

## Privacy Notice for Consultants and Professional Services Providers

The purpose of this document is to comply with Art 13 and 14 of the European General Data Protection Regulation (2016/679) (“GDPR”) and Art 13 and 14 of the UK-GDPR (“UK GDPR”). This document constitutes a Privacy Notice, which is intended to inform individuals of the nature and purpose of processing their personal data, who are the controllers and processors of such data, with whom it is shared, to where it is transferred and for how long it is retained. Furthermore, it will provide a clear explanation of what rights are available to individuals in regard to the data and its subsequent use.

### **Who are the Individuals for whom this Privacy Notice is intended?**

This privacy notice is intended for consultants, professional advisers, researchers, professional services providers or other personnel (“Service Provider”) who are in a contractual relationship with Celltrion, Inc. (“Celltrion”) as a client. All of these individuals are engaged in providing professional services and have signed a contract with Celltrion.

### **Who are the Data Controllers?**

The primary Data Controller is Celltrion, which is the client under the contract. Celltrion has appointed a Data Protection Officer (DPO), contact details for whom are provided below, who can provide additional information upon request.

### **What is the personal data covered by this Privacy Notice?**

This notice covers contact details (name, postal address, email, telephone, etc.) for all persons who are directly involved with the contract. Where payments are made, we collect the bank account information and social security number, if required. Furthermore, we may collect detailed CVs, copies of qualifications, letters of reference and other information related to professional history.

The personal data was collected in two ways: (i) directly from the Service Provider at the time that the contract with the individual has been signed, or (ii) via the employer of the Service Provider, where there is a business relationship between Celltrion and that employer.

### **How is the information processed, and with whom is it shared?**

The information regarding Service Provider will be processed for the purpose of performing relevant activities with respect to the contract.

A further purpose of processing relates to job opportunities and product information, where considered appropriate. This sharing will take place only within the Celltrion, Inc. group of companies or one of its subsidiaries.

### **Lawful Basis of Processing**

GDPR/UK GDPR require that we disclose the lawful basis of processing personal data. We have selected Article 6(1)(b) of the GDPR, “necessary for the performance of a contract.” For clarity, this means that explicit consent is not required for the processing of this data. Furthermore, it means that consent cannot be withdrawn (see The Rights of Individuals.)

As an additional purpose, selected Service Provider may be contacted from time to time to be informed of job opportunities or relevant products. This separate purpose is acknowledged to be electronic marketing (unless carried out by Post), and therefore a separate lawful basis of processing is used. Specifically, Celltrion, Inc. has selected Article 6(1)(f) of the GDPR “legitimate interests”,

with the addition of “soft opt-in” (as defined by the EU e-Privacy Directive (2002)). Consent for this marketing may be withdrawn at any time, e.g., by clicking the “unsubscribe” link in email communications, or by request to the Celltrion’s DPO.

As Legitimate Interests has been selected as the lawful basis for marketing purposes, Celltrion, Inc. has carried out a Legitimate Interests Assessment (LIA). This document is available upon request to the DPO.

## **The Rights of Individuals**

Based on the lawful basis of Contract, the following rights are available to data subjects:

- a) **Right to be informed** – you have the right to enquire what data is held about you as an individual.
- b) **Right to access** – you have the right to request a copy of all data held about you as an individual, including emails in which your name has been mentioned, or other structured records.
- c) **Right of rectification** – you have the right to request changes to information held about you which is erroneous.
- d) **Right to data portability** – you have the right to request structured personal data in a machine-readable format (such as CSV).
- e) **Right to opt-out from marketing** – you have the right to opt-out from marketing purposes at any time.

Note that the Right to be forgotten (also known as “Right of Erasure”) is not absolute and may be denied to comply with a legal obligation. Furthermore, there is no right to object to processing, because the data is necessary to be processed for the performance of a contract (the exception to this is marketing.)

At any time, you have the right to complain to Celltrion’s DPO or a relevant supervisory authority. This will usually be the Data Protection Authority located in the country where you are normally resident.

## **International Transfers**

Celltrion is based in South Korea. On 17 December 2021, the European Commission (the Commission), and on 23 November 2022, the Information Commissioner’s Office (the ICO) each adopted an adequacy decision for South Korea. This means that free unrestricted transfers of personal data from the European Economic Area (EEA) and/or the UK to private and public entities in South Korea will be permitted from that date onwards (including remote access from South Korea) without the need for certain restrictions such as, but not limited to, implementation of Standard Contractual Clauses.

## **Data Retention**

The personal data outlined in this notice will be retained for no longer than is necessary for the purposes for which it is being processed. When that period has elapsed, the data will be purged.

## **Contacting the Data Protection Officer (DPO)**

If you have any questions about this Privacy Notice, or to submit a Subject Access Request (SAR) in order to claim any of your rights under the GDPR, please contact Celltrion, Inc.’s DPO at the following email: [DPO@celltrion.com](mailto:DPO@celltrion.com). If you live in the Europe (EU/EEA), please contact [DPO\\_EU@celltrion.com](mailto:DPO_EU@celltrion.com).

## **Representative for data subjects in the EU and UK and Switzerland**

We value your privacy and your rights as a data subject and have therefore appointed Prighter Group with its local partners as our privacy representative and your point of contact for the following regions:

- European Union (EU)
- United Kingdom (UK)
- Switzerland

Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests to access or erase personal data). If you want to contact us via our representative, Prighter or make use of your data subject rights, please visit the following website: <https://prighter.com/q/15163507>

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