EXTRACT OF JOINT CONTROLLER AGREEMENT

FOR PROCESSING OF PERSONAL DATA CONCERNING THE RESPONDENTS

The Client Company and the Agency **Doxa Pharma S.r.l** (hereinafter collectively referred to as the "Parties", individually as "Client Company" and "Agency") shall mutually ensure that they know and apply, within their relevant activities, all existing rules on data protection that are relevant for the proper management of their activities

Article 1: RECITALS AND ANNEXES

[OMISSIS]

Article 2: COMPETENCE

[OMISSIS]

Article 3: PROCESSING ACTIVITIES

Processing activity under this Joint Controller Agreement is aimed at performing market researches, by means of qualitative methods (such as focus groups, face-to-face interviews, ethnographic work, telephone interviews, forums and web discussions). Respondents may be directly recruited by the Agency (also based on a list of names provided by Client Company) or by the Client Company itself. If respondents are recruited by the Agency using Third-Party Companies, the Agency is liable to Zambon for the lawfulness and correctness of processing previously made by said third-party companies, as well as for the quality and accuracy of data to be processed.
In these contexts, the staff of Client Company may monitor the researches:
- In real-time through the one-way mirror available at almost all main towns and/or remotely (Focus Vision or other platform: for example Zoom, Webex, Teams etc).
- After conclusion of the research by listening to audio recordings.
- Observing participants in given contexts, such as, for example, pharmacies and/or product retail outlets.

The Parties reserve the right to identify, during the processing activities, additional procedures and safeguards so that activities concerning the processing are carried out with due regard to principles set out under Article 5 of the Regulation and the national legislation of the member country where data are processed, with particular reference to the principles of lawfulness, correctness and transparency towards the data subjects, as well as limitations of the purposes, data minimization and correctness of processing.

Article 4: SUBJECT MATTER

Entering into this Joint Controller Agreement (Article 26 of the Regulation), the Parties, for the processing activities under previous Article 3, determine as follows:

a) **[OMISSIS]**

b) **Exercise of the rights of the data subject pursuant to Articles 15 et seq. of the Regulation** (collection and management of complaints by data subject): the Agency Doxa serves as contact point for the data subjects (in this case, respondents) in order to handle the requests from these latter. In these cases, the Agency undertakes to previously ascertain the respondent's identity to check the legitimacy of the request and, where necessary, to promptly notify the Client Company to ensure an adequate response within the timeline set by the Regulation. Until the research has not started, the data subject has the right to revoke his/her consent by requesting to keep his/her interview anonymous for the Client Company. In any case, the data subject may exercise his/her rights towards either Party that have the obligation to abide.

c) **[OMISSIS]**

      d)   **Adoption of appropriate security measures pursuant to Articles 32 and 89 of the Regulation**: in particular, each Party undertakes to ensure a level of security adequate to the risk, taking into account, in particular, the risks that may arise from the specific processing under the Agreement such as, for example, accidental or unlawful destruction or loss of data, as well as unauthorized access or processing that is not allowed or does not comply with the purposes for which data were collected.

      e)   **Timely notification of a personal data breach** to the Supervisory Authority and the data subject in the cases where conditions under Articles 33 and 34 of the Regulation are met: without prejudice to mutual collaboration, each Party takes steps autonomously.

Article 5: TERMINATION

[OMISSIS]

Article 6: TERM

[OMISSIS]

Article 7: AMENDMENTS TO THE AGREEMENT

[OMISSIS]

Place and date: Milan 13/06/2022