
Fintepla[®] Website Privacy Policy

Zogenix International Limited and its affiliates respect your privacy and recognize your need for appropriate protection and management of personal data you share with us or that we otherwise collect. The purpose of this privacy policy is to inform you what personal data we collect from you when you visit Fintepla[®] website (the “**Website**”); how we use such personal data; the choices and rights you have regarding our use of, and your ability to review and correct, your personal data.

This privacy policy only applies to personal data that is collected by Zogenix or third parties acting on our behalf via this Website. It does not describe the way in which we collect or use personal data obtained offline or through other websites owned by Zogenix, nor the collection, use or disclosure guidelines or corresponding practices of third parties who independently collect and process personal data via this Website.

Data Controller

For the processing of your personal data as described in this privacy policy, the controller within the meaning of the General Data Protection Regulation (“**GDPR**”), UK GDPR and UK Data Protection Act 2018 is Zogenix International, Ltd., located at The Pearce Building, West Street, Maidenhead, Berkshire, SL6 1RL United Kingdom (“**Zogenix**”, “**we**”, “**our**”). Should you have any questions or suggestions concerning data protection, or to exercise your rights, please contact Zogenix at the contact details set out at the end of this privacy policy. You can also contact our Data Protection Officer at: EUdataprivacy@zogenix.com.

Personal Data We Collect

For the purpose of this Privacy Policy, “**personal data**” means any information related to you as an identified or identifiable natural person.

We collect personal data that you provide to us, such as your contact information (e.g. name, address, telephone number, e-mail address) or communication channel preferences (for example whether you prefer to receive certain types of information by email or in writing), and information that we collect automatically when you use the Zogenix Website. We might also combine personal data about you collected through the Website with personal data collected offline from available public sources or that have been provided to us by third parties.

Whether or not to provide such personal data is completely your own choice, for example when you register to an event or webinar, contact us for any question and register for newsletters from Zogenix. In these cases, if you choose not to provide the personal data, you may be unable to access certain services and content on our Website or participate to an event.

In general, you can visit our Website without telling us who you are. However, if you contact us or decide to register for newsletters and events, we collect certain types of information, which may

include your name, address, or e-mail address, that we will use according to the purpose for which you provide it to us.

We will also collect personal data automatically, including the IP-address of users visiting our Website, the Internet domain address from which people visit us and information about how our visitors navigate the Website. We may use tools such as cookies, as described below, to collect such information.

Personal data that you may provide through our Website or we might otherwise process includes:

- Personal and Business Contact information, such as your first name, last name, email address, job title, role and country;
- Profile information, such as your interests and preferences;
- Transaction information, such as details about programs, webinars, events or other activities you register for through the Website;
- IP-address which reveals approximate location (country)
- Usage information, such as information about how you use the Website and interact with us, including information collected via cookies and similar technologies as set out in our [cookie policy](#);
- Areas of scientific interest, such as your interest on a specific scientific or medical topic when you register for scientific and educational materials and newsletters; and
- Marketing information, such as your preferences for receiving marketing communications, including preferred channels of communication, and any other information on your interests in relation to Zogenix products and services.

Cookies

To enable Zogenix to ensure the correct functioning of our Website and to provide customized and personalized services, Zogenix uses cookies and similar tools to store and sometimes track information, which may include personal data, about you. To learn more about our use of cookies, including your options, please see our [cookie policy](#).

How We Use Personal Data We Collect

We collect and process personal data for the purposes and on the legal bases identified below:

- Identity verification for restricted access: We may ask you to provide certain of your personal data to verify and confirm that you are qualified as health care professional to access certain sections of our Website that, due to regulatory requirements, are not generally accessible to the public but restricted to health care professionals. We process such personal data to the extent necessary to comply with applicable legal requirements and on the basis of our legitimate interests to ensure effective and secure access to the restricted section of our Website and to document compliance with our regulatory obligations. In some countries, we work together with third party service providers offering identity verification services for health care professionals, such as DocCheck. These third party service providers are generally responsible for the processing of your identity

verification and login data as independent controllers, without any control of such processing or any access to such data by Zogenix, and you should check the privacy policy of the respective third party before using the identity verification services.

- Complying with regulatory requirements and analysing country-specific traffic: We determine geolocation (country) based on the IP-address of users to our Website to understand from which countries users are accessing our Website. This helps us to make sure that we can display content and features tailored to comply with regulatory requirements applicable in the relevant country. The information will further be anonymized to gather aggregated statistics about from which countries users are accessing our Website in order to better understand the effects of our marketing and scientific campaigns, events and publications in target countries across Europe. The related processing of personal data is based on our legitimate interests in ensuring compliance with regulatory requirements and understanding the effects of our marketing and scientific efforts in specific countries to improve our offers and services.
- Improving our Website: We use the information we automatically receive from your Web browser to see which pages you visit within our Website. We can then develop statistics that are helpful to understanding how this Website is used by our visitors. This statistical data is interpreted by Zogenix in its continuing effort to present the Website content that visitors are seeking in a format they find most helpful. It is in our legitimate business interests to use the information provided to us for this purpose, so we can understand any issues with our Website and improve them.
- Performing our contracts with you: We may use your personal data to carry out any contracts with you, including in relation to your participation at events or webinar.
- Communicating with you: We may use your personal data when we communicate with you, for example if you provide us your contact information or ask us questions. It is in our legitimate business interests to be able to provide you with appropriate responses, provide you with product related information or to communicate with you regarding business activities.
- Exercising our rights: We may use your personal data on the basis of our legitimate interests to exercise our legal rights where it is necessary to do so, for example to detect, prevent and respond to fraud claims, intellectual property infringement claims or violations of law or misuse of the Website.
- Complying with our obligations: We may process your personal data to the extent necessary to comply with our legal or regulatory requirements, where this is required by law, for example for documenting and reporting product complaints and safety issues and comply with other regulatory requirements.
- Sending of non-promotional communications: We process your personal data to send you, by direct mail, email or SMS, scientific/educational materials and newsletters (e.g., educational information and materials) and invitation to educational events, which may be personalized according to your area of scientific interests and/or medical practice, and to contact you via telephone with this type of information. We will process your data to the extent necessary for our legitimate business interests in providing health care professionals with relevant scientific/educational information and/or, where legally required, to the extent you have given your prior consent, and always provided you have not opted-out from receiving such type of information.

- Sending of marketing communications: We process your personal data to send you marketing information, product recommendations and other promotional communications and invitations, including information about our products, promotions or events, as necessary for our legitimate interest in conducting direct marketing tailored according to your interests and/or, where legally required, to the extent you have given your prior consent, and always provided you have not opted-out from receiving such marketing communication.
- Profiling activities: We may perform user segmentation activities based on non-invasive categories such as, among others, the professional category to which you belong, the city/province/region in which you are based, the way you interact with us. Such processing will be carried out for internal research purposes, and to improve our products and services, and on the basis of our legitimate business interests. Subject to your consent for the processing of your data for the sending of marketing communications, and as long as you have not opted-out from receiving such marketing communications, the profiling activities described may also be carried out for the sending of personalized commercial communications based on your professional role and interests. You have the right to object to our processing of your personal data for such purposes at any time.

Disclosures to Third Parties

We disclose your personal data to third parties who act for or on our behalf, or in connection with our business, for processing in accordance with the purposes for which personal data was originally collected. Categories of recipients of personal data may comprise:

- Processors: Companies of Zogenix Group or external service providers that we use to render services, e.g., in the areas of pharmaceutical infrastructure but also marketing agencies that perform marketing activities on our behalf. These processors are carefully selected by us and regularly reviewed in order to ensure the security and confidentiality of your personal data. The service providers are allowed to use the personal data exclusively upon our instructions and on the basis of required data processing agreements;
- Public and administrative authorities: Regulatory and governmental bodies, such as national and international regulatory authorities, public institutions, prosecutors, courts or financial authorities, to which we are compelled by law to transfer personal data; and
- Independent data controllers: Zogenix ROI Limited and other companies of the Zogenix Group, dealers, cooperation partners, or support persons, credit agencies, legal advisors or external consultants to whom personal data are transferred, as applicable on basis of your consent, for the purpose of handling an inquiry, or to the extent this is necessary for performing on a contract with you or for the purpose of pursuing our legitimate interests.

We will share your personal data with the aforementioned external only to the extent this is (i) necessary for the purpose of the processing and for a legitimate business interest, (ii) required by a legal obligation, or (iii) with your prior consent. We may also share personal data in association with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company, or we sell, liquidate, or transfer all or a portion of our assets. For more information about the recipients of your personal data, please contact us using the contact details set out below at the end of this privacy policy.

International data transfers

If we transfer personal data to a recipient another country that may not provide the same legal protections for the personal data as your home country, then we will, prior to the transfer, ensure that such recipient offers an adequate level of protection or there is an alternative legal instrument providing enough safeguards to your personal data, for instance by entering into standard contractual clauses for the transfer of personal data as approved by the European Commission (see Art. 46 GDPR). In the event and to the extent your personal data will be transferred to third countries outside the European Economic Area (for example, to the US), we have ensured by entering into EU standard contractual clauses with the third parties involved and by implementing appropriate additional safeguards that your personal data will be adequately protected as required under European data protection laws. When we are not able to provide enough safeguards to the privacy and confidentiality of your personal data, we will ask for your consent before transferring such personal data to a third country. For more information on the recipients of your personal data and the appropriate safeguards in place, including on how to receive a copy, please contact us at the contact information set forth within this privacy policy.

Third-Party Links

This Website may contain links to other sites. Please be advised that Zogenix is not responsible for the privacy practices of non-Zogenix sites. We encourage you to review the privacy policies of any Web sites that you visit through a link on this Website.

Children

In order to respect the privacy of children online, we do not knowingly collect, maintain, or process personal data submitted by children under the age of 16. If you have a child under the age of 16 who you believe may have provided personal data to us, please e-mail us at EUdataprivacy@zogenix.com and we shall expeditiously delete it.

Data Retention

We retain your information for as long as needed for the purpose collected, in accordance with our data retention policy (which sets forth data retention periods required or permitted by applicable law). We will also retain your personal data for longer if needed for our legal obligations and the need to retain records in order to resolve disputes, enforce our agreements, and investigate or defend against potential legal claims. For more information about the specific retention periods applicable to your personal data, please contact us using the contact details set out below at the end of this privacy policy.

Your Rights

You have certain rights regarding the personal data we hold about you, subject to local law. These include the rights to access, correct, delete, restrict our processing of your personal data, or receive a portable copy of your personal data in a usable electronic format (right to data portability), subject to applicable conditions set forth under GDPR and applicable local data protection law.

Where the processing of your personal data is based on your consent, you have the right to withdraw your consent (without affecting the lawfulness of processing based on your consent before its withdrawal). If you withdraw your consent, we might still need to process certain personal data relating to you to comply with a legal obligation (for example, to provide you important safety information) or to pursue a legitimate business interest.

You further have the right to object at any time, on grounds relating to your particular situation and in accordance with applicable law, to any processing of your personal data based on the grounds that the processing is necessary for purposes of legitimate interests pursued by us. Where your personal data are processed by us for direct marketing, proactive scientific communication and/or profiling purposes, you further have the right to object at any time to such processing without having to provide any specific reason for such objection.

If you choose to withdraw your consent to receive marketing communications and/or to receive scientific and medical information, we will prevent further use of your data for the specific purpose(s) to which you have exercised the right “to be forgotten”. You are also free to unsubscribe to those communications; however, this may also affect the ability to receive updates on scientific, medical, clinical and/or marketing contents.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. You have in any case the right to lodge a complaint with the supervisory data protection authority competent for your place of habitual residence or the place of the alleged infringement.

Contact Information

Questions or comments regarding this Policy should be submitted by email to: EUdataprivacy@zogenix.com or by mail to: Zogenix International Limited, The Pearce Building, West Street, Maidenhead, Berkshire, SL6 1RL United Kingdom.

Changes to this Privacy Policy

We may modify or update this privacy policy from time to time. If we make any revisions that materially change the ways in which we process your personal data, we will take steps to notify you of these changes in advance. A notice will be posted on the Website whenever this privacy policy is changed in a material way.

Effective as of 6th April 2021.