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RECORDS OF PROCESSING ACTIVITIES - HYLORIS PHARMACEUTICALS



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1. OVERVIEW OF PROCESSING ACTIVITIES

This section summarises the data processing activities of **Hyloris Pharmaceuticals SA** (the **Company**).

❖ HR-related processing activities

- The processing of **candidates'** personal data that have been collected either directly from the candidates or through recruiters. The personal data collected are all information about the candidate, which can be found in their CV and/or cover letter. This information is stored in the HR folder on the Company's server. Access to this folder is restricted to only the person in charge of HR and the executing managers.
- The processing of **collaborators¹** personal data that have been collected:
 - directly from the employees through their completion of the on-boarding document or that have been communicated to the Company since the beginning of the employee's employment (including the time when the employment contract was entered into) until the end of it;
 - as far employees are concerned, indirectly through Hyloris Developments.
- The personal data collected are all information that were requested on the on-boarding document and other information that have been communicated to the Company from time to time for a specific purpose, such as doctor's certificates confirming sick leave (incapacitated for work). These information are stored in the HR folder on the server which access is limited to the person in charge of HR and the executing managers.

❖ Processing activities related to the website

- The processing of personal data on **subscribers to the Company's news**. Information is collected directly by the subscriber through the request form on the website. The personal data collected are name and email address. These information are stored on the Company's web platform, accessible by the administrative assistant and website manager, as well as the executing managers.
- The processing of personal data of **website users** collected through cookies, which are placed on the website.

¹ In this document "collaborator" means any employees regardless of their status, volunteers and interns, as well as self-employed contractors (such as consultants) working for the Hyloris Pharmaceutical group.

❖ **Processing activities related to the operation of the Company's core business**

- The processing of personal data on the contact person at the Company's customers (which are companies and distributors). The information is collected from the customers directly. The personal data collected are the personal e-mail addresses, and personal phone numbers. These information are stored in the Legal and Finance folders on the Company's server. Access is restricted to only the people in charge of legal matters, budget management, sales, and customer relationship.

❖ **Processing activities related to the administration and management of the Company**

- The processing of personal data on the contact person at the Company's suppliers (which are companies). The information is collected from the suppliers directly. These information are stored in the Legal, Finance, and Research folders on the Company's server. Access is restricted to only the people in charge of legal matters, budget management, and purchasing.
- Dulcedo is the Company's IT service provider. It likely processes all the personal data collected and stored by the Company in the context of IT maintenance service it provides to the Company.

2. DATA FLOW

This section describes the data flows per category of data subject. We identify the source, the first recipient at the Company, and all recipients thereafter.

2.1. Candidates



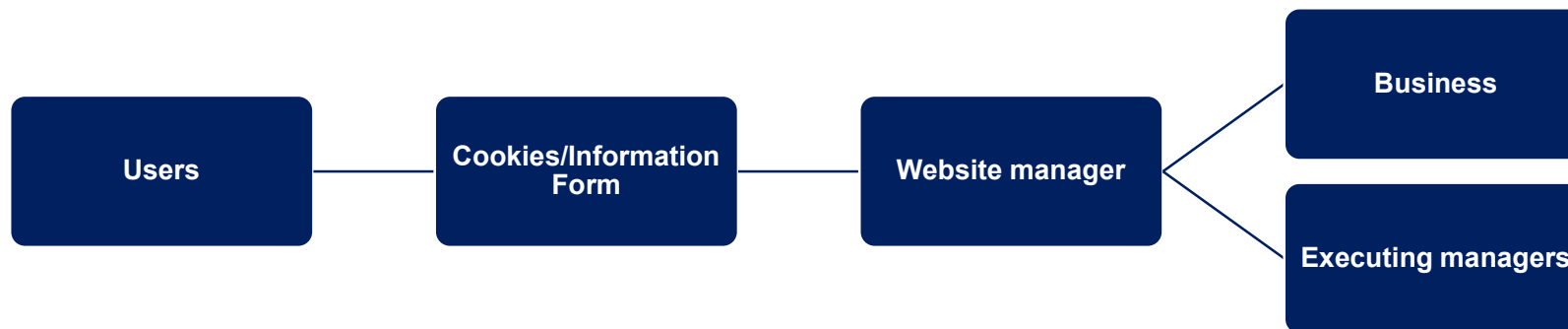
2.2. Collaborators



2.3. Newsletter subscribers



2.4. Website users



2.5. Contact person at Customers



2.6. Contact person at Suppliers



3. RECORDS OF DATA PROCESSING ACTIVITIES

3.1. Candidates

Filing system:	Hard copies only accessible to HR and executing managers. Electronic copy stored on the Company’s server under the folders “HR” and/or in the mailbox of recipient and the people in charge of HR	
IT System/Software:	N.A.	
Categories of personal data:	HR	
	<ul style="list-style-type: none"> All information provided on the CV and the cover letter. 	
Purpose of data processing and legal basis:	Recruitment	HR/Legal
	<ul style="list-style-type: none"> Steps necessary to enter into a contract Legitimate interests 	Identification data; information contained on CV
Categories of data subject:	Candidates	
Categories of data recipient:	HR	All data
	See purposes identified above	
	Data subject	All data
	Exercise of access rights	
Transfer to third countries and basis for equal-level protection:	N.A.	
Time limits for erasure of each data category:	Active storage	<ul style="list-style-type: none"> For successful candidates: the data will be transferred to the HR records and kept in accordance with the storage period for Collaborators.

		<ul style="list-style-type: none"> For unsuccessful candidates: for a maximum of two years after the end of the recruitment process.
	Intermediary storage	As long as necessary for administrative purposes or compliance with a legal obligation.
General description of the technical and organizational security measure:	Firewalls and restricted access defined on a need-to-know basis	
Means to inform data subject:	Privacy Policy available on the website	
Measures allowing data subject to exercise their rights	See <i>Internal Guidelines</i>	

3.2. Collaborators

Filing system:	Hard copies only accessible to HR and executing managers. Electronic copy stored on the Company server under the folders “Legal”, “HR” or “Finance” and in the mailbox of the people in charge
IT System/Software:	N.A.
Categories of personal data:	<p>HR</p> <ul style="list-style-type: none"> Identification data (name, home address, private phone number, place and date of birth) National Register / Social Security Identification Number E-identification data (professional IP address) Personal information (age, gender, marital status, information on any children and partner, diploma, languages spoken ,...) Bank account details Psychological data (character, personality ,...) Financial situation and conditions (gross basic salary, position, baremic category, grade,

	benefits, and miscellaneous expenses)	
	<ul style="list-style-type: none"> • Education and training • Occupation and employment (entry date, type of worker, any specific status, type of contract, position) 	
	Legal	
	<ul style="list-style-type: none"> • Identification data (name, home address, private phone number, place and date of birth) • National Register / Social Security Identification Number • E-identification data (professional IP address) • Bank account details • Financial situation and conditions • Occupation and employment 	
	Finance	
	<ul style="list-style-type: none"> • Identification data (name, home address, private phone number, place and date of birth) • E-identification data (professional IP address) • Bank account details • Financial situation and conditions 	
Purpose of data processing and legal basis:	Recruitment	HR/Legal
	<ul style="list-style-type: none"> • Steps necessary to enter into a contract • Legitimate interests 	Identification data; information contained on CV
	Administration of salary and other advantages	HR/Finance
	<ul style="list-style-type: none"> • Performance of contract • Legitimate interests 	Identification data; financial situation and conditions; occupation and employment; National Register / Social Security Identification Number; bank account details;
	Evaluation of performances	HR
	<ul style="list-style-type: none"> • Performance of contract 	Identification data; financial situation and

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	• Legitimate interests	conditions; occupation and employment
	Managing work incidents	HR/Legal
	• Performance of contract • Legitimate interests	Health (psychological and physical)
	Budget Management	Finance
	• Legitimate interests	Identification data; financial situation and condition
	Legal and tax obligations	Legal/Finance
	• Comply with legal obligations	All data
	General Management	Legal/Finance/Insurance company
	• Legitimate interests	All data
Categories of data subject:	Collaborators	
Categories of data recipient:	HR	See data identified above
	See purposes identified above	
	Legal	See data identified above
	See purposes identified above	
	Finance	See data identified above
	See purposes identified above	
	Data subject	See data identified above
	Exercise of access rights	
	Social security institutions, Public Authorities, Tax Administration	Identification data; National Register / Social Security; Identification Number; personal information; bank account details; financial situation and conditions
	Compliance with legal and tax obligations	
Transfer to third countries and basis for equal-level protection:	N.A.	

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Time limits for erasure of each data category:	Active storage	During the contract and 2 years thereafter.
	Intermediary storage	As long as necessary for administrative purposes or compliance with a legal obligation.
General description of the technical and organizational security measure:	Firewalls and restricted access defined on a need-to-know basis	
Means to inform data subject:	On-boarding document and Privacy Policy available on the website	
Measures allowing data subject to exercise their rights:	See <i>Internal Guidelines</i>	

3.3. Subscribers to the newsletter

Filing system:	The data is stored in an Excel spreadsheet, saved on the server which access is limited to the administrative assistant and the executing managers.	
IT System/Software:	N.A.	
Categories of personal data:	Administrative assistant/Executing managers/ Web manager	
	<ul style="list-style-type: none"> Name and email address 	
Purpose of data processing and legal basis:	Direct marketing	Administrative assistant / Web manager
	<ul style="list-style-type: none"> Consent 	Name and email address
	General management	Executing managers
	<ul style="list-style-type: none"> Legitimate interest 	Name and email address
Categories of data subject:	Anyone who subscribes to the Company’s newsletter by submitting their email address through the website.	
Categories of data recipient:	Administrative assistant/Executing managers/ Web manager	See data identified above
	See purposes identified above	
	Data subject	See data identified above
	Exercise of access rights	
Transfer to third countries and basis for equal-level protection:	N.A.	
Time limits for erasure of each data category:	Active storage	No longer than necessary and maximum for one year from the collection of the data.
	Intermediary Storage	As long as necessary for administrative purposes or compliance with a legal obligation.

General description of the technical and organizational security measure:	Firewalls and restricted access defined on a need-to-know basis
Means to inform data subject	Privacy Policy available on the website
Measures allowing data subject to exercise their rights:	See <i>Internal Guidelines</i>

3.4. Website Users

Filing system:	The data is stored in an Excel spreadsheet, saved on the server which access is limited to the Website manager and the executing managers.	
IT System/Software:	N.A.	
Categories of personal data:	Website manager and executing managers	
	<ul style="list-style-type: none"> • Through the browser: IP address, date and time of request, time zone difference to GMT, http status code, referrer, website actually visited, type of browser, operating system and interface, screen resolution, language and version of browser software and language settings, all information concerning pages of other websites consulted in order to go to the Website; • Through the voluntary completion of the information form: name, e-mail address, company, address, country, city postal code and phone number; • In case of the communication using emails on the website: the content of the e-mail in case; • Through the mobile device when accessing the Service by or through a mobile device: the type of mobile device used, the mobile device unique ID, the IP address of the mobile device, the mobile operating system, the type of mobile Internet browser used, the unique device identifiers and other diagnostic data. • 	
	Website display	Website manager
	<ul style="list-style-type: none"> • Legitimate interest 	IP address, date and time of request, time

Purpose of data processing and legal basis:		zone difference to GMT, http status code, referrer, website actually visited, type of browser, operating system and interface, screen resolution, language and version of browser software and language settings, all information concerning pages of other websites consulted in order to go to the Website
	Completion of transaction and response to inquiries	Website manager, Business and executing managers
	<ul style="list-style-type: none"> • Performance of contract • taking necessary steps prior to entering into a contract with You or our legitimate interests to answer Your inquiry 	Name and email address, content of the inquiry, name, e-mail address, company, address, country, city postal code and phone number
	Functioning of the website	Website manager
	<ul style="list-style-type: none"> • Legitimate interest 	IP address, date and time of request, time zone difference to GMT, http status code, referrer, website actually visited, type of browser, operating system and interface, screen resolution, language and version of browser software and language settings, all information concerning pages of other websites consulted in order to go to the Website; and/or the type of mobile device used, the mobile device unique ID, the IP address of the mobile device, the mobile operating system, the type of mobile Internet browser used, the unique device identifiers and other diagnostic data.
	Statistics and analysis	Website manager
	<ul style="list-style-type: none"> • Consent 	IP address, date and time of request, time

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	<ul style="list-style-type: none"> Legitimate interest 	<p>zone difference to GMT, http status code, referrer, website actually visited, type of browser, operating system and interface, screen resolution, language and version of browser software and language settings, all information concerning pages of other websites consulted in order to go to the Website; and/or the type of mobile device used, the mobile device unique ID, the IP address of the mobile device, the mobile operating system, the type of mobile Internet browser used, the unique device identifiers and other diagnostic data.</p>
	Advertising	Advertising partners
	<ul style="list-style-type: none"> Consent 	<p>IP address, date and time of request, time zone difference to GMT, http status code, referrer, website actually visited, type of browser, operating system and interface, screen resolution, language and version of browser software and language settings, all information concerning pages of other websites consulted in order to go to the Website</p>
Categories of data subject:	Website Users	
Categories of data recipient:	Website manager, business and executing managers	All data
	See purposes identified above	
	Data subject	All data
	Exercise of access rights	

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Transfer to third countries and basis for equal-level protection:	N.A.	
Time limits for erasure of each data category:	Active storage	From obtaining the consent to the withdrawal of such consent.
	Intermediary	As long as necessary for administrative purposes or compliance with a legal obligation.
General description of the technical and organizational security measure:	Firewalls and restricted access defined on a need-to-know basis	
Means to inform data subject	Cookies Policy available on the website	
Measures allowing data subject to exercise their rights:	See <i>Internal Guidelines</i>	

3.5. Contact person of Customers

Filing system:	Hard copies only accessible to Legal, Finance, and executing managers Electronic copy stored on the Company’s server under the folders “Legal” or “Finance” and in the mailbox of the people in charge	
IT System/Software:	N.A.	
Categories of personal data:	Legal/Finance	
	<ul style="list-style-type: none"> • Identification data on the contact person (name, email address, work address, work phone number) • E-identification data on the contact person (IP address, cookies) • Occupation and employment of the contact person 	
	Client Management	Legal/Finance
	<ul style="list-style-type: none"> • Performance of the contract • Legitimate interests 	See data identified above
Purpose of data processing and legal basis:	Budget Management	Finance
	<ul style="list-style-type: none"> • Legitimate interests 	See data identified above
	General Management	Legal/Finance
	<ul style="list-style-type: none"> • Legitimate interests 	See data identified above
Categories of data subject:	Contact person(s) at the current customers’ companies Contact person(s) at the former customers’ companies Contact person(s) at the prospective customers’ companies	
Categories of data recipient:	Legal	See data identified above
	See purposes identified above	
	Finance	See data identified above
	See purposes identified above	
	Data subject	See data identified above
	Exercise of access rights	

Transfer to third countries and basis for equal-level protection:	N.A.	
Time limits for erasure of each data category:	Active storage	During the contract and 2 years thereafter.
	Intermediary storage	As long as necessary for administrative purposes or compliance with a legal obligation.
General description of the technical and organizational security measure:	Firewalls and restricted access defined on a need-to-know basis	
Means to inform data subject	Privacy Policy on the website	
Measures allowing data subject to exercise their rights	See <i>Internal Guidelines</i>	

3.6. Suppliers

Filing system:	Hard copies only accessible to Legal, Finance, and executing managers. Electronic copy stored on the Company's server under the folders "Legal" or "Finance" and in the mailbox of the people in charge	
IT System/Software:	N.A.	
Categories of personal data:	Legal/Finance/Research	
	<ul style="list-style-type: none"> • Identification data on the contact person (name, email address, work address, work phone number) • E-identification data on the contact person (IP address, cookies) • Occupation and employment of the contact person 	
	Supplier Management	Legal/Finance
	<ul style="list-style-type: none"> • Performance of the contract 	See data identified above

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Purpose of data processing and legal basis:	• Legitimate interests	
	Purchase and budget Management	Finance
	• Performance of the contract • Legitimate interests	See data identified above
	General Management	Legal/Finance
	• Legitimate interests	See data identified above
Categories of data subject:	Contact person(s) at the suppliers' companies	
Categories of data recipient:	Research	See data identified above
	See purposes identified above	
	Legal	See data identified above
	See purposes identified above	
	Finance	See data identified above
	See purposes identified above	
	Data subject Exercise of access rights	See data identified above
Transfer to third countries and basis for equal-level protection:	N.A.	
Time limits for erasure of each data category:	Active storage	During the contract and 2 years thereafter.
	Intermediary storage	As long as necessary for administrative purposes or compliance with a legal obligation.
General description of the technical and organizational security measure:	Firewalls and restricted access defined on a need-to-know basis	
Means to inform data subject	Privacy Policy available on the website	
Measures allowing data subject to exercise their rights	See <i>Internal Guidelines</i>	