

The purpose of this Privacy and Personal Data Protection Management Procedure in Central America is to establish and inform the handling and/or processing provided by Sanofi to the personal data of those who have provided it, such as patients, providers, clients, health professionals and employees of Sanofi, as well as to disseminate and protect the rights of the holders of such personal data. It also defines the minimum requirements to ensure an adequate level of protection within Sanofi for the collection, use, disclosure, transfer, storage and other processes of personal data.

**Sanofi is committed to the responsible handling of personal data in order to gain and retain the trust of Sanofi employees and third parties who interact with a Sanofi Central America entity (including Caribbean, Ecuador & Venezuela).**

In its code of ethics, Sanofi emphasizes its commitment to privacy and personal data protection.

This procedure shall apply to all Databases and/or files containing personal data that are processed by the companies of the Sanofi Group in Central America, as the responsible party.

The requirements defined in this procedure shall also apply to third parties who process personal data on behalf of Sanofi, such as consultants, service providers, suppliers or other partners, for example, by means of contractual provisions.

It will apply to all the communication and interaction channels that the company uses and in which Personal Data such as Sensitive Personal Data, commercial and/or administrative data, among others, is collected

## **MANAGER IDENTIFICATION**

Sanofi's Personal Data Protection Officer at any of the following addresses:

**Physical mail:** P.O. Box 0819-07069, PH Evolution Tower, Bella Vista, Avenida Aquilino de la Guardia, 32nd floor, Panama, Republic of Panama.

E-mail: [proteccion.dedatos@sanofi.com](mailto:proteccion.dedatos@sanofi.com)

## **DEFINITIONS**

**Databases:** The ordered set of personal data referring to an identified or identifiable person, which will be subject to handling and/or processing.

**Personal Data:** Any information, audiovisual material, piece of information and/or any other information related to these that is linked or can be linked to one or more specific or identifiable persons.

**Sensitive Personal Data:** Personal data that affect the privacy of the holder or the improper use of which may lead to discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in trade unions, social organizations, human rights or promoting the interests of any political party or guaranteeing the rights and guarantees of opposition political parties as well as the data relating to health, sex life and biometrics.

**Manager:** This is the natural or legal person, public or private, that by itself or in association with others, carries out the handling and/or processing of personal data on behalf of Sanofi.

**Applicable Legislation:** Any applicable data protection and/or privacy legislation and any other legislation that modifies, adds to, regulates or substitutes them and any other rule that regulates the matter.

**Person in charge:** The natural or legal person, public or private, that by itself or in association with others, decides about the database and/or the handling and/or processing of the personal data.

**Holder:** The person to whom the Personal data that is subject to handling and / or processing corresponds.

**Transfer:** Data communication by the person responsible and/or in charge of the handling and/or processing, who are located in Central America, to a recipient who is in turn responsible for the handling and/or processing that is inside or outside the country.

**Transmission:** Handling and/or processing of personal data involving the communication of such data within or outside the Central America territory when it is intended to be handled and/or processed by the person in charge on behalf of the person in charge.

**Handling and/or processing:** Any operation or set of operations involving personal data and sensitive personal data, such as collection, transfer, storage, use, circulation or deletion.

**Personal Data Protection Officer:** Responsible for identifying and monitoring privacy and personal data protection requirements in accordance with the laws of each country.

**Consent:** These are the indications of the data owners, given freely, specifically and informed of their wishes, which express their agreement to the processing of their personal data for the purposes described.

**Mandatory corporate rules:** These are Sanofi's internal rules which define the policies regarding international transfers of personal data related to employee data and data from clinical trials and pharmacovigilance of a Sanofi entity.

## **GENERALITIES**

- During the handling and/or processing of personal data and sensitive personal data, Sanofi will comply with the guiding principles of data protection established in the applicable regulations, such as: (i) legality; (ii) purpose; (iii) freedom; (iv) truthfulness; (v) transparency; (vi) restricted access and circulation; (vii) security; and (viii) confidentiality.
- For the handling and/or processing of personal data Sanofi will request prior, express, informed and clear authorization from the data owner. The foregoing, with the exception of cases in which the applicable regulations allow for the handling of data without requiring authorization.
- The handling and/or processing of personal data shall be carried out under the terms of the express consent authorized by the holder and/or his authorized representative and only for the purposes provided for therein.

- Consent is not required for the handling and/or processing of personal data when the following aspects are involved:
  - Information required by a public or administrative entity in the exercise of its statutory functions or by court order
  - Data of public nature;
  - Medical or health emergency cases
  - Handling of information authorized by law for historical, statistical or scientific purposes
  - Data related to the civil registry of people
  
- Personal data will only be handled and/or processed for as long as is reasonable and necessary, in accordance with the purposes that justified it, taking into account the provisions applicable to the matter in question (e.g. administrative, accounting, tax, legal and historical aspects of the information). Once the purpose or purposes of the processing have been fulfilled, and without prejudice to any legal provisions stipulating the contrary, Sanofi shall proceed to deletion of personal data in its possession, without prejudice of the possibility of retaining those required for the fulfilment of a legal or contractual obligation.
  
- The handling and/or processing of personal data will be carried out under high standards of security and confidentiality, using the data exclusively for the purpose described in the corresponding privacy notice, and complying with the requirements of the applicable regulations.
  
- Sanofi will provide the necessary technical, human and administrative measures to provide security for the records, preventing their adulteration, loss, consultation, use or unauthorized or fraudulent access. Sanofi's obligation and responsibility is limited to having adequate means for this purpose. Sanofi does not guarantee the total security of your information nor is it responsible for any consequences arising from technical failures or improper entry by third parties into the database or file on which the personal data being processed by Sanofi and its managers are based. Sanofi will require third parties it contracts or with whom it exchanges information to adopt and comply with the appropriate technical, human and administrative measures for the protection of the personal data in relation to which such third parties are acting as processors.
  
- When accessing or using the services contained within Sanofi's web sites, Sanofi may collect information in a passive manner (i.e. collected without you directly providing information) through information management technologies, such as "cookies" or "web beacons," which are one pixel by one pixel small images, usually invisible, placed in the source code of a site's web pages or in an e-mail message, as these collect information about the computer hardware and software, IP address, browser type, operating system, domain name, access time and the addresses of the originating websites; by using these tools no personal data is directly collected from the users. Information will also be collected about what pages the person visits more frequently on these websites in order to know their browsing habits. However, the user of Sanofi's web sites has the possibility of configuring the operation of the "cookies", according to the options of your internet browser.

- We and our third-party service providers collect and passively use information in a variety of ways, including:

**Via your browser:** Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system version, and Internet browser type and version. We may collect similar information, such as your device type and identifier, if you access the site via a mobile device.

**Use of cookies:** Cookies represent a compilation of information stored directly on the computer you use. Cookies allow us to collect information such as browser type, time spent on the site, pages viewed, and language preferences. We and our service providers use the information for security purposes, to make navigation easier, to display information more effectively, and to personalize your experience when using the Site. We also use cookies to recognize your computer or device, which facilitates your use of the Site, such as remembering what is in your shopping cart. In addition, we use cookies to obtain statistical information about the use of the Site in order to continually improve the design and functionality of the Site, to understand how people use the Site, and to help us answer questions about the Site. Cookies even allow us to select which of our advertisements or offers are most likely to appeal to you and to display them while you are on the Site. We may also use cookies in online advertising to track consumer responses to our ads.

You may refuse to accept these cookies by following your browser's instructions; however, if you do not accept them, you may experience some inconvenience in your use of the site. You may also not receive advertising or other offers from us that are relevant to your interests and needs. For more information about cookies, please visit <http://www.allaboutcookies.org>.

**Use of Flash Cookies:** Our use of Adobe Flash technology (including Flash Local Stored Objects [Flash LSO]) allows us, among other things, to serve you with more tailored information, facilitate your ongoing access to and use of the site, and collect and store information about your use of the site. If you do not want Flash LSO stored on your computer, you can adjust your Flash player settings to block the storage of Flash LSO using the tools contained in the Website Storage Settings Panel. You can also control Flash LSO by going to the Global Storage Settings Panel and following the instructions (which may include instructions that explain, for example, how to remove existing Flash LSO (referred to as "information" on the Macromedia site), how to prevent Flash LSO from being stored on your computer without consulting you, and (for Flash Player 8 and later) how to block Flash LSO that is not being delivered by the operator of the page you are currently on). Please note that setting up the Flash player to restrict or limit acceptance of Flash LSO may reduce or prevent the functionality of some Flash applications, including, potentially, Flash applications used in connection with the Site or our online content.

**Use of pixel tags, visitor counters, transparent GIF (Graphics Interchange Format) or other similar technologies:** These may be used in connection with certain pages of the Site and HTML-formatted emails to, among other things, track the actions of Site users and email recipients, measure the success of our marketing campaigns, and compile statistics on Site usage and response rates.

**Behavioral online advertising:** The use of cookies, pixel tags, web beacons, Transparent GIFs or similar technologies allow our external suppliers to offer advertisements about our products and services when you visit the Site or other websites or web properties over the Internet. These providers will be able to place pixel tags, Web beacons, transparent GIFs, or similar technologies on the Site and other websites or web properties, and also place or recognize third party cookies when you visit the Site or other web sites or properties. They may use information about your visits to the Site and other sites or web properties to provide advertisements for goods and services that may be of your interest.

**IP address:** Your IP address is a number that your Internet service provider (ISP) automatically assigns to the computer you are using. An IP address is identified and automatically recorded in our server log when a user visits the Site, along with the time of visit and the page(s) visited. The collection of IP addresses is common practice on the Internet and is done from automatically by many websites. We use IP addresses for purposes such as calculating Site usage levels, helping to diagnose server problems and managing the Site.

**Device Information:** We may collect information about your mobile device, such as a unique device identifier.

#### **HANDLING AND/OR PROCESSING AND PURPOSE:**

Sanofi, acting as the party responsible for handling and/or processing personal data, for the adequate development of the activities contemplated in its corporate purpose, collects, stores, uses, circulates, deletes, processes, compiles, reproduces, exchanges, updates, disposes, communicates and transmits to third parties, countries, as the case may be, personal data of people with whom it has or has had a relationship.

Among the general purposes for which Sanofi handles and/or processes this personal data are the following:

- To carry out activities related to Sanofi's corporate purpose.
- To carry out commercial and marketing activities through the handling and/or processing of personal data of clients and suppliers.
- To send important information about your relationship with Sanofi, as well as about products, campaigns, events, about Sanofi's web sites or digital initiatives, modifications to the terms, conditions, and policies of Sanofi and any other administrative information.
- To follow up on activities, actions management, identification of opportunities, quality of services, with administrative, organizational, academic, scientific, research purposes, reporting obligations established by law or by Codes of Ethics.
- For commercial purposes, such as analyzing data, conducting market research, audits, developing new products, improving the site, enhancing the products and services of Sanofi, identifying site usage trends, customizing your experience on Sanofi's web sites by presenting products, and determining the effectiveness of our promotional campaigns.
- To respond to your queries and requests, as well as to send you the documents you request or alerts by e-mail.
- To follow up and process reports of product quality complaints and adverse events.
- To carry out the management and administration of Sanofi's Human Resources.
- To share, transfer and transmit it with Sanofi's parent company or affiliated companies for the purposes described in this Policy or in the consent granted by you.
- To share it with our external service providers who provide services such as website hosting and moderation, mobile application hosting, analysis of data, payment processing, order placement, infrastructure provision, services provided by ITS (Information Technology Services), the customer service email and direct mail delivery, credit card processing, the analysis of clients and suppliers, audit services and other services, in order to empower them to provide such services.
- To share it with a third party in the event of a reorganization, merger, sale, spin-off, joint venture, assignment, transfer or other disposition of all or any part of our business, assets or stock (including acts related to any bankruptcy or similar proceedings), as well as any change in Sanofi's corporate or administrative structure.
- To respond to requests from public and government authorities, including public and government authorities in your country of residence and abroad
- To enforce our terms and conditions.
- To protect our operations or the operations of any of our affiliates.
- To protect our rights, privacy, security or property, and/or those of our affiliated companies.

- For any other legitimate purpose authorized by you.

## **RIGHTS OF HOLDERS**

The following is a description of the rights of the holders of the personal data subject to handling and/or processing by Sanofi:

- To know, update and rectify your personal data with Sanofi. This right may be exercised, among others, in the case of partial, inaccurate, incomplete, fractionated, or misleading data, or data whose handling and/or processing is expressly prohibited or has not been authorized
- To request proof of authorization granted to Sanofi for the handling and/or processing of Personal data;
- To be informed by Sanofi, upon request, regarding the use that has been made of your personal data;
- To submit to the competent authority the complaints for violations of the provisions of the law on protection of personal data and other rules established according to the country that modify, add or complement it;
- To revoke the authorization and/or to request the deletion of the data, according to the established procedures. Notwithstanding the foregoing, deletion or revocation shall not proceed when the holder has a legal or contractual duty to remain in the database or while the relationship between the holder and Sanofi that gave rise to the collection of the personal data is in effect.
- To access, free of charge, your personal data that has been subject to handling and/or processing.

## **PROCEDURE FOR EXERCISING RIGHTS TO KNOW, UPDATE, RECTIFY AND DELETE INFORMATION AND REVOKE AUTHORIZATION FOR HANDLING AND/OR PROCESSING**

### **Can I consult, update, rectify and delete my personal data that is being processed by Sanofi and/or revoke the authorization for data handling and/or processing?**

Yes, you may consult, update, rectify and/or delete your personal data subject to handling and/or processing by Sanofi, as well as revoke the authorization for handling and/or processing at any time and free of charge.

#### **How do I do it?**

For this purpose, you must send a detailed communication of your request to Sanofi's Personal Data Protection Officer at any of the following addresses:

Physical mail: P.O. Box 0819-07069, PH Evolution Tower, Bella Vista, Avenida Aquilino de la Guardia, 32nd floor, Panama, Republic of Panama.

E-mail: [proteccion.dedatos@sanofi.com](mailto:proteccion.dedatos@sanofi.com)

In all communications you send to Sanofi, please include an e-mail or physical address so that the company can respond to your request.

#### **Who can do it?**

It can be done by:

- The Holder, who must prove his identity in a sufficient manner.
- The Holder's successors, who must prove such quality.
- The representative and/or proxy of the Holder, prior accreditation of the representation or proxy.
- A third party when it is the result of a stipulation in favour of another or for another, prior accreditation of this situation.

## **How is my application processed and how long does it take to respond?**

Your request will be answered within a maximum of fifteen (15) working days from the date of receipt. When it is not possible to attend to the consultation or request within this term, you will be informed, expressing the reasons for the delay and indicating the date when your consultation or request will be attended to, which in no case may exceed five (5) working days after the expiration of the first term.

## **Can Sanofi deny access to, revoke or delete Personal Information?**

In accordance with the applicable law (if any) of each country in Central America, Sanofi may deny access to personal data, or revoke authorization, or request deletion of a data in the following cases:

- When the applicant is not the owner of the personal data, his successor or the legal representative is not duly accredited to do so
- When the applicant is not a public or administrative entity in the exercise of his legal functions, or there is no court order
- When the Holder has a legal or contractual duty to remain in the database

## **COMPLAINTS AND CLAIMS PROCEDURE**

### **What is it about?**

If you or your successors in interest believe that the information contained in a database should be corrected, updated or deleted, or when they notice an alleged noncompliance with any of the duties contained in the law of each country in Central America, they may file a claim with Sanofi.

### **How do I do it?**

For this purpose, you must send a detailed communication of your request to Sanofi's Personal Data Protection Officer with:

- Identification
- Description of the facts giving cause for complaint
- Include an address so that Sanofi can respond to your complaint
- Attach any document(s) you would like to claim

To any of the following addresses:

Physical mail: P.O. Box 0819-07069, PH Evolution Tower, Bella Vista, Avenida Aquilino de la Guardia, 32nd Floor, Panama, Republic of Panama.

E-mail: [proteccion.dedatos@sanofi.com](mailto:proteccion.dedatos@sanofi.com)

### **How is the claim processed?**

**Incomplete Claim:** If the claim is incomplete, you will be required within five (5) business days of receipt of the claim to provide the missing information. After two (2) months from the date of the request, without the applicant submitting the required information, it will be understood that the claim has been withdrawn.

**Complete Claim:** Once the complete claim is received, a legend stating "claim in process" and the reason for the claim will be included in the database within two (2) business days. This legend shall be maintained until the claim is decided.



### **How long is the response time?**

The maximum term to attend the claim will be fifteen (15) working days from the day following the date of its receipt. When it is not possible to attend to the claim within such term, the interested party shall be informed of the reasons for the delay and the date in which the claim will be attended to, which in no case may exceed eight (8) working days following the expiration of the first term.

### **SENSITIVE PERSONAL DATA**

#### **Does Sanofi Collect Sensitive Personal Data?**

If Sanofi is to collect sensitive personal data, it is obliged to handle and/or process it in accordance with applicable regulations.

The creation of sensitive personal databases (e.g. patient databases, databases developed in the execution of employment contracts, etc.) will have a legitimate justification, as well as a specific purpose, and to develop Sanofi's activities. In order to create this type of database it will be necessary to have the express consent of the owners of sensitive data. In any case, for the holders and / or their legal representatives the following will be clear:

- That it is not obliged to authorize his handling and/or processing since his supply is optional.
- Which of the data to be handled and/or processed are sensitive and the purpose of this handling and/or processing.
- That no activity may be conditioned on the holder providing sensitive personal data.

The handling and/or processing of sensitive personal data for historical, statistical or scientific purposes is permitted. In these events Sanofi will suppress the identity of the holders.

#### **Does Sanofi collect Personal Data from minors?**

Sanofi does not, in principle, collect Personal Information from minors. In the event that it does:

- It will ensure respect for the fundamental rights of children and adolescents.
- It will ensure that it responds to and respects the best interests of children and adolescents.
- It will have the express consent of their legal representatives and guardians.
- It will validate that in the cases where it is appropriate, the minor has exercised his or her right to be heard.

### **PERSONAL DATA TRANSFER**

#### **Does Sanofi transfer my personal data to third parties?**

In principle, Sanofi does not transfer your personal information to third parties or grant authorization for third party use except where this is necessary to fulfill contractual, legal, pharmacovigilance, human resources, corporate (e.g., transfer to subsidiaries or parent company), and administrative obligations. You will be informed of this possibility in the consent form requested by Sanofi.

#### **How does Sanofi protect my personal data in cases where it is transferred to third parties?**

In such cases, Sanofi signs a contract for the transmission of personal data with the third parties in which it requires them to preserve the information in conditions of confidentiality and security and only use it to develop/provide the activities and/or services established in the data transmission contract, with risk assessments in the handling and/or processing of the personal data contained in the document of the contractual relationship to be executed.

**Will there be cases where Sanofi will transfer my information to other countries without my consent?**

Sanofi will transfer your Personal Information without your consent to other countries when:

- It is information for which the holder has given his or her express and unequivocal authorization for the transfer.
- There is an exchange of medical data, when the treatment of the holder requires it for reasons of health or public hygiene.
- In the case of bank or stock market transfers, in accordance with the applicable legislation.
- It is required for the realization of transfers legally required for the safeguard of public interest, or for the recognition, exercise or defense of a right in a judicial proceeding.
- The transfer is necessary for the execution of a contract concluded between the holder and Sanofi, or for the execution of pre-contractual measures, provided that the authorization of the Headline
- When the transfer is necessary or legally required for the safeguard of an interest public, or for the recognition, exercise or defence of a right in legal proceedings.

**Does Sanofi transfer my Personal Information to other countries?**

Sanofi may transfer your personal data to its affiliated companies, including but not limited to its parent company Sanofi located in France and its subsidiaries where applicable, as well as to third parties not related to Sanofi when necessary to fulfil obligations contractual, legal or related to the line of business to which the information relates, according to the principles and security protocols established in the Protection Regulation of Personal Data (GDPR).