

DATA PROTECTION POLICY FOR THE INTERNAL INFORMATION SYSTEM

In accordance with Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (GDPR); Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights (Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales) (LOPDGDD); and Law 2/2023 of 20 February governing the protection of persons who report regulatory infringements and the fight against corruption (Ley 2/2023, de 20 de febrero, reguladora de la protección de las personas que informen sobre infracciones normativas y de lucha contra la corrupción) (Whistleblower Protection Law), as well as all other applicable data protection legislation, we explain below how we process personal data provided through the Internal Information System.

The Internal Information System has the necessary measures in place to guarantee and ensure the confidentiality of the identity and protection of the reporting person and of any third party mentioned in the report, preventing unauthorised persons from accessing the information.

1. DATA CONTROLLER

Your personal data will be processed by:

Data Controller Details	
Identity	Farmaprojects, S.A.U. (hereinafter, the “ Data Controller ” or “ Controller ”)
Postal address	C/ de Provença, 392, 6th Floor, Eixample, 08025 Barcelona
Registration details	Farmaprojects, S.A.U., a company registered with the Barcelona Commercial Registry under Volume / IRUS 1000330079148, Folio 0, Sheet B-37982, with Tax Identification Number (N.I.F.) A58692997

2. TYPES OF PERSONAL DATA THAT MAY BE PROCESSED

This applies whether you provide your personal data to us directly or they are provided by a third party connected with the report. The main categories of personal data that may be processed are set out below.

Categories of data subjects	Categories of data
Enquirer	Identification data, contact details and other data associated with the enquiry and the supporting evidence, as well as, where applicable, image and voice data.
Identified reporting person	Identification data, contact details, data associated with the reported facts and the supporting evidence, as well as, where applicable, image and voice data.
Anonymous reporting person	Pseudonym, contact details, data associated with the reported facts and the supporting evidence, as well as, where applicable, image and voice data.

<i>(The reporting person may provide any or none of the following data)</i>	
Confidential reporting person <i>(The reporting person does not wish the Controller to know their identity)</i>	Identification data, contact details, data associated with the reported facts and the supporting evidence, as well as, where applicable, image and voice data.
Person concerned by the report	Identification data, contact details, data associated with the reported conduct and the supporting evidence, as well as, where applicable, image and voice data.
Witness	
Third parties	

During the handling of the report submitted, you may be asked to clarify the information provided or to provide additional information.

3. PURPOSES, LAWFUL BASIS AND RETENTION OF INFORMATION

Depending on the processing activities carried out, personal data may be processed for the following purposes and on the following lawful bases. The same table also sets out the applicable personal data retention periods:

Processing activity	Purpose	Lawful basis and retention
Handling enquiries	We will process the data to answer enquiries concerning the operation and management of the Internal Information System and/or the Compliance Model and to provide acknowledgement of receipt of submitted enquiries.	<u>Lawful basis:</u> Legitimate interests. The Controller's legitimate interest is to respond to the enquiries raised. The benefit to the Controller is the detection of deficiencies and improvement of internal processes relating to the Internal Information System and/or the Compliance Model. The benefit to you is receiving an answer to the enquiries raised. You may request further information on the legitimate-interest balancing test through the ethics channel itself. <u>Retention:</u> For enquiries, personal data will be retained for the time strictly necessary to resolve the doubt or issue raised and provide the data subject with a response. For further information on the retention period, see section "6. Duration of processing".

Management of reports	We will process the data to receive reports, provide acknowledgement of receipt, determine whether an investigation should be opened and record the report in the information register. Where the report is considered admissible, the data will be processed to investigate the reported facts, record the investigation in the information register, notify the Public Prosecutor's Office where there are indications of a criminal offence, protect the reporting person against retaliation, adopt appropriate corrective measures where necessary and, where applicable, bring legal actions against the persons concerned by the report and/or third parties.	<u>Lawful basis:</u> 1- Legal obligation, where the company is required to have an Internal Information System pursuant to Law 2/2023 of 20 February governing the protection of persons who report regulatory infringements and the fight against corruption (Ley 2/2023, de 20 de febrero, reguladora de la protección de las personas que informen sobre infracciones normativas y de lucha contra la corrupción) (Whistleblower Protection Law), and the report concerns any of the acts or omissions provided for in Article 2 thereof. 2- Public interest, where the company is not required to have an Internal Information System but has implemented one voluntarily, and the report concerns any of the acts or omissions provided for in Article 2 thereof. The Company's legitimate interest is to demonstrate the suitability and effectiveness of its internal rules and controls and to prevent infringements. The benefit to the data subjects and the company is the improvement and efficiency of internal processes and the prevention of infringements. You may request further information on the legitimate-interest balancing test through the ethics channel itself. <u>Retention:</u> Personal data will be retained in the reporting channel of the Internal Information System only for the time strictly necessary to decide whether to open an investigation into the reported facts and, in any event, for a maximum of three (3) months from the date on which acknowledgement of receipt is sent or, if no acknowledgement is sent, from the expiry of seven (7) days following submission of the report. If no investigative action has been initiated within three (3) months of receipt of the report, the data will be deleted from the Internal
------------------------------	---	--

		Information System, unless retained as evidence of the proper functioning of the System, in which case they will be anonymised and the blocking obligation under the LOPDGDD will not apply. Personal data relating to reports admitted for processing and personal data collected during the investigation will be retained within the Internal Information System for the duration of the investigation and, where the investigation results in corrective measures or legal action, for as long as such corrective measures or legal action remain in force. For further information, see section “6. Duration of processing”.
Demonstrating the proper functioning of the Internal Information System and/or the Compliance Model	We may retain your data to demonstrate the proper functioning of the Internal Information System and/or our Compliance Model.	<u>Lawful basis:</u> Legitimate interests. The Company’s legitimate interest is to demonstrate the suitability and effectiveness of the operation of the Internal Information System and/or the Compliance Model. The benefit to data subjects and the company is the improvement and efficiency of processes and management of the Internal Information System. You may request further information on the balancing test through the ethics channel itself. <u>Retention:</u> The data will be retained for the same periods specified in the preceding section, “Management of reports”. For further information, see section “6. Duration of processing”.

4. DISCLOSURE OF DATA

As a general rule, your personal data will be kept confidential and will not be disclosed to third parties, including the persons to whom the reported facts relate.

However, your personal data may be disclosed to service providers engaged by us to receive information through the reporting channel and, where applicable, to manage and conduct any necessary investigations, as well as to implement corrective measures and/or pursue legal action. Such providers will process the data as processors and will under no circumstances process the data for their own purposes.

Where the report concerns any company within the corporate group to which the Controller belongs (Polpharma Group), your personal data may be disclosed to such companies solely for the purpose of taking the appropriate action in relation to the reported facts.

They may also be disclosed to the Law Enforcement Authorities, judges or courts, and to any other competent authority where required in accordance with applicable law.

Where there are indications that the reported facts may constitute a criminal offence, in accordance with applicable law, your data may be disclosed to the Public Prosecutor's Office or, where the reported facts may affect the financial interests of the European Union, to the European Public Prosecutor's Office.

5. INTERNATIONAL TRANSFERS

Where the Controller uses international service providers or forms part of a group of companies, your personal data may be processed outside the European Union or the European Economic Area. In such event, the Controller will ensure that such processing is at all times protected by appropriate safeguards, which may include (I) Standard Contractual Clauses approved by the EU or (II) third-party certifications.

6. DURATION OF PROCESSING

All data provided will be processed for the period established in section 3, "Purposes, lawful basis and retention of information", of this Privacy Policy.

Once the applicable retention period has ended, the data will be blocked in order to demonstrate compliance with, and the suitability and/or effectiveness of, the Controller's Internal Information System and/or Compliance Model and, where applicable, to comply with any applicable legal obligations, for a maximum period of ten (10) years.

However, we may retain blocked personal data for a longer period where the limitation period applicable to infringements relating to the reported facts exceeds ten (10) years, in accordance with the laws applicable in each case. In such event, the blocking period will be equivalent to the relevant limitation period.

Once the applicable blocking period has expired, the personal data will be permanently deleted.

Notwithstanding the foregoing, we inform you that we will immediately delete data from the Internal Information System, without applying the blocking obligation, where:

- It is established that the information provided, or part of it, is untrue, unless the lack of truthfulness constitutes a criminal offence, in which case the data will be retained for the time necessary while the judicial proceedings are pending.
- Personal data not necessary for understanding and investigating the acts or omissions falling within the scope of this Internal Information System have been disclosed, including special categories of data. In the latter case, such data will be deleted immediately and will not be recorded or processed.

7. EXERCISE OF RIGHTS AND FURTHER INFORMATION

You may request further information about the processing of your personal data at any time and exercise your rights of access, rectification, erasure, objection, restriction or portability free of charge by contacting us by email at privacy@farmaprojects.com or by writing to Farmaprojects, S.A.U. at the postal address indicated in section 1, "Data Controller".

However, where the person under investigation exercises the right to object to the processing of their personal data, it will be presumed, unless proven otherwise, that there are compelling legitimate grounds authorising us to continue processing their personal data.

Where we consider it necessary, we may request a copy of your national identity document (DNI) or equivalent document evidencing your identity in order to process your request to exercise your rights.

If you have any doubt, query or complaint regarding the way in which we process your personal data, you may contact our Data Protection Officer (DPO) at the email address indicated in section 1, “Data Controller”. In addition, you may lodge a complaint with the Spanish Data Protection Agency (Agencia Española de Protección de Datos) (www.aepd.es) if you consider that we have not properly addressed your rights.

For further information on how to exercise your data protection rights, please refer to our website privacy policy, available at [Home - Farmaprojects](#).

Last updated: 23 July 2026