

**DATA PROTECTION POLICY****1- Introduction**

The purpose of this Policy is to provide the guidelines and principles to follow in relation to the protection of the personal data of Almirall stakeholders, within the scope of the activities carried out by the different departments and functional areas of Almirall, all with the aim of ensuring compliance with the applicable laws on data protection matters.

**2- Scope**

Data protection laws and this Policy apply to the processing of personal data by automated means; or other than by automated means which forms part of, or is intended to form part of, a filing system (for instance, paper files).

Personal data means information relating to natural persons: (i) who can be identified or who are identifiable, directly from the information in question; or (ii) who can be indirectly identified from that information in combination with other factors specific to the data; in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of such natural person

Personal data may also include special categories of information. These special categories are considered to be more sensitive and can only be processed in limited circumstances. Special categories of data may include: racial or ethnic origin, political opinions, religious or philosophical beliefs, data concerning health or sex life and sexual orientation, genetic data or biometric data, etc.

Personal data of Almirall stakeholders can only be processed if one of the following lawful bases exists and such lawful base is identified prior to start processing any personal data.

There are six available lawful bases for processing as described below:

-Consent: when the individual has given clear consent for Almirall to process their personal data for a specific purpose. The consent must be free, specific, informed and unambiguous.

-Contract: when the processing is necessary for Almirall to comply with any contractual obligation.

-Legal obligation: when the processing is necessary for Almirall to comply with any applicable law.

-Vital interests: when the processing is necessary to protect someone's life.

-Public task: when the processing is necessary to perform a task in the public interest.

-Legitimate interest: when the processing is necessary for Almirall's legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

The most appropriate basis to use will depend on the purpose and relationship with the individual. Almirall's privacy notices must include the lawful basis for processing personal data as well as the purposes of the processing, among other information.

### **3- Principles**

In order to demonstrate Almirall's accountability to comply with the applicable laws, all Almirall employees must observe the following general principles when processing any personal data: (i) lawfulness, fairness and transparency, (ii) purpose limitation, (iii) data minimization, (iv) accuracy, (v) storage limitation and (vi) integrity and confidentiality.

### **4- Roles and responsibilities**

Almirall has appointed a Global Data Protection Officer (GDPO). The GDPO duties and responsibilities will be those established by the applicable laws and, in particular, will carry out the following main tasks:

-To inform, advice and provide internal guidance to Almirall and to all its employees of their obligations pursuant to the data protection applicable laws;

-To monitor compliance with the data protection applicable laws and with Almirall's policies and standard operating procedures in relation to protection of personal data-

-To cooperate and act as the contact point for the supervisory Authorities on issues relating to processing of personal data.

The GDPO will be assisted by an internal Privacy Office with among others, the following functions:

-Monitor the privacy program implementation and ensure that the data protection principles referred to in section 3 of this Policy are observed.

-Monitor maintenance of the records of processing activities updated for Almirall and all its affiliates.

-Foster and maintain Almirall's personnel awareness on personal data protection duties and the sense of risk ownership in the business units. As part of this personnel awareness, plan staff training initiatives on personal data protection matters.

Barcelona, May 6, 2021