

Privacy Notice

Almirall, N.V. ("Almirall", "we", "our") is committed to protecting the privacy of its stakeholders and complying with data protection principles and applicable laws.

This Privacy Notice (together with the Cookies Policy of each website and the Terms of Use) sets out the basis on which we collect and process personal data on our websites and on our social media profiles. By visiting our websites, actively providing us with personal information, or following any of our social media profiles, you accept the practices described in this Privacy Notice.

For more information about this document or how we process your personal data, you can contact our Global Data Protection Officer at the email address dpo.global@almirall.com.

1. Basic Information:

Who is the controller of the data you provide?	The legal entity which collects and processes your data as data controller is Almirall, N.V. You can find more information about us at www.almirall.com
Which kind of personal data we process?	We will handle your personal data in different ways depending on the situation. This includes: <ul style="list-style-type: none">• Information you give us when you register on our websites.• Data we collect from your use of our websites, including technical details and Cookies.• Information you provide when filling out a form. If you agree, we may also use personal data from other sources. Additionally, we may process your data if you follow us on social media.
For what purposes do we need your personal data?	Depending on your choices and on the nature of our websites, We may use your data to (i) enable your navigation on our websites and social media, and provide you with the services they contain (this may include sending electronic communications, such as newsletters highlighting content from our websites, if you consent so); (ii) improve your user experience on our websites and have a personalized interaction with you; (iii) keep you updated on other news, activities, products, and services from Almirall that may be of interest to you, through any contact channel you provide.
Which is our lawfulness to process your personal data?	Depending on the nature of the purpose, the processing of your personal data can be based on your specific consent, on our legitimate interest, in the execution of an agreement with you and on the compliance of legal obligations to which We are subject.
¿For how long we will keep your personal data?	Your personal data will be stored and processed until the earliest of the following dates: the date you request us to delete your data and cancel your account, or the date Almirall must comply with any applicable law related to the service provided through the Websites. Additionally, we may stop processing your data if we identify you as an "inactive" user of any of our websites.
Are we going to share your personal data?	Your personal data will not be shared with third parties, except with our Service providers that help us to provide our services and communications (for example, for digital campaigns, data analysis, and related services to our websites and social media).
Which are your rights as data subject and	You can exercise your rights of Access, rectification, erasure and others, as explained in the Additional Information.

how you can exercise them?	
Additional Information	If you want to learn more about the Protection of your personal data, please consult the Additional Information.

2. Additional Information:

1. ¿Who is the Controller of the personal data you provide?

For the purposes of applicable privacy legislation, the data controller of the data provided through our websites and our social media profiles is Almirall, N.V. a Belgian company, with registered office at Lenneke Marelaan 4 1932 Zaventem, Belgium.

Please note that "data controller" means the legal entity that decides the purposes and means by which your personal data will be processed.

2. What type of personal data do we process?

We may collect and process the following data about you:

a) Information you provide to us: You may actively provide us with personal information in many ways. For example, during your registration process on our websites, when you follow us on our social media profiles, or whenever you fill out a form or create or share content or comments in the spaces provided for this purpose on our websites or social media (for example, but not limited to, when you download materials of your interest, when you participate in promotions or other type of campaigns, or when you report a problem with our websites or you make a query). In any case, we try to limit to collect the information that is strictly necessary to process your request in each case. The information you provide may include, among others, your name, postal address, email address, country, specialty, workplace, and phone number, or other information relevant to each case.

b) Information we collect about you: When you browse our websites or you follow us on social media, certain information may be collected passively (e.g., collected without you actively providing the information) using various technologies. We and our service providers may collect such information in the following ways:

- Through the use of Cookies or similar technologies: Cookies are pieces of information stored directly on the device you use. Cookies allow us to collect information such as the type of browser you use, the time you spend on our websites, the pages you visit, and your language preferences, among others. We and our service providers use the information for security reasons, to facilitate navigation, and to display information more effectively. We may also use Cookies to recognize your device, making your use of our websites easier and allowing us to display the website content correctly on your device. Additionally, we may use Cookies to collect statistical information about the use of our websites to continuously improve their design and functionality, understand how users use them, and help us resolve any questions that may arise. Some of our Cookies are managed by third parties. You can refuse to accept these Cookies by following your browser's instructions or through the cookie preference centre found in the Cookie Policy of each of our websites.
- Through your browser: Browsers and website provider automatically collect and store information in so-called server log files, which your browser automatically transmits to us. These are: browser type and version, operating system used, referrer URL, host name of the device accessing the site, time of the server request, and IP address. Additionally, when you interact with our websites through social media, or you click "Like" or analogous buttons on social media, when you follow us or you share our content on social media, we may receive information from those social media platforms, including information about your profile, user

ID associated with your social media account, and any other information you allow to be shared with third parties on each social media platform;

c) Information we receive from other sources: We may receive information about you if you use any of the websites we operate through the use of Cookies, or other services we provide or from other interactions with you. In this case, we will inform you when we collect those data that can be shared internally and combined with the data collected on this website and from other sources. We are also working closely with third parties (including, for example, technical service providers, advertising networks, analytics providers, search information providers) and may receive information about you from them, only if you provide us with your consent. The information collected through cookies will be anonymized and processed in aggregate unless you give us specific consent to link it to your profile, by agreeing to maintain a personalized interaction with you, as explained in more detail in section 3.b) below.

Except where expressly indicated, the provision of your personal data will always be voluntary and will not affect the quality or use of the services offered by us. However, if you provide incomplete or incorrect data, this may sometimes prevent Almirall from providing the services you request.

3. For what purposes do we process your personal data?

Your personal data will be used for different purposes, as indicated below:

a) To provide you with the services and content that you can access through our websites or social media profiles. These services may include sending electronic communications strictly related to the website to which you subscribe to the newsletter, downloading content, or participating in promotions, sending us your comments or questions. Part of the data is also collected to ensure the provision of error-free websites, improve the services offered through the platforms, and, where applicable, offer you personalized views based on the data you have already provided during the registration process on those websites that have user registration space. We could also use them to obtain an analysis of our website traffic, generate aggregated and anonymized analysis reports to measure the performance of our campaigns and digital content, or analyse situations where we detect unauthorized access or attempted access to our servers.

b) To improve your user experience and have a personalized interaction with you by combining data from your activity, interests, and preferences, your browsing habits and behaviours, collected on the platform or collected from internal and external sources. Check the Cookies Policy for more information, especially the section related to tracking tools, as well as to learn more about how to configure the cookies you want to be installed on the device from which you visit any of our websites.

c) To provide you with electronic communications with news about Almirall's activities, products, and services, through any provided channel (email, postal mail, phone, and others). This information may include Almirall's subsidiaries that belong to the same group of companies. You can find more information about our subsidiaries at www.almirall.com. These communications, which may be commercial communications, will or may be personalized and directed to you based on the information you have voluntarily provided to us through the registration process on any of our websites or from internal sources. If you give us your consent for the purposes indicated in section 3.b) above, we could combine this information with your browsing habits and behaviors, collected on our websites or collected from internal and external sources.

Your personal data will not be used for other purposes, except for other situations where Almirall is legally required to process your data to comply with legal, judicial, or governmental authority orders, when we reasonably believe we are legally obligated to do so.

4. What legal basis legitimizes us to process your data?

- a) To provide you with the services and content that you can access through our websites/ social media when you browse without registering: our legitimate interest, as well as the execution of a contract or pre-contractual measures, in relation to the Terms or Conditions of Use of our websites.
- b) Electronic communications (newsletters or others) related to relevant content on our websites: your consent.
- c) Participation in promotions, downloading materials, or sending us your comments or questions: your consent.
- d) To improve your user experience and have a personalized interaction with you by combining data from your activity, interests, and preferences, your browsing habits and behaviours, collected on the platform or collected from internal and external sources: your consent.
- e) To provide you with electronic communications with news about Almirall's activities, products, and services, through any provided channel: your consent.
- f) To ensure the provision of error-free websites: our legitimate interest in ensuring that the websites function properly from a technical point of view.
- g) Analysis of our website traffic or generating aggregated and anonymized analysis reports to measure the performance of our campaigns and digital content: our legitimate interest in improving our services.
- h) Compliance with our legal obligations.

5. How long will we keep your personal data?

The personal data you provide will be stored and processed until the earliest of the following dates: when you request the deletion of your personal data and the cancellation of your account, until the date Almirall is required to comply with any legal obligation that may arise in relation to any service provided through the Websites, or if we identify you as an "inactive" user, as detailed more thoroughly in our Terms of Use of the websites that have User registration areas.

6. Will we share your personal data?

Your data will not be shared with third parties other than our service providers who help us better provide the services related to our websites and carry out marketing actions according to your profile (for example, agencies that help us organize events, digital campaigns, data analysis, among others), (hereinafter, the "Recipients").

Whenever it is necessary to send information to Recipients located outside the European Economic Area in territories for which the European Commission has not issued an adequate level of protection decision, the personal data will be duly protected by standard contractual clauses approved by the European Commission [Standard Contractual Clauses \(SCC\) \(europa.eu\)](https://eugd.europa.eu/eugd-portal/en/standard-contractual-clauses-scc), or using a Certification or Binding Corporate Rules.

7. Which are your rights as data subject and how you can exercise them?

You may exercise at any time any of the following rights before Almirall in connection with the processing of your personal data:

- a. Right of access: means the right to obtain access to your information that Almirall processes.
- b. Right to rectification: means the right to be entitled to have your information corrected if it is inaccurate or incomplete.
- c. Right to erasure: in simple terms, it means to request the deletion or removal of the information concerning him/her where there is no compelling reason for an organisation to

keep using it. This right is also known as “the right to be forgotten” and is not a general right to erasure; there are exceptions.

- d. Right to restrict processing: means the right to ‘block’ or suppress further use of the information concerning You in certain circumstances. When processing is restricted, we inform you that Almirall can still store your information, but may not use it further.
- e. Right to data portability: means the right to obtain and reuse personal data by a third party in a structured, commonly used and machine readable format in certain circumstances. If you request the direct transfer of the data to another data controller, this will only take place if it is technically feasible.
- f. Right to object: means the right to object to certain types of processing, in certain circumstances.

The lawfulness of the data processing up to your consent withdrawal remains unaffected by the revocation.

If you would like to exercise any of the abovementioned rights, you can send us an electronic request to our address privacy.benelux@almirall.com.

Finally, we inform you that you can contact the Spanish Data Protection Agency or any European supervisory entity for any claim arising from the processing of your personal data. You can find an updated list of such organizations by jurisdiction at [Our Members | European Data Protection Board \(europa.eu\)](#).