

# Information notice - Debtors pursuant to Regulation (EU) 2016/679

Dear Sir,

As a Data Subject, i.e. the person to whom the personal data hereunder refer (hereinafter the "Data"), we would like to inform you of the following:

# a) Processing purposes and methods

The collection and processing of Personal Data of the Data Subject are carried out in order to allow this Company to conduct the following activities:

- Customer' agreement management
- Debtors management (management, accounting and collection of receivables on power of attorney and/or assignment);
- Activities scheduling;
- Internal Audit activities.

The processing of Personal Data for these purposes will take place with computer and manual methods, based on logical criteria compatible and functional to the purposes for which Personal Data were collected, in accordance with the rules of confidentiality and safety provided for by law and by internal company regulations.

### b) Personal Data Collection

Personal Data referred to the Data Subject are, or have been, supplied to Banca Farmafactoring S.p.A. – Sucursal em Portugal by companies that have contractual relations with the Data Subject - in the framework of the conferment to Banca Farmafactoring S.p.A. – Sucursal em Portugal of the power of attorney for the management, recovery and collection of receivables -, or supplied by the Data Subject, or known through access to public registers, lists, deeds or documents whose availability is regulated by law.

### c) Mandatory or optional nature to provide Data

Providing Personal Data to Banca Farmafactoring S.p.A. – Sucursal em Portugal is compulsory only for those Personal Data for which a legal obligation (or established by laws, regulations, measures of Public Authorities, etc.) or of a compulsory nature in this sense is envisaged. In all other cases, the Data Subject is free to provide or refuse to provide his/her Personal Data.

### d) Consequences in case of refusal to provide Data

In the presence of a regulatory or contractual provision obligation, the refusal by the Data Subject to provide the Data may result in the breach by the Data Subject of the rules establishing such obligation (with possible consequences for the Data Subject) or the contractual default by the Data Subject (possibly followed by non-compliance related contractual or statutory remedies). In any case, the Company will not be able to carry out the operations requiring the processing of the aforementioned Data and this with every consequence and damage on the side of the Data Subject. In cases in which the Data Subject is free to provide the Data, any refusal to provide them does not result in regulatory or contractual breaches (with the related aforementioned consequences).

### e) Scope of the communication and dissemination of Data



The Data, or some of it, may be disclosed to the following authorized persons or entities that may carry out processing operations on our behalf: consultants and freelancers, including in associate form; banks and credit institutions, outsourcing companies and will also be disclosed to our employees and managers. The Data will not be disclosed in any way, nor transferred abroad.

# f) Personal Data retention

The Data will be stored in a complete manner for the entire period of the execution of the contract; subsequently, the Data will be stored for a period of ten years in order to comply with legal obligations and, among these, the obligations referred to in article 2214 of the Civil Code. Any further storage of the Data or part of the Data may be arranged to enforce or defend their rights in any possible location and, in particular, in judicial venues.

# g) Rights of the Data Subject

Articles 15 et seq. of Regulation (EU) 2016/679 grant the Data Subject with a number of rights that we invite you to carefully consider. Among these, we remind you of the rights of:

- a) Access to the following information:
  - purposes of the processing,
  - categories of personal data concerned,
  - recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations,
  - existence of the Data Subject right to ask the controller to rectify or erase personal data or restrict the processing of personal data concerning him or her or object to such processing,
- b) Rectification, by this meaning:
  - rectification of inaccurate personal data concerning him or her without justified delay,
  - supplement of incomplete personal data, including by means of providing a supplementary statement;
- c) erasure of personal data concerning him or her without undue delay, if:
  - the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
  - the Data Subject withdraws consent and there is no other legal ground for the processing,
  - you object to the processing and there are no overriding legitimate grounds for the processing,
  - the personal data have been unlawfully processed,
  - the personal data have to be erased for compliance with a legal obligation,
  - the personal data have been collected in relation to the offer of information society services;
- d) restriction of processing:
  - if the accuracy of the personal data is contested, for a period enabling the controller to verify the accuracy of such personal data,
  - when the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead,
  - when the personal data are required by the Data Subject for the establishment, exercise or defense of legal claims, although the controller no longer needs them for the purposes of the processing,
  - if you object to processing by virtue of the right of opposition;



- e) Receive notification in case of rectification or erasure of personal data or restriction of processing;
- f) Data portability, i.e. the right to receive the personal data concerning him or her, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where:
  - the processing is based on express consent of the Data Subject for one or more specific purposes or takes place due to a contract signed with the Data Subject and
  - the processing is carried out by automated means;
- g) Objection at any time, on grounds relating to his or her particular situation, to processing of personal data concerning him or her.

You have the right to lodge a complaint with a supervisory authority if you believe that the rights listed herein have not been recognized to you.

### h) Data relating to the Controller

<u>The Controller</u> pursuant to the Law is Banca Farmafactoring S.p.A. – Sucursal em Portugal, Rua Barata Salgueiro nr. 37, 6º esq, 1250-042 Lisbon.

<u>The Representative of the Controller</u> is the Branch Manager of Banca Farmafactoring S.p.A. – Sucursal em Portugal.

The Company has also appointed a <u>Data Protection Officer</u> (*DPO*). You can reach it at the following e-mail address: <u>dpo@bffgroup.com</u>.