

PRIVACY INFORMATION NOTICE

Fondazione Internazionale Menarini ("**Fondazione**", or "**we**") wishes to inform you that the processing of your personal data, performed by way of the website ("Website") takes place in compliance with the applicable data protection law (Regulation (EU) 2016/679 – hereinafter referred to as "GDPR").

1. Data Controller and DPO

The Data Controller is Fondazione Internazionale Menarini with registered offices in Strada 6 – Edificio L, Centro Direzionale Milanofiori, 20089 Rozzano, Milano ("Controller")

The Data Protection Officer ("DPO") can be contacted at: dpo@menarini.com

2. The data we process

The only data we process are those of the device you use to browse the website – we need to process said information to enable you to use the website itself.

In any event, even without your prior consent, the Controller may process your data to comply with legal obligations stemming from laws, regulations and EU Law, to exercise rights in legal proceedings, to pursue its own legitimate interests and in all cases provided by Articles 6 and 9 of the GDPR, where applicable.

Processing shall take place both using computers and on paper, and shall always entail the implementation of the security measures provided by current law.

3. Why and how we process your data

The Data are processed to view the website's content and use the functionalities available thereon, pursuant to art. 6.1(b) GDPR (performance of a service for the benefit of the user).

Your data may in any case be processed, even without your consent, for the purpose of complying with laws, regulations, EU Law (art 6.1.(c) of the GDPR, to perform statistics on the Website's usage and ensure its proper functioning (art. 6.1.(f) of the Regulation), to enforce the Code of Conduct of the Menarini Group and to establish or defend the legal claims in the interest of the Fondazione.

Data shall be stored for as long as strictly necessary for the attainment of the purposes for which they were collected. In any event the criterion used to determine that period is based on compliance with the time limits set by law and with the principles of data minimisation, storage limitation and rational management of archives.

4. Browsing data

If you only visit the Website the processing of your data is limited to browsing data i.e., data whose transmission to the Website is necessary for the functioning of the computers which operate the Website and of the Internet communication protocols. This category includes, for example, IP addresses or computer domain used to visit the Website and other parameters pertaining to the operating system used to connect to the Website. We collect these and other data (such as, for example, number of visits and time spent on the Website) merely for statistical purposes and in anonymous form in order to monitor the functioning of the Website and improve its performance. Such data is not collected to be associated with other information regarding, or for the identification of, users; however, such information, by its very nature, may enable Fondazione to identify users through

processing and association with data held by third parties. Browsing data are normally deleted following processing in anonymous form but can be stored and used by the Fondazione to detect and identify perpetrators of any computer offences committed to the detriment of the Website or using the Website. Without prejudice to this possibility and to the provisions of the [Cookie Policy \[MV1\]](#) the browsing data described above are stored only temporarily, in compliance with law.

5. Links to other websites

This Information Notice applies only to the Website as defined above. Even though the Website may contain links to other websites (known as third party websites), please be informed that We do not perform any access or control over cookies, web beacons or other user-tracking technologies **that may be active on such third party websites**, on the contents and materials published thereon, or on their methods of processing of your personal data; for this reason, We expressly decline any liability for such matters. You should therefore verify the privacy policies of such third party websites and collect information about their terms and conditions and about how they process your personal data.

6. Persons who have access to the Data

The Data are processed electronically and manually according to procedures and logics relating to the above-mentioned purposes and are accessible by the Controller's staff authorised to process personal Data and their supervisors, and in particular to staff belonging to the following categories: technical, IT and administrative staff, internal audit and compliance staff, as well as other individuals who need to process the data to perform their job duties. The Data may be communicated, also in countries outside the European Union ("Third Countries ") to: (i) institutions, authorities, public bodies for their institutional purposes; (ii) professionals, independent consultants –individually or in partnerships- and other third parties and providers which supply to the Controller commercial, professional or technical services required to operate the Website (e.g., provision of IT and Cloud Computing services), in order to pursue the purposes specified above and to support the Fondazione with the provision of the services you requested; (iii) third parties in the event of mergers, acquisitions, transfers of business -or branches thereof-, audits or other extraordinary operations; (iv) Fondazione supervisory bodies, based at the Controller's address, in the pursuit of their activities (oversight over the enforcement of legal obligations, ethical standards, the Menarini Group's Code of Conduct, etc.).

The mentioned recipients shall only receive the Data necessary for their respective functions and shall duly undertake to process them only for the purposes indicated above and in compliance with data protection laws. The Data can furthermore be communicated to the other legitimate recipients identified from time to time by the applicable laws. With the exception of the foregoing, the Data shall not be shared with third parties, whether legal or natural persons, who do not perform any function of a commercial, professional or technical nature for the Controller and shall not be disseminated. The individuals who receive the data shall process them, as the case may be, in the capacity as Controller, Processor or person authorised to process personal data, for the purposes indicated above and in compliance with data protection law.

Regarding any transfer of Data outside the EU, including in countries whose laws do not guarantee the same level of protection to personal data privacy as that afforded by EU Law, the Controller informs that the transfer shall in any event take place in accordance with the methods permitted by the GDPR, such as, for example, on the basis of the user's consent, on the basis of the Standard Contractual Clauses approved by the European

Commission, by selecting parties enrolled in international programmes for free movement of data (e.g. EU-USA Privacy Shield) or operating in countries considered safe by the European Commission.

7. Your Rights

By contacting the Controller at the addresses indicated above you can, at any time, exercise the rights pursuant to Articles 15-22 of the GDPR such as, for example, obtaining an updated list of the individuals who can access your data, obtain confirmation of the existence or otherwise of personal data which relates to you, verify their content, origin, correctness, location (also with reference to any Third Countries), request a copy, request their rectification and, in the cases provided by the GDPR, request the restriction of their processing, their erasure, oppose to direct contact activities (including limited to some mediums of communication). Likewise, you can always report observations on specific uses of the data regarding particular personal situations deemed incorrect or unjustified by the existing relationship to the DPO or submit complaints to the Data Protection Authority. You may withdraw your consent at any time - however that shall not impair the lawfulness of the processing carried out before consent withdrawal.