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# Vipsiblings.eu Website Privacy Policy

The purpose of this privacy policy is to inform you what personal data we collect from you when you visit Vipsiblings.eu website (the “**Website**”); how we use such personal data; the choices and rights you have regarding our use of, and your ability to review and correct, your personal data.

This privacy policy only applies to personal data that is processed by Zogenix or third parties acting on our behalf via this Website. It does not describe the way in which we collect or use personal data obtained offline or through other websites owned by Zogenix.

## Data Controller

For the processing of your personal data as described in this privacy policy, the controller within the meaning of the General Data Protection Regulation (“**GDPR**”), UK GDPR and UK Data Protection Act 2018 is Zogenix International, Ltd., located at The Pearce Building, West Street, Maidenhead, Berkshire, SL6 1RL United Kingdom (“**Zogenix**”, “**we**”, “**our**”). Should you have any questions or suggestions concerning data protection, or to exercise your rights, please contact Zogenix at the contact details set out at the end of this privacy policy. You can also contact our Data Protection Officer at: [EUdataprivacy@zogenix.com](mailto:EUdataprivacy@zogenix.com).

## Personal Data We Collect

For the purpose of this Privacy Policy, “**personal data**” means any information related to you as an identified or identifiable natural person.

In general, you can visit our Website without telling us who you are. However, if you contact us, we collect certain types of information, which may include your name, address, or e-mail address, that we will use according to the purpose for which you provide it to us.

Below we set out in more detail what types of personal data we collect, for what purposes the data is used by us, and on what legal basis we process the related personal data.

- Data about Website Access (Log Files): Our Website collects certain personal data that will be automatically submitted from your browser to Zogenix when a user visits our Website (including: browser type and version, operating systems used by accessing system, the website from which an accessing system reaches our Website (referrer URL), hostname of accessing system, date and time of server request, Internet protocol address (IP address) of accessing system, name of the requested file, access status (file transmitted, not found, etc.), size of data transferred). We generally process the relevant data for the duration of your session to enable the technical delivery of our Website’s content and features to your device. Additionally, the data will be stored by us in log files for a short period of time for purposes of technical security of our Website, in particular to protect us against attempts to attack our web server. The data is deleted

thereafter, or anonymized by shortening the IP-address, so that it is no longer possible to draw any conclusion to the identity of an individual user of our Website. We analyze and use the data in anonymized form for internal statistical purposes, to optimize the content, features and security our Website. Zogenix processes your personal data on the basis of its legitimate interests in operating our Website, ensuring the efficiency and security of the Website, improving and maintaining site functionality, and establishing, exercising and defending our legal claims.

- Contact via our Website: Our Website does not offer any contact form or other technical possibility facilitating direct communication with users of the Website. However, if you decide to contact us through any contact details available on our Website, we will process the data received from you (such as name, email address, the topic and content of your request, enquiry or other communication, and any other personal data disclosed to us in the course of your contact, including potentially any health data disclosed by you) for purposes of handling your communication, such as responding to your enquiry. For this purpose, the processing of your personal data will be based on our legitimate interests in ensuring an efficient and appropriate communication, in ensuring and documenting compliance with our legal obligations, and in establishing, exercising and defending our legal claims.
- Pharmacovigilance: if you contact us to report an adverse event, we will process certain information about you, like your contact data (name, telephone number and/or email address, as necessary for any follow-up questions) and any relevant other information and health data (such as, for instance, age, date of birth, location, gender, pregnancy, breastfeeding, concurrent medical conditions, medications taken, and information on any adverse reaction). We will store and process the data for purposes of complying with our respective legal obligations (in particular statutory documentation and reporting obligations to the competent authorities), for reasons of public interests in the area of public health, in particular for ensuring high standards of quality and safety of health care and of medicinal products and for safeguarding our respective legitimate interests (in ensuring and documenting compliance with statutory pharmacovigilance requirements and in establishing, exercising and defending legal claims).
- Exercise of Rights and Legal Compliance: We may also use your personal data on the basis of our legitimate interests to establish, exercise and defend our legal rights where it is necessary to do so, for example to detect, prevent and respond to misuse of our Website or to protect ourselves against claims or to comply with other legal and contractual obligations.

## Cookies

To enable Zogenix to ensure the correct functioning and security of the Website, including your registration and access to scientific materials, provide site navigation functionalities, secure authentication and login, and remembering your session preferences and to provide customized and personalized services, Zogenix uses cookies and similar tools to store and sometimes track information, which may include personal data, about you.

The cookies used by Zogenix on the Website are strictly necessary to enable these core functionalities of the website. These cookies will be placed by our third-party service provider that is operating the Website on our behalf. The cookies will be session cookies and be deleted at the latest once your browser session has ended. Strictly necessary cookies do not require your consent. You can set your browser to block or alert you about these cookies, but some parts of the Platform will not then work. For further information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

## Disclosures to Third Parties

We disclose your personal data to third parties who act for or on our behalf, or in connection with our business, for processing in accordance with the purposes for which personal data was originally collected. Categories of recipients of personal data may comprise:

- Processors: Companies of Zogenix Group or external service providers that we use to render services, e.g., in the areas of pharmaceutical infrastructure. These processors are carefully selected by us and regularly reviewed in order to ensure the security and confidentiality of your personal data. The service providers are allowed to use the personal data exclusively upon our instructions and on the basis of required data processing agreements;
- Public and administrative authorities: Regulatory and governmental bodies, such as national and international regulatory authorities, public institutions, prosecutors, courts or financial authorities, to which we are compelled by law to transfer personal data; and
- Independent data controllers: Companies of the Zogenix Group, credit agencies, legal advisors or external consultants to whom personal data are transferred, as applicable on basis of your consent, for the purpose of handling an inquiry, or to the extent this is necessary for performing on a contract with you or for the purpose of pursuing our legitimate interests.

We may also share personal data in association with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company, or we sell, liquidate, or transfer all or a portion of our assets. For more information about the recipients of your personal data, please contact us using the contact details set out below at the end of this privacy policy.

## International data transfers

In principle, your personal data will be stored and processed by Zogenix solely within the European Union and in the UK.

However, in certain cases we may need to disclose your personal data to recipients located in countries outside the European Union (EU), the UK and the contracting states of the European Economic Area (EEA) (so-called “**third countries**”), for example in case of a disclosure of your personal data to other Zogenix group companies located in third countries for ensuring compliance with applicable pharmacovigilance obligations. The laws of these third countries, in particular in

the USA, may not provide for the same level of data protection as considered adequate in the European Union.

However, in these cases, we will – to the extent legally required – ensure by implementing appropriate safeguards and guarantees (such as by entering into agreements on the basis of the EU and UK standard contractual clauses for the transfer of personal data to third countries and by implementing appropriate supplementary safeguards, such as pseudonymization) that your personal data will be adequately protected as required under European data protection laws. In addition, where the transfer is made for pharmacovigilance purposes, the transfer is further based on the necessity of the transfer to comply with our legal obligations for important reasons of public interest in the area of public health.

For more information on the recipients of your personal data and the safeguards in place, including on how to receive a copy, you can contact us at any time at the contact information set out below at the end of this privacy policy.

## Data Retention

We retain your information for as long as needed for the purpose collected, in accordance with our data retention policy (which sets forth data retention periods required or permitted by applicable law). We will also retain your personal data for longer if needed for our legal obligations and the need to retain records in order to resolve disputes, enforce our agreements, and investigate or defend against potential legal claims. For more information about the specific retention periods applicable to your personal data, please contact us using the contact details set out below at the end of this privacy policy.

## Your Rights

You have certain rights regarding the personal data we hold about you, subject to local law. These include the rights to access, correct, delete, restrict our processing of your personal data, or receive a portable copy of your personal data in a usable electronic format (right to data portability), subject to applicable conditions set forth under GDPR and applicable local data protection law.

Where the processing of your personal data is based on your consent, you have the right to withdraw your consent (without affecting the lawfulness of processing based on your consent before its withdrawal). If you withdraw your consent, we might still need to process certain personal data relating to you to comply with a legal obligation (or to pursue a legitimate business interest).

**You further have the right to object at any time, on grounds relating to your particular situation and in accordance with applicable law, to any processing of your personal data based on the grounds that the processing is necessary for purposes of legitimate interests pursued by us.**

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. You have in any case the right to lodge a complaint with the supervisory data

protection authority competent for your place of habitual residence or the place of the alleged infringement.

## Contact Information

Questions or comments regarding this Policy should be submitted by email to: [EUdataprivacy@zogenix.com](mailto:EUdataprivacy@zogenix.com) or by mail to: Zogenix International Limited, The Pearce Building, West Street, Maidenhead, Berkshire, SL6 1RL United Kingdom.

## Changes to this Privacy Policy

We may modify or update this privacy policy from time to time. If we make any revisions that materially change the ways in which we process your personal data, we will take steps to notify you of these changes in advance. A notice will be posted on the Website whenever this privacy policy is changed in a material way.

Effective as of 1 April 2022.