ZUELLIG PHARMA

making healthcare more accessible

DATA SUBJECT REQUEST POLICY

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I. OVERVIEW

Zuellig Pharma acknowledges several rights of a data subject ("you", "your") regarding his/her information and is committed to meeting all reasonable requests of a data subject.

This Policy aims to explain how the various entities within the Zuellig Pharma group [(a non-exhaustive list of our entities is found at Part XIV (Contact Us) of or Privacy Policy located at https://www.zuelligpharma.com/privacy-policy] shall handle any Data Subject Request ("DSR") in compliance with applicable data protection laws.

Before you take any steps to exercise your right to your personal data, please read this document in full and make sure that you understand its contents.

II. WHAT IS THE PURPOSE OF THIS POLICY?

This Policy is designed to ensure that:

2.1. you have a clear way of exercising your right as a data subject and such right is recognized within the applicable data protection laws.

2.2. all our personnel are aware of their duties and responsibilities in dealing with DSRs.

2.3. all DSRs are recognized, acknowledged, and responded to in a timely manner.

III. DEFINITION OF TERMS

The following terms shall have the following meanings:

Business Day	:	shall mean a day other than a Saturday, Sunday, gazetted public holiday or day on which commercial banks are closed in the country where the Zuellig Pharma entity that received the DSR is located;
Data Protection Officer ("DPO")	:	shall mean the person responsible for ensuring compliance with the applicable data protection laws for a particular Zuellig Pharma entity;
Data Subject Request (DSR)	:	shall mean any request pertaining to personal data held by Zuellig Pharma about a particular individual.
Requestor	:	shall mean the individual who requested information about a data subject who may or may not be the owner of the personal data requested.

IV. RESPONSIBILITIES

YOUR RESPONSIBILITIES:

As a Requestor submitting a DSR, you are responsible for the following:

4.1. The DSR should include a detailed description of the specific information you are seeking. If the DSR is vague, we need you to provide information discussed in Part 5.1.5 below. Otherwise, we may not be able to proceed with your request.

4.2. If you are not the data subject but are acting on behalf of the data subject, you must provide sufficient details to verify the identity of the individual whose data you are requesting, and evidence of proper authorization as discussed in Part 5.2 below.

4.3. You must specify the Zuellig Pharma entity to which your request is directed. If you know the relevant department that should address your concern, please include this in your request as well.

4.4. You must not misrepresent any facts and must ensure that all information you provide us are accurate and true.

Please note that the timeframe for responding to your DSR discussed in Part VIII below shall only commence once all the conditions mentioned above have been fully satisfied. Failure to meet these conditions may result in a delay or denial of the request.

OUR RESPONSIBILITIES:

4.5. All our employees, contractors, third-party service providers and any person acting for and, on our behalf, know how to recognize a DSR.

4.6. If Zuellig Pharma is the data controller, the DSR shall be addressed in accordance with this Privacy Policy.

4.7. If Zuellig Pharma is the data processor, the Data Protection Officer of the entity receiving the request shall forward the request to the relevant data controller on whose behalf Zuellig Pharma processes personal data of the data subject or Requestor making said request.

4.8. The Data Protection Officer (DPO) of the Zuellig Pharma entity receiving the DSR shall be primarily responsible for processing a DSR in line with the requirements of the applicable data protection laws.

V. DATA SUBJECT REQUEST – WHAT DO WE DO WHEN WE RECEIVE A DSR?

5.1. SUBMISSION OF A DSR

5.1.1. We encourage you to submit the request in writing through the DSR Form which you can find in the **"Contact Us"** page of our Privacy Policy if you have any questions, comments, or if you wish to exercise any of your rights as a data subject. We advocate written requests to provide a clear audit trail of the request and to ensure that both Zuellig Pharma and the Requestor have a record of the information requested.

5.1.2. While we encourage all Requestors to submit a DSR in writing, any Requestor may send a DSR in multiple ways including but not limited to email, postal mail, online, mobile, or in-person.

5.1.3. Our DPO will provide a written acknowledgment to the Requestor indicating the receipt of the request immediately or within one (1) Business Day from the date of receipt of said request. If the request was received by any personnel other than the DPO, the DPO shall provide the written acknowledgement to the Requestor immediately or in any case within one (1) Business Day from knowledge of the request.

5.1.4. Upon receipt of the request, the DPO will review the request and decide on the action required.

5.1.5. If a DSR is too vague to be processed, we may ask the Requestor to clarify the information requested and submit supporting documents. Please understand that the request may not be considered valid until the information we requested has been clarified.

5.2. VERIFICATION OF IDENTITY

We will use reasonable measures to verify the identity of the Requestor and the data subject whose personal data is being requested.

5.2.1. We need to verify the identity of the Requestor to ensure that the information is only given to the person entitled or authorized to receive it. Rest assured that we will only request information necessary to confirm the identity and we will delete such information immediately upon verification. Depending on the sensitivity and nature of the request, we may require in-person verification.

5.2.2. If the identity of the Requestor has not yet been provided, our DPO shall ask the Requestor to provide proof of identity.

5.2.3. For DSRs made by a third party acting for and on behalf of another, we may request for evidence of proper authorization and supporting documents to validate the authority and identity of the Requestor as well as to confirm the identity of said Requestor.

5.2.4. If the Requestor making the DSR is not the data subject, the Requestor must specify the basis under the law that said Requestor is entitled to the information requested. The Requestor shall be asked to provide: i) a written authority from the data subject that the Requestor is authorized by the data subject; ii) if the Requestor has been appointed by a competent authority to act on behalf of the data subject, the Requestor must present relevant documentation to provide his/her capacity to act on behalf of the data subject; and iii) proof of identity of the data subject.

Examples:

If the data subject is an incapacitated person or a minor below eighteen (18) years of age, the requestor must provide a document issued by the court or any similar document confirming the requestor's relationship, guardianship, or capacity to act on behalf of the data subject.

5.2.5. The DPO shall evaluate the validity of the request. If the Requestor fails to provide sufficient proof of authority or capacity to act on behalf of the data subject or if the request falls under any of the instances enumerated in Part VI below, Zuellig Pharma may deny the DSR.

5.3. LOGGING AND TRACKING OF DSR

To ensure transparency and accountability in our handling of personal data, all DSRs are logged, tracked, and stored securely within our system. This process enables us to monitor the progress of your request, ensure timely responses, and maintain records of how each request was handled in compliance with our internal policies and applicable data protection laws.

5.4. ASSESSING THE DSR

5.4.1. Upon receipt of the DSR, we will check if the details provided by the Requestor are sufficient to find the information requested. If we need more information, we will promptly ask the Requestor.

5.4.2. Then, we will identify the data repositories that may contain the requested personal data, whether it is manual or electronic. The DPO shall contact the relevant system, process, or account owners that have been identified as likely to hold the information.

5.5. FEES

5.5.1. As a rule, we do not charge the Requestor for any fee. Zuellig Pharma is committed to providing data subjects with access to their personal data in compliance with applicable data protection laws, and in most cases, this service is provided free of charge. However, Zuellig Pharma may charge a reasonable fee for the request if the request is unusually large or complex.

5.5.2. We aim to balance the rights of data subjects with the practical considerations of fulfilling large or complex requests while maintaining fairness and transparency throughout the process. If a fee is deemed necessary, we will inform you in advance of the estimated cost. We will only charge you based on actual cost and explain to you the reason for charging said cost. In this case, we will wait for your response and provide you the opportunity to modify or narrow down the scope of your request to reduce or eliminate the fees. Rest assured that we will not proceed with any chargeable action until you have agreed to the proposed fee.

5.6. SCREENING THE INFORMATION

5.6.1. Upon receipt of the information, the DPO shall screen, and review said information for the presence of any third-party data and any information that the requestor is not entitled to receive. This may result in the redaction or removal of such information unless the third-party concerned has consented to the disclosure.

VI. DSR REFUSAL – UNDER WHAT INSTANCES CAN ZUELLIG PHARMA DENY A DSR?

The right of the Data Subject to request information is not an absolute right. After an appropriate evaluation, Zuellig Pharma may deny the DSR and shall not disclose information about a data subject. The following are some of the instances where Zuellig Pharma may deny a DSR:

6.1. *Incomplete information regarding the requested personal data*

As explained in Part 5.1.5 above, provided that the Requestor is first given a reasonable opportunity to amend the request and provide complete information.

6.2. *Information about other data subjects*

As a rule, a person may not request for access to information that relates to another person. By way of exception, access to such information may only be granted if:

6.2.1. the individual whose information is requested has provided a written consent to the disclosure of his/her data.
6.2.2. The individual is a minor or an incapacitated person and the requestor is a legally appointed guardian.

6.3. *Information requested is manifestly unfounded, excessive, or repetitive*

If the request is manifestly unfounded, excessive, or if the requestor repeatedly requested the same information and there is no significant change in the personal data held in relation to such data subject, or if the burden or expense of providing access would be unreasonable or would involve a disproportionate effort on our part, Zuellig Pharma has the right to refuse the DSR.

6.4. *Information covered by confidentiality or protected by intellectual property law or requests made for other non-data protection purposes*

If the Requestor requests for access to information that is not covered by the purview of the applicable data protection laws such as information covered by confidentiality agreements, information protected by any applicable intellectual property law, or any other data, Zuellig Pharma may deny this request.

6.5. *Publicly available information*

Zuellig Pharma is not required to provide information that is already available in the public domain.

6.6. *If the personal data requested has already been deleted by the time we receive the request pursuant to Zuellig Pharma's retention policy.*

If a Requestor has requested for personal data which we no longer possess because of our retention policy, the request will be denied because the data has been permanently removed from our systems and is no longer available. This is part of our commitment to managing personal data responsibly and in compliance with the requirements of the applicable data protection laws.

6.7. *If the disclosure of personal data could put an ongoing criminal investigation at risk as determined by the appropriate public authority.*

For this purpose, we shall provide the Requestor a written proof of this determination.

6.8. Rest assured that we will only deny a request after giving the data subject or the Requestor a reasonable opportunity to amend the request in situations falling under Part 6.1 and 6.2 above.

6.9. In case of a refusal or denial of a DSR, the DPO shall inform the Requestor in writing of the reason for said refusal and of the right of the Requestor to complain to the regulatory authority and seek judicial remedy.

VII. ISSUING OUR RESPONSE

7.1. After assessing the DSR, the DPO shall provide a written response together with copies of the information requested and an explanation of any technical terms or redactions made.

7.2. The response shall be sent to the Requestor in line with his/her preference whenever possible. If the Requestor has not provided his/her preference, we shall provide the information using appropriately secure channels such as encrypted email, secure file transfer, or postal service with tracking mechanism except where the Requestor agrees, where it is impossible, or where it would involve undue effort. In these cases, an alternative would be to allow the Requestor to view the information on screen inside the Zuellig Pharma premises.

7.3. If you request for deletion of personal data, we will not retain any of your data except for the details of the DSR itself. These DSR details will be securely stored in accordance with our data retention policy, solely for the purpose of documenting the request and our response.

7.4. In cases where we are unable to fulfil your request for deletion due to legal, contractual, or other legal basis allowed by applicable data protection laws that would require or enable us to retain your personal data, we will provide you with information regarding this matter in our response. Once our legal basis for retaining the personal data has been fulfilled, we will process the deletion of your data in accordance with our data destruction policy.

VIII. TIMEFRAME FOR RESPONDING TO A DSR

There are certain territories that require a period within which to respond to a DSR. Failing which, Zuellig Pharma could be liable for an enforcement action by the corresponding regulatory authority in the country and/or legal action by the affected Requestor.

8.1. GENERAL RULE: If the applicable data protection law provides for a response time, the response time shall be that provided by the applicable data protection law.

8.2. EXCEPTION: If the applicable data protection law does not provide for a response time, Zuellig Pharma shall respond to a DSR without delay and at the latest within 30 Business Days from receipt of the request.

IX. ARCHIVING AND CLOSURE OF REQUEST

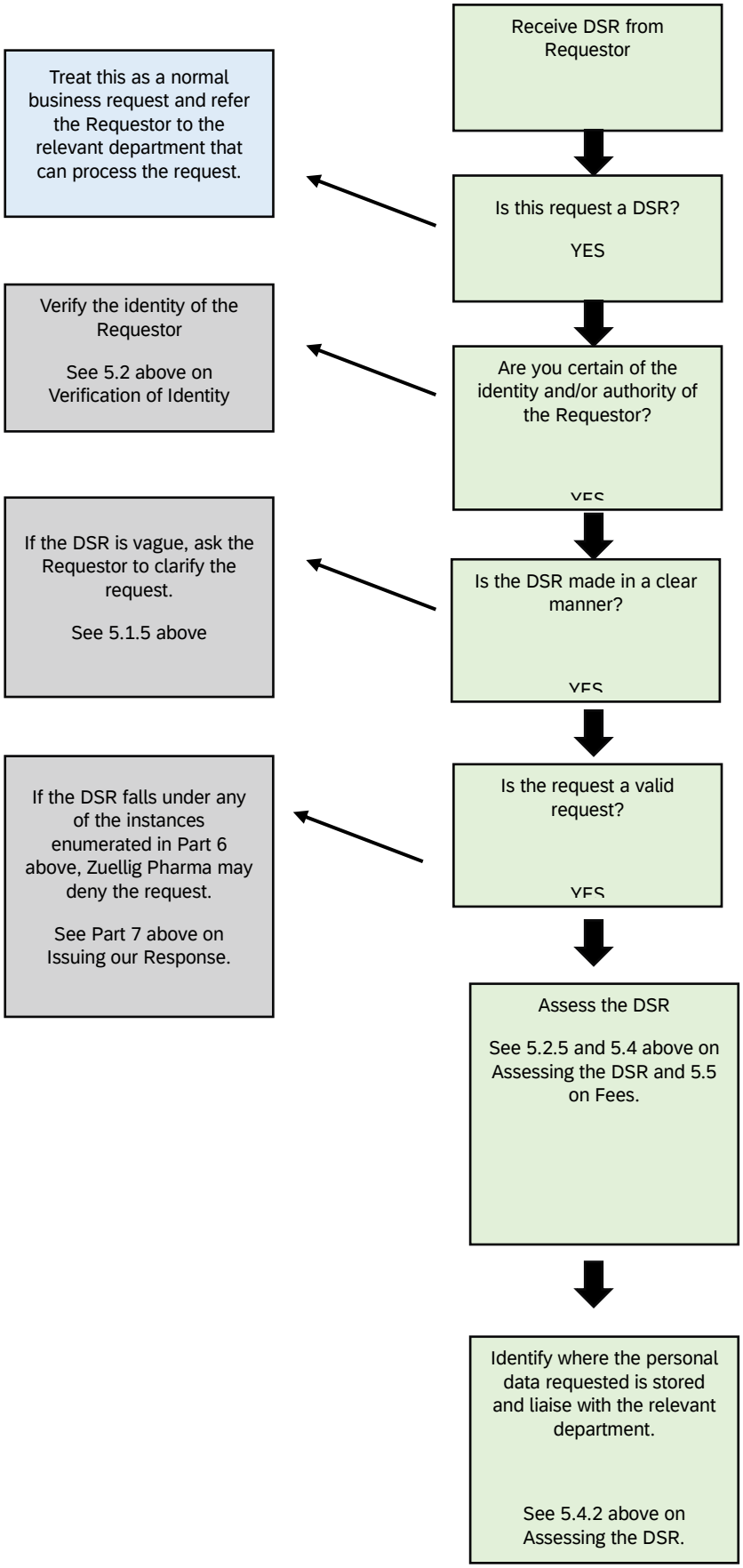
After Zuellig Pharma sends the response, the DSR shall be considered closed and archived by the DPO. Zuellig Pharma shall retain records of correspondence and all communication relating to a DSR in accordance with Zuellig Pharma's retention policy.

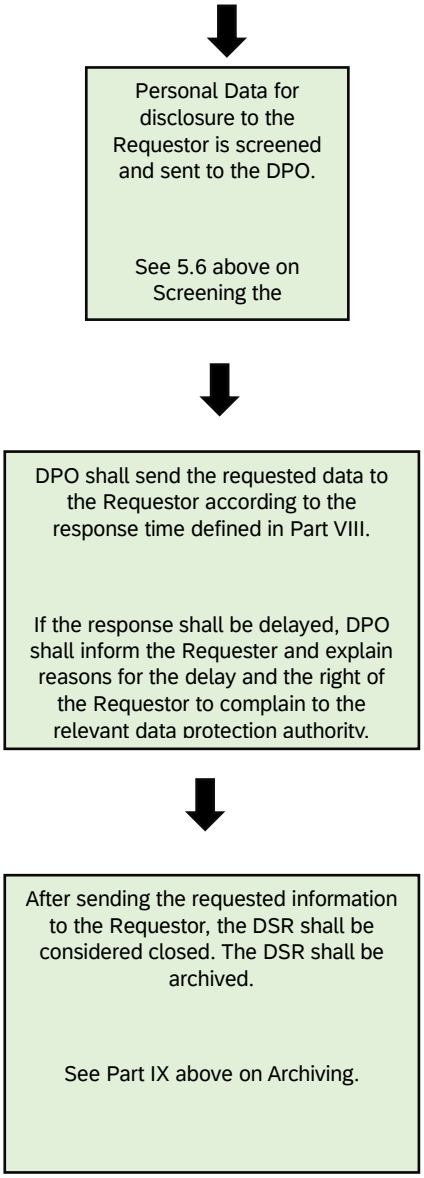
X. POLICY REVIEW

This policy shall be evaluated, audited, and reviewed every three (3) years or sooner if required by the applicable data protection laws or whenever necessary to improve based on best practices.

SCHEDULE 1

DATA SUBJECT REQUEST FLOW CHART




Personal Data for disclosure to the Requestor is screened and sent to the DPO.
See 5.6 above on Screening the
DPO shall send the requested data to the Requestor according to the response time defined in Part VIII.
If the response shall be delayed, DPO shall inform the Requester and explain reasons for the delay and the right of the Requestor to complain to the relevant data protection authority.
After sending the requested information to the Requestor, the DSR shall be considered closed. The DSR shall be archived.
See Part IX above on Archiving.

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