



## HEALTH CARE PROFESSIONALS PRIVACY NOTICE

### 1. INTRODUCTION AND SUMMARY

At Bracco we recognize the importance of, and we are fully committed to, protecting the privacy of information related to Health Care Professionals (HCPs) and other medical professionals with whom we interact (altogether “HCPs”).

This notice includes information about what, why and how data are processed, as well as the rights of individuals.

References to “Bracco”, “group”, “affiliates”, “we”, “us” and “our” are references to Bracco Imaging S.p.A. and/or its worldwide branches and subsidiaries, including the Swiss subsidiary Bracco Suisse SA.

This Privacy Notice is aligned with the EU General Data Protection Regulation («GDPR») and the Swiss Data Protection Act («DPA»). However, the application of these laws depends on each individual case.

### 2. INFORMATION WE MAY PROCESS ABOUT YOU

We only keep information about you that is necessary for managing our relationship with you. Depending on the relationship, we may process information about you including:

- a) General information: such as name, postal and/or email address, phone number, date of birth;
- b) Professional information: such as job title, professional qualifications, professional licenses, employer/organization for which you work, networks and affiliates, programs and activities participated in, board memberships, professional conference and events, influence rankings;
- c) Professional credentials, educational and professional history, institutional and government affiliations, and information included on a resume or curriculum vitae (such as work experience, education, and languages spoken);
- d) Information about the Bracco Initiatives, products and activities in which you have been engaged;
- e) Details about our interactions with you (including tracking of electronic communication), your prescribing of our products and the agreements you have executed with us;
- f) Publicly-available information related to your practice;

- g) Assessment information: such as internal assessments, feedback, evaluations, classifications or performance ratings of your professional activities and outcomes.

### **3. SOURCES OF INFORMATION**

In most cases, we will collect information directly from you, although sometimes we will obtain information about you from alternative sources including, but not limited to: publicly accessible sources (such as websites, social media and other digital platforms, publication databases, journals, scientific societies, editorial board websites, national registries, professional directories and third party healthcare professionals databases), medical congress organizers, third party vendors and service providers acting on our behalf.

### **4. WHY WE PROCESS YOUR INFORMATION**

We will only process information for purposes permitted by applicable laws, which may vary depending on where you live and where we operate.

We may process information about you in order to:

- a) Conduct our business or scientific operations, for example: inviting you to our events or to participate in our activities, advising on activities involving HCPs and other scientific and commercial activities such as but not limited to the provision of scientific information, marketing and commercial communications as permitted, proposing you possible engagements and other collaborations in view of the organization of advisory boards or focus groups, meetings with internal and external experts, and other similar activities aimed at supporting the clinical development and use of Bracco's drugs and medical devices.

*Legal basis of processing:* in accordance with local practice, your data may be processed for the purposes of the legitimate interests pursued by Bracco in the framework of the scientific and commercial relationship between life sciences companies and HCPs. In some cases this processing is conditional on you having provided your explicit prior consent (in such case, consent can be withdrawn at any time) or is necessary for the performance of a contract between you and Bracco.

- b) Ensure a safe environment at our events, facilities and networks: we identify who attends them to address safety risks.

*Legal basis of processing:* the processing is necessary to safeguard vital interests of any individual.

- c) Comply with legal, regulatory, industry best practices and ethical obligations: for example, conducting fraud detection and prevention, reporting interactions with

HCPs for transparency purposes, complying with applicable laws, regulations and requests from governmental agencies and reporting obligations (including without limitation Pharmacovigilance); and complying with our policies.

*Legal basis of processing:* the processing is necessary for our compliance with a legal obligation or for the performance of a task carried out in the public interest.

- d) Enforce our rights, protect our intellectual property and the confidentiality of our information, and pursue legal remedies or limit the damages that we may suffer.  
*Legal basis of processing:* legitimate interest to protect our tangible and intangible assets and interests.

Moreover, Bracco may offer apps, special programs, activities, events or promotions or may sponsor clinical studies (“Initiatives”) that may have unique or additional specific terms, privacy notices and/or consent forms that explain how any information you provide will be processed in connection with the Initiatives.

## **5. WHERE WE PROCESS YOUR INFORMATION**

The headquarters of the Bracco Group are in Italy, with operations through our branches and subsidiaries in Europe, Asia, North America and South America. Information about individuals may be accessible to our headquarters in Italy, and to some of the Bracco Group affiliates, and as well as to selected vendors and partners, globally.

Accordingly, certain recipients may be located in any country worldwide. In particular, you must anticipate your data to be transmitted to any country in which the Bracco Group is represented by affiliates, branches or other office (<https://www.bracco.com/data-protection>) as well as to other countries in Europe and the USA where our service providers are located (such as Microsoft, SAP, Salesforce.com).

Where we process information in countries that may not provide the same level of protection as an individual’s own country, we will implement reasonable and appropriate legal and security measures to protect your information from unauthorized access, use or disclosure including, but not limited to, maintaining binding contracts that require appropriate protection of information about individuals. For residents in EEA or Switzerland: whenever we transfer your information outside of the EEA or Switzerland, we will take necessary steps to ensure that adequate safeguards are put in place to protect your information. Such safeguards may include, without limitation, the use of European Commission/Swiss authority approved standard contractual clauses.

## **6. DISCLOSURE OF YOUR PERSONAL INFORMATION**

We disclose individual information where this is reasonably required to pursue our legitimate business aims and as required by law. Information will be disclosed only in accordance with applicable laws, and appropriate safeguards will be established, where

possible, to protect your information. We may disclose information within the Bracco Group and its worldwide affiliates.

In order to conduct our business, we may also disclose information to third parties such as public/regulatory authorities/governmental bodies (governments, including health, social and benefits departments), third parties that provide services to us (such as conducting audits, IT services, assisting in health care compliance activities), business partners and collaborators (such as external scientists). If Bracco or all or part of its assets are acquired by a third party, personal information held by us about individuals will be included as transferred assets.

We may also disclose information to enforce any agreements we have with you or to protect our rights or the rights, property or safety of our employees, patients or others (e.g. visitors to Bracco stands/premises).

## **7. CLASSIFICATION, AUTOMATED DECISION MAKING AND YOUR RIGHTS**

Your personal data may be combined with other information we may already have about you or obtained through public means such as scientific and medical publications, national registries and the Internet. We may also carry out internal assessments, evaluations, classifications or ratings of your activities, and/or your site's performance (where applicable). Bracco may use an algorithm to tier HCPs according to their scientific or research activity (including publications) skills (such as years of experience and qualifications) and interests (e.g.: tracking of electronic communication). Applicable rates for invitation to our events and/or participation to our activities are set according to the tiering of HCPs but any final decision is taken by the individual.

## **8. INDIVIDUAL CHOICES: RIGHTS AND ACCESS TO INFORMATION**

### **Access, Revision, Deletion, Objection to Processing, Portability**

Under applicable data protection/privacy law, you have a right to request a copy of your information held by us.

You also have the right to revise, correct, or delete such information. These rights may be subject to limited legal and regulatory restrictions.

In certain circumstances, you can formally object to processing of your information, you may have the right to restrict aspects of the processing of your information, and you may have the right to ask for a copy of your data to be provided to you, or a third party as data controller, in a digital format.

### **Lodging a Complaint with Data Protection Authorities**

You may have the right to lodge a complaint directly with the relevant data protection authority or supervisory authority if you believe that we have processed information in a manner that is unlawful or breaches your rights under applicable data privacy law.

For residents in EU: You can find the relevant supervisory authority name and contact details under [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home.html>).

Without limiting any rights to complain directly to an authority, we are committed to protecting personal information, and complaints may be made directly with us.

## **9. HOW LONG WE RETAIN YOUR INFORMATION**

We aim to retain your information for no longer than is necessary for the specific purpose for which it was collected (e.g., three years after the last interaction with you for the provision of scientific information). Data may be retained for a longer duration where applicable laws or regulations require or allow us to do so.

This implies that we will retain the documents that we reasonably believe to (i) demonstrate that we have accurately performed our legal obligations and/or (ii) are instrumental to enforce our rights, for a period of time equal to the statute of limitation under applicable law, provided that we will adopt suitable security measures and we will not process any information about you that are available on those documents for purposes other than those identified in (i) and (ii) above.

## **10. PROTECTION OF INFORMATION - SECURITY**

We use appropriate technical and organizational measures to protect information. When handling the information of HCPs, we take reasonable steps to protect it from loss, misuse, unauthorized access, disclosure, alteration or destruction.

## **11. CHANGES TO PRIVACY NOTICE**

We may update this notice from time to time by posting any revisions on [www.braccoimaging.com](http://www.braccoimaging.com). Where any material revisions are made, we may directly notify individuals to do so, or may place a prominent notice on [www.braccoimaging.com](http://www.braccoimaging.com). Please regularly refer to this page for updates.

## **12. CONTACT US**

The data controller in relation to the information processed in accordance with this privacy notice is Bracco Imaging s.p.a., Via Egidio Folli, 50, 20134 Milano (MI), Italy, or its affiliate specified in the relevant communication provided to the data subject.

Without prejudice to the following, if you have any questions about this privacy notice, or if you wish to obtain more information about Bracco's privacy practices, or to exercise your rights above, or to make a complaint with us, you can contact us by e-mail to [dpo@bracco.com](mailto:dpo@bracco.com) or by postal mail to:

**Bracco Imaging s.p.a.**

Att.: Group Data Protection Officer Via Egidio Folli,50  
20134 Milano (MI)  
Italy

For France based HCPs:

**Bracco Imaging France SAS**

7, rue Léonard de Vinci, Bâtiment Pascal  
91300 Massy  
France  
E-mail: [donnees.personelles@bracco.com](mailto:donnees.personelles@bracco.com)

For Germany based HCPs:

**Bracco Imaging Deutschland GmbH**

Max-Stromeyer-Strasse 116 78467 Konstanz  
Germany  
E-mail: [dpo.bid@bracco.com](mailto:dpo.bid@bracco.com)

For Poland based HCPs:

**Bracco Imaging Polska Sp. z o.o.**

Horizon Plaza  
ul. Domaniewska 39A0 02-672 Warszawa Poland  
E-mail: [dpo\\_PL@bracco.com](mailto:dpo_PL@bracco.com)

For UK based HCPs:

**Bracco UK Limited**

Unit 15

Valley Business Centre

Gordon Road

High Wycombe

BUCKS

HP13 6EQ

E-mail: [dpouk@bracco.com](mailto:dpouk@bracco.com)

For Switzerland based HCPs:

**Bracco Suisse SA**

Via Ponteggia 23

6814 Cadempino

Switzerland

E-mail: [dpo@bracco.com](mailto:dpo@bracco.com)

Bracco Imaging s.p.a. additionally acts as our representative in the EEA according to article 27 GDPR (if necessary).

*Last Update: September 2023*