

## NOTICE ON THE PROCESSING OF PERSONAL DATA

### 1. WHO PROCESSES MY DATA?

The data controller of your personal data is Advice Pharma Group S.r.l., with registered office in Milan (MI), Via Olgettina 60, 20132, Tax Code and VAT No. 07674580969, which you can contact by email at: [info@advicepharma.com](mailto:info@advicepharma.com).

### 2. HOW CAN I CONTACT THE DATA PROTECTION OFFICER?

The Data Protection Officer (DPO) supervises the proper handling of your personal data, in order to ensure comprehensive compliance with privacy regulations. You can contact the DPO by email at: [dpo@advicepharma.com](mailto:dpo@advicepharma.com).

### 3. FOR WHAT PURPOSES ARE MY DATA PROCESSED AND WHY IS THE PROCESSING LEGITIMATE?

	PURPOSE	LEGAL BASIS	OBLIGATION TO PROVIDE DATA
A	<p>Create your personal profile to access the app and its features, offer you technical support and manage any support and assistance requests, and perform anonymous statistical analyses.</p> <p>You can find further information by consulting the Terms and Conditions directly on the app.</p>	<p>The processing of your data is legitimate because it is based on the contract (Article 6, paragraph 1, letter b) of the GDPR) and on your consent (Article 9, paragraph 2, letter a) of the GDPR), which you can provide by ticking the box and which you can revoke at any time by contacting the Data Controller.</p>	<p>For this purpose, you are free not to provide your data, but in this case, you will not be able to access the app and its features.</p>
B	<p>To give the Data Controller the opportunity to contact you to propose participation in initiatives promoted by the Data Controller, such as interviews, focus groups, or analyses for the purpose of preparing reports. For effective participation in each initiative, the Data Controller will ask you for specific consent from time to time.</p>	<p>The processing of your data is legitimate because it is based on your consent (Article 9, paragraph 2, letter a) of the GDPR), which you can provide by ticking the box and which you can revoke at any time by contacting the Data Controller.</p>	<p>The provision of your data is optional. We remind you that, if you do not provide your consent, this will not affect your rights in any way on the provision of the Service. Likewise, any withdrawal of consent will not affect this.</p>

### 4. TO WHOM ARE MY DATA DISCLOSED?

To carry out certain activities, the Data Controller turns to parties external to its organization for support and assistance. Some of your personal data may therefore be disclosed to consultants, companies, and entities that process data as independent Data Controllers or Data Processors pursuant to Article 28 of the GDPR. Specifically, the Data Controller will share your data with:

- suppliers of goods and services to support business activities (for example, companies providing cloud services and email management, web services, applications, etc.);
- professionals and consultants.

This list is not exhaustive, but you can request a complete list of recipients of your personal data by contacting the Data Controller at the contact details above.

### 5. WILL MY DATA BE DISSEMINATED?

Your personal data will not be disseminated or published.

### 6. WILL MY DATA BE TRANSFERRED OUTSIDE THE EUROPEAN UNION?

Your data will not be transferred by the Data Controller to countries outside the European Union. The Advice Pharma Group data storage system is hosted by third parties located within the European Union. In the event that your data is transferred outside the European Union, this will be done in accordance with one of the methods permitted by applicable law, such as your consent, the adoption of Standard Clauses approved by the European Commission, or the

adoption of other guarantees that ensure an adequate level of personal data protection. For more information, please contact the Data Controller at the contact details above.

#### **7. HOW LONG IS MY DATA KEPT?**

The Data Controller will retain your personal data for a period of time no longer than necessary to achieve the purposes for which it is being processed. Specifically, your data will be processed for the entire duration of use of the app until your account is deleted, and for the following 3 years. After this period, the data may be anonymized.

#### **8. WHAT ARE MY RIGHTS?**

As a data subject, you may at any time exercise the rights provided for in Articles 15 et seq. of Regulation (EU) 2016/679, which are:

- Right of access to data, which consists in the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you is being processed and, where that is the case, to obtain: access to your data, a copy of the same, and information relating to the processing;
- Right to rectification, i.e., the right to obtain from the Data Controller, without undue delay, the rectification of inaccurate personal data concerning you, as well as the completion of incomplete personal data, including by means of providing a supplementary statement;
- Right to erasure, i.e., the right to obtain from the Data Controller, without undue delay, the erasure of personal data concerning you, where one of the following grounds applies:
  - the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - you object to the processing and there are no overriding legitimate grounds for the processing;
  - the data are or have been unlawfully processed;
  - the data must be erased for compliance with a legal obligation to which the Data Controller is subject;
- Right to restriction of processing, i.e., the right to obtain from the Data Controller restriction of processing where one of the following applies:
  - You contest the accuracy of the personal data, the Data Controller will restrict their processing for a period enabling us to carry out the necessary verifications;
  - the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
  - although the Data Controller no longer needs the personal data for the purposes of the processing, you require the data for the establishment, exercise or defense of legal claims;
  - you have objected to the processing pending verification whether the legitimate grounds of the Data Controller override yours;
- Right to data portability, which consists of the right to receive from the Data Controller, in a structured, commonly used and machine-readable format, the personal data concerning you and which are processed by the Data Controller, and to transmit those data to another controller, if the processing is based on consent or a contract and is carried out by automated means;
- Right to withdraw consent;
- Right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

You may exercise your rights by contacting the Data Controller at the contact details above. The Data Controller will respond as soon as possible and, in any case, if applicable, no later than 30 days after your request.

#### **9. HOW CAN I SUBMIT A COMPLAINT?**

If you wish to lodge a complaint regarding the way in which your personal data is processed by the Data Controller or regarding the handling of a complaint you have lodged, you have the right to submit a request directly to the Supervisory Authority according to the methods indicated on the website [www.garantepriacy.it](http://www.garantepriacy.it).

#### **10. UPDATES**

This privacy policy was last updated on October 15, 2025. The Data Controller will notify you promptly if the text is updated or revised.