

Central Privacy Notice – THERAMEX

Last update: 17 December 2025

1. Introduction

Theramex and its group entities respect your right to privacy. This General Privacy Notice (“Privacy Notice”) explains who we are, how we collect, use, and share personal data about you, and how you can exercise your privacy rights.

For specific information on recruitment, website usage, medical information inquiries, pharmacovigilance (adverse event reporting), clinical research studies or patient support programmes, please refer to the following notices:

- Recruitment Privacy Notice
- Website Privacy and Cookie Policies (available in the footer of each website)
- Privacy Notice for Patient-Related Data (available in the footer of each website)

If you have any questions or concerns about how we handle your personal data, please contact us using the details provided at the end of this Privacy Notice.

We recommend reading this Privacy Notice in full to understand how and why we use your personal data. However, if you wish to access a particular section, you may click on the relevant heading below:

- Data Controller information
- Categories of data subjects and types of personal data collected
- Purposes of processing
- Legal basis for processing
- Data sharing and disclosure
- International data transfers
- How Theramex keeps your personal data secure
- Data retention
- Automated decision-making
- Your data protection rights and how to exercise them
- Updates to this Privacy Notice
- Contact information

2. Data Controller Information

Theramex HQ UK Limited (“Theramex”), whose registered office is at 50 Broadway, London SW1H 0BL, United Kingdom, is a global specialty pharmaceutical Theramex is committed to supporting the health needs of women through every stage of life. Theramex is headquartered in the United Kingdom, with group entities operating worldwide.

For a list of our group companies, branches, and their contact details, please visit our [Locations page](#).

Further information about Theramex can be found in the [About Theramex](#) section of our website.

3. Categories of Data Subjects and Types of Personal Data Collected

Depending on how you interact with us, we may collect and process personal data that directly identifies you (for example, your name, contact details, or email address). We may also collect personal data that does not directly identify you but could make identification possible when combined with other information (for example, your organisation, job title, or identification number).

The personal data we collect and process generally falls into the following categories:

Category of Data Subject	Type of personal data likely to be processed
	Please refer to our Privacy Notice for Pharmacovigilance and Clinical Research (available in the footer of each website)
Healthcare Professionals (HCPs) (including contractual relationships, events, clinical research, medical enquiries, and adverse event reports)	<ul style="list-style-type: none">- Identity data (name, title, date of birth)- Contact data (professional email, phone number, business address)- Professional data (medical licence/registration number, qualifications, clinical specialty, affiliations, employer, practice location)- Financial data (bank details, payments, consultancy or honoraria, transfers of value)- Contractual data (agreements, engagement history, event attendance, advisory participation)- Compliance data (conflict of interest declarations, transparency reporting information)

	<ul style="list-style-type: none"> - Interaction data (records of communications, event participation, feedback, sample training) - Health data (only where relevant, e.g., adverse event reporting in which case our Privacy Notice for Patient-Related Data will apply) - Communication preferences and consent records
Third-party partners, suppliers, and consultants (including contract research organisations, vendors, and service providers)	<ul style="list-style-type: none"> - Identity data (name, title, date of birth) - Contact data (email, phone number, address) - Professional data (role, qualifications, experience, company affiliation) - Financial data (bank account details, payment history, tax details) - Contractual and performance data (agreement details, deliverables, audits, compliance documentation) - Certification data (training, accreditation, insurance, regulatory approvals)
Key Opinion Leaders (KOLs) and Advisory Board Members	<ul style="list-style-type: none"> - Identity data (name, title) - Contact data (professional email, phone, address) - Professional data (specialty, qualifications, affiliations, publication and speaking history) - Contractual data (agreements, engagements, remuneration details) - Transparency and compliance data (transfers of value, conflict declarations, disclosure obligations) - Communication and event participation data
Regulators, authorities, and inspectors	<ul style="list-style-type: none"> - Identity data (name, title, position) - Contact data (professional email, phone, postal address) - Professional data (agency or body represented, position, area of responsibility) - Communication data (correspondence, inspection records, meeting minutes, regulatory submissions)
Distributors, wholesalers, and pharmacies	<ul style="list-style-type: none"> - Identity data (name, title) - Contact data (email, phone number, address) - Professional and business data (licence number, regulatory approvals, business registration, distribution records) - Financial and transactional data (invoices, payments, delivery confirmations) - Communication and relationship management data

Clinical Research site staff and investigators	<ul style="list-style-type: none"> - Identity data (name, title) - Contact data (email, phone, work address) - Professional data (qualifications, certifications, experience, institutional affiliations) - Employment and contractual data (site agreements, investigator declarations, CVs) - Training and audit data (GCP training records, inspection reports) - Financial data (honoraria, reimbursements, payments for trial activities)
Stakeholders and members of the public communicating with the company	<ul style="list-style-type: none"> - Identity data (name, title, where provided) - Contact data (email, phone, address) - Communication data (correspondence content, enquiries, complaint details) - Contextual data (topic of enquiry, follow-up actions, date/time of contact)

4. Purposes of Processing

Depending on your relationship or interaction with Theramex, your personal data may be processed for one or more of the following purposes:

- Providing support services for patients, healthcare professionals, or caregivers, such as disease awareness initiatives and similar programmes.
- Conducting research and development, including clinical trials, non-interventional and retrospective studies (for more details, please refer to our Privacy Notice for Patient-Related Data).
- Responding to your requests or enquiries, such as medical information questions, product feedback, complaints, or event participation.
- Managing our communications and interactions with you, including invitations, news, educational materials, and other updates about Theramex, its products, and therapeutic areas, where permitted by law.
- Supporting sales, marketing, and engagement activities, including the organisation of Theramex events or sponsorship of third-party events.
- Recording participation and attendance at Theramex-sponsored events.
- Conducting surveys and market research to gather insights, feedback, and opinions relevant to Theramex’s business and therapeutic areas.
- Analysing publicly available information, such as websites and social media, to understand stakeholder sentiment and identify experts or thought leaders.

- Delivering training and awareness programmes on Theramex's products, activities, and therapeutic areas.
- Managing contracts and commercial relationships, including procurement of goods and services and related financial transactions.
- Taking steps to enter into or perform a contract with you.
- Conducting due diligence and risk assessments before or during relationships with third parties.
- Complying with legal and regulatory obligations, such as pharmacovigilance (adverse event reporting), tax, accounting, or audit requirements.
- Complying with transparency obligations, such as reporting transfers of value to healthcare professionals.
- Responding to binding requests from regulatory authorities, courts, or government bodies.
- Monitoring, auditing, and reviewing third-party interactions to ensure compliance with applicable laws, industry codes, and Theramex's internal standards.
- Preventing, detecting, and addressing fraud or misuse, and protecting Theramex's assets and the rights of others.
- Supporting corporate transactions, such as reorganisations, mergers, or acquisitions.
- Protecting Theramex's legal interests, enforcing contractual terms, and managing or defending legal claims.

The personal data you are asked to provide, and the reasons for collecting it, will be made clear at the point of collection.

5. Legal Basis for Processing

The legal basis on which we collect and use your personal data depends on the personal data concerned and the specific context in which we collect it. The following lawful bases may apply to our processing of your personal data:

- **Consent:** You have provided your consent for us to process your personal data for one or more specific purposes.
- **Legitimate interests:** The processing is necessary for our legitimate interests (or those of a third party) and these interests are not overridden by your data protection interests or fundamental rights and freedoms. Where this applies, we will make clear to you what those legitimate interests are at the relevant time.
- **Contract:** The processing is necessary to take steps at your request prior to entering into a contract or for the performance of a contract with you.

- Legal obligation: The processing is necessary for compliance with a legal obligation to which we are subject, such as obligations relating to pharmacovigilance (reporting of adverse events), product safety, accounting, or financial disclosures.
- Vital interests / protection of life: The processing is necessary to protect your vital interests or those of another person, or for the protection of your life or physical safety or that of a third party.
- Public interest in the area of public health: We may process special category data for reasons of public interest in the area of public health, for example to ensure high standards of quality and safety of healthcare and medicinal products or medical devices, or to protect against serious cross-border threats to health.
- Scientific research purposes: We may process personal data, including special category data, where necessary for scientific or historical research purposes, such as in the context of clinical studies (for more details, please refer to our Privacy Notice for Patient-Related Data).
- Manifestly public data: We may process personal data that you have manifestly made public, such as posts or publications on social media platforms.

If we ask you to provide personal data to comply with a legal requirement or to perform a contract with you, we will inform you at the relevant time whether the provision of your personal data is mandatory and what the possible consequences may be if you do not provide it.

If you withdraw your consent, this will not affect the lawfulness of any processing based on consent before its withdrawal, nor will it affect processing based on other lawful grounds. Your data protection rights, as set out in the section [“Your data protection rights and how to exercise them”](#), will continue to apply.

6. Data Sharing and Disclosure

We may share your personal data with the following categories of recipients:

- Group companies and service providers: To our group companies and trusted third-party service providers who perform services on our behalf (for example, providers supporting our Website, IT and security systems, pharmacovigilance reporting, or data analytics) only to the extent such group companies or providers need to receive such data. These parties are authorised to process your personal data only as necessary to provide their services to us and in accordance with our instructions.

- Regulators and public authorities: To competent authorities, regulators, government agencies, courts, or other third parties where disclosure is necessary (i) under applicable law or regulation, (ii) to exercise, establish, or defend legal rights, or (iii) to protect your vital interests or those of any other person.
- Corporate transactions: To a potential or actual buyer (and its agents or advisers) in connection with any proposed or actual purchase, merger, or acquisition of any part of our business, provided that the buyer agrees to use your personal data only for the purposes described in this Privacy Notice.
- Other disclosures: To any other person where you have provided your consent for such disclosure.

7. International Data Transfers

Your personal data may be transferred to, and processed in, countries other than the one in which you are resident. These countries may have data protection laws that differ from those of your country and, in some cases, may not provide the same level of protection.

In particular, our servers are located in the United Kingdom and the European Union, and in the United States for our Brazilian and Mexican group entities. Our group companies operate in various countries listed at <https://www.theramex.com/locations/>. This means that when we collect your personal data, it may be processed in any of these locations.

However, we have implemented appropriate safeguards to ensure that your personal data remains protected in accordance with this Privacy Notice. These include the use of the European Commission's Standard Contractual Clauses (SCCs) for the transfer of personal data between our group companies, requiring all group entities to protect personal data originating from the EEA or the UK in line with applicable data protection laws.

We have also implemented similar safeguards with our third-party service providers and partners. Additional information on these safeguards, including a copy of the SCCs, can be provided upon request by contacting us using the details set out under the "[Contact information](#)" section below.

8. How We Keep Your Personal Data Secure

We implement appropriate technical and organisational measures designed to protect the personal data we process. These measures aim to provide a level of security appropriate to the risk associated with processing your personal data.

Specific measures include, but are not limited to:

- Encryption of personal data in transit and at rest;
- Pseudonymisation and encryption on supported systems;
- Measures to ensure the ongoing confidentiality, integrity, availability, and resilience of our processing systems and services; and
- Procedures to restore availability and access to personal data in a timely manner in the event of a physical or technical incident.

9. Data Retention

We retain the personal data we collect from you for as long as we have a legitimate business need or legal obligation to do so, and in accordance with the Theramex Document Retention Policy, which specifies the retention periods for all Theramex business records.

The criteria used to determine these retention periods include:

- (i) whether there is a legal obligation to which we are subject (e.g. pharmacovigilance, tax or accounting requirements);
- (ii) whether we have an ongoing relationship with you and for how long;
- (iii) whether retention is necessary due to ongoing, threatened or anticipated litigation, investigations, or legal hold orders; and
- (iv) whether any industry codes or best practices apply in a particular case.

In principle, we will not retain your personal data for longer than is necessary for the purposes for which it was collected, as outlined in this Privacy Notice or as required by law or contract.

10. Automated Decision-Making

In some instances, our use of your personal data may involve automated decision-making (including profiling) that produces legal or similarly significant effects concerning you.

An automated decision means a decision made solely by automated means—such as through algorithms or machine learning—without human involvement. Theramex implements measures to safeguard your rights and interests, including verifying that any automated decisions are fair, transparent, and beneficial to you as a user of our services.

Where we make an automated decision about you, you have the right to:

- contest the decision;
- express your point of view; and
- request human review of the decision.

You can exercise these rights by contacting us using the details provided under the “[Contact Information](#)” section below.

11. Your Data Protection Rights and How to Exercise Them

Subject to certain exceptions and depending on where you live, you have the following data protection rights:

- **Access, correction and deletion:** You may request access to, correction, or deletion of your personal data at any time by contacting us using the details under the “[Contact Information](#)” section below.
- **Restriction, objection and portability:** If you are a resident of the UK or the European Union, you may object to or request the restriction of processing of your personal data, or request its portability.
- **Anonymisation, cancellation and blocking:** Under certain jurisdictions, such as Brazil and Mexico, you may request the anonymisation, cancellation or blocking of your personal data prior to its deletion.
- **Marketing communications:** You have the right to opt out of marketing communications at any time by clicking the “Unsubscribe” or “Opt-out” link in the marketing e-mails we send you, or requesting this by replying to the relevant email address.
- **Withdrawal of consent:** If we process your personal data on the basis of your consent, you may withdraw it at any time. This will not affect the lawfulness of processing carried out before your withdrawal, or processing based on other lawful grounds. **Right to complain:** You have the right to lodge a complaint with your local data protection authority. Contact details for authorities in the EEA, Switzerland, and certain non-European countries (including the UK, Australia, Brazil and Mexico) are available [here](#).

We respond to all requests in accordance with applicable data protection laws. To protect your personal data, we may need to request additional information to verify your identity before acting on your request.

12. Updates to This Privacy Notice

We may update this Privacy Notice from time to time—for example, to reflect changes in legislation, our business operations, or the way we process personal data. When we make material changes, we will take appropriate measures to inform you, consistent with the significance of the changes.

We encourage you to review this Privacy Notice periodically to stay informed about how we protect your personal data. You can determine when this Notice was last updated by referring to the “Last Update” date at the top of this page.

13. Contact information

If you have any questions about this Privacy Notice or if you would like to request the exercise of individual rights, please contact Theramex's Privacy Officer by email at:

dataprivacy@theramex.com

or write to the following address:

Privacy Officer, Theramex HQ UK Limited,
50 Broadway,
London SW1H 0BL, United Kingdom