

Personal Data Protection Charter

At ZESTE SANTE, the confidentiality of Personal Data is of paramount importance. This is why we wish to share this Privacy Policy with you. It will provide answers to your legitimate questions concerning the use of your Personal Data.

The Privacy Policy details the measures implemented by ZESTE SANTE when processing your Personal Data in accordance with the applicable regulations, in particular the General Data Protection Regulation of 27 April 2016 (EU 2016/679) which came into force on 25 May 2018.

The purpose of the contents of this Personal Data Protection Charter is to specify the terms and conditions under which your Personal Data can be collected and used in the context of our activity.

1. Who are we?

ZESTE SANTE is an independent agency specialising in pharmaceutical market research.

ZESTE SANTE (SARL) is registered in the Trade and Companies Register of Lille Métropole under number 491 312 005. Its head office is located in the Eurasanté health cluster, 30 Avenue Pierre Mauroy - Bâtiment C, 59120 LOOS (hereinafter referred to as "ZESTE SANTE").

2. How is your data used?

2.1 What information might we collect?

• Healthcare professionals

The Personal Data of healthcare professionals may be collected:

- Directly, i.e. via the form used to collect or update their contact details in the ZESTE SANTE healthcare professionals database, available on its Website. For further details, consult [our Privacy Policy].
- Indirectly, in particular via public sources such as healthcare facility websites.

In the context of participation in market research, ZESTE SANTE collects the following Personal Data:

- Your first name and last name*
- Your unique affiliation number for the relevant professional council/board of your profession*
- Professional postal address*
- Professional email address
- Telephone number

The mandatory Professional Data is identified by an asterisk (*)

• Patients

Patients' Personal Data can only be collected indirectly, in particular via patient associations or healthcare professionals.

In the context of participation in market research, ZESTE SANTE collects the following Personal Data:

- Your last name and first name
- Home address
- Personal email address
- Telephone number

2.2 For what purposes is your Personal Data collected and processed?

In accordance with the applicable legal framework, all collection and processing of Personal Data must be justified by one or more identified purposes, based on one of the legal bases provided for in the legislation and regulations applicable to Personal Data Protection, and may only be retained for specific periods.

ZESTE SANTE does not intend to collect information which is not necessary and useful for the processing of your Personal Data for the purpose of communication and participation in the performance of market research.

Your Personal Data may therefore be used for one or more specific identified purposes, of which you are informed beforehand.

Purpose [Data processing objectives]	Legal basis	Data retention period	Zeste Santé's Treatment role
Conducting market research with healthcare professionals or patients	Consent	12 months as from the end of the survey	Data processor
Communication in order to propose market research to healthcare professionals or patients	Consent	3 years as from the last contact with the healthcare professional or patient	Data controller
Remuneration of healthcare professionals	Performance of the contract	10 years	Data controller
Patient compensation	Performance of the contract	10 years	Data controller
Fulfill its legal obligations for healthcare professionals (French Bertrand Act, Anti-Gift Act)	Legal obligation	10 years	Data controller
Pharmacovigilance	Consent	10 years	Data processor
Send information emails (Newsletter)	Consent	3 years as from the last contact with the healthcare professional	Data controller

3. What are your rights?

At ZESTE SANTE, we are committed to ensuring that the rights granted to you by the personal data protection regulations and legislation are guaranteed. For this reason, we undertake to enable you to exercise the rights stated below.

To do so, you can contact our Data Protection Officer (DPO) at the following email address: dpo@wearezeste.com.

3.1. Right to access your Personal Data

You have the right to be informed if your Personal Data is processed by ZESTE SANTE and its partners/customers. If this is the case, we will explain to you how these partners use your data. We will also inform you how and why this data is used, what data categories are concerned, with whom and where this data is shared, how long the data is retained and if your data is used through automated processing enabling the implementation of automated individual decisions in particular.

3.2. Right to request rectification

It is essential for ZESTE SANTE to have accurate Personal Data. For this reason, we will rectify any inaccuracies in your data without delay.

3.3. Right to request erasure ("right to be forgotten")

In accordance with the applicable legal and regulatory measures, you have the right to request the deletion of your Personal Data, in particular if it is no longer justified by the purposes for which it was collected.

We will delete your Personal Data in order to comply with our legal obligations, in particular if your data is no longer necessary, or if you ask us to do so.

3.4. Right to restrict processing

You can ask ZESTE SANTE to restrict the processing of your Personal Data if you consider that your data is not accurate or if you ask us to delete your data. Moreover, you can ask us to restrict processing if you have the right to object to processing.

3.5. Right to data portability

You can ask us for a copy of the data you have provided us with in a structured, commonly used, machine-readable form if this data is processed using automated procedures. If it is technically possible, you can ask for this data to be transferred directly to a Third Party.

3.6. Right to object

You can object to the processing of your Personal Data if you have legitimate grounds which you can explain, and if the processing to which you object does not enable ZESTE SANTE to fulfil a legal obligation.

3.7. Right to lodge a complaint with an inspection authority

If you deem that ZESTE SANTE is not complying with this Privacy Policy or that your rights guaranteed by the applicable law are not adequately protected by ZESTE SANTE, you have the right to lodge a complaint with a competent inspection authority. In France, this authority is the CNIL, the French Data Protection Authority, <https://www.cnil.fr/>

4. Who are the recipients of your personal data?

In order to provide better service, we may, in certain cases, share your data with third parties, in particular technical service providers. We only share your data with service providers who can provide adequate guarantees with regard to the implementation of appropriate technical and organisational measures to ensure the protection of your data and rights.

These recipients are:

- Our customers (international market research agency or laboratory sponsors)
- Our subcontractors, in order to carry out the service (translators, interpreters, analysts and technical personnel for interviews requiring video transmission).
- The administrative authorities

5. Where do we store your personal data?

All the data we process in this context is stored within the European Economic Area (hereinafter referred to as "EEA") but can also be transferred and stored outside the EEA, particularly in the context of research where the sponsors are based outside the EEA.

In order to ensure the security of your data, we only use subcontractors who implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of the regulations in terms of personal data protection.

We also ensure that the processing of the data by our subcontractors is performed in accordance with our Privacy Policy. In the same way, if research requires the transfer of your data outside the EEA, we ensure that this transfer is governed by one of the guarantees recognised as compliant by the European Regulation.

6. Updates

This Charter may be amended or adapted at any time. We encourage you to consult it regularly.

7. Contact

If you have any questions concerning this Charter and the way in which we use your Personal Data, you are welcome to address them to our Data Protection Officer at the following address: dpo@wearezeste.com.

