

# PRIVACY NOTICE for Speak-Up and Whistleblowing

## 12.12.2024

At **Zentiva Group, a. s.**, ID no. 07254792, with its registered seat U kabelovny 529/16, 102 00 Praha 10 – Dolní Měcholupy, Czech Republic and/or **Zentiva, k.s.**, ID no. 49240030, with its registered seat U kabelovny 130, 102 00 Praha 10 – Dolní Měcholupy, Czech Republic (“we”, “us”, or “our”), we are committed to maintaining the highest standards of integrity and accountability.

Our whistleblowing platform (“**Platform**”) allows you to report concerns about misconduct or violations of laws and company policies in the scope described below.

This Privacy Notice explains how we collect, use, and protect your personal data, when you use the Platform in line with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“**GDPR**”).

This Privacy Notice is meant to address the data privacy aspects implied by the Reporting of Concerns process of Zentiva, divided into [Speak-Up or Whistleblowing](#).

### (A) How we get your personal data

In the process of receiving, recording, examining, documenting and solving the reporting of concerns ([Speak-Up or Whistleblowing](#)), we may process your personal data obtained either directly from you or indirectly, e.g. face-to-face discussions, telephone discussions, or in writing, electronically and/or on paper.

In case you act in relation to us as a reporter or whistleblower, we obtain your personal data directly from you, with the exception of the case where the reporting is made anonymously.

In case you are the person concerned by the reporting, we may obtain your personal data either directly from you, or indirectly, from the reporter or whistleblower.

### (B) The purposes of processing for which the personal data are intended, as well as the legal basis for such processing

We will process your personal data for the following purposes and based on the following legal grounds, as the case may be:

- i. receiving, recording, examining, documenting and resolving the reporting of concerns ([Speak-Up or Whistleblowing](#)) where we will rely our processing on:
  - a) the satisfaction of legal requirements, according to art. 6, para. (1), lit. c) from GDPR ([in case of Whistleblowing](#)); respectively
  - b) legitimate interest, according to art. 6, para. (1), lit. f) from GDPR ([in case of Speak Up](#)) respectively, prevention, detection and investigation of misdemeanor, including conflict of interest, anti-bribery, fraud and money laundering or financing of terrorist acts and analysis and management of commercial risks;
- ii. documenting your report received by us:
  - a) making a recording of the conversation in a durable and accessible form, where we will rely the processing on your consent, according to art. 6, para. (1), lit. a) from the GDPR; or
  - b) making a full and accurate transcript of the conversation, where we will rely the processing on:
    - the satisfaction of legal requirements, according to art. 6, para. (1), lit. c) from GDPR ([in case of Whistleblowing](#)); respectively
    - legitimate interest, according to art. 6, para. (1), lit. f) from GDPR ([in case of Speak Up](#)), respectively, prevention, detection and investigation of

misdemeanor, including conflict of interest, anti-bribery, fraud and money laundering or financing of terrorist acts and analysis and management of commercial risks;

- iii. disclosure of your identity as whistleblower, where we will rely the processing on your consent, according to art. 6, para. (1), lit. a) from the GDPR, expressed by completing the consent form provided by us.

In case you, as reporter or whistleblower, do not express your consent for the documentation of the report by transcribing or recording of the conversation, you will be directed to report the concern in writing, on paper, addressed to the attention of the related compliance person ([in case of Speak-Up](#)) or our Designated Person ([in case of Whistleblowing](#)), or in electronic format, by means of the Platform ([details are available here](#)) or to the dedicated electronic correspondence address (e-mail), as follows:

- i. [Whistleblowing-cz@zentiva.com](mailto:Whistleblowing-cz@zentiva.com)
- ii. [compliance@zentiva.com](mailto:compliance@zentiva.com)

### (C) Personal data we may process

We may process, in whole or in part, the following categories of personal data concerning you, in relation to the processing purposes herein:

- ✓ **identification data:** name / surname, physical and / or electronic signature, including the electronic signature obtained through electronic devices and / or qualified;
- ✓ **occupational data:** the professional context in which the reported information was obtained (for example, workplace, work / service report, function etc.); information regarding an individual's activity, such as its working relations and economic or social behavior;
- ✓ **contact data:** personal / work telephone number, personal / work electronic correspondence (e-mail) address, physical correspondence address, content of physical / electronic communications;
- ✓ data regarding the concerns to which the report refers, including evidence in support thereof;
- ✓ any other categories of personal data useful, relevant and conclusive for solving the report thus received (for example, data regarding reprisals, reparative measures etc.).

### (D) The conditions under which we may disclose your personal data

Your Personal Data is intended for use by us, as a personal data controller.

Your identity as reporter or whistleblower and the information that would allow your direct or indirect identification are confidential, except for the case where:

- ✓ there is your express consent; or
- ✓ we have a legal obligation to disclose your identity, in compliance with the conditions and limits stipulated by the applicable law, in which case you will be informed regarding the disclosure of the identity and the reasons for the disclosure of the confidential data in question, beforehand, in writing. Such an obligation that does not exist in case the information would endanger investigations or judicial proceedings;
- ✓ the reporter or whistleblower maliciously makes a false statement.

Also, your identity as the person concerned by the report, as well as the third person referred to in the report and the information that would allow your direct or indirect identification are confidential as long as the subsequent actions of the report are in progress, except when, as a result of the resolution of the report, it is found that you are not guilty of the violations of the law subject of the report.

To meet the purposes of your personal data processing, your personal data may be disclosed to:

- ✓ you and, where appropriate, your appointed representatives;
- ✓ public authorities and institutions that, according to special legal provisions, receive and resolve in their field of competence reports regarding violations of the law;
- ✓ Ministry of Justice of the Czech Republic;
- ✓ other legal entities that are part of the Zentiva group, if the case (you can view the list of the legal entities part of Zentiva group here: [Zentiva-Entities.pdf](#));
- ✓ other (contractual) partners directly or indirectly involved in receiving, recording, examining, documenting and solving the reports on violations of the law (e.g., providers of operational services like telecommunication, IT, archiving services etc.);
- ✓ our external consultants (e.g., auditors, lawyers etc.).

*Our* platform for [Reporting of Concerns](#) is technically operated by our vendor bound by confidentiality obligations, **FaceUp Technology s.r.o.**, through a cloud solution. The privacy notice of **FaceUp Technology s.r.o.** is [available here](#).

If we will transfer your personal data outside the European Union and / or the European Economic Area, we will do so only by observing the legal provisions in place, by applying adequate protection measures and notifying you when and if appropriate.

**Your personal data will not be subject to a decision based on automated processing, including profiling.**

### **(E) The rights you have in relation to your personal data**

If not provided otherwise by the applicable legal provisions, you have the following rights in relation with your personal data thus processed:

- ✓ **the right of access;**
- ✓ **the right to rectification;**
- ✓ **the right to erasure/right to be forgotten;**
- ✓ **the right to restriction of processing;**
- ✓ **the right to object;**
- ✓ **the right to data portability;**
- ✓ **the right to withdraw your consent;**
- ✓ **the right to lodge a complaint with Office for Personal Data Protection;**
- ✓ **the right not to be subject to a decision based solely on automated Processing, including profiling;**

**Where the processing of your personal data is based solely on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal.**

Except for the right to file a complaint with Office for Personal Data Protection, as set forth above, such rights may be exercised by sending a written request to the Data Protection Officer, using all or any of the contact details listed below:

- ✓ e-mail address: [DPO@zentiva.com](mailto:DPO@zentiva.com); and / or
- ✓ at our registered office **Zentiva Group, a. s.**, ID no. 07254792, with its registered seat U kabelovny 529/16, 102 00 Praha 10 – Dolní Měcholupy, Czech Republic and/or **Zentiva, k.s.**, ID no. 49240030, with its registered seat U kabelovny 130, 102 00 Praha 10 – Dolní Měcholupy, Czech Republic; and/or
- ✓ by filling in the form available here: [https://www.zentiva.com/gdpr/rights \(ENG\)](https://www.zentiva.com/gdpr/rights (ENG)).

**(F) The retention period of your personal data**

We will keep your personal data for a period of 5 years from the report registration date. Nevertheless, in case the provisions of a special law (e.g., the criminal law, the contravention law, the financial-fiscal law etc.) are applicable to the reported concern, the retention period of your personal data can be extended by the retention period thus provided by the respective special law. Upon the expiry of the said retention period, we will dispose the personal data thus processed, irrespective of their support (paper form or electronic etc.).

**(G) The revisions of the present Privacy Notice**

We regularly review the Privacy Notice, without prior notice but of immediate effect. We will communicate any revision via update of this Privacy Notice online.