

Privacy Policy

Napo Thera may change its Privacy Policy from time to time. We encourage you to review this Privacy Policy periodically from our website.

This page was last modified on 28 Apr 2026.

Introduction

This privacy policy sets out how **Napo Therapeutics S.p.A.** (hereinafter “**Napo Thera**” or “**we**”) uses and protects your personal data.

Napo Thera is a pharmaceutical company with its corporate domicile and principal place of business at Via Matteo Bandello 15 - 20123 – Milano (Italy) and listed on the trade register of the Chamber of Commerce under number 11764390966, contacts: privacy.thera@napo.eu; contacts of the Data Protection Officer: dpo.thera@napo.eu. 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 conformity with the General Data Protection Regulation or GDPR (in effect since May 25, 2018) and the relevant national data protection legislation of Countries in which Napo Thera operates. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy policy.

How we use your personal data

Profile data or customer relationship data

We may collect and store the following information on our **customers and business partners (or their personnel)** to create profiles in order to facilitate the administration of our services and to maintain contact:

- name, surname and job title
- contact information including telephone number or email address
- internet protocol (IP) address
- demographic information such as postcode
- other information relevant to customer and/or job offers

The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR our legitimate interests, namely the proper administration of our website and business, our relationships with customers, communicating with customers and keeping records of those communications.

When you voluntarily provide us this information through our websites or any other information channel, the personal data provided by you will be used only for the purpose of responding to your query or your request for information. We will not use this personal data for direct marketing purposes.

Job applicant data

If you post your personal data as a **job applicant**, the personal data provided by you will be used for recruitment and employment purposes or –if you agree to this- for informing you of future job opportunities. The legal basis for this processing is taking steps, at your request, to enter into a contract between you and us. For more information, please refer to job applicant privacy policy (contacts: privacy.thera@napo.eu).

Clinical trial data

If you are a **patient** you may participate in clinical trials of Napo Thera products in order to further research and develop these therapeutic drugs. By giving consent to participate in such clinical trials, the doctor or investigator conducting the clinical trial will collect your personal data, including data relating to your health and pharmaceutical needs. Napo Thera receives this information in a pseudonymized form, which means that we do not receive data such as your name or address (or any other contact information) so that we cannot directly identify you. On occasions, Napo Thera employees or contractors working on behalf of Napo Thera, may however access the patient's personal data at the source of data collection for the purpose of verifying data. The patient data will only be processed for scientific research purposes with appropriate safeguards in place.

Personal data about the **doctors and investigators** conducting clinical trials and people who assist them is collected by Napo Thera as well. In general, the type of this information includes the name, address, telephone details, field of expertise, position, role in study and qualifications, and includes information provided on Curricula Vitae and Financial Disclosure Forms (US) or Declaration of Interest (EU). Napo Thera is required to obtain such data on potential or actual investigators in order to maintain the quality of the clinical trials (legitimate interests and the performance of contracts, or taking steps, at your request, to enter into this contract) and consistently meet global regulatory and compliance guidelines (legal obligation).

For more information, please refer to patient or doctor/investigator privacy policies (contacts: privacy.thera@napo.eu).

Data about visitors of our website

If you visit our website we will process the technical data (such as your IP address or other technical information) 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 to manage the website and to respond 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 the purposes of managing our relationship with our parent company (Napo Pharmaceuticals, Inc.), to receive from and provide services to it;
- insofar as reasonably necessary for our business or administration purposes. Under certain circumstances, these third parties provide technical, organisational or consultancy support services (*e.g.* IT-support or legal support) 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 for compliance with a legal obligation to which we are subject; or
- when we have your consent to disclose your personal data.

Your personal data will not be transferred to third parties without taking appropriate protection (i.e. encryption, such as the Secure Socket Layer (SSL) protocol, password, secured connection...) and having a contractual agreement that assures the recipient will apply the same standards of protection.

We will never sell your personal data to third parties.

For more details on data transfers please refer to our dedicated privacy policies to suppliers, patients, employees/applicants and doctors/investigators (contacts: privacy.thera@napo.eu).

International transfers

We have offices and facilities in EU and US, and may collaborate with other partners outside the EU as well. Transfers of your data outside of EU countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted and approved by the European Commission.

For more details on international transfers please refer to our dedicated privacy policies to suppliers, patients, employees/applicants and doctors/investigators (contacts: privacy.thera@napo.eu).

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.

Retaining and deleting personal data

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

For example, the period of retention of **job applicant data** will be no longer than two (2) years. and the period of retention of **clinical trial data** will be at least twenty five (25) years after the completion of the trial.

For more details on data retention please refer to our dedicated privacy policies to suppliers, patients, employees/applicants and doctors/investigators (contacts: privacy.thera@napo.eu).

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 dpo.thera@napo.eu 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 on you or check if you are included in the database of Napo Thera.
- 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: 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. You may do so in the EU member state of your habitual residence, your place of work 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 <https://www.garanteprivacy.it/>.

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

