

# Privacy policy

This website has been developed and is operated by Swedish Orphan Biovitrum s.r.o. (hereinafter referred to as “Sobi”) in order to establish and operate a platform for sharing materials intended for healthcare professionals, specifically a collection of materials originating, for example, from webinars, recorded seminars, and similar events.

This privacy policy applies to personal information collected by Swedish Orphan Biovitrum s.r.o. (“Sobi”) during an interaction between you and Sobi. The interaction with Sobi may take place via a Sobi controlled webpage. Please read this privacy policy carefully and feel free to contact us if you have any questions.

This privacy policy explains what personal information may be collected and processed about you during your visit to a Sobi owned website to which this policy applies, and how Sobi may use that information. It also includes a description of your rights related to Sobi’s use of your personal information.

## Personal data

In relation to your use of this website, Sobi may collect certain personally identifiable information, meaning any information relating to an identified or identifiable person either directly or indirectly, such as names, email addresses, country through your interactions with us via our websites. In addition to that, upon registration on our website we may ask for your area of specialization and medical institution affiliation to confirm that you are a healthcare professional.

In relation to your use of this website, Sobi may also collect certain metadata that result from your access to and usage of the website, such as internet protocol (IP) address, from which an approximate location may be determined, date and time of the access to the website, page interaction including error logs and other metadata (“metadata”). Such metadata do not directly identify you, but it is theoretically possible that you might be identified on the basis of the metadata, therefore, we treat them as personal data. However, we do not use them for your identification.

Sobi has issued specific privacy notices for pharmacovigilance/drug safety and clinical trial activities. Please refer to the Pharmacovigilance Data Privacy Policy and the document “Clinical studies and data privacy” for more information.

## Data controller

Swedish Orphan Biovitrum s.r.o., identification No.: 281 71 276, with registered offices at Na strži 1702/65, Nusle, 140 00 Prague 4, Czech Republic, e-mail address [privacy@sobi.com](mailto:privacy@sobi.com), is responsible for the processing of your personal information in scope of this policy as it decides why and how it is processed, thereby acting as the “data controller” of such personal information.

## Legal basis for processing

Sobi may process your personal data based on Sobi’s legitimate interest, when necessary to maintain websites and ensure its security and access to our website. Sobi will also rely on its legitimate interest to provide training and educational materials to healthcare professionals for the processing of your personal data if you decide to register and use our website. In case the data is necessary in order for us to comply with a legal obligation, the legal basis for the processing of personal data will be our legal obligation.

Collection and use of personal information may in some situations require Sobi to ask for, and obtain consent, before personal information is collected and used. If the consent concerns a child under the age of 16 (or such other lower age determined by the local laws where you live), consent must be given by an authorized person with parental responsibility for the child.

## How we may collect personal information

The personal information collected by Sobi may be information you voluntarily disclose, such as e.g., information provided in contact forms or in registration pages on websites. Sobi may also collect certain personal information that does not directly identify you, but which makes identification possible through the combination of other information or identifiers such as your company name and position.

When you interact with Sobi, the website automatically collects metadata relating the your access to and usage of our website, which might be considered personal data.

## How we will use your personal data

By providing your personal information to us, you agree that, where it is permitted by local law, we may use the information:

- to maintain and improve our website and ensure its security and enable your access our website
- to comply with local laws, for example reporting adverse event information

- by placing cookies on your device. For more information about how we use cookies for this purpose, what cookies are and how you may choose to remove cookies from your device, please read our Cookie Policy, which is available on the website we operate.
- for other purposes that may be detailed on the website or otherwise agreed between Sobi and you.

## **Direct Marketing**

We will only use the personal information collected from you for the purposes for which it is collected. Personal information collected for purposes other than marketing will not be used for marketing. When legally required, Sobi ensures that consent is obtained prior to sending marketing information.

## **How we share your personal data?**

In the course of our activities and for the same purposes as those listed in this privacy policy, your personal information can be accessed by, or transferred to the following categories of recipients on a need to know basis to achieve such purposes:

- our personnel (including personnel, departments or consultants),
- other companies from Sobi group of companies,
- our independent agents or brokers (if any),
- our other suppliers and services providers that provide services and products to us,
- our IT systems providers, cloud service providers, database providers and consultants,
- any third party to whom we assign or novate any of our rights or obligations, and
- our advisors and external lawyers in the context of the sale or transfer of any part of our business or its assets.

Sobi is responsible for any processing by such third parties and will ensure that such contractors have entered into written agreements allowing Sobi to comply with our obligations under this privacy policy and applicable laws.

## **Transfer of data outside the EEA**

This website is owned and operated by Sobi in the Czech Republic, but the personal information collected by Sobi may be made accessible or transferred to the recipients listed above. Such recipients may be located in other countries, including countries outside the European Economic Area ("EEA"). The level of legal protection for personal data is not the same in all countries and may not provide the same level of protection as the data

protection laws in the EEA or of the country in which you live. In case of such transfer, Sobi will take reasonable efforts and security measures in an effort to keep your information secure, and Sobi is responsible to ensure that the transfer takes place by means of EU approved “Standard Contractual Clauses” or another method in accordance with applicable law. You may contact us at [privacy@sobi.com](mailto:privacy@sobi.com) or if you have any questions about the methods we use to safeguard any personal information transferred outside the EEA.

## **Security of personal information**

We take reasonable steps to protect your personal information from loss, misuse, unauthorized access, disclosure, alteration or destruction by using security precautions that provide for industry standard protection. However, no data stored or transmitted over the Internet can be guaranteed to be completely secure. As a result, to the extent permitted under applicable law, we make no warranty, express or implied, concerning the security or integrity of any personal information.

## **Retention and erasure of personal information**

We will retain your information only for the period necessary to fulfil the purposes outlined in this privacy policy or the period to which you have consented unless a longer retention period is required by law.

## **Information regarding your rights**

Whenever we process your personal information, we take reasonable steps to keep your personal information accurate and up-to-date for the purposes for which it is collected. We will provide you with the ability to exercise the following rights under the conditions and within the limits set forth in the applicable law:

- the right to be informed about what personal information we have about you and how we process it,
- the right to access your personal information processed by us and, if you believe that any information relating to you is incorrect, obsolete or incomplete, to request its correction or updating,
- the right to request the erasure of your personal information or the restriction thereof to specific categories of processing,
- the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal,
- the right to object, in whole or in part, to the processing of your personal information. With certain exceptions, this includes the right to object to direct marketing,
- the right to request a data portability, i.e., that the personal information you have provided to us be returned to you or transferred

to the person of your choice, in a structured, commonly used and machine-readable format without hindrance from us and subject to your confidentiality obligations, and

- the right to object to automated decision-making including profiling resulting in a significant or legal effect, i.e., you can request a human intervention in any automated decision-making process related to processing of your data resulting in a significant or legal effect, and where such processing is not based on your consent, authorized by law or necessary for the performance of a contract.

If you have any questions, requests or complaints about how we process your personal information, please contact us at [privacy@sobi.com](mailto:privacy@sobi.com).

If you have any comments or complaints regarding the way your personal data is being handled, you have the right to contact the supervisory authority in the Czech Republic (Czech: *Úřad pro ochranu osobních údajů*, see this [link](#)) or in the country where you live or work, to lodge a complaint.

## Links to other websites

Websites operated by Sobi contains links to a number of sites that we believe may offer useful information for our website visitors. This privacy policy and the obligations under it do not apply to such websites (unless the other website is owned by Sobi and directly links to this policy). We suggest contacting those websites directly for information on their personal data protection, security, data and collection policies. Sobi cannot be held liable for any actions by or content provided by such third-party websites.

## Changes to this privacy policy

We may update this privacy policy from time to time. In case of material changes to this policy (meaning any changes that materially affect your rights), a temporary notice will be published on our websites.

Last updated: 03/12/2025