

PRIVACY NOTICE TO SUPPLIERS

1. PERSONAL DATA PROCESSED, PURPOSES AND LEGAL BASIS OF THE PROCESSING

"Personal Data" means data about natural persons processed by Napo Therapeutics S.p.A. in order to manage the contractual relationship with its suppliers and their employees. Specifically, said Data will be processed for the purposes listed below.

A. **Management of the contractual relationship**, such as: answer to requests of the supplier before the conclusion of the contract; conclusion, modifications, execution of the contract; provision and management of related services; management of complaints or disputes.

The legal bases for the processing in relation to the aforementioned purposes are:

- The fulfilment of contractual obligations and/or execution of pre-contractual measures adopted at the request of the data subject, for contracts entered into directly with the data subject;
- The legitimate interest (to manage and execute the contract) for the processing of the data of the supplier's employees.

B. **Administrative – accounting**, such as: invoicing, payment, accounting, organization of business activities.

The legal bases for the processing in relation to the aforementioned purposes are:

- The need to comply with the obligation to keep lawful accounts;
- The legitimate interest in the administrative management of the contractual relationship.

C. **Fulfilment of legal obligations** under national or European Union law, such as occupational health and safety and crime prevention obligations.

The legal basis for the processing is the need to comply with a legal obligation to which the data controller is subject.

D. **Exercise and/or defense of rights**, such as: management of any disputes, protection and recovery of credits.

The legal basis for the processing is legitimate interest.

2. RETENTION PERIOD

The data will be processed for the duration of the contractual relationship and, after its termination, until the statutory limitation period for mutual claims is over. In the event of legal disputes, the data will be retained for its entire duration, until the dispute is fully resolved.

3. METHODS OF DATA PROCESSING

The processing of personal data may be carried out both manually and/or with electronic or automated means, with methods and procedures strictly necessary for the pursuit of the purposes described above.

4. SCOPE OF COMMUNICATION, SUBJECTS AUTHORIZED TO PROCESS

The Data may be communicated to external parties operating as independent data controllers, such as public or private entities allowed to process the Data (e.g. public administrations, banks and credit institutions, lawyers and other professionals).

The Data may be processed, on behalf of the Data Controller, by suppliers designated as data processors, inasmuch as necessary for the performance of their services.

The Data may be processed by the Data Controller's employees, who have been expressly authorised and have received operating instructions.

The Data are not subject to widespread diffusion.

5. TRANSFER OF DATA TO THIRD COUNTRIES

Personal data will be transferred to the USA, as the IT infrastructure used by Napo Therapeutics S.p.A. for data processing is provided by the parent company Napo Pharmaceuticals Inc., based in San Francisco, California.

Data security is ensured by the obligation, assumed by both companies, to comply with the Standard Contractual Clauses drafted by the European Commission.

6. PROVISION OF DATA

Any refusal by the data subject to provide personal data may make it impossible for Napo Therapeutics S.p.A. to comply with legal obligations, or to stipulate or correctly execute the contract or service. In this case, without prejudice to the right of the data subject not to provide his/her data, the Data Controller reserves the right to suspend, interrupt or not establish the contractual relationship.

7. DATA CONTROLLER

The data controller is Napo Therapeutics S.p.A., C.F. 11764390966 and P.I. 11764390966, with registered office in Via Matteo Bandello, 15, 20123 Milan, contacts: privacy.thera@napo.eu.
The Data Protection Officer of the controller can be contacted at dpo.thera@napo.eu.

8. RIGHTS OF THE DATA SUBJECT

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 dpo.thera@napo.eu to exercise your rights:

- Right to be informed about the processing of your data (see this privacy notice).
- Right of access: you may, at any time, have access (obtain a copy) to the data that Napo Therapeutics has for you or check if you are included in Napo Therapeutics' 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 Therapeutics and by its active partners.
- Right to erasure: you may request the deletion of your personal data held by Napo Therapeutics.
- 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 Therapeutics to send your data to another data controller.

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: dpo.thera@napo.eu.

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.

9. PROCESSING OF THIRD PARTIES' PERSONAL DATA

The supplier is informed that, if it makes use of its employees or partners (including any subcontractors) in executing the contractual relationship, the personal data of the latter may be processed by Napo Therapeutics S.p.A., in its capacity as data controller, for the purposes referred to in point 1. Such processing has the same purposes, methods and retention periods described in this policy; in relation to such processing, the data subjects have the same rights identified in point 8.

The supplier is responsible for correctly informing its employees and partners about the aforementioned processing, by forwarding them this privacy notice.