

# PRIVACY NOTICE

## A. GENERAL PART

### A.1. COLLECTION AND PROCESSING OF PARTICIPANT DATA

As part of providing the platform for registration and management of the webinar named "All for Alzheimer's, CTAD highlights webinar", ROCHE Farmacêutica Química, Lda., with registered office at Estrada Nacional 249-1 Venteira, Amadora and with Tax ID No. 500 233 810, as personal data controller (hereinafter "ROCHE"), may request and process the Participant's personal data.

The term "personal data" shall refer to any information of any nature regardless of its support-basis, which includes sound and image, concerning an identified or identifiable natural person ("Data Subject" or "Participant"). A person who can be identified directly or indirectly, by reference to an identification number or to more specific elements of their physical, physiological, mental, economic, cultural or social identity, shall be considered identifiable.

### A.2. PERSONAL DATA COLLECTED

Through this Privacy Notice, ROCHE provides the Participant with detailed information about the nature of the collected data, and the purpose and processing that will be carried out in relation to their data.

The personal data collected and processed includes information regarding the name, e-mail address, country, professional type, specialty, Healthcare Organization where the Participant performs his/ her functions and professional license number (optional field).

### A.3. DATA PROCESSORS AND THIRD PARTIES

Within the scope of the processing of the Participant's personal data, ROCHE uses or may use Data Processors so that, on behalf of ROCHE, and in accordance with its instructions, the Participant's data may be processed, in strict compliance with the provisions of the General Data Protection Regulation (hereinafter, "GDPR") and other data protection laws and regulations duly applicable, as well as this Privacy Notice.

The Data Processors may only engage another Data Processors with the ROCHE's prior authorization. Where the Data Processors engage another Data Processors for carrying out specific processing activities on behalf of the ROCHE, the same data protection obligations as set out in the contract or other legal act between the ROCHE and the Data Processor shall be imposed on that other Data Processor by way of a contract or other legal act

For this event, ROCHE engages the company ADDLIFE - IMAGEM E COMUNICAÇÃO, LDA., with registered office at Praça de Alvalade, no. 7, 10st Floor, 1700-036 Lisboa, with Tax ID No. 504 758 683, to proceed on its behalf and according with its instructions with the organization, management, programming, presentation, development, maintenance and support of the webinar, as well as, to validate the identity of the participants to ensure that they are indeed HCPs and to manage the consents.

In accordance with the applicable law, ROCHE may transmit or communicate the Participant's personal data to other entities, in case such transmission or communication is necessary for the performance of the contract established between the Data Subject and ROCHE, or for pre-contractual diligences at the Participant's request, in case it is necessary for the fulfillment of a legal obligation to which ROCHE is subject, or in case it is necessary for the purpose of pursuing the legitimate interests of ROCHE or of a third party. This may include communicating the personal Participant data to companies of the Roche Group, when legally permissible.

### A.4. DATA COLLECTION CHANNELS

ROCHE collects personal data directly from the Data Subject on the registration platform.

## B. GENERAL PRINCIPLES APPLICABLE TO THE PROCESSING OF DATA OF THE DATA SUBJECT

As a general principle, concerning the processing of its personal data, ROCHE undertakes to ensure that the Participant's personal data is:

- Processed in a lawful, fair and transparent manner in relation to its Participant;
- Collected for specified, explicit and legitimate purposes, and not further processed in a way incompatible with those purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and up to date where necessary, with every reasonable step being taken to ensure that inaccurate data, having regard to the purposes for which they are processed, are erased, or rectified without delay;
- Kept in a form suitable for the Participant to be identified, only for the period necessary for the purposes for which the data is processed;
- Processed in a manner that ensures their safety, including protection against unauthorized/unlawful processing, and also against accidental loss, destruction, or damage, with appropriate technical or organizational measures being taken.

The process of data carried out by ROCHE is done in a lawful way, when at least one of the grounds for lawfulness set out in Article 6 of the GDPR is met (and if applicable, with one of the exceptions of Article 9 or 10 of the GDPR).

ROCHE undertakes to ensure that the processing of the Participant's data is only carried out under the conditions listed above, respecting the principles.

The time for which data is stored and retained varies according to the purpose for which the information is processed. There are legal requirements for data to be kept for a minimum time. Therefore, and whenever there is no specific legal requirement, the data shall be stored and kept only for the minimum time necessary for the purposes for which it is being collected or subsequently processed, after which it shall be deleted.

In particular, the Participant's personal data will be kept on the Site for six (6) months after the account becomes inactive.

### B.1. USE AND PURPOSES OF PROCESSING PARTICIPANT DATA

In general terms, ROCHE uses the Participant's data for the following purposes:

- To send the invitations for the Webinar;
- To manage Webinar access and participation;
- To allow participants access after confirmation that they are indeed HCPs;
- If the Participant's consents, to join the on the Roche's platform specific to be used by health professionals;
- If the Participant's consents, to receive invitations and manage participation in events organized by Roche or by third parties.
- If the Participant's consents, to send scientific information relevant to the Participant's clinical practice or interest.
- If the Participant's consents, to send promotional information about Roche products.
- To send information and notifications about the course available on the Site.
- To contact the Participant.

Please note, even though Roche is the personal Data Controller, Roche will only have access to the data of Participants who register for the event when they give some consents.

In cases where no consent is given, Roche will not have access to the Participants' data.

Additionally, it must be noted that when the Participant gives the consent to any such processing, your personal data will be shared with the Roche affiliate of the country indicated by you in the webinar registration form.

### B.2. TECHNICAL, ORGANISATIONAL AND SAFETY MEASURES IMPLEMENTED

To ensure the safety of the Participant's data and its maximum confidentiality, ROCHE processes the information provided with absolute confidentiality, in accordance with its internal safety and confidentiality policies and procedures, which are periodically updated when deemed necessary, as well as in accordance with the legally provided terms and conditions.

Depending on the nature, scope, context, and purposes of the data processing, as well as the risks for the rights and freedoms of the Participant arising from the processing, ROCHE undertakes to implement, when defining the means of processing and during processing itself, the necessary and appropriate technical and organizational measures to protect the Participant's data and to comply with the legal requirements.

ROCHE undertakes to ensure that, by default, only data that is necessary for each specific purpose of the processing shall be processed and that the data shall not be made available to an indefinite number of persons without human intervention.

In terms of general measures, ROCHE adopts the following:

- Regular audits to assess the effectiveness of technical and organizational measures implemented;
- Raising awareness and training staff involved in data processing operations;
- Pseudonymization and encryption of personal data;
- Mechanisms to ensure the ongoing confidentiality, availability and resilience of information systems;
- Mechanisms to ensure the timely restoration of information systems and access to Personal Data, in the event of a physical or technical incident.

### B.3. TRANSFERS OF DATA TO THIRD COUNTRIES

Your personal data may be transferred outside the European Economic Area if the country indicated by you on the webinar registration form is outside the European Economic Area.

In addition, if it may be necessary transfer your personal data outside the European Economic Area for other entities.

For the international data transfers, ROCHE will implement the necessary measures to ensure that these transfers comply with the law, with Chapter V of the GDPR, and that an essentially equivalent level of protection is guaranteed to the Data Subjects' personal data. This may be achieved, for example, by ensuring the existence of an European Commission Adequacy Decision relating to the country of destination or by concluding Standard Contractual Clauses and, if necessary, implementing additional measures.

## C. PARTICIPANT RIGHTS (DATA SUBJECTS)

### C.1. PROCEDURES FOR THE EXERCISE OF PARTICIPANT RIGHTS

The right of access, the right of rectification, the right of erasure, the right of limitation, the right of portability and the right of opposition may be exercised by the Participant by contacting ROCHE through the page [www.roche.pt/dataprivacy](http://www.roche.pt/dataprivacy), the email [portugal.dataprivacy@roche.com](mailto:portugal.dataprivacy@roche.com) or by registered letter to the postal address Estrada Nacional 249 - 1, 2720-413 Amadora.

When the processing of the Participant's personal data is carried out by ROCHE based on the Participant's consent, the Participant shall be entitled to withdraw the consent at any time. The withdrawal of consent shall not, however, compromise the lawfulness of the processing carried out by ROCHE based on consent previously given by the Participant.

The table below contains a summary of the Participant rights as referred to in the paragraphs above.

<b>Right of access</b>	It is possible to obtain confirmation that your personal data is being processed and to access it. For such effects, a copy of the data subject to processing is made available to the Participant on your request, as long as there are no legal restrictions.
<b>Right of rectification</b>	The Participant may request for inaccurate personal data to be rectified or completed.
<b>Right to erasure</b>	Under the terms of the law, the Participant may also, at any time, request the deletion of their personal data. ROCHE may refuse to grant such request in certain situations, when the data is still necessary for the purpose for which it was collected or when the processing is required for compliance with a legal obligation.
<b>Right to restriction of processing</b>	The Data Subject may obtain the limitation of the processing when: a) they contest the accuracy of the personal data; b) the processing is unlawful and the data subject requests limitation as an alternative to erasure; c) ROCHE no longer needs the data for its original purpose and the data is requested by the data subject for the purposes of declaring, exercising or defending a right in legal proceedings and; d) when the Data Subject has opposed the processing, until it is ascertained whether the legitimate interests of the controller override those of the data subject.
<b>Right to data portability</b>	When the ground for data processing is consent or the performance of the contract, and there is processing by automated means, the Data Subject shall have the right to request the portability of their data. This right may not, however, prejudice the rights and freedoms of third parties.
<b>Right of opposition</b>	When data is processed based on legitimate or public interest, or for the purposes of direct marketing, the data subject shall have the right to object to the processing.
<b>Right to withdraw consent</b>	When consent is the lawful basis for data processing, the Participant has a right to withdraw consent at any time. This does not, however, invalidate the lawfulness of processing carried out up to that date based on consent previously given.

ROCHE will respond in writing (including by electronic means) to the Participant's request without undue delay and, in any event, within a maximum period of one month from the receipt of the request, although this time period may be extended in cases of particular complexity or due to the number of requests.

If the requests submitted by the Participant are manifestly unfounded or excessive, particularly due to their repetitive nature, ROCHE reserves the right to charge administrative costs or to refuse following up the request.

Without prejudice to any other administrative or judicial remedy, the Data Subject has the right to lodge a complaint with the National Commission for Data Protection or with another competent authority under the law, when they consider that their data is not being lawfully processed by ROCHE, pursuant to the applicable legislation and this Notice.

### C.2. PERSONAL DATA BREACHES

In case of a data breach and insofar as such breach is likely to involve a high risk to the rights and freedoms of the Participant, ROCHE undertakes to report the personal data breach to the Supervisory Authority within 72 hours from the knowledge of the incident.

In addition, ROCHE will communicate this breach to the Participant when required by law or when ROCHE deems it relevant. In legal terms, this communication to the Participant is not required in the following cases:

- When ROCHE has implemented adequate protection measures, both technical and organizational, and those measures have been applied to the personal data affected by the breach, especially measures rendering the personal data unintelligible to any person not authorized to access the referred data, such as encryption;
- If ROCHE has taken subsequent measures to ensure that the high risk to the Participant's rights and freedoms is no longer likely to materialize; or
- In case the communication to the Participant implies a disproportionate effort on behalf of ROCHE. In such case, ROCHE shall make a public communication or take a similar measure through which the Participant will be duly informed.

## D. FINAL PART

### D.1. QUESTIONS

If you have any questions or concerns regarding the way ROCHE handles your personal data, please contact the Data Privacy Coordinator of ROCHE [amadora.dpo@roche.com](mailto:amadora.dpo@roche.com).

### D.2. APPLICABLE LAW AND JURISDICTION

The Privacy Notice, as well as the collection, processing, or transmission of Participant data, is governed by the provisions of the GDPR and the laws and regulations applicable in Portugal, in particular the GDPR Implementation Law.

Any disputes arising from the validity, interpretation or execution of the Privacy Notice, or that are related to the collection, processing or transmission of the Participant's data, shall be exclusively submitted to the jurisdiction of the courts of the district of ROCHE's headquarters (Tribunal Judicial da Comarca de Lisboa), without prejudice to the applicable legal rules.

### D.3. CHANGES TO THE PRIVACY NOTICE

ROCHE reserves the right to change this Privacy Notice at any time. In case this Privacy Notice is modified, the date of the last modification, available at the top of this page, will be updated. If the change is substantial, a notice will be posted on the Site.