

OPELLA HEALTHCARE KFT.'S
PRIVACY NOTICE REGARDING DATA PROCESSING RELATED TO COMPANY LAW MATTERS

The purpose of this privacy notice is to provide You (as data subject of the data processing operation) with appropriate information regarding the handling of Your personal data by **Opella Healthcare Commercial Limited Liability Company** in line with the Regulation (EU) 2016/679 of the European Parliament and of the Council on the General Data Protection Regulation (hereafter referred to as "GDPR"), and by the Act CXII of 2011 on the right to informational self-determination and on the freedom of information (hereafter referred to as "Info. Act").

1. The data controller, the data protection officer's Hungarian contact person and contact information

The controller is Opella Healthcare Commercial Limited Liability Company (company registration number: 01 09 374797, address: **HU-1138 Budapest Váci út 133. „E” épület 3. emelet**) (hereafter referred to as "**Data Controller**").

Data Controller's appointed data protection officer (**Data Protection Officer, DPO**) is Lionel de Souza. The data protection officer's Hungarian contact person is **Dr. Márkus Fanni Réka** (postal address: **HU-1138 Budapest Váci út 133. „E” épület 3. emelet**; e-mail address: **fanni.markus@sanofi.com**; phone number: **+36 70 333 1502**).

In connection with any of your questions or the exercise of your right to self-determination of information, you may contact the Data Controller via <https://www.sanofi.com/en/data-protection-contact> by completing the webform; or if such completion is impossible for you, you may contact the Hungarian contact person of the Data Protection Officer.

2. Informational self-determination rights and remedies

If you have any comments, questions or complaints regarding the handling of your personal data, please contact the Data Controller directly.

You have various rights (information self-determination rights) related to the processing of your personal data, which are basically determined by the legal ground of data processing. This privacy notice indicates separately what rights you have in connection with the given data processing legal ground. Please note that the GDPR may specify additional conditions for exercising of a right, which may exclude or restrict the exercising of the right. Therefore, before exercising your right to self-determination of information, please read carefully this privacy notice and the provisions of the GDPR regarding the detailed content of Your rights.

(a) Right to withdraw consent (Article 7, section (3) of the GDPR)

You have the right to withdraw your consent to the data processing at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

(b) Right of access (Article 15 of the GDPR)

You have the right to receive feedback from the Data Controller whether the processing of your personal data is in progress and, if such processing is in progress, you have the right to access the personal data and other certain information specified in Article 15.

(c) Right to rectification (Article 16 of the GDPR)

You have the right to request rectification from the Data Controller regarding the personal data concerning you without delay. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement

(d) **Right to erasure ('right to be forgotten')** (Article 17 of the GDPR)

You have the right to have your personal data deleted without delay at your request, and the Data Controller is obliged to delete your personal data without delay if any of the conditions set out in Article 17 are met.

(e) **Right to restriction of processing** (Article 18 of the GDPR)

You have the right to request the Data Controller to restrict the processing if the conditions set out in Article 18 is met.

(f) **Right to data portability** (Article 20 of the GDPR)

You have the right to receive your personal data provided to the Data Controller in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller from the Data Controller if:

- processing of data with consent mentioned in Article 6 (1) (a) or Article 9 (2) (a), or
- is based on a contract declared in Article 6 (1) (b)

and data management is automated.

In exercising the right to data portability, you have the right (if technically feasible) to request the direct transfer of personal data between the Data Controller and the data controller.

If Your personal data rights are breached, You have the following options to seek remedy:

(a) You can contact the Data Controller or the data protection officer's contact person in Hungary at the contact details described in Section 1, as specified therein.

(b) You can file a complaint to the supervisory authority:

National Authority for Data Protection and Freedom of Information (address: 1055 Budapest Falk Miksa utca 9-11; postal address: 1363 Budapest, p.o.b.: 9; e-mail: ugyfelszolgalat@naih.hu; phone: +36 (1) 391-1400; webpage: www.naih.hu)

(c) You can file a legal action against the Data Controller

You are entitled to turn to court in case of breach of your personal data rights. To find more information about the competent court please visit the www.birosag.hu website.

3. **Applied data security measures**

This section contains the applied data security measures related to the data processing activity.

The digital documents containing personal data are processed by the Data Controller's "Policy on using information technology and solutions" standard operating procedure, which contains - including, but not limited to - followings:

- i. we use privileged allotment of access right to databases and regularly monitor the scope of persons with access right
- ii. we protect the IT system storing and processing personal data by firewall
- iii. regular backup and storage of the database storing personal data is also secured
- iv. we ensure continuity of operation of systems storing and processing personal data
- v. the IT system storing and processing personal data sends signals to authorized persons in case of repeated failed logins or if the system stops operating.

Physical documents containing personal data received by the Data Controller are stored in a closed manner only accessible by Sanofi employees authorized to access them.

4. **Accountability**

The Data Controller is responsible for ensuring lawfulness of any data processing activity carried out by it and, as part of this activity, Data Controller will have to be able to verify legal compliance as well ('accountability principle'). Accordingly, Data Controller processes documents and personal data included in them that are necessary for proving legal compliance in line with the relevant annex of the General Privacy Notice.

Such legal compliance documents can be including but not limited to the followings: consent of data subject (name, date, signature); in case of online consent: digital logs; contracts (name, title, signature, date); other correspondence and documents generated in connection with compliance of data processing operations (and personal data included in them). Such personal data are processed by Data Controller for 5 (five) years following termination of the given data processing operation.

5. **Characteristics of the data processing**

Purpose of data processing	Data processing related to company law matters
Description of the purpose of data processing	Processing of personal data to be reported to the company register and kept in the company register
Categories of personal data processed	in case of the auditor: name, name of the auditing company, address, date of establishment and date of termination of legal relationship or (if the relationship is terminated earlier than the date set in the company register) the effective date of termination of relationship. in other cases: name, tax identification number, place of residence, date of birth, mother's maiden name, position, date of establishing this legal relationship, date of termination of legal relationship in case of fixed-term representation; if the termination takes place earlier than the date indicated in the company register, the actual date of termination and the fact that a notarized copy of the authorization for representing the company or a signature countersigned by a lawyer or bar counsel has been submitted; if the person does not have Hungarian citizenship: address of Hungarian residence, passport identification number
Legal basis for data processing	fulfilling the legal obligation of data controller
Description of legitimate interest	-
Consequence of non-processing	the data controller is unable to fulfill its obligation prescribed by law (Act V of 2006 and Act V of 2013)
Duration of data processing	Duration according to relevant document retention list, which can be accessed from the intranet page (in Excel) currently: 30 years or 5 years from the termination of the data controller

Data subjects	those persons who hold a position that is part of the Company Register (not including employees of data controller for whom a separate Privacy Notice is applicable)
Source of personal information	directly from the data subject (or from the auditor company regarding the auditor)
The provision of data is based on a legal or contractual obligation	law (Chapter III of Act V of 2006, with special regard to the provisions of paragraph 24-26 and 30 (1); Book III of the Civil Code)
Is the provision of data a precondition for executing the contract? (Yes/No)	No
Is the data subject obliged to provide personal data? (Yes/No)	Yes
Possible consequences of not providing personal data	rejection of the request for registration of changes, initiation of legality supervision proceedings against the data controller with possible other legal consequences thereof
Is profiling done as part of the data processing activity? (Yes/No)	No
In the case of profiling, on what aspects is the profile compiled and what is the impact on the data subject?	N/A
DATA SECURITY MEASURES	
Description of data security measure	The description of the implemented Data Security Measure is included in the Privacy Policy.
Persons having access to personal data	staff of the Corporate and Legal Affairs Department of Data Controller
TRANSFER OF PERSONAL DATA	
Recipients	Court of Registration, Sanofi S.A., Sanofi-Aventis Zrt.
Nature of Recipient	Court of Registration: the body keeping the register of companies; Sanofi S.A. (France): data processor; Sanofi-Aventis Zrt: data controller (parent company)
Purpose of transfer	Court of Registration: compliance with the principle of company publicity and other related regulations; Sanofi S.A.: in the context of parent-subsidary; Sanofi-Aventis

	Zrt: fulfilment of contractual obligation at the level of the parent company
Transfer to a third country	N/A
Guaranties regarding data transfer	N/A
RIGHTS OF DATA SUBJECT TO CONTROL OF INFORMATION	
<i>(The description of the each right and the manner of exercising them are contained in the general client privacy policy of the Data Controller. Abbreviations Y = yes / N = no / C = according to the conditions included in the GDPR)</i>	
Withdrawal of consent	N
Access	Y
Correction	Y
Deletion	C
Restrictions on data management	C
Data Portability	N
Right to Object	N
Release from scope of decision made by automated processing	N/A
Complaint (to the Data Controller)	Y
Complaint (to supervisory authority)	Y
Initiation of a proceeding (at court)	Y
Other characteristics	
Further information regarding data processing:	-

6. Version information

This privacy policy was adopted on the 9th of June in 2023. The current version of this privacy policy is 1.0.