

## PRIVACY NOTICE FOR BUSINESS PARTNERS

*In accordance with the European Union Regulation 2016/679 ("GDPR"), the UK Data Protection Act 2018 ("UK GDPR") and the Federal Act of on Data Protection of the Swiss Confederation ("FADP")*

APR Applied Pharma Research s.a. ("APR"), in the context of its commercial relations, processes personal data of contact persons related to its business partners ("Business Partners"), including officers, directors, employees, sub-contractors and consultants (each, a "Data Subjects"). In consideration of the foregoing, APR hereby provides the Privacy Notice for Business Partners.

### 1. DATA CONTROLLER



The data controller is **APR Applied Pharma Research SA**, a company existing under the laws of Switzerland, fully owned by RELIEF THERAPEUTICS Holding SA and having its register office at Via Corti 5, CH - 6828 Balerna, Switzerland, VAT CHE-101.714.120. APR can be contacted by phone at 0041 91 6957020 or at the following email address: [privacy@apr.ch](mailto:privacy@apr.ch).

### 2. DATA PROTECTION OFFICER



APR has appointed a Data Protection Officer who can be contacted at the following email address: [dpo@relieftherapeutics.com](mailto:dpo@relieftherapeutics.com)

### 3. REPRESENTATIVES IN EU AND UK



- 3.1. APR has appointed, as its representative in the European Union, **APR Applied Pharma Research SA - Italy S.r.l.**, a company existing under the laws of Italy and having its registered office at Corso Vittorio Emanuele II, 154 - 00186 Rome, Italy, VAT 03736410139, which can be contacted by phone at 0039 066869927 or at the following email address: [privacy@apr-italy.it](mailto:privacy@apr-italy.it).
- 3.2. APR has appointed, as its representative in the United Kingdom, **Rickert Services Ltd UK**, PO Box 1487, Peterborough, PE1 9XX, United Kingdom who can be contacted by email at [art-27-rep-apr@rickert-services.uk](mailto:art-27-rep-apr@rickert-services.uk).

### 4. PURPOSES AND LEGAL BASES OF THE PROCESSING



- 4.1. APR processes the personal data of the Data Subjects for the following purposes:
  - (a) carrying out pre-contractual activities, including the organization of meetings and the exchange of communications;
  - (b) management of the contractual relationship, including dealing with pre/post-sales assistance and administrative-accounting operations, processing payments, performing auditing activities;
  - (c) execution of the contract;
  - (d) ensuring compliance with legal obligations, including accounting and tax requirements;
  - (e) defense of its rights and interests in court and out-of-court;
- 4.2. For the purposes referred to in letters (a), (b) and (c), the legal basis of the processing is the performance of pre-contractual activities and the execution of the contract with the Business Partner.
- 4.3. For the purposes referred to in letter (d), the legal basis of the processing is the fulfillment of legal obligations imposed on APR.
- 4.4. For the purposes referred to in letter (e), the legal basis of the processing is the legitimate interest of APR in the proper management of its commercial relations and the protection of its rights.

### 5. CATEGORIES OF PERSONAL DATA



- APR processes the following categories of personal data:
- (a) identification data, such as such as full name and title of the Data Subjects;
  - (b) contact data, such as telephone number, email address of the Data Subjects;
  - (c) data relating to the professional role performed by the Data Subjects, such as work address, work telephone number, and work email address;
  - (d) bank and payment details.

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### 6. SOURCE OF PERSONAL DATA



APR may collect the personal data directly from the Data Subject or from the Business Partner.

### 7. RECIPIENTS OF THE DATA



Within the limits relevant to the purposes, the personal data may be communicated by APR:

- (a) to affiliated companies within the RELIEF THERAPEUTICS Group;
- (b) when required, to governmental authorities, courts or agencies;
- (c) to services providers, including agents, freelancers, third-party companies, insurance companies, insurance intermediaries, law firms, banking institutions, transport companies.

### 8. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES



8.1. APR may transfer the personal data in Switzerland. The transfer is lawful, for the personal data protected under the GDPR, by virtue of the existence of an adequacy decision of the European Commission and, in case of personal data protected under the UK GDPR, of the UK Government.

8.2. APR may also transfer the personal data in a Country within the European Union. The transfer is lawful, in case of personal data protected under the UK GDPR, by the existence of an adequacy decision of the UK Government.

### 9. RETENTION PERIOD



The data collected will be kept by APR for a period not exceeding the achievement of the purposes for which they are processed or according to the deadlines provided for by law. The verification of the obsolescence of the data stored in relation to the purposes for which they were collected is carried out periodically.

### 10. OBLIGATION TO COMMUNICATE DATA



There are no statutory or contractual obligation to provide the personal data. In case the Data Subjects decide not to provide their personal data, APR will not be able to conclude the contractual relationship.

### 11. AUTOMATED DECISION-MAKING PROCESSES



There are no automated decision-making processes.

### 12. RIGHTS OF THE DATA SUBJECTS



Subject to the terms and conditions set forth in applicable laws and regulations governing the processing of personal data, the Data subject is entitled to: (i) the right to be informed about the collection and the use of their personal data; (ii) the right to access personal data and supplementary information; (iii) the right to have inaccurate personal data rectified, or completed if it is incomplete; (iv) the right to erasure; (v) the right to restrict processing; (vi) the right to data portability; (vii) the right to object to processing; (viii) rights in relation to automated decision making and profiling; (ix) the right to withdraw consent at any time provided that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal; (x) the right to complain to the data protection authority. The Data Subject may exercise its rights by sending a written request addressed to APR at the postal address or by e-mail, as indicated in the previous Section 1.