Information on the Processing of Personal Data

(pursuant to art. 13 of EU Regulation 2016/679)

Kyowa Company Hakko Bio Italia Srl (hereinafter also "the Company" or "the Data Controller"), as the Data Controller, is committed to protecting the privacy of users who visit this website (hereinafter "the Site"). This policy describes how the Site is managed with regard to the processing of personal data of users who consult it, in accordance with Regulation (EU) 2016/679 (hereinafter "GDPR" or "Regulation").

1. Data Controller

The Data Controller of your personal data is: with registered office at Via Piero e Alberto Pirelli 6, 20126 Milan - Italy, REA number MI-1920989, VAT number IT 06894270963 Email: Kyowa-bio@kyowa.it; Telephone number +39 02 36706901

2. Data Protection Officer (DPO)

The Company has designated a Data Protection Officer (DPO), who can be contacted for questions relating to the processing of your personal data at the following address: Email: p.gobbi@uniolex.com ; Postal address: Via Piero e Alberto Pirelli 6, 20126 Milan, Italy DPO contact

3. Purpose of the Processing, Legal Basis and Retention Period

Your personal data will be processed for the purposes and according to the legal bases and retention periods indicated below.

Purpose of the Processing

A) Browsing the Site

Categories of Processed Data

Browsing data (e.g., IP addresses, computer domain names, system logs).

Legal Basis (Articles 6 and 9 GDPR)

Legitimate interest in ensuring the correct functioning and security of the Site.

Retention Period

Data retained for a maximum of 7 days, unless required by judicial authorities to investigate crimes.

Purpose of the Processing

B) Response to requests for information (via the "Contact" form or email)

Categories of Processed Data

Identification data (name, surname), contact details (email, telephone), message content.

Legal Basis (Articles 6 and 9 GDPR)

Execution of pre-contractual measures taken at the request of the interested party

Retention Period

Time required to respond to the request and for a maximum period of 12 months to manage any subsequent contacts.

Purpose of the Processing

C) Sending commercial communications and newsletters

Categories of Processed Data

Identification data (name, surname) and contact information (email address).

Legal Basis (Articles 6 and 9 GDPR)

Consent of the interested party

Retention Period

Until the interested party revokes consent.

Purpose of the Processing

D) Registration in reserved areas

Categories of Processed Data

Identification data, contact details, professional/specific data of suppliers or customers

Legal Basis (Articles 6 and 9 GDPR)

Performance of a contract or pre-contractual measures

Retention Period

For the entire duration of registration in the reserved area and, after cancellation, for 10 years for administrative and legal purposes.

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4. Nature of the Data Provision

- The provision of data for **Purpose A) (Navigation)** is implicit in the use of Internet communication protocols.
- Providing data for **Purposes B), C), D), and ****E ****)** is necessary to process your requests, fulfill legal obligations, or execute a contract. Failure to provide such data would make it impossible to provide the requested service, manage your report, or complete your purchase.
- Providing data for **Purpose D) (Marketing)** is optional. Failure to provide it will have no impact on the services requested, but will make it impossible to receive our commercial communications.

5. Categories of Data Recipients

Your data may be disclosed to entities acting as Data Processors (appointed pursuant to Art. 28 GDPR) or as persons authorized to process data under the direct authority of the Data Controller. They may also be disclosed to independent data controllers. Specifically, recipients may include:

- Internal Company personnel, duly authorized and trained.
- Technical service providers (e.g. hosting providers, IT services).
- Marketing and communications company.
- Companies that manage logistics and shipping.
- Law and consulting firms.
- National and community health authorities
- Judicial or administrative authorities, where required by law.

The complete list of Data Processors is available upon request from the Data Controller.

6. Transfer of Data Abroad

If personal data is transferred outside the European Economic Area (EEA), this will only occur if there is an adequacy decision from the European Commission or on the basis of adequate safeguards provided for by the GDPR (e.g., Standard Contractual Clauses). Further information on the safeguards adopted is available from the Data Controller.

7. Rights of the interested party

As a data subject, you have the right to exercise the rights provided for in Articles 15 to 22 of the

GDPR, including:

- **Right of access** (Article 15): obtain confirmation as to whether or not your data is being processed and receive all the information required by law.
- **Right to rectification** (Article 16): obtain the correction of inaccurate personal data.
- **Right to erasure ("right to be forgotten")** (Article 17): obtain the erasure of your data, in the cases provided for by law.
- **Right to restriction of processing** (Article 18): Obtain restriction of processing when the conditions provided for by law apply.
- **Right to data portability** (Article 20): the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller.
- **Right to object** (Article 21): object, at any time, to the processing of your data based on legitimate interest or carried out for direct marketing purposes.
- **Right not to be subjected to automated decision-making processes** (Article 22), including profiling, which produce legal effects concerning you.

Furthermore, if the processing is based on consent, you have the **right to withdraw your consent** at any time, without affecting the lawfulness of the processing based on the consent given before its withdrawal.

Requests to exercise these rights can be sent to the Data Controller or the DPO using the contact details indicated in points 1 and 2 of this policy.

The deadline for responding is one (1) month, extendable by two (2) months in particularly complex cases; in these cases, the Data Controller will provide at least one interim communication within one (1) month of receiving the request. We inform you that you have the right to lodge a complaint or report to the Italian Data Protection Authority. The contact details of the Italian Data Protection Authority can be found on the website http://www.garanteprivacy.it

8. Right to lodge a complaint

If you believe that the processing of your personal data violates the provisions of the GDPR, you have the right to lodge a complaint with the competent supervisory authority (for Italy, the Italian Data Protection Authority, located in Piazza Venezia n. 11, 00187, Rome - www.gpdp.it).

9. Changes to the Policy

The Data Controller reserves the right to update this policy. Any changes will be posted on this page, and if the changes are substantial, we will provide a more prominent notice.