

# MEDICAL INFORMATION REQUEST PRIVACY POLICY

The protection of your personal data is particularly important to us, AOP Orphan Pharmaceuticals GmbH, Leopold-Ungar-Platz 2, 1190 Vienna, Tel.: +43 1503 72 44 ("we," "us"), and we take your rights to privacy and data protection very seriously.

For this reason, we process your data in accordance with the EU General Data Protection Regulation ("GDPR") and any applicable local data protection provisions. To support compliance with these standards, we have appointed a Data Protection Officer, Alona Klammer, who can be reached at [dataprotection@aoporphan.com](mailto:dataprotection@aoporphan.com). With this privacy policy, we aim to inform you about the data we process when you submit a medical request.

## 1. MEDICAL REQUESTS

When you submit a medical request to us, either per email, telephone, or via a filled-in form (e.g., provided at a conference), we will process the personal data you provide and, in some cases, additional data needed to address your request: Name, contact details, occupation, and firm (if applicable) of the person making the request, and the request itself. In case the requester is a patient, we may process the patient's data relevant for the request, which can include name, contact details, and any provided relevant medical history. In case it is a patient, we will immediately delete any medical data in case it is not relevant, and we will anonymize the request as soon as it is replied to. We are legally required to process this data in order to provide accurate medical information and comply with applicable legal and regulatory obligations, including under Article 98 of Directive 2001/83/EC. The processing is thus necessary for compliance with a legal obligation to which we are subject according to Art 6 Para 1 lit c GDPR and Art 9 Para 2 lit I GDPR if you are a patient providing health data.

### Contact:

AOP Orphan Pharmaceuticals GmbH  
Leopold-Ungar-Platz 2  
1190 Vienna  
[dataprotection@aoporphan.com](mailto:dataprotection@aoporphan.com)  
("AOP Health", "we", "us")

## **2. DATA RETENTION**

We process your data only as long as it is necessary for the fulfilment of the respective purpose. We retain data in connection with your enquiries for the period that is required to be able to respond to the request and any follow-up questions.

## **3. DATA TRANSFER**

If required in the course of our activities, we transfer your personal data to IT service provider, cloud services, data hosting and processing or similar services. Our processors are carefully selected and regularly audited. They process the data based on processing agreements exclusively on our behalf and on the basis of our documented instructions.

In addition, we may transmit your personal data - insofar as necessary - to the following recipients, who act as independent data controllers:

- external third parties who advise and support us to the extent necessary on the basis of our legitimate interests (e.g. legal representatives and insurance companies, auditors and consultants, etc);
- courts, authorities and other public bodies to the extent required by law or on a case-by-case basis (e.g. local drug and health authorities; tax authority, data protection authority, civil courts, etc).

### **Recipients outside of the European Union**

When providing our services, your personal data may be transferred to recipients who are either located or process data outside the European Union. If there is no adequacy decision pursuant to Art 45 GDPR for the respective third country, we implement suitable guarantees to maintain the level of data protection according to Art 44 GDPR. This usually involves the conclusion of standard contractual clauses pursuant to Art 46 Para 2 lit c GDPR or the existence of binding corporate rules due to Art 47 GDPR. If necessary due to legal conditions in the respective country, we also implement supplementary measures in order to take the special data protection situation into account. Upon your request, we will gladly provide you with a copy of the respective appropriate guarantees with a specific data recipient. If no such appropriate guarantees are available for the data transfer, we can base the processing on your express consent in individual cases pursuant to Art 49 GDPR. In this case, we will inform you separately.

## 4. DATA SUBJECT RIGHTS

As a data subject, you have the right to information about the personal data processed about you. Furthermore, you have the right to rectification, erasure and restriction of processing or to data portability. You also have the right to object to the processing of your personal data if this results from your particular situation or if your personal data is processed for direct marketing purposes. If the processing is based on your voluntary consent, you can withdraw this consent at any time, free of charge and without giving reasons, with effect for the future, e.g. by sending an email to [data-protection@aoporphan.com](mailto:data-protection@aoporphan.com).

Furthermore, you have the right to complain to the competent supervisory authority. In Austria, it is the Austrian Data Protection Authority, accessible at <https://dsb.gv.at>.

However, before you contact the authority, if you want to exercise your data protection rights or have any other questions about data protection, please contact us directly at using the contact details listed above. We will be happy to provide you with advice and answers at any time.