



SEPTODONT GLOBAL PRIVACY POLICY

Septodont pays due attention to the protection of your Personal Data (as defined hereafter). Septodont has a global privacy program to help ensure that your Personal Data is handled appropriately and protected in compliance with applicable data protection laws, including when applicable the European General Data Protection Regulation.

This policy explains our approach to any Personal Data that we collect from you or that we have obtained about you.

Septodont reserves the right to update this policy to comply with changes to applicable law. If you have concerns about the way Septodont is handling your personal data, please contact the Data Protection Officer at dataprotection@septodont.com as indicated in below Section 11.

1. Definitions

“Data Protection Officer” means the data protection officer appointed by Septodont.

“GDPR” means the European General Data Protection Regulation 2016/679 dated on April 27, 2016.

“Personal Data” means any information or pieces of information that could identify you either directly or indirectly.

“Policy” means this privacy policy.

“Process”, “Processing”, “Processes” and/or “Processed” means any operation on Personal Data, such as collection, recording, organisation, storage, alteration, consultation, use, disclosure by transmission, or otherwise making available, restriction, or erasure.

“Septodont Entity(ies)” means Septodont Holding and/or any entity directly or indirectly controlled by Septodont Holding.

“User(s)” means any current, past and prospective Septodont customers, individuals reporting side medical effects related to Septodont products, job applicants, service providers, partners, contractors, subcontractors, Website users, visitors and more generally, anyone who is in contact with Septodont.

“Website(s)” means the website www.septodont.com and any other Septodont Entity website or web pages accessible by going to the “Languages” page or link in the homepage of www.septodont.com

2. What are the principles governing the Processing of Personal Data?

We Process your Personal Data in compliance with the applicable legal requirements and, in particular when applicable, the GDPR. In particular, we undertake to deploy all efforts to:

- Process your Personal Data fairly and lawfully;
- Process your Personal Data for legitimate purposes;
- Process only Personal Data that is relevant and not excessive in relation to those purposes;
- Promptly respond to your questions, requests and concerns regarding the Processing of your Personal Data and ensure that your Personal Data is accurate.

3. Which Personal Data do we collect?

Septodont may collect Personal Data such as your name, address, e-mail address, telephone number, other contact details, country of residence, IP address, RPPS number, client code and any other Personal Data you choose to provide to us.

Additionally, Septodont may collect Personal Data about you such as details regarding the products you ordered, details relating to your former orders, data relating to your commercial relationship with Septodont, billing and payment information, information related to your use of our Website (pages you looked at, duration of your visit, etc.), data related to any incident reported about a product (treatments administered, nature of side effects), resume (qualification, previous jobs), etc.

As a User, there are many ways that you might share your Personal Data with us. You may provide your Personal Data to us, either:

- directly: when you contact us via our Websites, when you ask for a quote estimate, when you order our products, subscribe to one of our services, or when you register for a promotion or complete a survey, etc.



- or indirectly: when we use cookies to understand how you use our Websites, when we receive your Personal Data from business partners or third party services providers contracted to send out surveys and/or promotional messages, etc.

When you visit one of our Websites, or engage with us by email or through other electronic methods (such as filling out a contact form on one of our Websites), we may collect information by automated means, using technologies such as cookies.

If you have applied for a job at Septodont, the Personal Data in your application will be used and retained for recruiting and other human resources purposes. For more information, please contact the Data Protection Officer.

4. Why do we collect Personal Data?

Septodont may collect your Personal Data for various purposes, including:

- To conduct its business in order to: process your orders, provide you the product ordered, manage our relationship with you, manage any request to a product, conclude a specific agreement when you supply us with a product or provide a service;
- To optimize access to our e-platforms in order to: identify you and allow you access to Website services, process your identification, optimize online browsing, protect you against fraud or misuse of our Website;
- To improve our communication and interactions with you in order to: provide you with our newsletters, send you marketing communications, keep an up-to-date opt-out list as applicable if you have asked not to be contacted, identify your preferences, recommend products or services that might be of interest to you, personalize your experience;
- To allow you to apply for a job in order to: manage recruitment processes, review candidates applications, hire candidates;
- To comply with applicable law and regulation in order to: provide health surveillance report when you report to us medical side effects related to our products;
- To manage your requests and enquiries, in order to: respond to when you ask questions relating to our products, allow you to exercise your rights in compliance with this Policy.

5. What are the legal grounds for processing Personal Data?

Septodont will Process your Personal Data on the basis of at least one of the following legal grounds:

- Where you have clearly expressed your consent to the Processing of Personal Data (e.g. specific consent required for an enquiry or application);
- Where the Personal Data processing is required for the performance of a contractual relationship between you and Septodont (e.g. allow performance of an agreement with a supplier or business partner);
- Where Septodont has to comply with a legal obligation (e.g. comply with legal obligations related to health vigilance provisions);
- It is Septodont's legitimate interest to Process such Personal Data (e.g. ensure we provide you with Website, ensure we are able to handle any incident reported about a product).

6. When do we share your Personal Data?

We may share your Personal Data as follows:

- Within Septodont, and with any Septodont Entity who may only use your Personal Data for the purposes described in this Policy.
- With our trusted service providers including contractors, subcontractors, agents, advisors, vendors, and suppliers and distributors, who will carry out certain services necessary for the purposes indicated above on our behalf (marketing services, hosting services, database maintenance, etc.).

Additionally, Septodont may share your Personal Data with other third parties:



- To respond to legal proceedings of any nature, court orders or implementing enforcement measures that are required by the competent authorities;
- To protect the rights, property, or safety of Septodont or other Septodont Entities and to preserve evidence as required or authorized by applicable law;
- In the event of health surveillance reporting (pharmacovigilance activity), Septodont may share your Personal Data - as required by applicable regulation - with health professionals, third parties involved in the commercial exploitation of the concerned product, etc.
- For other purposes required by applicable laws or with your prior consent.

Please note that Septodont does not sell your Personal Data to third parties.

7. How do we transfer your Personal Data?

Being a global pharmaceutical company that Processes data as part of its ordinary course of business, your Personal Data may be transferred from a country located within the European Economic Area to outside the European Economic Area. Transfers of Personal Data from one country to another (or one geographic region to another) will be completed in compliance with applicable Personal Data protection laws and with adequate safeguards (eg. EU standard contractual clauses).

8. How long is your Personal Data retained?

We deploy all efforts to retain your Personal Data no longer than necessary to fulfil the purposes for which it was collected (e.g. the length of your contract with Septodont). As an exception, we may keep your Personal Data for a longer period of time as required or permitted by law and/or to comply with applicable statute of limitations periods such as tax and accounting requirements and/or to preserve the evidence of performance of an obligation.

9. How is your Personal Data protected?

It is Septodont's commitment to keep your Personal Data secure. We implement a variety of reasonable organisational and technical measures to ensure the integrity and confidentiality of your Personal Data and to protect your Personal Data against any unauthorized access and modification, disclosure, loss, or destruction.

10. What are your rights on the Personal Data?

You can exercise your rights in respect of your Personal Data. Where required by applicable law (and in particular when applicable the GDPR) and subject to limitations which may apply in consideration of exceptions or legal requirements or policies, you benefit from:

- A right of access and rectification: you have the right to obtain confirmation as to whether or not Personal Data concerning you is being Processed, and, where that is the case, to access such Personal Data, and to obtain the rectification of inaccurate or incomplete Personal Data;
- A right to deletion: in some cases set forth by applicable data protection law, you have the right to obtain the erasure of your Personal Data;
- The right to revoke your consent: without affecting the lawfulness of the Processing carried out prior to your revocation, you may revoke your consent to the Processing of your Personal Data when such Processing is based on your consent;
- A right to object to Processing: you have the right to object to Processing of your Personal Data where the Personal Data has been processed based on the legitimate interest of Septodont, it being specified that your request has to be justified by your particular situation;
- A right to limitation of Processing: in some cases set forth by applicable data protection law, you have the right to obtain limitation of the Processing of your Personal Data;
- A right to data transmission: you have the right to receive your Personal Data which you have provided to Septodont. This right only applies when Processing of your Personal Data is based on your consent or on a contract and such Processing is carried out by automated means;
- The right to file a complaint with the supervisory authority: While we suggest that you contact us beforehand, if you wish to exercise this right, you should contact the competent data protection authority.



11. How to contact us?

If you have any question or concern about this Policy or about how Septodont Processes your Personal Data or if you wish to exercise any of your rights set out in Section 10 above, please contact the Data Protection Officer at dataprotection@septodont.com. Individuals who may have certain other rights under local or regional regulation, may also contact us to exercise those rights through the same email address.

You can also send a letter to the following address: Septodont, Data Protection Officer, 127 Boulevard Diderot - Paris 75012 - France.

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