

PRIVACY NOTICE FOR BUSINESS PARTNERS

1. WHO WE ARE

Immedica Pharma AB, with registration number 556835-6322 (“**Immedica**”), is a Swedish pharmaceutical company commercializing medicinal products for rare diseases primarily in Europe and the Middle East. We are responsible for the processing of your personal data since we decide why and how the personal data is processed and are therefore the data controller under this Notice. Immedica may exercise this responsibility alone or jointly with other company(-ies) in the Immedica group. In this Notice, the terms “Immedica”, “we” or “us” refer to Immedica and its group companies.

2. ABOUT THIS PRIVACY NOTICE

For the purpose of the scope of this Privacy Notice for Business Partners (the “**Notice**”), the Notice applies to Immedica’s processing of personal data relating to you as representative/contact person of our business customers, distributors, licensor, licensee, manufactures, professional business consultancy provider, suppliers, contractors and other business service providers (collectively “**Business Partners**”). For personal data processed in relation to healthcare professionals, please be referred to Immedica’s Privacy Notice for Healthcare Professionals.

Immedica invites you to read this Notice, which sets out in which context we are processing information that relates directly or indirectly to you as an individual and explains your rights with respect to the processing of your personal information. Immedica is committed to ensuring that any personal data we collect is processed and protected in accordance with applicable data protection laws and Immedica policies and standards.

The purpose of this Notice is to clarify the way we are processing your personal data in connection with managing business relationships with our Business Partners. In this context, our activities include the processing of your personal data pertaining to contract and business relationship management, and services and activities that are adjacent thereto.

3. CATEGORIES OF PERSONAL DATA WE MAY COLLECT ABOUT YOU

Depending on how you interact with us and for what purpose, we collect and process different types of personal data about you. In order for you to more easily understand what type of personal data we may process about you, we have categorized the personal data into the following categories, including data elements:

Personal data that we may collect about you for purposes contemplated in this Notice	
Category	Description and examples of personal data
Contact Details	<ul style="list-style-type: none"> • First and/or last name, and/or initials • Working address • E-mail • Telephone/mobile number • Profession/Title/Position/Department • Social security/ID number (for instance if you provide the services as a sole trader) • Bank account details (either your own bank account details if you, for instance, perform services to us as a sole trader, or your employer’s bank account details)

Personal data that we may collect about you for purposes contemplated in this Notice	
Business Information	<ul style="list-style-type: none"> • Information processed in a project or in connection with the performance of activities under a contract • Ordering and payment management • Forecast management
Interactions Information	<ul style="list-style-type: none"> • Summaries of our interactions, for instance handling of inquiries or requests, management of business relationships, projects and communications

4. CATEGORIES OF RECIPIENTS WHO WE MAY SHARE PERSONAL DATA WITH

We may share or transfer your personal data to third parties. The table below describes the categories of such third-party recipients. Please see Section 7 where we specify in further detail in which instances we may share your personal data to third parties.

Category of third-party recipients	Description
Staff	Refers to employees or in-house consultants at Immedica
Authorities	Refers to national, local, regional or multinational authorities and public agencies or bodies
External Service Providers	Refers to third-party service providers appointed by or on behalf of Immedica for the provision of professional services which we cannot perform ourselves. Examples of external service providers are IT and software providers and business service consultants

Category of third-party recipients	Description
Business Partners	Refers to companies supporting Immedica in commercializing our products. Examples of business partners are contract manufacturers, wholesale and transport companies and license and distribution partners

5. HOW WE COLLECT PERSONAL DATA

Immedica collects personal data under this Notice in various ways, including:

- directly from you, for instance in connection with entering an agreement, when you do business with or perform services to us or when you otherwise interact with us;
- from our Business Partners (for instance the company for whom you work); and/or
- from other third parties or through publicly available sources.

6. FOR WHAT PURPOSES DO WE USE PERSONAL DATA AND WHAT LEGAL BASIS DO WE RELY ON

The table below explains the categories of personal data and the purposes for which Immedica processes your personal data in connection with interactions and cooperations with Business Partners. We have also described the legal basis we rely on and for how long we will store your personal data.

Purpose of the processing	Categories of personal data used for the purpose	Legal basis for the processing	Retention period
<p>To communicate with you or the company you work for about our products, services, cooperation and projects of Immedica or our business partners, e.g. by responding to inquiries or requests.</p>	<p>Contact Details, Business Information, Interactions Information</p>	<p>Legitimate interest, Contractual obligation</p>	<p>For personal data which relates to a contract (either the contract we have directly with you or through your company, or with your employer), the retention period is the duration of the contract, plus the time until the legal claims under the contract become time-barred.</p> <p>Personal data which is not related to a contract will be stored for thirty-six (36) months after your last interaction with you.</p>

Purpose of the processing	Categories of personal data used for the purpose	Legal basis for the processing	Retention period
To administer, plan, perform and manage the (contractual) relationship with you or the company you work for, such as performing transactions, negotiating agreements, handling/processing orders of products or services, manage purchase history, arranging shipments and deliveries, processing payments and invoices, performing accounting, auditing and billing.	Contact Details, Business Information, Interactions Information	Contractual obligation	For the duration of the contract, plus the time until the legal claims under the contract become time-barred.
To implement tasks in preparation of or to perform activities under existing contracts.	Contact Details, Business Information, Interactions Information	Contractual obligation	For the duration of the contract, plus the time until the legal claims under the contract become time-barred.

Purpose of the processing	Categories of personal data used for the purpose	Legal basis for the processing	Retention period
<p>To perform business planning and development, strategical reviews and evaluations.</p>	<p>Contact Details, Business Information, Interactions Information</p>	<p>Legitimate interest</p>	<p>For personal data which relates to a contract (either the contract we have directly with you or through your company, or with your employer), the retention period is the duration of the contract, plus the time until the legal claims under the contract become time-barred.</p> <p>Personal data which is not related to a contract will be stored for thirty-six (36) months after your last interaction with you.</p>

Purpose of the processing	Categories of personal data used for the purpose	Legal basis for the processing	Retention period
To improve the quality of our services by adapting our offering to your or your company's specific needs.	Contact Details, Business Information, Interactions Information	Legitimate interest	<p>For personal data which relates to a contract (either the contract we have directly with you or through your company, or with your employer), the retention period is the duration of the contract, plus the time until the legal claims under the contract become time-barred.</p> <p>Personal data which is not related to a contract will be stored for thirty-six (36) months after your last interaction with you.</p>
To archive and keep records (for instance record-keeping for calculating milestones, royalties and/or sales, keeping minutes from meetings).	Contact Details, Business Information, Interactions Information	Contractual obligation	For the duration of the contract, plus the time until the legal claims under the contract become time-barred.

Purpose of the processing	Categories of personal data used for the purpose	Legal basis for the processing	Retention period
To ensure compliance with legal obligations (such as tax, accounting, record keeping obligations), export control and customs, as well as to investigate alleged, actual or potential fraud, misconduct, infringements or other violations of legal rights and obligations.	Contact Details, Business Information, Interactions Information	Comply with legal obligations	For the duration of the contract, plus the time until the legal claims under the contract become time-barred.
To solve disputes, enforce our contractual rights under agreements and to establish, exercise or defend legal claims.	Contact Details, Business Information, Interactions Information	Contractual obligation	For the duration of the contract, plus the time until the legal claims under the contract become time-barred.

7. WHO WE MAY SHARE PERSONAL DATA WITH

Immedica will not share or transfer your personal data to third parties other than those indicated in this Notice. In connection with the activities and for the same purposes as those listed in this Notice, your personal data can be accessed by, or disclosed to, the following recipients with a justified need to access the information in accordance with applicable legislation:

Category of recipient	Categories of personal data
Staff	Contact Details, Business Information, Interactions Information
Authorities	Contact Details, Business Information, Interactions Information
External Service Providers	Contact Details, Business Information, Interactions Information
Business Partners	Contact Details, Business Information, Interactions Information

8. TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES

We strive to process your personal data within the EU/EEA. However, due to the global nature of Immedica’s operations, Immedica shares personal data to companies in the Immedica group, External Service Providers and Authorities when we perform the activities described in this Notice. Some of the recipients of your personal data as stated above may reside outside the EU/EEA. The level of legal protection for personal data is not the same in all countries and may not provide the same level of protection as the data protection laws in the EU/EEA or of the country in which you live.

In case of a transfer of your personal data to recipients based in countries outside the EU/EEA, Immedica will take reasonable efforts and adopt adequate safeguards to keep your personal data processed in accordance with applicable requirements under the GDPR. These safeguards consist of one of the following legal mechanisms:

- (a) **Standard Contractual Clauses.** According to these clauses, the recipient of your personal data needs to protect your personal data and provide you with rights and protection that are on the same level as EU-standards. These clauses have been adopted by the European Commission.

- (b) **Adequacy Decision by the European Commission.** This means that we transfer personal data to countries outside the EU/EEA which have adequate level of data protection, according to a decision adopted by the European Commission. [Follow this link](#) to see which countries that have received an adequacy decision by the European Commission.

9. YOUR RIGHTS

You have several rights in accordance with applicable data protection legislation, including the GDPR. You have the right to:

- **request information** about your personal data processed by Immedica;
- **request correction** of your personal data if incorrect or incomplete;
- **request transfer** of your personal data to you or another person in a commonly utilizable format;
- **file a complaint** to a data protection authority;
- **object to processing** of your personal data as far as such processing is only based on Immedica's legitimate interest;
- **request the deletion** of your personal data if they are no longer necessary for the purposes of processing or there is no legal ground for their further processing.

Please note, however, that these rights may be limited in order to fulfil and comply with legal obligations. Your rights are limited where there is a legal ground for processing your personal data, for example we cannot delete information that has been collected as part of an adverse reaction report to any of our pharmaceutical products unless it is inaccurate. Immedica may require you to provide proper identification before we comply with any request to access or correct your personal data.

10. HOW TO CONTACT US

The company responsible for the processing of personal data and that acts as the data controller under this Notice is:

Immedica Pharma AB
Solnavägen 3H
113 63 Stockholm
Sweden

If you want to reach any of us, have questions or want to exercise your rights explained above, you are welcome to contact us. Please do so by sending an e-mail to privacy@immedica.com.

11. CHANGES TO THIS NOTICE

We work continuously with improving our products and services and may update this Notice from time to time. We encourage you to periodically review this page for the latest information on our privacy practices.