

## Privacy Notice

In compliance with the provisions of the **Federal Data Protection Act (FADP)**, we provide you with the necessary information regarding the processing of personal data collected and processed through the ETHICSPPOINT portal.

The purpose of this information, provided in accordance with the FADP, is to inform data subjects (those who interact with the portal) with respect to the processing of personal data carried out by **HAS Healthcare Advanced Synthesis SA**, a company under Swiss law with registered office at Via Industria 24, 6710 Biasca, Switzerland (hereinafter also "HAS").

This disclosure is framed within the provisions contained in the Code of Conduct and Ethics and the policy system adopted by **HAS Healthcare Advanced Synthesis SA** and, in particular:

- Code of Conduct and Ethics
- "Reporting and Management of Misconduct (Speak Up)" procedure
- Personnel Disclosures
- Privacy and Data Protection

Therefore, for general aspects governing the practices and operation of these processes in **HAS**, please refer to the aforementioned procedures.



### 1. DEFINITIONS

The personal data acquired will be processed in accordance with the provisions of the FADP. In particular:

**Personal (so-called common) data:** all information concerning an identified or identifiable natural person. For example: first name, last name, contact details, biographical data.

**Personal data worthy of special protection** (so-called data relating to criminal convictions or offenses).

The data processed will be those related to reports made by reporting subjects through the portal, which may include data related to third parties, i.e., reported subjects.

Data related to reporting subjects, which may be provided by reporting subjects:

- First name, last name;
- Business function;
- Reporting party's willingness to remain anonymous, if any;
- Other information provided by the reporter (by way of example but not limited to, consequences suffered for the alleged violations).

In case the report is made anonymously, no personal data of the reporting person will be processed.

Data related to the reported person, which may be provided by the reporting person:

- First name, last name or other elements that make it possible to identify the person to whom the reported facts are attributed;
- Business function;
- Other personal data such as telephone number, e-mail address;
- Other information communicated by the reporter.

**Data subject:** the private person whose personal data are processed. The data subjects of this processing are: i) employees; ii) subjects indicated in the above-mentioned procedures. More generally, the reported subjects, the reporter or third parties.

**Processing:** any operation concerning data, regardless of the means and procedures used, namely the collection, storage, use, modification, communication, archiving or destruction of data;

**Communication:** the act of making data accessible, such as authorizing consultation, transmission, or dissemination. In this context, communication to the emergency department is necessary to safeguard the safety of the worker.



## 2. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER and of the DATA PROTECTION ADVISOR/DATA PROTECTION OFFICER

The company that determines the purpose and means of the processing of personal data, in accordance with the FADP, is **HAS Healthcare Advanced Synthesis SA**, a company under Swiss law with its registered office at Via Industria 24, 6710 Biasca, Switzerland, (hereinafter also referred to as the "data controller")

The contact details of the data controller are as follows: [Privacy@hashealthcare.com](mailto:Privacy@hashealthcare.com)

### DATA PROTECTION ADVISOR (DATA PROTECTION OFFICER)

**HAS Healthcare Advanced Synthesis SA** has appointed its Data Protection Advisor/Data Protection Officer (CPD/DPO) in accordance with Article 10 [of FADP](#). The DPO can be reached via e-mail at: [dpo.privacy@hashealthcare.com](mailto:dpo.privacy@hashealthcare.com)

## 3. PURPOSE OF DATA PROCESSING/DATA RETENTION



| PURPOSE OF DATA PROCESSING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | DATA RETENTION                                                          |
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| <p>Handling and collecting reports of violations of the Code of Conduct and Ethics, regulations and internal procedures that have come to our attention in the work context.</p> <p>Specifically:</p> <ul style="list-style-type: none"> <li>- compliance with the policies adopted by HAS on conflict of interest in order to avoid situations of actual and potential conflict of interest, financial or otherwise, direct, or indirect, and to ensure that HAS can conduct its business in an ethical manner.</li> <li>- compliance with the policies adopted by HAS c.d. reporting/management of misconduct ("Speak Up"), anti-corruption and non-retaliation policy having to do with reporting actions or situations that HAS employees believe, or reasonably suspect violate the Code of Conduct and Ethics, laws, regulations, policies, procedures, ethics, and contractual obligations.</li> </ul> <p>The processing of data in question falls under the overriding interest of the data controller i.e., business needs related to the adoption of internal rules/directives that must be observed and complied with by employees and the receipt of reports in case of non-compliance.</p> | <p>Data will be kept for 10 years from the date the report is sent.</p> |



#### 4. DATA RECIPIENTS

The data of a personal nature provided will be communicated to recipients, who will process the data in their capacity as managers for the purposes listed above or as data controllers. Precisely, the data will be communicated to:

- (a) parties who provide services for the management of the information system used by **HAS** (parties intended for the management/maintenance/administration of the portal <https://secure.ethicspoint.eu/domain/media/en/gui/109062/index.html>);
- b) employees of HAS duly instructed in the processing of the data in question;
- (c) competent authorities for compliance with obligations of laws and/or provisions of public bodies, upon request.



#### 5. COMMUNICATION OF DATA ABROAD

Personal data are not disclosed outside the territory of the federal government.



#### 6. EXERCISE OF RIGHTS

Under the conditions set forth in the FADP, the Controller specifically recognizes the following rights (non-exhaustive list):

- To obtain rectification of inaccurate or outdated personal data;
- To be informed in writing and free of charge if personal data concerning you are being processed;
- prevent the disclosure to third parties of personal data worthy of special protection;
- express your opinion on an automated individual decision or request that it be reviewed by a natural person;
- obtain the delivery of personal data or demand its transmission to a third party;
- demand that data processing be stopped, that its disclosure to third parties be prevented, or that personal data be rectified or destroyed;
- right to demand that a certain processing of personal data be prohibited, that a certain disclosure of personal data to third parties be prohibited, or that personal data be deleted or destroyed;
- if neither the accuracy nor the inaccuracy of personal data can be proved, to request that a note be added to the data noting its disputed nature;
- demand that the rectification, destruction, blocking, especially that of disclosure to third parties, as well as the mention of the disputed character or the judgment be disclosed to third parties or published;
- have the illegality of a processing of personal data established.

You may exercise your rights as expressed by the FADP by contacting the Controller through the address [Privacy@hashealthcare.com](mailto:Privacy@hashealthcare.com) or to the DPA/DPO at [dpo.privacy@hashealthcare.com](mailto:dpo.privacy@hashealthcare.com)



#### 7. MORE INFORMATION: AMENDMENT | ENTRY INTO FORCE

The data controller reserves the right to change, update, add or remove portions of this privacy policy at its discretion and at any time. In order to facilitate such review, the policy will contain the date it was updated.

Update date: September 22, 2022