

## **PRIVACY POLICY**

Swizzard Pharma AG, Gubelstrasse 12, 6300 Zug, Switzerland (“Swizzard”, “we”, “us”) is committed to respecting and protecting your privacy. This Privacy Policy (“Policy”) applies to our collection and use of personal data collected through our website (“Site”) and through offline business-related interactions with you. The purpose of this Policy is to inform you about the collection and use of your personal data, as well as your rights in accordance with applicable privacy and data protection laws.

### **Introduction**

Based on Article 13 of the Swiss Federal Constitution, the Swiss Federal Data Protection Act (FADP) and its implementing ordinances, as well as the European General Data Protection Regulation (GDPR), every individual is entitled to the protection of their privacy and to protection against the misuse of their personal data. At Swizzard, we take these obligations very seriously, especially when it comes to patient data, given its sensitive nature.

This Privacy Policy applies to all personal data we process in connection with our services, including, but not limited to:

- Market Access & Market Entry
- Market Research
- Article 71 KVV Case Management
- Marketing Services
- Any other services made available on this website or that are subject to bilateral agreements between Swizzard Pharma and its customers

We treat personal data collected in the course of our business with the utmost care and in strict compliance with applicable data protection laws and regulations.

### **Personal Data We Process**

We process the following personal data:

- Data of the contacting person / healthcare professional:
  - Identification data (surname, first name, contact details such as telephone number, email), if applicable, data relating to his/her professional life (profession, type of practice, specialty, professional contact details).
- Patient data necessary to manage the case:
  - Data that indirectly identifies the person regarding this case (identifying information such as age, year or date of birth, sex, weight, height) or personal insurance number.
  - Health data, such as: treatments administered, test results, personal or family history, diseases or events associated with it, risk factors, pregnancy, information relating to the type of prescribing and use of medicinal products and the therapeutic conduct of the prescriber or healthcare professionals involved in the treatment of the disease.
- Data of health insurance and invalidity insurance employees:
  - Identification data (surname, first name, contact details such as telephone number, email)

When Swizzard Pharma accesses sensitive personal information, we will take appropriate measures to protect it accordingly, consistent with the Swiss Federal Data Protection Act (FADP), its ordinances, the GDPR, and other applicable data protection regulations.

#### **Personal data collected through our website ('Site Data')**

We automatically collect basic technical information from all visitors to the Site. We collect technical information during your visit to the Site through automatic data collection tools, which include cookies and other similar technologies. Via these tools, we collect and further process information that may be considered personal data under applicable privacy and data protection laws, including:

- Your Internet Protocol (IP) address
- Other unique identifiers, including mobile device identification numbers
- Your browser type and operating system
- Sites you visited before and after visiting the Site
- Pages you view and links you click on within the Site
- Information about your interactions with e-mail messages, such as the links clicked on and whether the messages were received, opened, or forwarded; and
- Standard Server Log Information.

#### **Personal data about our Customers' and Business Partners' staff ('Customer and Partner Data')**

We process personal data about the staff of our current, former and prospective customers as well as business partners to enable the delivery of service to us.

We collect the following personal data about these individuals:

- Contact information, such as name, e-mail address, and phone number
- Professional information, such as professional title, position or function, education background, credentials, specialty, and work history
- The content of any communications that you send to us
- Information described to you at the point of collection or pursuant to your consent; and
- Information that we may collect from you offline in connection with business-related interactions with you, such as if you provide information to us at an industry event, business meeting, or contact us by telephone.

#### **Personal data usage**

Subject to applicable privacy and data protection laws, we use personal data to:

- Operate and improve our Site, products, information, and services
- Understand you and your preferences to enhance your experience using our Site, products, and services
- Respond to your comments and questions and provide customer service
- Provide and deliver products, information, and services you request
- Send you related information, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages
- Communicate with you about upcoming events and news about products, information and services offered by Swizzard and our selected partners
- Protect, investigate, and deter against fraudulent, unauthorized, or illegal activity

- Comply with and enforce applicable legal requirements, relevant industry standards and our policies; and
- As otherwise described to you at the point of collection or pursuant to your consent.

### **Disclosure and processing of personal data**

We disclose your personal data to others as follows:

- To our service providers that may perform certain functions or services on our behalf (such as to host the Sites, fulfill orders, provide products and services, perform analyses, provide customer service, or send communications for us);
- To other recipients if:
  - We are required to do so by law or regulation (e.g., by a regulatory authority)
  - Law enforcement authorities or other government entities provided us with a lawful disclosure request
  - We believe disclosure is necessary or appropriate to prevent harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity.

We process your personal data:

- If you have consented to such processing
- To the extent that it is necessary for the performance of your agreement with us or in order to take steps at your request prior to entering into an agreement with us
- To the extent that it is necessary to comply with our legal obligations; or
- To the extent that it is necessary for the purposes of our legitimate interests as a company.

### **In terms of management and negotiation of 71a-d KVV cases**

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  - Identification data (surname, first name, contact details such as telephone number, email), if applicable, data relating to his/her professional life (profession, type of practice, speciality, professional contact details).
- Patient data necessary to manage the case:
  - Data that indirectly identifies the person regarding this case (identifying information such as age, year or date of birth, sex, weight, height) or personal insurance number.
  - Health data, such as: treatments administered, test results, personal or family history, diseases or events associated with it, risk factors, pregnancy, information relating to the type of prescribing and use of medicinal products and the therapeutic conduct of the prescriber or healthcare professionals involved in the treatment of the disease.
- Data of health insurance and invalidity insurance employees:
  - Identification data (surname, first name, contact details such as telephone number, email)

When Swizzard Pharma accesses sensitive personal information, we will take appropriate measures to protect it accordingly.

## Your data protection rights

Subject to possible restrictions under applicable privacy and data protection laws, you can exercise the following rights:

- **Right to access:** you have the right to obtain confirmation as to whether or not your personal data are being processed and, where this is the case, access to the personal data. You also have the right to ask us for copies of your personal data. This right always applies.
- **Right to rectification:** you have the right to ask us to rectify personal data about you that you think are inaccurate. You also have the right to ask us to complete data you think are incomplete. This right always applies.
- **Right to erasure:** it enables you to request the deletion or removal of your data where there's no compelling reason for us to keep using the data. This is not a general right to erasure; there are exceptions.
- **Right to restriction of processing:** You have the right to ask us to restrict the processing of your personal data in certain circumstances.
- **Right to data portability:** This right only applies to personal data you have given us. You have the right to ask that we transfer the data you gave us to another organization or give the data to you. The right only applies if we are processing personal data based on your consent or under, or in talks about entering into, a contract and the processing is automated.
- **Right not to be subject to a decision based solely on automated processing:** you have the right not to be subject to a decision based solely on automated processing of your data – this means without any human intervention – which produces legal effects for you or similarly affects you. However, we may base our decision on automated processing of your data if you explicitly consented to it. In that case, you have the right to obtain human intervention, to express your point of view and to contest the decision.
- **Right to revoke consent:** Where we have obtained your consent for the processing of your personal data, you have the right to withdraw your consent at any time. This will not affect the lawfulness of the processing that we carried out prior to the withdrawal.
- **Right to lodge a complaint:** If you have concerns about the way we handle or process your personal data, you have the right to lodge a complaint with your local Data Protection Authority.
- **Right to object:** When we process your personal data for purposes of pursuing our legitimate interests, you have the right to object to such processing at any time. If you exercise this right, we will stop the processing unless we have strong and legitimate reasons to continue using your data.
- To exercise these rights, please submit a request in writing using the contact details provided

## Data retention

In general, we will store your personal data as long as necessary to fulfil the purposes for which we collected the data:

- **Site Data** – Site Data is stored no longer than required by applicable laws.
- **Customer and Business Partner Data** – Customer and Business Partner Data is stored for as long as required by applicable laws.

In exceptional cases (e.g., in pending litigation matters or where the law requires us to) these personal data may need to be kept for longer periods of time.

Our Site provides links to other websites. These websites may operate independently from us and may have their own privacy notices or policies, which we advise you to review. To the extent any linked websites or apps are not owned or controlled by us, we are not responsible for their content. The Site may contain links to other websites or online services that are operated and maintained by third parties and that are not under the control

of or maintained by us. Such links do not constitute an endorsement by us of those other websites, the content displayed therein, or the persons or entities associated therewith. This Privacy Policy does not apply to this third-party content. We encourage you to review the privacy policies of these third-party websites or services.

We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use, or disclosure. However, no method of security or method of transmission over the Internet can be guaranteed to be 100% secure. You should always use caution when transmitting personal data over the Internet.

#### **How to contact us**

If you wish to contact us about this Policy:

- You may contact us at: Swizzard Pharma AG, Gubelstrasse 12, 6300 Zug, Switzerland
- You can also contact us via email: [welcome@swizzard-pharma.com](mailto:welcome@swizzard-pharma.com)

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