

# PRIVACY POLICY

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## 1. Introduction

Laboratoires Juvisé Pharmaceuticals (hereinafter “**Juvisé Pharmaceuticals**”, “**we**”) takes the utmost care to protect the personal data it collects and considers the protection of personal data to be of fundamental importance to the operation of its business. The personal data that we collect are protected and processed with the utmost care, in compliance with applicable legislation and in particular with the General Data Protection Regulation (EU) 2016/679 of April 27, 2016, known as the “**GDPR**”.

This Privacy Policy is directed to individuals outside our organization with whom we interact, including visitors to our website <https://www.juvisehcpportal.com/>

(hereinafter referred to as the “**Website**”), our prospects, clients, partners, healthcare professionals, patients or candidates (jointly, “**you**”).

As part of our commitment to protect your personal data in a transparent manner, we want to inform you:

- how and for what purposes Juvisé Pharmaceuticals uses and stores your personal data;
- the legal basis on which your personal data are processed;
- the categories of recipients of your personal data;
- of your rights and our obligations with respect to such processing.

## 2. Who is responsible for processing your data?

The responsible for processing your personal data is Laboratoires Juvisé Pharmaceuticals, a simplified joint stock company with a capital of € 304,499.00, registered with the Lyon Trade and Companies Register under number 509 059 879, having its registered office at 149 Boulevard Bataille de Stalingrad 69100 Villeurbanne, France.

## 3. What personal data do we process and for what purposes?

Juvisé Pharmaceuticals only collects and processes personal data about you for which it has legal bases. The legal bases include your consent (where you have given your consent to the processing of data), the contract (where the processing of data is necessary for the performance of the contract between Juvisé Pharmaceuticals and you), compliance with a legal obligation, and the “legitimate interests” of Juvisé Pharmaceuticals.

In the context of the processing of personal data, Juvisé Pharmaceuticals collects and processes the following data for the purposes detailed below:

| Purpose of the treatment  | Categories of personal data processed   | Legal basis of the processing operation  |
|---|---|--|
| <b>All data subjects/Website users</b>                                    |   |  |
| <b>Management of the Website and realization of audience measurements</b> | IP addresses, browser type, language, operating system, device information (including application and device identifiers), referring web page, pages visited, location and other cookie information (depending on the permissions you have given us). | We have a legitimate interest in the processing in order to allow you to access the Website and to carry out audience statistics where you have given us your consent. |

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| <b>Management of requests received via the contact form</b>   | Name, first name, country, email, phone number, status, subject and content of your message and attachments you may decide to join to your message.  | We have a legitimate interest in the processing of your data in order to be able to deal with your request and contact you.   |
| <b>All data subjects</b>  |  |   |
| <b>Ensuring security in particular in respect of:</b> <ul style="list-style-type: none"> <li>• access to premises (e.g. security passes and CCTV recordings);</li> <li>• preventing and managing incidents against persons or assets (e.g., thefts, assaults, degradations);</li> <li>• internal and external investigations made by authorities (e.g., CCTV recordings)</li> </ul> | Name, first name, image, date and time of entry/exit.  | Processing is necessary for the purposes of the legitimate interests pursued by Juvisé Pharmaceuticals in ensuring the security of premises and infrastructure. In some cases (investigations by authorities), the processing is necessary to comply with a legal obligation. |
| <b>Clients, prospects, suppliers, and partners</b>  |  |   |
| <b>Management of business development</b>   | Surname, first name, name of the company, address, telephone, email, position held within the company, data relating to the acts of canvassing carried out.  | The processing is necessary for the performance of measures prior to the conclusion of a contract with you, or because we have a legitimate interest in the processing in order to contact you.   |
| <b>Management of the relationship with our customers, suppliers and partners</b>  | Surname, first name, company name, address, telephone, email, position held within the company, data relating to the business relationship, billing data.  | The processing is necessary for the performance of the contract binding us or for the performance of measures prior to the conclusion of a contract with you, or because we have a legitimate interest in the processing in order to contact you.                             |
| <b>Job applicants</b>   |  |   |
| <b>Application and recruitment management</b>   | Surname, first name, email, address, telephone number, current position, level of experience, field of activity, interview reports, connection logs and, in general, all personal data appearing on your CV, covering letter or any other document to which you give us access in the context of your application. | We have a legitimate interest in the processing, in order to handle the applications we receive and to recruit profiles adapted to our needs.   |
| <b>Patients / Clinical research participants</b>  |  |   |

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|---|--|--|
| <b>Participation in clinical research projects conducted or sponsored by Juvisé Pharmaceuticals</b>   | Coded or pseudonymized health data, genetic data, age, sex, clinical history, treatments received, data from previous research projects or medical records, and any data collected as part of your participation in observational studies, registries, or cohorts. | The processing is based on your consent or on the performance of a task carried out in the public interest in accordance with the French Data Protection Act.  |
| <b>Reuse of health and research data for secondary purposes (e.g., retrospective analyses, real-world data, disease understanding)</b>  | Coded or pseudonymized data previously collected in the context of other studies, patient registries, or during routine care.  | The processing is based on the legitimate interest of Juvisé Pharmaceuticals, or on the public interest where applicable.  |
| <b>Healthcare professionals</b>   |  |  |
| <b>Identification and engagement of healthcare professionals for scientific collaboration, medical research, or participation in advisory boards</b>  | Surname, first name, professional contact details, specialty, employer or institution, professional biography, participation history in events or studies, and public data available from professional registries or platforms (e.g., LinkedIn).                   | The processing is based on the legitimate interest of Juvisé Pharmaceuticals to identify experts and collaborate with healthcare professionals.  |
| <b>Management of professional communications (promotional or non-promotional) sent to healthcare professionals</b>  | Surname, first name, professional contact details, specialty, job title, institution.  | The processing is based, depending on the case, on the healthcare professional's consent, collected via a dedicated form, or on the legitimate interest of Juvisé Pharmaceuticals to promote its products and services.  |
| <b>Identification and interaction with healthcare professionals for the purpose of sharing scientific and medical information about Juvisé Pharmaceuticals' products, therapeutic areas, or research activities</b> | Surname, first name, professional contact details, specialty, job title, institution, Interaction history with Juvisé Pharmaceuticals (e.g., inquiries submitted, topics of interest, attendance at events).   | The processing is based on Juvisé Pharmaceuticals' legitimate interest of to ensure safe and effective product use and maintain accurate scientific communication, or on Juvisé Pharmaceuticals' legal obligations, where applicable (e.g., pharmacovigilance, transparency requirements). |
| <b>Transparency obligations and compliance with legal requirements related to interactions with healthcare professionals</b>  | Surname, first name, professional identification number, nature and amount of benefits or agreements concluded with Juvisé Pharmaceuticals.  | The processing is based on compliance with a legal obligation (e.g., French Sunshine Act – Loi Bertrand).  |

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| <b>Organization of scientific and promotional events involving healthcare professionals</b>   | Professional contact details, travel and accommodation preferences, information required for hospitality arrangements, consent and preferences regarding participation.   | The processing is based on the execution of the contract binding Juvisé Pharmaceuticals and the healthcare professional or on its legitimate interest in the organization of its scientific and commercial activities.   |
| <b>Patients / Clinical research participants and Healthcare professionals</b>   |   |  |
| <b>Management of the pharmacovigilance system</b>   | <p>Healthcare professionals: surname, first name, professional contact details, specialty, job title, employer or institution.</p> <p>Patients: surname, first name, position, postal address, telephone number, e-mail or fax address of the person who reported the adverse event; first 3 letters of the surname and first name of the person exposed to the adverse event (unless he is the reporter himself), age, sex, treatment administered, medical history (health data).</p> | <p>The processing is based on compliance with a legal obligation (Articles L. 5121-22 et seq. and R. 5121-150 et seq. of the Public Health Code).</p> <p>The processing of health data is based on public interest in the area of public health (Article 9(2)(i) GDPR).</p>  |
| <b>Management and follow-up of product quality complaints reported by healthcare professionals (HCPs), patients, or other stakeholders, in order to ensure patient safety, comply with regulatory obligations, and implement corrective/preventive actions where required</b> | <p>Healthcare professionals: surname, first name, professional contact details, specialty, job title, employer or institution, nature of the complaint and context of the report.</p> <p>Patients: age or age range, sex, health information related to the complaint (e.g., reaction to product, underlying conditions).</p>   | <p>The processing is based either on (i) a legal obligation (compliance with product quality regulations), (ii) Juvisé Pharmaceuticals' legitimate interest to ensure product safety and continuous quality improvement.</p> <p>The processing of health data is based on public interest in the area of public health (Article 9(2)(i) GDPR).</p> |

#### 4. To which categories of recipients are your data transmitted?

Juvisé Pharmaceuticals guarantees the confidentiality of your personal data. The personal data that we collect, as well as those that are collected subsequently, are thus intended for us in our capacity as data controller. They may be communicated to the categories of recipients listed below for the purposes set out in this privacy policy. These operations are carried out on the basis of instruments that comply with the applicable regulations and are suitable for ensuring the protection and respect of your rights.

Thus, for the purposes stated above, Juvisé Pharmaceuticals may share your personal data with third parties, but only in the following cases:

- Juvisé Pharmaceuticals may use service providers, agents or suppliers to support and help manage internal operations. These third parties must at all times maintain the same levels of security as Juvisé Pharmaceuticals with respect to your personal data and are bound, where applicable, by a

legal agreement that requires them to maintain the confidentiality and security of your personal data and to process it only as specifically directed by Juvisé Pharmaceuticals;

- Juvisé Pharmaceuticals may disclose your personal data to:
  - some of its employees, who are also subject to a confidentiality obligation, and only for the purposes mentioned above;
  - its legal counsels; and
  - its designated Data Protection Officer (DPO), if you contact them;
- in addition, Juvisé Pharmaceuticals may share personal data (including coded or pseudonymized data) with healthcare professionals and staff involved in clinical research projects, acting under the responsibility or authority of the principal investigator;
- your data may be transferred to specialized providers acting as data controllers for their own research and analysis purposes (e.g., market studies concerning our products and services), on the basis of the legitimate interest of Juvisé Pharmaceuticals;
- clinical research associates or study technicians in the performance of their duties, under the responsibility of the investigator. In terms of pharmacovigilance, Juvisé Pharmaceuticals may transmit information relating to notified adverse events containing pseudonymized data from the person concerned by the adverse event to partners operating the medicinal product concerned outside the European Economic Area. These partners are located in a country with a level of protection adequate to that imposed by the GDPR or have been contractually imposed obligations equivalent to those laid down in the GDPR. In any case, the transfer of such data is only carried out subject to appropriate safeguards as required by the regulations on personal data;
- in the event of a merger or acquisition of Juvisé Pharmaceuticals, in whole or in part, by another company or if Juvisé Pharmaceuticals was to sell or dispose of all or part of its business, the purchaser would have access to information collected by Juvisé Pharmaceuticals, and in particular personal data, subject to applicable laws. Similarly, personal data may be transferred in the context of a corporate restructuring, insolvency proceedings or any other similar event, if permitted by and in accordance with applicable law;
- Juvisé Pharmaceuticals may also disclose your personal data when required to do so by law to legally authorized authorities to fulfill its legal, regulatory or contractual obligations, including pharmacovigilance. This includes national, European or international health authorities (e.g., ANSM, EMA, FDA), public oversight bodies, administrative or judicial authorities, and Juvisé Pharmaceuticals' legal counsel in the context of litigation or pre-litigation proceedings.

In all cases, Juvisé Pharmaceuticals will make its best efforts to ensure the confidentiality and security of the personal data collected when it is transmitted to the aforementioned persons.

## **5. Do we transfer your data outside the European Economic Area?**

Yes, your personal data may be transferred outside the European Economic Area (EEA) in limited and regulated circumstances.

Such transfers may occur, in particular:

- in the context of pharmacovigilance activities, where pseudonymized data relating to adverse events must be shared with partners operating the medicinal product in countries outside the EEA, in particular where the local marketing authorization holder is subject to national regulatory obligations requiring notification of adverse events that occurred abroad;
- in the event of a merger, acquisition, or restructuring involving Juvisé Pharmaceuticals, where such transfers are necessary and lawful.

In all such cases, Juvisé Pharmaceuticals ensures that personal data is transferred in accordance with applicable data protection rules. These transfers are carried out only if:

- the recipient is located in a country that benefits from an adequacy decision by the European Commission; or
- appropriate safeguards are in place, such as the use of standard contractual clauses (SCC) or equivalent legal mechanisms ensuring a level of protection essentially equivalent to that provided under the GDPR.

Juvisé Pharmaceuticals also ensures that all recipients of personal data outside the EEA are contractually bound to comply with strict confidentiality and data protection obligations.

## 6. For how long do we keep your data?

The retention periods we apply to your personal data are limited and proportionate to the purposes for which they were collected. The length of time we retain personal data is variable and determined by various criteria, including:

- the purpose for which we use them: Juvisé Pharmaceuticals must retain the data for the period of time necessary to fulfill the purpose related to the treatment; and
- legal obligations: legislation or regulations may set a minimum length of time for which we must retain personal data.

In particular, Juvisé Pharmaceuticals applies the following data retention periods:

- contractual data: retained throughout the duration of the agreement and for five (5) years after the end of the contractual relationship;
- commercial prospecting data: retained for the duration of the business relationship and for up to three (3) years from the last contact, or until unsubscription (objection or withdrawal of consent, depending on the applicable legal basis);
- pharmacovigilance data (adverse event notifications), quality management and products complaints: retained for the entire duration of the marketing authorization and for at least ten (10) years after its expiration, in accordance with applicable regulations;
- CCTV: images are deleted after seven (7) days of retention;
- job applications: retained for a period of two (2) years from our last contact.

We organize our data retention policy according to these criteria and are at your disposal to answer any questions you may have. For any specific question, you may contact us at the email address indicated at the end of this policy.

Furthermore, your data is kept until you request its deletion. If you request deletion, all your data will be permanently deleted within thirty (30) days of your request, insofar as such deletion is permitted by the regulations in force.

## 7. What rights do you have over your data?

**Your right to information** - This Privacy Policy informs you of the identity of the controller, the purposes and legal basis for which your data is processed, the duration of the storage of your data and the recipients or categories of recipients with whom your personal data is shared and your rights. If we decide to process data for purposes other than those indicated, you will be informed of these new purposes.

**Your right to access and rectify your data** - You have the right to access and rectify your personal data. In this respect, you have confirmation that your personal data is or is not processed and when it is processed, you have access to the data we have about you.

You can also ask us to correct or complete your personal data if they are inaccurate, incomplete, ambiguous or out of date, as the case may be.

**Your right to have your data deleted** - You may request the deletion of your personal data if one of the following reasons apply:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- you withdraw the consent previously given;
- you object to the processing of your personal data where there is no legal reason for such processing;
- the processing of personal data does not comply with the provisions of the applicable laws and regulations;
- your personal data has been collected in the context of offering information society services to children under the age of 16.

Nevertheless, the exercise of this right will not be possible when the retention of your personal data is necessary in view of legislation or regulations and in particular for example for the observation, exercise or defense of legal rights or the monitoring of pharmacovigilance events.

**Your right to limit data processing** - You may request the limitation of the processing of your personal data in the cases provided for by laws and regulations.

**Your right to object to data processing** - You have the right to object to the processing of personal data concerning yourself when the processing is based on the legitimate interest of the data controller.

**Your right to portability of your data** - You have the right to portability of your personal data. This right is limited to processing based on consent or contract. This right does not include derived or inferred data, which are data created by Juvisé Pharmaceuticals.

**Your right to withdraw your consent** - Where the data processing we carry out is based on your consent, you may withdraw it at any time. We will then stop processing your personal data without jeopardizing any previous transactions for which you have consented.

**Your right to obtain a copy of the safeguards put in place for transfers outside the EU** - When we transfer personal data to a third country or an international organization located in a territory that does not benefit from an adequacy decision issued by the European Commission, you can obtain a copy of the safeguards we have put in place with the third party recipient.

**Your right to appeal** - You have the right to lodge a complaint with the CNIL on French territory, or with any other supervisory authority, without prejudice to any other administrative or jurisdictional recourse.

**Your right to issue post-mortem instructions** - You have the right to issue instructions regarding the storage, deletion and disclosure of your personal data after your death to a trusted, certified third party who is responsible for enforcing the wishes of the deceased in accordance with the requirements of the applicable legal framework.

**How to exercise your rights** - All the rights listed above can be exercised at the following email address [gdpr@juvise.com](mailto:gdpr@juvise.com) or by mail to the following address: Laboratoires Juvisé Pharmaceuticals, 149 Boulevard Bataille de Stalingrad 69100 Villeurbanne, France.

## **8. How do we protect your personal data?**

All useful precautions are taken to ensure the security and confidentiality of your personal data, in particular to prevent their loss, alteration, destruction or use by unauthorized third parties. We follow generally accepted standards, including the use of appropriate administrative, physical and technical safeguards to protect the personal data submitted to us and implement adequate technical and operational security measures. These measures take into account the sensitivity of the personal data we collect, process and store and the current state of technology.

In addition, we require our service providers and subcontractors who may have access to personal data to implement appropriate technical and organizational security measures with regard to such personal data.

In addition, employees of Juvisé Pharmaceuticals who may have access to your personal data because of their duties are subject to the utmost confidentiality in this regard.

However, while we strive to use reasonably acceptable means to protect your personal data, we cannot guarantee its absolute security or confidentiality, but we guarantee to make all reasonable efforts to prevent any misuse or loss.

## **9. Any questions?**

If you have any questions about this Privacy Policy or our data collection and cookie management practices, please contact us by sending us an e-mail : [gdpr@juvise.com](mailto:gdpr@juvise.com) or by mail to the following address: Laboratoires Juvisé Pharmaceuticals, 149 Boulevard Bataille de Stalingrad 69100 Villeurbanne, France.

## **10. Update**

We reserve the right to amend this policy to reflect changes in various regulations and practices.

Any changes we make to our policy will be published directly on this page of our Website. To ensure that you always have the latest version, we invite you to consult it online.