

PRIVACY POLICY Altana¹

1. PREAMBLE

This privacy policy (hereafter “**Privacy Policy**”) is made by the limited liability company for non-commercial services (SELARL) Altana composed of lawyers, members of the Paris Bar, with a share capital of € 116 700, with its head office at 45 rue de Tocqueville 75017 Paris, registered under number RCS Paris 517 867 925 (hereafter “**Altana**”).

Altana may collect your data in the framework of professional encounters, seminars, meetings, files, applications, visits to the premises or to the website, and, incidentally, in the framework of the cases entrusted to it.

The Privacy Policy sets out the conditions under which Altana, as a data controller, collects and processes personal data of its clients (hereafter “**the Clients**”), its prospects (hereafter “**the Prospects**”), third parties in the context of the contractual relationship with its Clients or Internet users accessing Altana’s website accessible at the address www.altanalaw.com (hereafter “**the Internet Users**”).

Altana has a contact person for all issues related to data protection who can be contacted via the following address: privacy@altanalaw.com.

Constitute personal data any information related to the Client, the Prospect, a third party or the Internet User natural person identified or identifiable, directly or indirectly, by reference to an identification number or to one or more factors related to the person (in particular, name, surname, date of birth, postal address, email address, hereafter designated by “**Personal Data**”).

Altana is committed to protecting the privacy and personal data of its Clients, its Prospects and its Internet Users. As a data controller, Altana respects the data protection regulation, notably the Act n°78-17 of 6th January 1978 as amended (hereafter “**French Data Protection Law**” or “**FDPA**”) and the Regulation (UE) 2016/679 of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereafter the “**GDPR**”).

Altana may update the hereby Privacy Policy. Updates to the Privacy Policy will be accessible on Altana’s website.

Altana performs several personal data processing operations as a data controller. Details and information related to (i) their purpose, (ii) the data collected, (iii) the legal grounds for processing, (iv) the data retention timeframes and (v) the data recipients are provided in the **table** below.

¹ Last version established on 25th May 2018

Table of personal data processing operations				
Purposes	Data collected	Legal ground of processing	Data retention timeframe	Recipients
Management, preparation, exercise and follow-up of the litigation and pre-litigation for the Clients	<ul style="list-style-type: none"> • Identification data of Clients : surname, name, email address, postal address, company, etc., and Data related to the family, professional, economic and financial situation and, in general, any personal data provided by the Client for the purposes of management of his/her case and follow-up of invoicing • Data relating to convictions and offences such as: <ul style="list-style-type: none"> – The facts underlying the proceedings; – The information and documents relating to the proceedings (report, testimony, complaint, etc.); – The characteristics of the litigation (date of beginning and date of closing of the dispute, court, date of subpoena, date of court hearing, etc.); – Date, nature, reasons and amount of convictions; – Commentaries relating to the description and follow-up of the proceedings. • Sensitive data : in particular, health data for the purposes of cases relating to medical liability and pharmaceutical product liability 	<ul style="list-style-type: none"> – Processing by the representatives of the law for the strict needs of the exercise of the functions granted to them by the law (art. 9-2 of the FDPA) – Processing is necessary for the purposes of the legitimate interests pursued by the Client and for the establishment, exercise or defence of legal claims and, thus, by the lawyer as a representative of the law (art. 6-1 (f) et 9-2 (f) of the GDPR) – Performance of the mandate contract between the Client and Altana 	<ul style="list-style-type: none"> – Data relating to the Client may be retained during the time of the contractual relationship between Altana and the Client – After that, data must be archived for the time during which the lawyer's liability may be invoked, before complete erasure. 	<ul style="list-style-type: none"> – The partners and associates of Altana – The legal assistants and the interns – The internal department in charge of creating the paper files – The subcontractors of Altana in charge of IT security – For sensitive data : lawyers specifically in charge of the related litigations, their assistants subject to reinforced obligation of confidentiality, and the IT manager
Providing legal advice and legal assistance to the Clients outside of litigation cases	<ul style="list-style-type: none"> • Identification data of Clients : surname, name, email address, postal address, company, etc., and any data necessary for the performance of the mandate contract by the lawyer, family, professional, economic and financial situation, contact details of the contact person in the 	<ul style="list-style-type: none"> – Performance of the mandate contract between the Client and Altana 	<ul style="list-style-type: none"> – Data relating to the Client may be retained during the time of the contractual relationship between Altana and the Client – After that, data must be archived for the time during which the lawyer's liability may be invoked, before complete erasure. 	<ul style="list-style-type: none"> – The partners and associates of Altana – The legal assistants and the interns – The internal department in charge of creating the paper files – The subcontractors of Altana in charge of computer security

Table of personal data processing operations				
Purposes	Data collected	Legal ground of processing	Data retention timeframe	Recipients
	Client's company / legal representative(s) of the company, etc.			
Management of newsletter subscriptions and invitations to thematic breakfasts and other events organised by Altana to the Clients and Prospects	<ul style="list-style-type: none"> Identification data of Clients and Prospects : surname, name, email address, postal address, company, position/role in the company, etc., Data relating to events they attended and refusals to attend. 	Consent of Clients and Prospects and/or performance of the mandate contract between the Client and Altana (legal monitoring within the scope of the lawyer's mission)	<ul style="list-style-type: none"> Data related to the Client are retained for the duration of the contract between the Client and Altana, and five years from the end of the contract except if the Client unsubscribes Data related to Prospects are retained for three years from the date of their collection or the last contact from the Prospect 	<ul style="list-style-type: none"> The partners and associates of Altana The legal assistants Employees of Altana in charge of the follow-up regarding the relationship with Clients and Prospects The subcontractors of Altana in charge of computer security Communication agency of Altana
Processing of applications and requests from Internet Users via the email address "contact"	<ul style="list-style-type: none"> Identification data of Internet Users: surname, name, email address, postal address, company, etc. Data related to the family, professional, economic and financial situation and any personal data provided by the Internet User In the framework of recruitment, any information spontaneously provided by the applicant in his/her curriculum vitae 	Consent of the Internet User formalised by the request or the application sent	Data related to Internet Users are retained for the period necessary for the processing of the request or the application and two years from the last contact or the application except if the person objects to the data processing	<ul style="list-style-type: none"> The partners and associates of Altana The legal assistants Employees of Altana in charge of processing the requests and applications Les employés d'Altana chargés du traitement des demandes et candidatures The subcontractors of Altana in charge of computer security

2. RIGHTS OF THE CLIENTS, THE PROSPECTS AND THE INTERNET USERS WHOSE DATA ARE COLLECTED

Regarding the protection of their personal data, the Clients, Prospects and Internet Users hold the following rights. Some of these rights may not apply when their exercise by the data subject is contrary to the legitimate interests of the controller (data necessary for carrying out the tasks and missions entrusted to Altana in the framework of their mandate, management of invoicing, etc.).

2.1. RIGHT OF INFORMATION

The Clients, Prospects and Internet Users have the right to obtain from Altana the following information:

- The legal ground for processing of their Personal Data;
- The purposes of the processing;
- The categories of Personal Data concerned;
- The recipients of the Personal Data;
- The transfers of Personal Data to a third country;
- The existence of automated decision-making and the right to object to automated processing when the decision about the person is based solely on automated processing which produces legal effects concerning him or her.

2.2. RIGHT OF ACCESS TO THEIR PERSONAL DATA

The Client, Prospects and Internet Users have the right to obtain from Altana the communication of Personal Data concerning them as well as information related to the origin of these data, except if the exercise of this right is contrary to the principles of professional secrecy.

2.3. RIGHT TO RECTIFICATION

The Clients, Prospects and Internet Users have the right to request from Altana that incomplete or inaccurate Personal Data are rectified, completed or updated without undue delay.

2.4. RIGHT TO ERASURE

The Clients, Prospects and Internet Users have the right to obtain from Altana the erasure, without undue delay, of Personal Data concerning them when Personal Data are no longer necessary in relation to the purposes for which they were collected or when they withdraw consent on which the processing is based.

2.5. RIGHT TO WITHDRAW THEIR PERSONAL DATA

The Clients, Prospects and Internet Users have the right to withdraw consent, at any time, to the processing operations carried out by Altana and based on that consent.

2.6. RIGHT TO OBTAIN THE RESTRICTION OF PROCESSING OF PERSONAL DATA BY ALTANA IN SOME CASES, IN ACCORDANCE WITH ARTICLE 18 OF THE GDPR

The Clients, Prospects and Internet Users have the right to obtain from Altana the restriction of processing of personal data concerning them when (i) the accuracy of the Personal Data is contested by the Client, Prospect or Internet User, for a period enabling Altana to verify the accuracy of the Personal Data, (ii) the processing is unlawful, (iii) Altana no longer needs the Personal Data for the purposes of

the processing, but they are required by the Client, Prospect or Internet User for the establishment, exercise or defence of legal claims, (iv) the Client, Prospect or Internet User has objected to processing.

2.7. RIGHT TO DATA PORTABILITY

When the processing is based on the consent of the Client, Prospect or Internet User, or on the contract concluded with the Client, and the processing is carried out by automated means, the Clients, Prospects and Internet Users have the right to receive the personal data concerning them which they have provided to Altana, in a structured, commonly used and machine-readable format and have the right to transmit those Personal Data to another controller without hindrance from Altana.

2.8. RIGHT TO OBJECT

The Clients, Prospects and Internet Users have the right to object, at any time, on grounds relating to their particular situation, to processing of Personal Data by Altana, unless there are compelling legitimate grounds or for the establishment, exercise or defence of legal claims.

The Clients, Prospects and Internet Users have the right to object, at any time, to the processing of Personal Data by Altana for direct marketing purposes.

2.9. RIGHT TO LODGE COMPLAINTS

In any case, the Clients, Prospects and Internet Users have the right to lodge a complaint with the Commission Nationale Informatique et Libertés (CNIL) or any other local supervisory authority, if they believe their rights have been infringed.

2.10. RIGHT TO DECIDE WHAT HAPPENS TO THEIR PERSONAL DATA AFTER THEIR DEATH

The Clients, Prospects and Internet Users have the right to decide what happens to their Personal Data after their death by providing general guidelines to Altana that Altana will comply with. By default, the rightful claimants of the deceased will have the possibility to exercise the rights set out in this Privacy Policy in the name and on behalf of the deceased.

3. SECURITY AND CONFIDENTIALITY

Conscious of the confidential and, at times, very sensitive nature of information and Personal Data provided by its Clients, and of the trust that implies the relationship between them and Altana, Altana ensures the security and confidentiality of its Clients' Personal Data, but also of its Prospects and Internet Users, by the implementation of technical and organizational measures.

Altana implements measures to prevent data, including Personal data, from being distorted, damaged, destroyed, disclosed to unauthorized third parties. Despite the efforts put in place by Altana in this regard, Clients, Prospects and Internet Users are aware that no computer system, be that for hosting, storage, transmission, etc., is infallible.

In particular, for the processing of sensitive data collected in the framework of some pre-litigations and litigations, Altana implements all the appropriate security measures to ensure that the data are not lost, damaged or accessible by unauthorized third parties. Restrictions of access are implemented inside the firm and the staff that is not subject to the professional secrecy of lawyers and has access to these data are subject to a reinforced obligation of confidentiality. Furthermore, these data are structurally stored in a system separated from other data processed by Altana.

As an independent French law firm, all data entrusted to Altana by the Clients, Prospects and Internet Users are stored in a server located in France, and no transfers are operated outside of the European Union, except for occasional transfers mentioned in paragraph 4.

The subcontractors of Altana are also bound, in the same conditions, to implement appropriate technical and organisational measures to ensure the protection of Personal Data of the Clients, Prospects and Internet Users.

Altana implemented an internal process allowing it to notify the supervisory authority of any personal data breach likely to result in a high risk to the rights and freedoms of data subjects in the time imposed by the applicable regulation.

4. TRANSFER OF PERSONAL DATA

Altana regularly works in partnership with foreign law firms when necessary for the performance of the mandate contract concluded with the Client. Thus, Altana is likely to transfer Personal Data of its Clients to law firms located in third countries each time the transfer is necessary for the performance of the contractual relationship between the Client and Altana or each time the transfer is necessary for the establishment, exercise or defence of legal claims of the Client, in accordance with article 49 e) of the GDPR. Altana may also transfer data in accordance with article 48 of the GDPR when it is based on an international agreement or a mutual legal assistance treaty.

5. APPLICABLE LAW AND JURISDICTION

The hereby Privacy Policy is governed by French law. In the event of a dispute with a Client, Prospect or Professional Internet User, the competent court is the Tribunal de Grande Instance of Paris, notwithstanding plurality of defendants or introduction of third parties.

6. CONTACT

In order to exercise their rights mentioned in article 2 of this Privacy Policy, the Clients, Prospects and Internet Users will have to justify their identity and submit their request to Altana via the following electronic address: privacy@altanalaw.com. The Clients, Prospects and Internet Users can also submit to the same address any question related to the hereby Privacy Policy.