# **Privacy Policy**

Napo Therapeutics S.p.A. processes personal data in compliance with applicable legislation (EU Regulation 2016/679 – GDPR and Legislative Decree 196/2003 - Personal Data Protection Code). On this page you can find the specific information to interested parties provided by Napo Therapeutics S.p.A..

### **Introduction**

This privacy policy sets out how **Napo Therapeutics S.p.A.**, VAT code 11764390966, principal place of business in Via Matteo Bandello 15 - 20123 – Milano (Italy); contacts: <a href="mailto:privacy.thera@napo.eu">privacy.thera@napo.eu</a>; contacts of the Data Protection Officer: <a href="mailto:dpo.thera@napo.eu">dpo.thera@napo.eu</a> (hereinafter "**Napo Thera" or "we**") uses and protects your personal data when you visit our company website. This policy applies to the personal data for which Napo Thera acts as data controller; in other words, where we have control over what happens with your data and how this data is handled.

Napo Thera is committed to ensure that your privacy is protected and will only process your personal data in compliance with the General Data Protection Regulation or GDPR and the relevant national data protection legislation of EU Countries in which Napo Thera operates.

## How we use your personal data

If you visit our website we will process the technical data (such as your IP address) necessary for the correct functioning of the site.

If you send us any communication through the contact channels provided on the website, we'll also process your contact information and any further data that you decide to include in your communications, for the purpose of responding.

The legal basis of the processing is our legitimate interest in managing the website and in responding to communications.

The data will be retained for as long as it is necessary to achieve the purposes listed above.

We do not use cookies on our website.

## **Providing your personal data to others**

## Transfers to third parties

We may disclose your personal data to third parties in the following cases:

insofar as reasonably necessary for our business or administration purposes, under certain circumstances, there are third parties who provide technical, organisational or consultancy support services (*e.g.* IT-support or legal support) to us and may occasionally have access to your personal data in order to enable them to provide these services. All companies providing such support services are required to apply the same standards of protection as us and cannot use your personal data for their own purposes;

when disclosure is necessary to comply with a legal obligation to which we are subject.

Your personal data will not be transferred to third parties without taking appropriate protection and having a contractual agreement that assures the recipient will apply the same standards of protection.

We do not sell or rent your personal data to third parties.

#### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over these other websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites; and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the websites concerned.

### Your rights

It is important to know that you can exercise different rights which give you a certain control over your personal data. You can always contact our Data Protection Officer at <a href="mailto:dpo.thera@napo.eu">dpo.thera@napo.eu</a> to exercise your rights:

- Right to be informed about the purposes of the processing (see above).
- Right of access: you may, at any time, have access (obtain a copy) to the data that Napo Thera has for you or check if you are included in Napo Thera's database.
- Right to rectification: We take all reasonable steps to ensure that the data we hold is up to date. We encourage you from time to time to consult us to check that your data is up to date. If you find that your data is inaccurate or incomplete, you have the right to ask us to correct it.
- Right to object: you may object to the use of this data by Napo Thera and by its active partners.
- Right to erasure: you may request the deletion of your personal data held by Napo Thera.

- Right of limitation of processing: you may, ask for a limitation of processing when you have objected to the processing, when you dispute the accuracy of the data, or when you consider that the processing is illegal.
- Right of portability: you may ask Napo Thera to send your data to another data controller.

## **Questions and complaints**

If you have any questions or complaints on how Napo Thera processes your personal data, you can always contact our Data Protection Officer at the following e-mail: <a href="mailto:dpo.thera@napo.eu">dpo.thera@napo.eu</a>.

If you believe that our processing of your personal data infringes on your rights and/or on data protection laws, you also have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your continued residence, or the place of the alleged infringement, or in Italy (the EU Country where Napo Thera's registered headquarters are located). The Italian Data Protection Authority can be reached at <a href="https://www.garanteprivacy.it/">https://www.garanteprivacy.it/</a>.

We however kindly request that you present your complaints to our Data Protection Officer first, so that we can quickly find a suitable solution to your problem.