Privacy Notice and Consent Form
on the
Disclosure of Transfer of Values

Dated: 11th March 2026

1. Purpose

Santhera and its Affiliates (**Santhera**, **we**, or **us**) are committed to ensuring transparency around their interactions with

- Healthcare Professionals (**HCP**)
- Healthcare Organizations (**HCO**)
- (Expert) patients (**PTS**)
- Patient Organizations (**PO**)
- Other Relevant Decision Makers (**ORDM**; individuals who can influence the administration, consumption, prescription, purchase, or recommendation of medicines but are not HCP), and

Below, we will refer to any of the individuals above as **Reportable Subject**.

We process data related to these interactions in our internal systems. We may report these as outlined below, ensuring individual privacy is protected.

In some jurisdictions, we are legally obliged to disclose such Transfers of Value (**ToV**) under applicable transparency or sunshine acts. In others, disclosures obligations arise from applicable codes of Pharma industry associations such as the EFPIA (European Federation of Pharmaceutical Industries and Associations) and the UK ABPI (Association of the British Pharmaceutical Industry).

This Privacy Notice (**Notice**) explains how we process personal data we obtain from the above-mentioned Reportable Subjects (i.e., information that directly or indirectly identifies an individual) (**Personal Data**) for transparency purposes, specifically the disclosure of ToV made to such individuals. ToV include payments for services, donations in cash or in kind, reimbursement of expenses and sponsorships.

This Notice describes the types of Personal Data we collect, how we may use or disclose it, how we safeguard it, and how you can contact us to exercise your rights.

2. Processing of Personal Data for the Purpose of Public Disclosure of ToVs

Santhera will process Personal Data in accordance with applicable privacy and data protection laws and regulations, including the Regulation (EU) 2016/679 (the General Data Protection Regulation, **GDPR**), the UK Data Protection Act 2018 (DPA 2018), the UK GDPR and the Swiss Federal Act on Data Protection.

2.1. Types of Personal Data

Your Personal Data may either be directly provided by you, by our business partners where they are your employers in the interaction, or from trusted publicly available sources (such as congress websites or university websites), where permitted under applicable law. Where required, the relevant party must have a valid legal basis, for instance your consent, to provide us with your Personal Data.

Santhera will process the following types of Personal Data:

a) **Personal identifiers**: title, full name, principal professional/practicing address, professional email address and phone number (where relevant), area of expertise, physician's lifelong identification number (if applicable)

b) **Transfers of Value**: the financial value (whether in payment or benefit in kind) of the following activities:
   - Services and consulting fees (including any expenses) and details of the related activities
   - financial benefits for educational and other events, including:
     - costs of meeting and registration fees
     - refunding/reimbursement of travel & accommodation costs
     - sponsorship of educational events
     - donations and grants
     - other financial benefits (whether direct or indirect services)
     - where necessary for calculation or verification, supporting financial documents may also be processed (e.g. payment records, agreements, invoices and expense receipts).

Santhera processes payments and financial value in the currency of the country in which the publication will be made, usually the country in which the Reportable Subjects exercises its practice.

2.2 Internal processing activities

Santhera may process and disclose certain Personal Data for the purposes set out below subject to any local data privacy requirements.

The legal bases listed below may be exclusive of each other or cumulative (with respect to some or all Personal Data), depending on the jurisdiction and circumstances

Purpose of Processing	**Lawful Basis**
Processing records of ToVs in Santhera's financial systems prior to publication and the preparation of reports for disclosure (before consent status is known)	Legal obligation(s): In the jurisdictions where we operate, we are under the obligation to create and maintain financial records to ensure the completeness and accuracy of our financial statements. Legitimate interest: We have a legitimate interest in creating and maintaining records of ToVs and to verify that reported data is complete and accurate before submission.
Documentation and retention of disclosed ToVs	Legitimate interest: We have a legitimate interest to maintain the relevant records of disclosures for 5 years after the end of the reporting period (unless local laws or regulations differ) in order to comply with potential requests by government and other regulatory bodies.

2.3 Publication of Transfers of Value (ToV)

Disclosures of ToVs are made for a period specified by applicable transparency regulation, usually the previous calendar year. Disclosures must be unrestricted and publicly available. Therefore, disclosures will be made on Santhera's website and/or on a platform provided by the relevant body or authority, as required by applicable law or stipulated by the applicable disclosure code. The applicable method varies by jurisdiction.

Under the EFPIA Code, disclosures have to be made within 6 months after the end of the reporting period and must remain publicly available for a minimum of 3 years after the first

publication, unless a shorter period is required under applicable national laws or regulations, or consent is withdrawn or legitimate interest objected, as may apply.

Jurisdiction-specific notes

Disclosure requirements and publication channels vary by country and may change over time. If local law requires individual publication, we will publish as required by law; if local rules allow aggregate publication where consent is not given, we will publish in aggregate.

In jurisdictions where disclosure of ToVs is mandated by law, Santhera will disclose the required information in accordance with applicable legal obligations and will not request consent where consent is not required by law.

In jurisdictions where individual named disclosure is not legally mandated, Santhera may rely on:

- legitimate interest, where permitted under applicable law and industry transparency rules; and/or
- consent, where required for individual named disclosure under applicable law or applicable industry codes.

The publication of ToV data serves important transparency interests because it instils public confidence in the integrity of the relationship between the pharmaceutical industry and HCP, HCO and others by demonstrating transparently that these interactions are legitimate and with the purposes of advancing medical sciences and most importantly improving patient outcomes.

Where disclosure of ToV on an individual basis cannot be made under the applicable lawful basis, including when consent is required but is not provided or has been withdrawn, Santhera shall make an aggregate disclosure of the ToV made to you.

The following table describes the method of disclosure, i.e., individual vs. aggregate disclosures, and the lawful basis.

Individual vs. aggregate publication of ToV	**Lawful basis**
Individual publication of the transfers of value	Some national laws require the disclosure of ToV on an individual, i.e. named basis. (“sunshine acts”) Where this is not the case, we rely on consent or in some jurisdictions, on legitimate interest to disclose ToVs individually.

	To the extent that legitimate interest is the basis for processing, Reportable Subjects have the right to object to the processing of their Personal Data.
Aggregate publication of the transfers of value	Where consent is not given and the national legal requirements allows aggregate disclosure: We have a legitimate business need to publicly disclose the aggregate sums of ToVs made to Reportable Subjects where consent is not given.

4. Access to Personal Data

We restrict access to Personal Data to those that require it to perform their functions at Santhera. This may includeIT, finance, legal, compliance and Santhera management functions, and external auditors and service providers acting on Santhera's behalf under appropriate confidentiality and data protection obligations

5. Securing Personal Data

We take reasonable steps to ensure the security of Personal Data. We maintain appropriate administrative, technical, and physical safeguards designed to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration, and destruction. We also require that third party service providers acting on our behalf or with whom we may need to share your Personal Data in order to meet our legal and regulatory obligations, also provide such security measures in accordance with industry standards.

5. Will my data be transferred abroad?

We generally process and store Personal Data on servers in Switzerland or in the EU.

6. Data retention

We will retain your Personal Data that we have disclosed under applicable transparency regulations for 5 years after the end of the reporting period (unless local laws or regulations differ). We only retain your information as long as needed to comply with legal or regulatory obligations. Public disclosures remain available for 3 years after first publication where required by the EFPIA Code, unless a longer period is required under applicable law.

7. Your choice and rights

You have the following rights in relation to your Personal Data to:

- Access and receive a copy of your data
- Update, amend, or correct incomplete or inaccurate data
- Request to delete or stop processing your Personal Data to the extent that Santhera relies on consent or legitimate interest to process your Personal Data or request restriction of processing, where applicable
- Withdraw your consent of our ability to use your data
- Object to the processing of your data where we rely on your consent or our legitimate interest as the legal basis
- Lodge a complaint with a Data Protection Authority/EU Supervisory Authority

8. Updates to Reportable Subjects of Transfer of Value Privacy Notice

This Notice may be updated periodically to reflect changes in our Personal Data practices or relevant laws. We will indicate at the top of the Notice when it was last updated.

Contact us

If you have any questions about our privacy practices or would like to exercise your rights, please contact our Data Protection Officer at privacy@santhera.com or

Santhera's data protection officer (DPO):
Swiss Infosec AG
Centralstrasse 8A
6210 Sursee
Switzerland