

Privacy Policy

This Privacy Policy explains how **EHA – European Healthcare Alliance** (the **Association**), a non-profit association with registered office in Milan, processes personal data in its capacity as **Data Controller**, in accordance with Regulation (EU) 2016/679 (*General Data Protection Regulation – GDPR*), the Italian Civil Code and applicable Italian and EU data protection legislation.

The Association operates on a national and international basis and pursues non-commercial, non-profit-making purposes, as set out in its Statute. Its activities are aimed at facilitating information exchange, licensing opportunities and product scouting among members active in the pharmaceutical, healthcare, medical devices, diagnostics, cosmetic and nutraceutical sectors.

This Privacy Policy applies whenever you access or use the Association's website or otherwise interact electronically with the Association.

The Policy may be updated from time to time. Users are therefore invited to review it periodically.

1. Data Controller and Contact Details

EHA – European Healthcare Alliance

Registered office: Via Turati, 29, 20121 Milan, Italy

E-mail: info@eha-network.com

You may contact the Association at the above email address for any information regarding this Privacy Policy or to exercise your rights under applicable data protection law.

2. Scope of Application

This Privacy Policy applies to the processing of personal data relating to:

- natural persons acting in their own capacity;
- legal representatives, employees or collaborators of companies or institutions;
- professional consultants operating in the pharmaceutical and healthcare sector, including business development professionals;

who:

- browse the Association's website;
- submit an application for admission as members of the Association;
- create and manage a personal or corporate profile on the website;
- submit information concerning products available for licensing;
- access the members' reserved area following approval of their membership;

- receive communications related to the Association's statutory activities, including product scouting initiatives.

3. Categories of Personal Data Processed

3.1 Data provided directly by users

When applying for membership, creating a profile or interacting with the Association, users may provide:

- identification and contact details (e.g. name, surname, email address, telephone number);
- professional and corporate information (e.g. role, company name, registered office, VAT number, business sector, number of employees, logo);
- login credentials (username and password chosen by the user);
- information relating to products available for licensing, including therapeutic areas and EU countries where subsidiaries or distributors are present;
- any other information voluntarily submitted through forms, applications or communications with the Association.

3.2 Technical and usage data

When users browse the website, the Association may collect technical data such as IP addresses, browser type, operating system, access times, traffic data and navigation logs. Such data are processed in aggregated or anonymised form, where possible, to ensure website security and functionality.

4. Purposes and Legal Bases of Processing

Personal data are processed for the following purposes:

4.1 Membership application and governance

- to receive, evaluate and manage applications for admission as members;
- to carry out internal approval procedures in accordance with the Association's Statute;
- to manage initial and annual membership fees;
- to administer membership relationships, including renewals, withdrawals and exclusions.

Legal basis: performance of pre-contractual and contractual obligations (Article 6(1)(b) GDPR); compliance with legal obligations (Article 6(1)(c) GDPR).

4.2 Management of the members' digital platform

- to activate and manage user profiles;
- to grant access to the members' reserved area;
- to enable members to showcase products and view licensing opportunities offered by other members;
- to facilitate exchanges of information and contacts among members.

Legal basis: performance of contractual obligations (Article 6(1)(b) GDPR).

4.3 Product scouting and informational communications

In line with its statutory purposes, the Association carries out product scouting activities outside the European Union and informs members, by email, of identified opportunities that may be relevant for licensing, distribution or acquisition within EU markets. The Association will also include the opportunities in the website to be stored and available to all Members.

Legal basis: performance of contractual obligations and the Association's legitimate interest in pursuing its non-profit statutory objectives (Article 6(1)(b) and (f) GDPR).

Such communications are strictly limited to information consistent with the Association's purposes and do not constitute marketing communications.

4.4 Compliance with legal and regulatory obligations

Personal data may be processed to comply with applicable laws, regulations, court orders or requests from competent authorities.

Legal basis: compliance with a legal obligation (Article 6(1)(c) GDPR).

5. Cookies

The Association uses cookies and similar technologies strictly necessary for the operation and security of the website, as well as analytical cookies to collect aggregated statistical information on website usage.

Details on the cookies used, their purposes and how to manage preferences are provided in the dedicated **Cookie Policy**, available on the website.

6. Data Recipients

Personal data may be accessed by:

- authorised members of the Association's governing bodies and staff;
- external service providers acting as data processors (e.g. IT, hosting, payment or email service providers), duly appointed pursuant to Article 28 GDPR;

- public authorities or third parties where disclosure is required by law.

Personal data are not sold, rented or disclosed to third parties for independent commercial or marketing purposes.

7. International Data Transfers

Personal data are normally processed within the European Economic Area (EEA). Where transfers outside the EEA are necessary, they will take place in compliance with GDPR requirements, including the adoption of appropriate safeguards.

8. Data Retention

Personal data are retained for the period strictly necessary to fulfil the purposes for which they were collected and in accordance with statutory retention obligations.

Data relating to membership profiles are retained for the duration of the membership relationship and, following its termination, for the time required to comply with legal obligations or to protect the Association's rights.

9. Data Security

The Association adopts appropriate technical and organisational measures to protect personal data against unauthorised access, loss, alteration or disclosure.

Access to reserved areas of the website is protected by authentication credentials chosen by users, who are responsible for maintaining their confidentiality. Each Member has just one username and one unique access and The Association is asking Members to keep the authentication credentials reserved without sharing it. As communicated to the Members in the login instructions, in case of any potential breach the Member has to immediately request a reset of the password and inform the Association to be able to place the user on hold and verify any misuse of the access. The Association is not responsible for any improper use done by External Members of the Association when is not properly informed to be able to notify within 72 hours of the breach.

Although the Association implements robust security measures, the transmission of data over the internet cannot be guaranteed to be completely secure

10. Data Subjects' Rights

Data subjects may exercise the rights provided by Articles 15–22 GDPR, including the right to access, rectify or erase their personal data, restrict or object to processing, and request data portability, where applicable.

Requests may be addressed to the contact details indicated in section 1.

Data subjects also have the right to lodge a complaint with the competent supervisory authority.

11. Contact Us

For any questions regarding this Privacy Policy or the processing of personal data, please contact:

Email: info@eha-network.com