

NEOPHARMA JAPAN'S SUBJECT ACCESS REQUEST PROCEDURE AND FORM

1. INTRODUCTION

This procedure document supplements the subject access request (SAR) provisions set out in NeoPharma Japan's (hereinafter referred to as the 'NPJ') Data Protection Policy and provides the process for individuals to use when making an access request, along with the protocols followed by NPJ when such a request is received.

NPJ needs to collect some personal information to effectively and compliantly carry out our everyday business functions and services and in some circumstances, to comply with the requirements of the law and/or regulations.

As NPJ processes personal information regarding individuals (data subjects), we are obligated under the General Data Protection Regulation (GDPR) to protect such information, and to obtain, use, process, store and destroy it, only in compliance with the GDPR and its principles.

1.1 The General Data Protection Regulation

The General Data Protection Regulation (GDPR) gives individuals the right to know what information is held about them, to access this information and to exercise other rights, including the rectification of inaccurate data. The GDPR is a standardized regulatory framework which ensures that personal information is obtained, handled and disposed of properly.

As NPJ is obligated under the GDPR data protection law, we abide by the Regulations' principles, which ensure that personal information shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency').
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation').
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization').
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy').
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation').
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ('integrity and confidentiality').

The Regulation also requires that 'the controller shall be responsible for, and be able to demonstrate, compliance with the GDPR principles' ('accountability').

NPJ have adequate and effective measures, controls and procedures in place, that protect and secure your personal information and guarantee that it is only ever obtained, processed and disclosed in accordance with the relevant data protection laws and regulations.

2. WHAT IS PERSONAL INFORMATION?

Information protected under the GDPR is known as 'personal data' and is defined as:

“Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, 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 that natural person.”

Further information on what constitutes personal information and your rights under the data protection regulation and laws can be found on the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) [website](#).

3. THE RIGHT OF ACCESS

Under Article 15 of the GDPR, an individual has the right to obtain from the controller, confirmation as to whether personal data concerning them is being processed. We are committed to upholding the rights of individuals and have dedicated processes in place for providing access to personal information. Where requested, we will provide the following information:

- the purposes of the processing
- the categories of personal data concerned
- the recipient(s) or categories of recipient(s) to whom the personal data have been or will be disclosed
- If the data has been transferred to a third country or international organization(s) (and if applicable, the appropriate safeguards used)
- the envisaged period for which the personal data will be stored (or the criteria used to determine that period)
- where the personal data was not collected directly from the individual, any available information as to its source.

3.1 How to make a Subject Access Request (SAR)?

A subject access request (SAR) is a request for access to the personal information that NPJ holds about you, which we are required to provide under the GDPR (unless an exemption applies). The information that we provide is covered in Section 3 of this document.

You can make this request in writing using the details provided in Section 7, or you can submit your access request electronically. Where a request is received by electronic means, we will provide the requested information in a commonly used electronic form (unless otherwise requested by the data subject).

3.2 What we do when we receive an access request

Identity Verification

Subject Access Requests (SAR) are passed to our Data Protection Officer as soon as received and a record of the request is made. The DPO will use all reasonable measures to verify the identity of the individual making the access request, especially where the request is made using online services.

We will utilize the request information to ensure that we can verify your identity and where we are unable to do so, we may contact you for further information, or ask you to provide evidence of your identity prior to actioning any request. This is to protect your information and rights.

If a third party, relative or representative is requesting the information on your behalf, we will verify their authority to act for you and again, may contact you to confirm their identity and gain your authorization prior to actioning the any request.

Information Gathering

If you have provided enough information in your SAR to collate the personal information held about you, we will gather all documents relating to you and ensure that the information required is provided in an acceptable format. If we do not have enough information to locate your records, we may contact you for further details. This will be done as soon as possible and within the timeframes set out below.

Information Provision

Once we have collated all the personal information held about you, we will send this to you in writing (or in a commonly used electronic form if requested). The information will be in a concise, transparent, intelligible and easily accessible format, using clear and plain language.

4. FEES AND TIMEFRAMES

We aim to complete all access requests within 30 days and provide the information free of charge. Where the request is made by electronic means, we provide the information in a commonly used electronic format, unless an alternative format is requested.

Whilst we provide the information requested without a fee, further copies requested by the individual may incur a charge to cover our administrative costs.

NPJ always aim to provide the requested information at the earliest convenience, but at a maximum, 30 days from the date the request is received. However, where the retrieval or provision of information is particularly complex or is subject to a valid delay, the period may be extended by two further months. If this is the case, we will write to you within 30 days and keep you informed of the delay and provide the reasons.

5. YOUR OTHER RIGHTS

Under the GDPR, you have the right to request rectification of any inaccurate data held by us. Where we are notified of inaccurate data, and agree that the data is incorrect, we will amend the details immediately as directed by you and make a note on the system (or record) of the change and reason(s).

We will rectify any errors within 30-days and inform you in writing of the correction and where applicable, provide the details of any third-party to whom the data has been disclosed.

If for any reason, we are unable to act in response to a request for rectification and/or data completion, we will always provide a written explanation to you and inform you of your right to complain to the Supervisory Authority and to seek a judicial remedy.

In certain circumstances, you may also have the right to request from NPJ, the erasure of personal data or to restrict the processing of personal data where it concerns your personal information; as well as the right to object to such processing. You can use the contact details in section 7 to make such requests.

6. EXEMPTIONS AND REFUSALS

The GDPR contains certain exemptions from the provision of personal information. If one or more of these exemptions applies to your subject access request or where NPJ does not act upon the request, we shall inform you at the earliest convenience, or at the latest, within one month of receipt of the request.

Where possible, we will provide you with the reasons for not acting and any possibility of lodging a complaint with the Supervisory Authority and your right to seek a judicial remedy. Details of how to contact the Supervisory Authority are laid out in Section 7 of this document.

7. SUBMISSION & LODGING A COMPLAINT

To submit your SAR, you can contact our DPO at sebok@sudy.co.hu. You can also submit your request in writing using the form in Appendix 1, sending the request to:

Sudy and Co., Ltd., Data Protection Officer
Mérnök str.39., Budapest, 1119 Hungary

1.2 Supervisory Authority

If you remain dissatisfied with our actions, you have the right to lodge a complaint with the Supervisory Authority. The Hungarian National Authority for Data Protection and Freedom of Information (NAIH) can be contacted at:

Hungarian National Authority for Data Protection and Freedom of Information

1055 Budapest, Falk Miksa, utca 9-11.

Mailing address: 1374 Budapest, Pf. 603.

Tel.: +36 1 3911 400

E-mail: ugyfelszolgalat@naih.hu

Homepage: <http://www.naih.hu/>

SUBJECT ACCESS REQUEST FORM

Important Information

NPJ collects, holds, and processes certain personal data about our employees, data processor employees, ('data subjects'). As a data subject, you have a legal right, under EU Regulation 2016/679 General Data Protection Regulation ('GDPR') to find out about our use of your personal data as follows:

- confirmation that your personal data is being processed by us
- access to your personal data
- how we use your personal data and why
- details of any sharing or transfers of your personal data
- how long we hold your personal data
- details of your rights under the GDPR including, but not limited to, your rights to withdraw your consent to our use of your personal data at any time and/or to object to our processing of it.

No fee is payable under normal circumstances. We reserve the right to charge a reasonable fee for requests that are manifestly unfounded, excessive, or repetitive. Such charges will be based only on the administrative cost that we will incur in order to respond.

Please complete the required information overleaf and return it to us by email AND/OR by post addressed to:

Sudy and Co., Ltd, Data Protection Officer

Mérnök str.39., Budapest, 1119 Hungary

Email: sebok@sudy.co.hu.

You do not have to use this form and may instead write to us using the same contact details.

After receiving your subject access request, we may contact you to request additional supporting information and/or proof of your identity. This helps us to safeguard your privacy and personal data.

We will respond to all subject access requests within one month of receipt and will aim to provide all required information to you within the same period. If we require more information from you, or if your request is unusually complicated, we may require more time and will inform you accordingly.

SUBJECT ACCESS REQUEST FORM

Your Details

Title:

Forename(s):

Surname:

Address:

Telephone Number:

Email Address:

Information Being Requested

Please provide specific details (along with any relevant dates) of the information being requested and any additional information that may help us to locate your personal data and to confirm your identity.

By completing this form, you are making a subject access request under the GDPR for personal data collected, processed, and held about you by us that you are entitled to receive.

Declaration

By signing below, you confirm that you are the data subject named in this Subject Access Request Form. You warrant that you are the individual named and will fully indemnify Neopharma Japan for all losses and expenses incurred if you are not. We cannot accept requests in respect of your personal data from anyone else, including members of your family.

Name:

Signature:

Date: