

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA OF REPORTED INDIVIDUALS AT ADARE PHARMACEUTICALS S.R.L.**

in accordance with Article 13 of the “GDPR - Regulation (EU) No. 679/2016,”  
as integrated by Legislative Decree No. 196 of 30 June 2003  
(as amended by Legislative Decree No. 101 of 10 August 2018)

Dear Sir/Madam,

In compliance with data protection regulations (pursuant to Regulation (EU) No. 679/2016 - General Data Protection Regulation - “GDPR” and the Italian Personal Data Protection Code - Legislative Decree No. 196 of 30 June 2003, amended by Legislative Decree No. 101 of 10 August 2018 - Provisions to align national law with Regulation (EU) 2016/679), we provide the following information on the processing of personal data concerning the management of reports under Adare Pharmaceuticals S.r.l.’s Whistleblowing Procedure. This notice does not cover reports submitted through external channels or public disclosures.

### DATA CONTROLLER

The Data Controller is: Adare Pharmaceuticals S.r.l., with its registered office at via Martin Luther King 13, 20042 Pessano con Bornago, represented by its Legal Representative.

### METHODS OF PERSONAL DATA COLLECTION

Your personal data is collected exclusively via the IT platform implemented by Adare to comply with the requirements of Legislative Decree 24/2023 regarding reporting violations of national and international law.

### TYPES OF DATA COLLECTED

Within the purposes and methods defined in this notice, the following data are processed:

- Data of the Reported Individual, provided by the Reporter within the report and/or obtained during the necessary investigative activities (e.g., interviews with third parties) and/or provided by the Reported Person if they are interviewed during the report management process;
- Data of individuals mentioned or otherwise involved in the report management process, provided by the Reporter within the report and/or obtained during the necessary investigative activities (e.g., interviews with third parties) and/or provided by the individuals involved during the report management process.

Specifically, the data subject to processing includes:

- Common personal data, such as the data subject’s identifying information, contact details, and information regarding their role/job function;
- Special categories of personal data under Article 9 of the GDPR, such as information related to the data subject’s health, political opinions, religious beliefs, and trade union membership;
- Personal data relating to criminal convictions and offences under Article 10 of the GDPR of the data subject.

Within the reporting procedure, only personal data that are clearly useful for processing the specific report will be collected. Should any personal data that is evidently unnecessary for managing the Report be collected, even accidentally, such data will be immediately deleted.

## PURPOSE OF DATA PROCESSING

The aforementioned personal data are processed by the Data Controller for the following purposes:

- Management of the Report submitted under Legislative Decree No. 24/2023.
- Fulfilling obligations set out by law or EU regulations;
- Exercising, defending, or establishing its own rights in civil, administrative, or criminal proceedings, in relation to or as a consequence of receiving reports.

The legal basis for processing is:

- For the purpose stated in the first point, the fulfilment of a legal obligation (the obligation to establish a reporting channel under Legislative Decree No. 24/2023) to which the Data Controller is subject. Therefore, pursuant to Article 6, paragraph 1, letter (c) of the GDPR, consent of the data subject is not required for this processing;
- For the purpose stated in the second point, the fulfilment of a legal obligation to which the Data Controller is subject. Thus, pursuant to Article 6, paragraph 1, letter (c) of the GDPR, consent of the data subject is not required for this processing;
- For the purpose stated in the third point, the legitimate interest of the Data Controller or third parties, represented by the right to establish, exercise, and defend their rights before any competent authority. Accordingly, under Article 6, paragraph 1, letter (f) of the GDPR, consent of the data subject is not required.

The provision of data is necessary to achieve the above purposes; failure to provide complete or accurate data may result in the inability to process the report.

## METHODS OF PERSONAL DATA PROCESSING AND SECURITY MEASURES

The processing of your personal data is carried out exclusively through the whistleblowing platform, which is equipped with all measures necessary to ensure data security and confidentiality in compliance with Legislative Decree No. 24/2023.

The Report Management System guarantees, at all stages, the confidentiality of the Reported Individual's identity, the identities of persons involved and/or otherwise mentioned in the Report, the content of the Report, and related documentation, except as provided under Article 12 of Legislative Decree No. 24/23

The Data Controller has requested documentation from the whistleblowing platform provider to support the platform's security requirements.

## PARTIES AUTHORISED TO PROCESS PERSONAL DATA AND DISCLOSURE

Data is currently processed and stored exclusively on the whistleblowing platform, accessible to the Managing Entity (authorised by the Data Controller via an appointment letter as Data Processor), the Platform Administrator (authorised by the Data Controller via an appointment letter as Designated Processor), and any internal (authorised by the Data Controller via an appointment letter as Designated Processor) or external parties to Adare (authorised by the Data Controller via an appointment letter as Data Processor) who intervene at the request of the Supervisory Body.

Reports and supporting documents are managed through the EthicsPoint application - Adare Pharmaceuticals, Inc.

No data is transferred to servers located outside the EU.

Where strictly necessary for the investigation of reports, your personal data may be communicated to:

- Internal personnel designated as competent to support the verification, specifically authorised by the Data Controller. These individuals will receive an appointment as Designated Processor, along with instructions on the methods and purposes of processing, and will be bound by confidentiality, privacy, and data security obligations;
- External parties (e.g., consulting firms, qualified professionals) designated as necessary to support verification activities and specifically appointed as Data Processors by the Data Controller. These parties will receive instructions on processing methods and purposes and will be required to uphold confidentiality, privacy, and data security obligations;
- Oversight bodies (e.g., Statutory Auditor) where identified as necessary to support the verification.

For legal compliance or in response to orders issued by authorised authorities, personal data may also be communicated to public bodies (e.g., judicial authorities, police bodies, ANAC) who will perform their respective processing activities as independent data controllers.

Additionally, at the end of the investigation phase, your data may be communicated to the Disciplinary Authority and/or relevant bodies for any subsequent actions.

In any case, only the data necessary to achieve the specific purposes for which they are intended will be communicated to the aforementioned recipients.

#### DATA RETENTION

Personal data will be retained for five years from the date of communication of the final outcome of the reporting procedure, in accordance with the data minimisation principle under Article 5, paragraph 1, letter (c) of the GDPR, as well as the legal obligations binding on the Data Controller.

In the event of legal proceedings, personal data will be retained for the duration of the proceedings, until all appeal options have been exhausted.

The platform automatically deletes expired reports at the end of the retention period in a secure manner.

The software provider will delete all reports on the platform 15 days after deactivation of the service, including those involved in judicial proceedings, following export and transfer of any non-expired reports to the Data Controller.

#### RIGHTS OF DATA SUBJECTS

The data subject, in the case of the Reported Individual, has the right to access their personal data at any time and to exercise the rights provided under Articles 15 to 22 of the GDPR, as applicable (including the right to access personal data, the right to rectification, the right to erasure or “right to be forgotten,” and the right to restrict processing) by sending an email to: [privacy.it@adarepharma.com](mailto:privacy.it@adarepharma.com). Additionally, the data subject has the right to lodge a complaint with the Data Protection Authority.

The Data Controller reserves the right to limit or delay the exercise of these rights to the extent and for the time necessary and proportionate, particularly where there is a risk of actual, concrete, and unjustifiable harm to the confidentiality of the Reporter’s identity or where it could impair the ability to effectively verify the validity of the Report or gather necessary evidence, in accordance with Legislative Decree No. 24/2023.

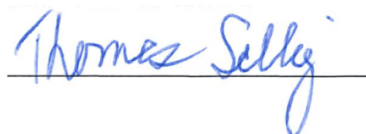
If the data subject believes that the Data Controller’s processing of personal data is in violation of Regulation (EU) 2016/679 or is based on unfounded reports — which may only be determined after an investigation — they have the right to lodge a complaint with the Supervisory Authority of the Member State in which they reside.

CHANGES TO THIS NOTICE

Any future changes to this notice will be made available on the company website.

This notice is effective as of 17 December 2023.

The Data Controller  
**For Adare Pharmaceuticals Srl**  
**Thomas Edward Sellig**

A handwritten signature in blue ink, reading "Thomas Sellig", is written over a horizontal line.