authority supervising the activities of the Company, namely Hungarian National Data Protection and Freedom of Information Agency (Nemzeti Adatvédelmi és Információszabadság Hatóság, H-1024 Budapest, Szilágyi Erzsébet fasor 22/C.; phone: +36-1-391-1400; fax: +36 1 391 1410; email: ugyfelszolgalat@naih.hu) or to the competent data protection regulatory authority located in the state where your habitual residence is.

This Website may contain links to third-party sites. These linked sites are not under our control, and are regulated by their own privacy policies. We are not responsible for the privacy practices of any such linked sites.

HOW CAN YOU CONTACT US ABOUT THIS PRIVACY NOTICE?

For information regarding data protection inquiries and requests by Data Subjects, please contact the Company's Legal and Global Operations Management Department (postal address: Központi Iratkezelő, 1475 Budapest 10. kerület. Postafiók 27.; email: dataprotection@richter.hu).