

Privacy Policy

This privacy policy describes the ways in which Farindustria, the Italian Association of Pharmaceutical Companies, a professional and trade organisation (hereinafter also "**Farindustria**" or "**the Association**"), collects and processes personal data of visitors/users who navigate on the website www.farindustria.it (hereinafter, also the "**Site**").

Pursuant to art. 13 of EU Reg. 2016/679, Farindustria, as "**Data Controller**", is required to inform data subjects, to whom the data refer, about the type of data processed and to provide certain elements qualifying the processing, in full compliance with the privacy legislation on the protection of personal data and the corresponding regulatory provisions (EU Regulation 2016/679 (GDPR); Italian Legislative Decree 196/2003 as amended (the Privacy Code)).

The attention to privacy, confidentiality and protection of users' personal data is considered by the Association a relevant task to be pursued. Consequently, the personal data are processed with the utmost care, in compliance with the principles of lawfulness, transparency and confidentiality, and in accordance with current data protection and security legislation.

This Privacy Policy is provided solely for the institutional site of Farindustria, identified above, and not concern any other websites that may be consulted by the user through links from this website.

Other internet addresses to which this site may conduct the user could contain tracking systems unrelated to Farindustria.

Farindustria, therefore, does not guarantee that these external sites are equipped with appropriate security systems aimed at protecting the data processed and is therefore not responsible for the content of these sites or for any processing of personal data carried out on such sites. It is therefore necessary to examine the notice provided on each website linked to this one to identify any possible processing of personal data and the related measures adopted.

Site users/visitors are invited to carefully read this Privacy Policy before disclosing any type of information/personal data and/or filling in any form present on the website.

Nature of the personal data processed

Access to certain sections of the website and/or any requests for information or services made by users of the website may require to entry personal data, which will be processed by Farindustria (the "Data Controller") in compliance with the privacy legislation concerning personal data protection.

The data collected through the site are personal data relating directly to the data subject (name, surname, etc.) and contact data (email, telephone number), and as such fall into the category of "personal data" pursuant to art. 4, paragraph 1 of the GDPR.

No special categories of data are normally processed, as defined pursuant to art.9 of the GDPR, nor is any judicial data; in any case, should it become necessary to process these types of data, the Association will proceed with the processing after the acquisition of the user/data subject's consent.

Purposes and legal basis of the processing

Depending on the needs expressed in each case by the user accessing the various sections of the website, the personal data provided directly by users by filling out the online forms may be processed for the following purposes:

a) to permit, by filling in a specific *form* in the "Work with Us" section of the Site (for which reference is made to the specific privacy notice) - the collection of personal data of users who intend to apply for a job position at Farindustria, and information concerning their professional experience, organised in the form of a curriculum vitae (CV). The processing of such data is therefore aimed at searching for and selecting personnel for Farindustria's own organisation or that of its member companies, and for management of this service, functional to the fulfilment of pre-contractual obligations. (art.6, para.1, lett. b) GDPR);

b) to carry out communication and promotional activities (such as, sending promotional information and invitations to events, etc.), also by e-mail, without prejudice to the data subject's right

to object to the processing of the data at any time. Such processing is carried out on the basis of the legitimate interest (Article 6, paragraph 1, lett. f) GDPR) of the Data Controller to inform users who visit the Association's website about the main initiatives and developments in the pharmaceutical industry, through the sending of communications for information and promotional purposes.

In compliance with national and EU legislation, a better detailed in the Association's Articles of Association, made public on its website, Farindustria pursues the following goals, among others: *Promotion of scientific research in the pharmaceutical field at all levels, reinforcement and legislative protection of scientific research in the pharmaceutical industry, development of a market based on the principles of free competition, in particular through the implementation of appropriate policies concerning pricing and recognition of the value of innovation, collaboration with the competent authorities for the study and implementation of regulations concerning the sector.*

For the purposes of pursuing its statutory goals, it is essential to communicate and provide information on the Association's activities and initiatives to the public, to the authorities, to various social players, to member companies and to the various institutions.

The personal data acquired are therefore processed for the following purposes:

- For all aspects of statutory, administrative and general association management; — For the sending of communications and of invitations to meetings, events, courses, and conferences, as well as the sending of promotional material on courses and workshops through newsletters;
- For any other institutional activities promoted by Farindustria in accordance with its articles of association.

The processing activities described above are carried out on the basis of the assumption that the user is interested in staying up to date on the most significant news, while offering the user the option of objecting to the receipt of these communications by means of the appropriate link placed on the bottom of the communications sent by email. **Categories of personal data subject to processing and methods of processing**

Browsing data

The computer systems and software procedures used to operate this website acquire, in the course of their normal operation, certain items of personal data that are then implicitly transmitted in the use of internet communication protocols.

Such information could, due to its very nature, through association and processing of data held by third parties, permit the identification of users/visitors (e.g. IP address, domain names of computers used by users/visitors who connect to the site, addresses in URI – Uniform Resource Identifier – notation of the requested resources and other parameters concerning the operating system and the IT environment used by the user).

Such data, not associated with directly identifiable users, are processed, for the time strictly necessary, for the sole purpose of obtaining anonymous statistical information on the use of the site and checking its smooth operation.

Tracking pixel data – Use in e-mail communications

What tracking pixels are and which data they collect

In accordance with the Guidelines issued by the Italian Data Protection Authority on the use of tracking pixels in e-mail communications (Provision No. 284 of 17 April 2026), we hereby inform you that certain e-mails may contain tracking pixels, i.e. very small and generally invisible images, the loading of which may allow the detection of the recipient's interaction with the communication and the collection, as the case may be, of information such as whether the e-

mail has been opened, the date and time of opening, the IP address of the device used, the type of device and e-mail client, etc.

Why we use them and under what conditions

Tracking pixels may be used to measure the audience and performance of communications and assess their effectiveness, including measuring e-mail opening rates, the relevance and frequency of content, the effectiveness of campaigns and the level of user engagement, as well as to carry out individual profiling activities.

Their use is governed by Article 122 of the Italian Privacy Code and, where the specific conditions for exemption provided for by the applicable legislation are not met, it requires the prior consent of the data subject.

The applicable legislation identifies specific cases in which the use of tracking pixels does not require any prior consent, as they are strictly necessary to provide the service. This applies when tracking pixels are used:

- to collect aggregated and anonymous statistical information on e-mail opening rates, aimed at improving e-mail delivery;
- to verify the authenticity of a device as part of security procedures, for example for account activation or password recovery;
- to send institutional or service communications that we are required to provide, such as security notices, contractual amendments or privacy notices.

In all other cases, particularly where tracking pixels are used to analyse individually your interactions and preferences concerning our communications on initiatives, projects and events related to the pursuit of the institutional purposes of our Association, with a view to improving and tailoring such communications, it is necessary to obtain information about your preferences regarding the tracking of communications.

Preferences

To manage your email tracking preferences, you can use the link provided in the footer of each of our emails, which allows you to disable tracking pixels at any time.

Data provided voluntarily by users

Farindustria acquires personal data directly from users through:

- a) the voluntary sending by the user of e-mails to the addresses indicated for the different channels used to access the site;
- b) the voluntary filling in of forms present in various sections of the website.

Obligation or right to provide data and consequences of refusal

The provision of "mandatory" personal data (marked with an asterisk) is necessary for Farindustria to enable Farindustria to meet users' needs through the website's functionalities.

Refusal, partial or inaccurate provision of the above mandatory personal data will make execution of the requested service impossible.

Failure, partial or inaccurate provision of optional data (not marked with an asterisk) will not entail any consequences for the data subject (site user/visitor).

Personal data will be processed primarily by automated means or manually using paper-based records, in accordance with procedures strictly related to the aforementioned purposes and for no longer than is necessary to achieve those purposes. In all cases, appropriate measures will be adopted to ensure the security and confidentiality of the data, in compliance with the applicable laws and regulations in force.

Cookies

The use of session cookies that are not stored persistently on the user's computer and disappear when the browser is closed is strictly limited to the transmission of session identifiers, consisting of random numbers generated by the server, which are necessary to enable users to browse the website securely and efficiently (so-called technical session cookies).

Disclosure and dissemination of personal data

Personal data provided directly by users by filling in online forms will not be "disseminated", meaning that the data will not be provided to unidentified parties in any way, even by making them available or permitting the consultation.

Personal data may, on the other hand, be "disclosed", meaning that knowledge of the data may be provided to one or more specific persons: a) persons appointed within Farindustria to process the data, who will process same on the basis of the operating instructions defined by Farindustria as Data Controller; b) persons who can access the data under the law, or under EU legislation, within the limits set forth by law; c) persons who need to access the data for

purposes ancillary to the relationship with the user, within the limits strictly necessary to carry out the auxiliary tasks entrusted to them (e.g. companies and/or third parties whose services the Association makes use of in specific consulting and data processing services), subject to a specific letter of appointment that imposes on such third parties the duty of confidentiality and security in data processing.

It should be noted that a complete, updated list of the third parties referred to in letter c) above, to whom the data may be disclosed in view of their capacity as Personal Data Processors, may be requested by emailing privacy@farmindustria.it.

Data subjects' rights

Pursuant to Articles 15 to 20 of the GDPR, data subjects (users/visitors) are entitled to exercise the following rights:

- the right to obtain confirmation of the existence or non-existence of processing of their data, and access to their data, including information concerning:
 - the purpose of the processing;
 - the categories of personal data being processed;
 - the recipients to whom the data is or will be disclosed;
 - whether the data will be transferred outside the European Union, and the existence of the corresponding guarantees;
 - the data retention period, or the criterion for determining it;
 - the source of the data, if the data has not been collected directly from the data subject; - the existence of an automated decision-making process.
- the right to obtain updating, correction and integration of their data;
- the right to obtain erasure, transformation into anonymous form, or freezing of data which need not be retained for the purposes for which the data was collected and processed;
- the right to obtain a copy of the personal data being processed, in a structured format in common use readable with an electronic device, also for the purpose of transmission to another data controller, where this is not damaging to the rights and freedoms of others;
- the right to revoke the consent provided at any time if the legal basis for the processing consists of the data subject's explicit consent;

Pursuant to Articles 21 and 22 of the GDPR, moreover, data subjects are entitled:

- to object at any time, for legitimate reasons related to their situation, to the processing of data concerning them that is necessary for the performance of tasks in the public interest or for the pursuit of the legitimate interests of the data controller;
- not to be subjected to decisions based solely on automated processing, which may have legal effects or a significant impact on the person of the data subject involved.

In any case, pursuant to art. 77 of the GDPR, the data subject is always entitled to lodge a complaint with the Italian Data Protection Authority, if he or she considers the processing of his or her data to violate the laws in force concerning the protection of personal data.

To exercise their rights, or to obtain information regarding the processing of data concerning them, data subjects may contact Farindustria in one of the following ways:

- through the postal service, by writing to the following address:
Farindustria, Largo del Nazareno, 3, Rome;
- by email sent to the following email address: privacy@farindustria.it

In particular, the data subject may object at any time pursuant to art.21 of the GDPR - to the sending of communications concerning the promotional activities and initiatives of the Association (for example: newsletters, memoranda, invitations, communications, etc.), by sending an e-mail to the address privacy@farindustria.it.

Data Controller

The Data Controller is Farindustria, the Italian Association of Pharmaceutical Companies, a trade and professional organisation based in Largo del Nazareno, 3, Rome.

Retention of personal data

The data will be kept for the amount of time necessary to achieve the specific purposes for which the data is being processed and for the purposes of maintaining the membership relationship. Data acquired and used for promotional/informative purposes (sending of newsletters, invitations, memoranda and communications, etc.) will be processed until the user/data subject objects to its processing and/or submits an explicit request for deletion of the data.

Transfer of personal data abroad

No provision is made for the dissemination and transfer of data outside the Economic Area of the European Union, and consequently to a Third Country.

In any case, if it should become necessary, also for any needs pertaining to the management of cloud computing services (allocated on servers physically residing outside the European Economic Area), the transfer of data abroad may be authorised, in the presence of an assessment of adequacy conducted by the European Commission pursuant to art. 45 of the EU Regulation, or, alternatively, after verifying the existence of appropriate guarantees providing for enforceable rights and effective means of redress for data subjects, referred to in art. 46 of the EU Regulation, by the Data Controller. In the absence of any other assumption, it is

possible to consider the transfer of personal data, pending the existence of specific derogations pursuant to art. 49 of EU Regulation 2016/679.

Changes to this policy

Farindustria reserves the right to modify or update the content of this privacy policy, in part or completely, also in response to any changes to the applicable legal provisions. Such changes will become effective as soon as they are published on the Association's websites.

Farindustria therefore invites you to visit this section regularly to be constantly updated on the purposes and methods of processing, collection and use of data.

Social plug-ins and connections

The website may contain social network plug-ins. If you access a web page with a plug-in of this type (such as a "Share" button), the Internet browser will connect directly to the social network, and the plug-in will be displayed on the screen through connection with the browser. Before using such Plug-ins, the data subject is invited to consult the privacy policy of the social networks, present on their official pages.