



PRIVACY POLICY

Dear Customer/Supplier,

Jetpharma SA is committed to ensuring the protection of the privacy of its customers and suppliers and to complying with data protection regulations. This policy indicates how we use and protect the personal data you provide to us. "Personal data" means any information concerning an identified or identifiable natural person. Personal data may, for example, concern legal representatives or employees of legal entities that are our customers or suppliers.

a) Identity and contact information of the Data Controller

The Data Controller of the personal data is Jetpharma SA, with head office in Balerna, Via Sottobisio 42 a/c, Tax IDI and VAT No. CHE-103.793.509 VAT (in short, "Data Controller"). You may contact the Data Controller using the following e-mail address: dataprotection@jetpharma.com.

b) Personal data that we process

We may collect the following information that is typically provided to us by the customer or supplier itself:

- name and job title;
- contact information including e-mail address;
- information related to services and/or products purchased;
- other information provided by the customer or supplier as part of the contractual relationship or in business contacts with us.

c) Purpose of the data processing

Personal data provided, including through the website, will be processed for the following purposes in particular (which are generally based on the need to perform the existing contract with customers and suppliers, on the fulfillment of legal obligations or on legitimate interests of Jetpharma SA):

- Performance of obligations arising from the contract to which the customer or supplier is a party;
- fulfillment, before or after the execution of the contract, of your specific requests;
- fulfillment of obligations and administrative-accounting activities;
- acquisition of pre-contractual data and information;





- management of transactions and compensation practices in case of damage suffered by third parties;
- judicial and/or administrative exercise of legitimate rights.

d) Recipients of the personal data and persons authorised to process the data

The data may be processed by representatives and/or employees of the Data Controller, delegated to achieve the purposes indicated above and therefore specifically authorised and adequately instructed by the Data Controller. The data will be processed by automated and non-automated means, using electronic instruments and computer storage media or paper documents, observing the rules of confidentiality and adopting adequate security measures as required by privacy legislation.

For the purposes described above, personal data may also be communicated to other entities of the Jetpharma SA's group and to certain categories of external third-parties in their capacity as data controllers; by way of example, supervisory or control authorities and organisations and generally public and private subjects entitled to request and/or receive the data, such as: insurance companies and credit institutions.

The data may likewise be processed on behalf of the Data Controller by external subjects engaged as data processors which perform specific activities on behalf of the Data Controller such as, by way of example, management of IT services, processing of administrative and accounting data for keeping company documents, and more generally provision of services for the management of the company and its individual areas.

In the context of IT services, the Data Controller may use cloud services, selecting suppliers from those which guarantee an adequate level of protection in accordance with the data protection legislation.

e) Transfer of data abroad

In the context of our relationship with you, we may disclose, transfer and/or store personal data abroad i) in connection with the conclusion or performance of contracts directly or indirectly related to our business relationship with you, ii) when disclosure is necessary to safeguard an overriding public interest, or iii) in exceptional cases provided for by applicable laws.

Transfers of data abroad may include transfers to jurisdictions that i) ensure an adequate level of data protection for the rights and freedoms of data subjects in relation to the processing, ii) benefit from adequacy decisions in relation to their level of protection (e.g., adequacy decisions of the European Commission or the competent Swiss authority), or iii) do not benefit from such adequacy decisions and do not offer an adequate level of data protection. In the latter case, Jetpharma SA ensures i) that adequate safeguards are provided, for example by using standard data protection contractual clauses



established by the European Commission accompanied by the necessary technical and organizational measures, or ii) that an exemption under data protection regulations is applicable.

In view of the fact that Jetpharma SA's customers may be located anywhere in the world, their personal data may also be transferred anywhere in the world in the context of fulfilling contractual obligations. Otherwise, at present Jetpharma SA uses, for IT services involving the processing of personal data, only service providers located in Switzerland and Germany.

For further information on international transfers or appropriate safeguards, you may of course contact us.

f) Period of data retention.

Data will be retained for the duration of the relationship and, after its termination, until all related obligations have been fulfilled; in case of litigation, data will be retained for the duration of the litigation.

This is without prejudice to the further retention of data due to legal obligation (e.g., accounting records are retained for ten years) or in case of legitimate interest (e.g., contract documentation is in principle retained for ten years after termination of the contractual relationship).

g) Data security

We are committed to ensuring the security of the data we process. In order to prevent unauthorized access or disclosure, we have put in place appropriate physical, electronic and managerial procedures to safeguard and protect the information collected.

h) Rights of the data subjects

Pursuant to the data protection regulations you may exercise the right to access your personal data, the right to have it rectified or erased, the right to restriction of processing, the right to data portability and the right to object to processing. To exercise the above rights, you may contact the Data Controller by writing by mail to the above address or to the email address dataprotection@jetpharma.com.

i) Automated decision-making processes and profiling methods

In the establishment and execution of contractual relationships with customers and suppliers, Jetpharma SA does not use any automated decision-making processes or profiling methods. Should we use such procedures in individual cases, we will notify you accordingly where required by law.