



## **Data protection notice pursuant to the General Data Protection Regulation (GDPR)**

This data protection notice is designed to inform you of what purposes STADA Arzneimittel AG Stadastraße 2-18, 61118 Bad Vilbel and its subsidiaries STADA Consumer Health Deutschland GmbH (Stadastraße 2-18, 61118 Bad Vilbel), STADAPHARM GmbH (Stadastraße 2-18, 61118 Bad Vilbel), Aliud Pharma GmbH (Gottlieb-Daimler-Straße 19, 89150 Laichingen), Mobilat Produktions GmbH (Luitpoldstraße 1, 85276 Pfaffenhofen an der Ilm) and Hemopharm GmbH (Theodor-Heuss-Straße 52, 61118 Bad Vilbel) (henceforth "we" or "us") process your personal data for. Personal data means any information relating to you personally. The following information explains how your personal data is processed and ensures transparency.

We process the following personal data for the following purposes:

### **1. Data from business partners / customer data / supplier data**

This encompasses any data from customers or business partners processed in the course of a business relationship with us. This applies in particular to the following personal data: contact details of our business partners (name, position, business contact details, e-mail address, telephone and fax numbers and information about the business relationship).

We process this data for the purpose of conducting the business relationship, concluding contracts, processing orders, carrying out analyses and evaluations and for fulfilling our legal obligations, e.g. for the purpose of conducting screening-measures. Processing is carried out on the basis of Article 6 (1) 1 b, c, f GDPR. If the basis for the processing is a legitimate interest within the meaning of Article 6 (1) 1 f GDPR, our legitimate interest lies in responding to inquiries and conducting business contact relationships. The provision of your personal data is required for the business relationship. This means that if you decide not to provide us with your personal data, it is not possible to conduct the business relationship.

We also receive personal data from the following sources: IQVIA Commercial GmbH & Co OHG and, under certain circumstances, from wholesalers from whom you purchase our products. These sources are not publicly available. In order to inform and advise you, we keep and maintain your contact data and information about your specialisations with the help of OneKey™, a database operated by IQVIA Commercial GmbH & Co OHG, Albert-Einstein-Allee 3, 64625 Bensheim, Germany, with up-to-date contact and specialisation data on healthcare professionals. Processing is carried out on the basis of the "balancing of interests clause" of the GDPR. If you send us your data directly or we receive it in any other way, the data is not automatically stored in the OneKey™ database. IQVIA may receive a message from us and will then contact you directly to enter or update your data. You can object to the collection of your



data by IQVIA at any time or contact IQVIA's data protection officer. In addition to this, we may have received your personal data from publicly accessible sources on the Internet.

We transfer your personal data to the following categories of recipients: service providers and/or STADA companies as required to process your request. This includes both STADA companies in Germany and, if applicable, abroad. Categories of external service providers may be: IT service providers, waste disposal service providers, shipping services, auditors, consultants or authorities. In case of credit management it may also concern credit agencies, debt collectors and credit insurers. In some cases both the STADA companies and potential service providers that we may transfer your personal data to may be located outside the EU.

## **2. Sales department, in particular field sales force**

Our sales department processes the personal data of pharmacists and doctors that is required to perform its tasks. This includes in particular the following personal data: Data on doctors and pharmacists and, if applicable, their employees who are contacted and visited by the field staff (name, position, business contact information, e-mail address, telephone and fax number), or who are contacted by the sales department.

We process this data in order to sell our products and to maintain the data in our CRM systems. The field sales force processes this data for the purpose of notification, execution and follow-up of field service visits or other kinds of sales activities such as maintaining lists of interest. Furthermore, the data may be used to conduct business analyses, for instance analysis of sales figures, trends, etc. Processing is based on Article 6 (1) 1 b, f GDPR. If the basis for the processing is legitimate interests within the meaning of Article 6 (1) 1 f GDPR, our legitimate interest lies in optimizing sales processes and marketing campaigns.

If data is collected directly: providing your personal data is not a legal or contractual requirement. This means that you are not obligated to provide us with your personal data. If you decide not to provide us with your personal data, the sales department will not be able to contact you.

If data was not collected directly: We received your personal data from the following sources: IQVIA Commercial GmbH & Co OHG as well as from wholesalers in some cases (see point 1). These sources are not publicly available. In addition to this, we may have received your personal data from publicly accessible sources on the Internet.

We transfer your personal data to the following categories of recipients: Affiliated companies for CRM maintenance, IT service providers, and in some cases disposal service providers, pharmacy cooperations, shipping services, consulting companies, analytical service providers or marketing services.

Your data is processed mainly in Germany. However, it may also be possible for foreign affiliated companies to access the data, for example for the purposes of maintaining our IT systems.



### **3. Staging competitions/lotteries and surveys**

We regularly stage competitions/ lotteries and surveys with different target groups. We process personal data on those participating in the competition or survey (in particular name, position, business or private contact information, e-mail address, telephone number).

We process this data for the purpose of staging the competition or the surveys. The data is processed in accordance with Article 6 (1) 1 a GDPR.

You are not legally required to provide your personal data, but this is often necessary to participate in the competition/survey. This means that you are not legally obligated to provide us with your personal data. If you decide not to provide us with your personal data, usually it is not possible for you to participate in the competition or survey.

We may transfer your personal data to the following categories of recipients: Affiliated companies and, where applicable, external service providers (shipping companies, IT service providers, waste disposal services; publishers and web media producers) entrusted with processing or evaluating the competition or survey.

We only process your data within Germany.

### **4. E-mail correspondence**

We process the following personal data in the scope of e-mail correspondence: Personal data of the senders and recipients of e-mails (in particular name, position, business or private contact information, e-mail address, telephone number, fax number) as well as other personal data you may disclose about yourself through your signature or in the text of the e-mail.

We process this data to communicate with all stakeholders. The legal basis for processing this data is Article 6 (1) 1 a, f GDPR. If the basis for the processing is legitimate interests within the meaning of Article 6 (1) 1 f GDPR, our legitimate interest lies in responding to inquiries and conducting business communication.

You are not legally required to provide your personal data, but this is necessary in order to communicate by e-mail. This means that you are not legally obligated to provide us with your personal data. If you decide not to provide us with your personal data, communication by e-mail is not possible.

Where necessary, we transfer your personal data to the following categories of recipients: employees of affiliated companies as well as external service providers assisting us in responding to the request, such as IT service providers, consulting firms or auditors.

In some cases, affiliated companies and also service providers that we may transfer your personal data to are located outside the EU.



## **5. Contact initiated using STADA Group's digital channels (health data)**

When responding to inquiries received at STADA functional mailboxes, such as [info@stada.de](mailto:info@stada.de), via social media channels or via our contact pages on the Internet, we process all the data provided by the sender of the inquiry (name, company, position, business or private contact information, e-mail address, telephone number, fax number) as well as additional personal data you may disclose about yourself in writing or orally in the text of the message or in the further course of processing of the inquiry. This may also be health data.

We process this data in order to be able to answer your inquiry. If you report side effects to us through these channels, the inquiry is immediately forwarded to the responsible colleagues at the drug safety department.

In case of a medical/ scientific request regarding STADA diagnostic DNA tests, it might be necessary to forward your request including your name and your contact details for the purpose of expert feedback to our service provider humatrix AG (<https://www.humatrix.de/service/datenschutz.htm>), who might as well directly deal with your request. Via the STADA contact form or STADA's functional mailboxes there must not be given any sensitive personal data (health data, patient data, genetic data) in case of requests concerning DNA tests.

The legal basis for this is our legitimate interest under Article 6 (1) f GDPR.

You are not legally or contractually required to provide your personal data. This means that you are not obligated to provide us with your personal data. If you decide not to provide us with your personal data, this has the following consequences: it will not be possible to process your request.

We transfer your personal data to the following categories of recipients: recipients entrusted with processing your request or inquiry. These may be employees of affiliated companies as well as external service providers, e.g. IT service providers, consulting firms and partner laboratories. Cases which might be of relevance for insurance cases will be forwarded to the respective insurance company, which might then directly contact you.

If your inquiry involves a foreign country, your data may also be transmitted to affiliated companies abroad. Some of these are located outside the EU.

## **6. Business cards policy**

Business cards are exchanged routinely in the scope general business contacts, trade fairs or similar events.

We process the personal data contained on the business card in order to possibly initiate contact at a later time, or to update our data and may enter the data into our Outlook address book or our CRM system.



You are not contractually or legally required to provide your personal data. This means that you are not obligated to provide us with your personal data. If you decide not to provide us with your personal data, this has the following consequences: We do not receive and consequently do not use your business cards.

The legal basis for this is our legitimate interest under Article 6 (1) f GDPR.

We may transfer your personal data to the responsible contact person in the Group.

If the matter relates to something abroad, your data may also be transmitted to affiliated companies abroad. Some of these are outside the EU.

### **7. Video surveillance**

Some areas of our sites are under video surveillance. In this context, footage data as well as time and geographical data on persons on our premises is processed.

We process this data to ensure security at our sites. The legal basis for this is our legitimate interest within the meaning of Article 6 (1) f GDPR in the safety of our sites.

You are not legally or contractually required to provide your personal data. This means that you are not obligated to provide us with your personal data. If you decide not to provide us with your personal data, however, it is not possible for you to visit STADA sites.

We transfer your personal data to the following categories of recipients: security service providers, IT service providers and in some cases, if there are substantiated grounds for suspicion, to external authorities.

Processing takes place exclusively in Germany.

### **8. Ordering drug samples**

Under Section 47 German Pharmaceuticals Act (AMG), certain groups of persons can order samples from us. If you request samples from us, we process the following personal data: Name, business contact information, position, number of samples sent to you so far.

The legal basis for this processing is Article 6 (1) b GDPR and Section 47 German Pharmaceuticals Act.

You are not legally obligated to provide your personal data, but this is required for the conclusion of the contract. This means that you are not legally obligated to provide us with your personal data. If you decide not to provide us with your personal data, this has the following consequences: It is not possible to order drug samples.

We transfer your personal data to the following categories of recipients: shipping service providers, affiliated companies and analysis service providers.



Your data will be processed mainly in Germany. However, it may also be possible for foreign affiliated companies to access the data, for example for the purpose of maintaining our IT systems.

#### **9. Advertising by fax, telephone and e-mail**

We conduct advertising and information measures to make our customers aware of current offers, information and services. We process the following personal data in this context: Name, position, business contact information, e-mail address, telephone number, fax number.

The legal basis for this processing is your consent (Article 6 (1) a GDPR) or our legitimate interest (Article 6 (1) f GDPR). To the extent that processing is based on our legitimate interest, we base this on the cases pursuant to Section 7 (3) German Act Against Unfair Competition (UWG).

You are not legally or contractually required to provide your personal data. This means that you are not obligated to provide us with your personal data. If you decide not to provide us with your personal data, it is not possible to receive information/advertising through the above-mentioned channels for which you have not given your consent or for which STADA cannot claim a legitimate interest.

We transfer your personal data to the following categories of recipients: call centres, lettershops, shipping companies, printers and IT service providers.

Your data will be processed mainly in Germany. However, it may also be possible for foreign affiliated companies to access the data, for example for the purposes of maintaining our IT systems.

#### **10. Registering for events**

We invite individuals to events directly or indirectly through third parties. In the scope of staging such events, we process the following personal data of the participants: Name, position, contact information, e-mail address, telephone number, fax number.

The legal basis for processing your personal data is your consent (Article 6 (1) a GDPR). You are not legally required to provide your personal data, but this is required in order to register for the event. This means that you are not obligated to provide us with your personal data. If you decide not to provide us with your personal data, you will not be able to participate in the event.

If data is not collected directly, then we receive your personal data from the place where you registered for the event, for example from the organizer or through Xing Events. Depending on the type of event, the data may or may not be publicly available. For example, the participants at a specific event may be displayed publicly on Xing Events.



We transfer your personal data to the following categories of recipients: service providers assisting us in organising the event, shipping services for the purposes of sending invitations and/or information material and IT service providers.

Your data will be processed in Germany. It is possible that your data may also be processed abroad.

### **11. Newsletters**

We offer different ways to subscribe to newsletters. In the scope of sending newsletters, we process the following personal data of newsletter recipients: Form of address, title, name, institution, position, address, telephone number, e-mail address and possibly your SAP customer number and online shop customer number.

The legal basis for this processing is your consent (Article 6 (1) a GDPR) or our legitimate interest (Article 6 (1) f GDPR). To the extent that processing is based on our legitimate interest, we base this on the cases under Section 7 (3) German Act Against Unfair Competition Act (UWG). You are not legally required to provide your personal data. This means that you are not obligated to provide us with your personal data. If you decide not to provide us with your personal data, you will not be able to receive our newsletters.

We transmit your personal data to agencies in order to send the newsletter.

Your data will be processed mainly in Germany. However, it may also be possible for foreign affiliated companies to access the data, for example for the purposes of maintaining our IT systems.

### **12. Reporting side effects (health data)**

If you inform us of suspected adverse reactions, a suspected lack of efficacy, exposure during pregnancy and lactation or other incidences relating to our products which are required to be documented, we process your personal data for the purpose of verification and investigation, to ensure safe use of our products and to fulfil our statutory documentation and reporting obligations. For this purpose, we process the following personal data from you in our central drug safety database, which we are legally obligated to maintain:

The person submitting the report to us: name, contact details, e-mail address, telephone number, medical qualification.

The person affected by suspected adverse reactions, lack of efficacy, exposure during pregnancy and lactation or other incidents requiring documentation: Initials, date of birth, age, age group, gender and the health-related information that you provide and that is necessary to document and evaluate the incident.



This means health-related data is generally collected in a pseudonymised form, unless you, as the person concerned, report the incident yourself. The legal basis for processing is the relevant legislation on the safety of drugs and medical devices of the European Union, the member states and third countries. We collect and process this data only to the extent that we are legally obligated to.

You are not legally required to provide your personal data, so you are not obligated to provide us with your personal data. If you decide not to provide us with your personal data, this has the following consequences: data is recorded in anonymous form. This in turn means that we cannot contact you, for example if we have any follow up questions.

Alternatively, as the person affected, you can also ask your doctor, your pharmacist, another healthcare professional with whom you are undergoing treatment, or a third party, to report the incident for you - in this case we will only receive pseudonymous data on you that does not allow you to be identified. You also have the option of sending a corresponding notification directly to the responsible authorities. If you, as a doctor or pharmacist, for instance, are subject to legal or professional obligations to report the above events, you can also fulfil your obligation by reporting directly to the responsible authorities or to your relevant professional organisations (AkdÄ, AMK etc.).

If data was not collected directly, then we received your data from the following sources:

Your doctor, pharmacist or other healthcare professional with whom you are undergoing treatment, or a relative, your lawyer or other person to whom you have disclosed this information about you. We also receive data of this kind from competent supervisory authorities inside and outside the EU, either directly or via the central European database. These sources are not publicly available. In all such cases, we receive health-related personal data solely in the same pseudonymised form in which we would collect it ourselves. We only receive data in assignable form from the individuals reporting the information themselves and to the same extent to which we would collect it ourselves.

We transfer your personal data to the following categories of recipients: To fulfil our statutory obligations with regard to ensuring drug and medical device safety, we make the data available within our central drug safety database to a closed user group consisting of the employees of STADA Arzneimittel AG, its subsidiaries and external service providers directly entrusted with tasks relating to the safety of drugs and medical devices. Other employees of STADA Arzneimittel AG, its subsidiaries and external service providers only receive anonymous evaluations of this data as needed, for instance of the frequency of certain events within certain patient groups. To the extent that external parties have access to the data, appropriate agreements exist to ensure an appropriate level of data protection.

Moreover, we transmit the data in accordance with our statutory reporting obligations to supervisory authorities inside and outside the EU as well as to contractual partners inside and outside the EU, to the extent that this is necessary to fulfil our statutory documentation and reporting obligations relating to the safety of drugs and medical devices, we make the data



available within our central drug safety database to a closed user group consisting of the employees of STADA Arzneimittel AG, its subsidiaries and external service providers directly entrusted with tasks relating to the safety of drugs and medical devices. Other employees of STADA Arzneimittel AG, its subsidiaries and external service providers only receive anonymous evaluations of this data as needed, for instance of the frequency of certain events in certain patient groups. To the extent that external parties have access to the data, appropriate agreements exist to ensure an appropriate level of data protection.

Furthermore, we transmit the data in accordance with our statutory reporting obligations to supervisory authorities inside and outside the EU as well as to contractual partners inside and outside the EU, to the extent that this is necessary to fulfil our statutory documentation and reporting obligations. To the extent that data is transferred to contractual partners, corresponding protection agreements exist.

### **13. Special products**

The BfArM's (Federal Institute for Drugs and Medical Devices) approval requirements mean that for special preparations we are obligated to document which doctor and which pharmacy prescribed or requested a certain preparation.

For this purpose we process the personal data of the pharmacy placing the order, which is communicated by the pharmacy stamp on the order fax. With regard to the prescribing doctor, the following personal data is collected and processed: Name, hospital/outpatient clinic, contact address and doctor identifier number.

The legal basis for this processing is Article 6 (1) c GDPR. This means you are legally required to provide this personal data. This means that you are obligated to provide us with your personal data if you prescribe or order such medication.

We transmit your data to authorities if requested.

Your data will be processed mainly in Germany. However, it may also be possible for foreign affiliated companies to access the data, for example for the purposes of maintaining our IT systems.

### **14. Visitor book/visitor management system**

When visiting our locations, visitors (employees of external companies or other visitors) are requested to register in our visitor book/visitor management system or they are entered in such a system.

We process this data to ensure security at our sites. The legal basis for this is our legitimate interest within the meaning of Article 6 (1) f GDPR in the safety of our locations.

You are not legally required to provide your personal data, but this is necessary to ensure security at our sites. This means that you are not legally obligated to provide us with your



personal data. If you decide not to provide us with your personal data, you cannot enter our locations.

If needed, we transfer your personal data to the following categories of recipients: security service providers, IT service providers, waste disposal services, possibly to auditors and, in the event of substantiated suspicions, possibly to external authorities.

Processing takes place exclusively in Germany.

Your data will be processed mainly in Germany. However, it may also be possible for foreign affiliated companies to access the data, for example for the purpose of maintaining our IT systems.

#### **15. Requests for samples (health data in some cases)**

We offer the possibility of receiving samples of our products in the scope of marketing campaigns.

If you decide to order these samples, we will process the following personal data on you: Name, title, contact details, e-mail and possibly your telephone and fax numbers and, if applicable, data on your illness for the purpose of processing the sample requests.

The legal basis for processing is our legitimate interest pursuant to Article 6 (1) a GDPR.

You are not legally or contractually required to provide your personal data. This means that you are not obligated to provide us with your personal data. If you decide not to provide us with your personal data, however, it will not be possible to process your request or, in turn, to send the requested samples.

We transfer your personal data to the categories of recipients assisting us in this process; this includes in particular IT service providers and shipping services.

Your data will be processed mainly in Germany. However, it may also be possible for foreign affiliated companies to access the data, for example for the purpose of maintaining our IT systems.

#### **16. Publication of photos and videos**

At internal and external events, we may take photos and videos. This involves processing the footage or images of the persons concerned and possibly the names of the persons depicted. The purpose of this processing is to carry out internal and external communication measures.

The legal basis for this processing is your consent (Article 6 (1) a GDPR). In certain cases, which are defined by the exceptions set forth in Section 23 German Art Copyright Act (KUG), the legal basis can be our legitimate interest under Article 6 (1) f GDPR.



You are not legally or contractually required to provide your personal data. This means that you are not obligated to provide us with your personal data. If you decide not to provide us with your personal data, no photos of you will be taken or published.

We transfer your personal data to the categories of recipients assisting us in this process; this includes in particular IT service providers.

Your data will be processed mainly in Germany. However, it may also be possible for foreign affiliated companies to access the data, for example for the maintenance of our IT systems.

### **17. Facebook Messenger**

As part of the publication of the Health Report, STADA provides a chatbot via the Facebook Messenger in which questions from the Health Report are answered. By clicking on the advertisement, you will be directed to the Facebook Messenger, where a conversation (survey) with our chatbot starts. Participation is voluntary! The legal basis for the processing of your data in this regards is your consent. You can withdraw your consent anytime with effect for the future (for details regarding exercising your rights, please see below). For the purpose of the survey, we process your profile name, which is transferred to us by Facebook and the answers from the chatbot. We analyze this data only anonymously. Please note that based on your answers, conclusions regarding your health data might be possible. However, we will never connect these to your personal data. Addresses and Links to the data privacy information of Facebook: Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA; <https://www.facebook.com/policy.php>; further information on data collection: <http://www.facebook.com/help/186325668085084>, <http://www.facebook.com/about/privacy/your-info-on-other#applications> as well as <http://www.facebook.com/about/privacy/your-info#everyoneinfo>. Facebook is licensed under the EU-US-Privacy-Shield, <https://www.privacyshield.gov/EU-US-Framework>.

### **18. Special Measures during Corona Pandemic**

If you visit one of our locations during the corona pandemic, you may be asked to provide a self-assessment regarding your contact with infected people and your recent travel activities. This data will not be transferred to third parties and only will be stored internally for a period of max. 3 months.

You may also be asked to have a fever measurement. If the measured temperature is below 37.8 ° C, no personal data of you will be collected and stored. If your temperature is above this temperature you will not be allowed to enter the companies premises and you data will be stored. The fever measurement is carried out by an external security company and the external company doctor. Both service providers are obliged to comply with data protection.

The legal basis for the processing of data in the context of these measures is our legitimate interest in accordance with Art. 6 (1) f GDPR and the protection against serious cross-border health risks in accordance with Art. 9 (2) i GDPR.



If individual service providers or affiliated companies are located outside the EU, there may not be an adequate level of data protection compared to the level of data protection within the European Union. This means that the data protection laws in this country, to which your data may be transferred, do not offer the same protection as in Germany.

We have therefore taken appropriate protective measures to ensure data protection: a global Group-wide Code of Conduct, standard contracts for contract processing or standard contract clauses within the STADA Group and with external service providers.

The Code of Conduct can be downloaded from [https://www.stada.de/fileadmin/user\\_upload/A\\_stada.de/5\\_Investor\\_Relations.de/07\\_Corporate\\_Governance/STADA\\_Verhaltenskodex.pdf](https://www.stada.de/fileadmin/user_upload/A_stada.de/5_Investor_Relations.de/07_Corporate_Governance/STADA_Verhaltenskodex.pdf). Contracts for contract data processing have been concluded in accordance with Article 28 GDPR, the standard contractual clauses in accordance with EU requirements (<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32010D0087&from=DE>).

In the above cases, there is no automatic decision-making based solely on automated processing, including profiling, and which has legal implications or would affect you in any similar way.

STADA deletes personal data based on the following:

- Based on statutory or contractual deletion periods
- If processing is based on your consent, we process this data until you revoke your consent
- If we process the data in the context of a legitimate interest, we process the data until the time at which our legitimate interest no longer exists.

Under the rules of the EU General Data Protection Regulation you can assert the following rights vis-à-vis us:

- right to information
- right to rectification
- right to restrict processing
- right to erasure/right to be forgotten
- right to data portability
- right to object.

To exercise one of the rights listed above, you can contact us at any time: [compliance@stada.de](mailto:compliance@stada.de).

Our data protection officer can be contacted at: SPIE GmbH, Lyoner Straße 9, 60528 Frankfurt am Main or at [compliance@stada.com](mailto:compliance@stada.com).

Should you be of the opinion that we are processing your personal data in a non-compliant way, please contact us at [compliance@stada.de](mailto:compliance@stada.de). You also have the right to contact the data protection



supervisory authority. The following link takes you to the relevant supervisory authority:  
[https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html).