

Privacy Policy

No. POL-CNO-009-00

DEPARTMENT: COMPLIANCE

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1. PURPOSE

This Privacy Policy (hereinafter, "Privacy Policy" or simply "Policy") aims to establish the guidelines and controls for the proper processing of personal data managed by **humanova**, in compliance with Law No. 29733, Personal Data Protection Law, its Regulations approved by Supreme Decree No. 016-2024-JUS and other complementary provisions issued by the competent authority.

With this policy **humanova** seeks to ensure that the processing of the personal data it collects is carried out in a lawful, informed, consented, proportionate, secure and transparent manner, protecting the fundamental rights of the data subjects (hereinafter, "the Data Subject" or "Data Subject") and promoting a culture of privacy and information protection at all levels of the organization.

Depending on the nature of the activities, the categories of data subjects, the purposes of the processing, the collection channels or the associated risks, **humanova** may approve specific policies, procedures, protocols or guidelines that complement this Policy. Such documents will set out the particular obligations applicable to certain processing activities, without contravening the principles and provisions established in Law No. 29733, its Regulations and this Policy.

2. SCOPE

This Privacy Policy applies to all personal data processing activities carried out by **humanova**, regardless of the medium, format or platform used for their collection, storage, processing, transfer, retention or deletion.

The policy covers all personal data banks, information systems, processes, products and services managed by the organization in which personal data of natural persons are processed, including, among others: employees, former employees and their beneficiaries, applicants to selection processes, customers, consumers and Data Subjects of **humanova's** products, healthcare professionals and other actors in the health sector, suppliers, contractors and representatives of legal entities, participants in patient support programs, reporters, patients and third parties involved in pharmacovigilance, technovigilance and health surveillance activities, visitors to the company's premises subject to video surveillance systems, and users of websites, applications, digital platforms and service channels managed by **humanova**.

Likewise, this policy is mandatory for the members of the Board of Directors, General Management, the Personal Data Officer, the employees of **humanova**, contractors, consultants and third parties in charge of processing personal data, and any person who, by virtue of a contractual or functional relationship, has access to personal data processed by the organization.

3. OBJECTIVES

The objectives of this Policy are to:

- Ensure regulatory compliance in matters of personal data protection and privacy, in accordance with current Peruvian legislation and the provisions issued by the competent authority.
- Protect the rights of data subjects, ensuring adequate mechanisms for the exercise of the rights of information, access, rectification, cancellation, opposition, portability and other rights recognized by applicable regulations.

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- c. Define the responsibilities of executives, employees and third parties involved in the processing of personal data, strengthening the culture of privacy within **humanova**.
- d. Implement technical, organizational and legal security measures aimed at preventing the loss, alteration, unauthorized access, improper disclosure or any other form of unauthorized processing of personal data.
- e. Properly manage the risks associated with the processing of personal data, establishing controls that make it possible to protect the confidentiality, integrity and availability of information.
- f. Regulate the collection, use, storage, transfer, retention and/or deletion of personal data, ensuring that such activities are carried out in accordance with the purposes informed and authorized, always taking into account the applicable regulations.
- g. Ensure the proper management of personal data banks, including their creation, maintenance, updating and, where applicable, their registration with the National Personal Data Protection Authority.

4. GUIDELINES

4.1. COLLECTION CHANNELS

humanova may collect information through the following channels:

- a. **In-person channels:** Physical registration forms, contracts and documents signed by the data subject, job interviews and selection processes, service at offices or establishments, corporate events, training sessions, conferences and promotional activities, visitor registration and access controls, and video surveillance systems.
- b. **Digital channels:** Corporate websites: www.humanovalab.com and www.confia.pe, electronic forms and landing pages, mobile applications, customer service platforms, patient support platforms, job and recruitment portals, training and e-learning platforms, online surveys, cookies and similar technologies, where applicable.
- c. **Communication channels:** Email, phone calls, instant messaging (WhatsApp Business), video calls and virtual meeting platforms, chatbots and/or virtual assistants.
- d. **Social media:** Corporate profiles on social media, contact forms enabled on social media, digital marketing campaigns and promotions.
- e. **Specific channels:** Pharmacovigilance and technovigilance reports, patient support programs, adverse event registration, complaints and/or claims from consumers, activities with healthcare professionals.
- f. **Collection by third parties:** **humanova** may also receive personal data from authorized third parties, such as: Related or affiliated companies, service providers, recruitment agencies, distributors and business partners, public authorities, healthcare professionals and healthcare establishments, research and pharmacovigilance organizations.

The personal data actually collected by **humanova** will correspond only to those that have been previously informed to the Data Subject through the applicable information clause or

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privacy notice, and will be processed in accordance with the purposes communicated.

4.2. PERSONAL DATA COLLECTED

The data collected may include, depending on the nature of the relationship with the data subject and the purposes informed:

- a. **Identification data:** full name, national identity document (DNI), foreigner's identity card or passport, date of birth, sex, nationality, marital status, image, handwritten or digital signature
- b. **Contact data:** home address, email address, telephone number, work address and emergency contact details.
- c. **Employment and professional data:** curriculum vitae, academic background, employment history, employment references, performance evaluations, and information on remuneration and benefits.
- d. **Economic and financial data:** bank account number, payment and transfer information, credit history, tax information, payment receipts and invoicing.
- e. **Contractual and commercial data:** purchase or consumption history, commercial preferences, claims and inquiries, customer service records.
- f. **Browsing and technological data:** IP address, device identifiers, cookies and similar technologies, platform access logs, geolocation information where applicable and consent exists
- g. **Image and voice data:** video surveillance recordings, photographs, videoconference recordings.
- h. **Sensitive data:** health data of patients (such as: pathologies, diagnoses, prescribed medications, others) or employees, biometric data (fingerprint, facial recognition), information on disability, union membership.
- i. **Patient data:** patient initials or identifiers, age or age range, sex, relevant medical information, pharmacotherapeutic history, adverse event reports, information on treatments and clinical follow-up.
- j. **Healthcare professional data:** full name, specialty, professional registration number, workplace, professional contact information, participation in scientific or educational activities.
- k. **Pharmacovigilance data:** reports of suspected adverse reactions, medicine safety information, clinical information necessary to assess adverse events, communications with health authorities and reporters.

4.3. REGISTERED DATA BANKS

humanova has the following data banks registered:

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NAME OF DATA BANK	CODE
ETHICS LINE	PJ-2026-3476
PHARMACOVIGILANCE AND TECHNOVIGILANCE	PJ-2026-405
MARKETING ACTIVITIES	RNPDP-PJP N.º 6616
HEALTHCARE PROFESSIONALS	RNPDP-PJP N.º 6617
EMPLOYEES	RNPDP-PJP N.º 6618
VIDEO SURVEILLANCE	RNPDP-PJP N.º 7932
SUPPLIERS	RNPDP-PJP N.º 7935
SALES REPRESENTATIVES REGISTER	RNPDP-PJP N.º 7936
APPLICANTS	RNPDP-PJP N.º 7981
CONFÍA PROGRAM PARTICIPANTS	RNPDP-PJP N.º 30442

The list of personal data banks managed by humanova and registered in the National Registry of Personal Data Protection may be consulted through the inquiry service available on the institutional portal of the Ministry of Justice and Human Rights (MINJUSDH).

4.4. RETENTION PERIOD OF PERSONAL DATA

Personal data will be retained by **humanova** for the time necessary to fulfill the purposes for which they were collected, as well as to meet the legal, regulatory, contractual and oversight obligations applicable to the company. Once such period has ended, the data will be securely deleted, anonymized or blocked, unless a legal provision requires their retention for an additional period.

The retention period according to the type of data bank is as follows:

DATA BANK	RETENTION PERIOD
Ethics Line	Up to 5 years from the conclusion of the investigation process
Pharmacovigilance and technovigilance	In accordance with the applicable health regulations, pharmacovigilance reports and documentation will be retained for up to 05 years after the cancellation of the sanitary registration.
Marketing activities	Until the data subject withdraws consent or requests the deletion of their data.
Healthcare professionals	Until the data subject withdraws consent or requests the deletion of their data.
Employees	They will be retained for the duration of the employment relationship, and thereafter for as long as necessary to comply with legal, labor, social security, tax, and occupational health and safety obligations, as well as to address any liability

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DATA BANK	RETENTION PERIOD
	arising from the employment relationship or requirements of competent authorities.
Video surveillance	In accordance with the regulations on the matter.
Suppliers	For the duration of the contractual relationship and up to 10 years thereafter.
Sales representatives register	During the term of the contractual relationship and up to 10 years after its conclusion for the purpose of complying with tax and legal obligations.
Applicants	Up to 2 years from the conclusion of the selection process, unless consent is given for longer retention.
Confia Program participants	For the duration of the commercial relationship with the data subject, or until the data subject withdraws consent or requests the deletion of their data.

Without prejudice to the foregoing, **humanova** may retain personal data of the Data Subject indefinitely provided that such data are duly dissociated, anonymized or pseudonymized.

4.5. PURPOSE OF THE PROCESSING OF PERSONAL DATA

humanova processes the personal data it collects for the purpose of carrying out its commercial, employment, scientific, regulatory and health-related activities, including the management of relationships with employees, applicants, suppliers, healthcare professionals and patients, as well as compliance with legal, regulatory, pharmacovigilance, clinical research and security obligations and the handling of requests from competent authorities.

The purposes of the processing according to the personal data banks registered with the data authority are set out below:

DATA BANK	PURPOSES OF THE PROCESSING
Ethics Line	Manage the company's ethics line.
Pharmacovigilance and technovigilance	Record, identify, evaluate and code notifications of suspected adverse reactions associated with the products of humanova , for subsequent analysis that contributes to the issuance of signals or adverse event reports, in compliance with pharmacovigilance and technovigilance activities.

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DATA BANK	PURPOSES OF THE PROCESSING
Marketing activities	Comprehensive management of marketing activities, including commercial, promotional and advertising actions, as well as the design and execution of campaigns; and the creation of profiles, statistics, analysis of consumer preferences and commercial segmentation, in addition to sending educational information about treatments, event invitations and satisfaction surveys.
Healthcare professionals	Comprehensive management of the relationship with healthcare professionals within the framework of promotional, scientific dissemination and educational activities regarding pharmaceutical products, pathologies and related matters, as well as the preparation of statistics and reports.
Employees	Management of human resources and organizational development processes, institutional activities, administration of salaries, benefits and compliance with current labor, social security, and occupational health and safety obligations.
Video surveillance	Management of the security of facilities through video surveillance systems, incident investigation and compliance with applicable legal obligations, process control and asset security.
Suppliers	Management of the relationship with suppliers for the acquisition of goods and services, and compliance with current contractual and tax obligations.
Sales representatives register	Management of incentives, commercial follow-up and administration of the relationship with sellers in distribution channels and points of sale.
Applicants	Management of the personnel selection and recruitment process. Creation of profiles.
Confía Program participants	Management of the patient support program, the Confía Program, and the associated communications.

The personal data of the Data Subject will only be used for limited purposes and aims, such as those described above.

If you do not consent to the processing of your personal data required for the essential purposes described above, pursuant to Supreme Decree No. 016-2024 – JUS approving the regulations of Law No. 29733 – Personal Data Protection Law, **humanova** will not be able to process your registration, complete a transaction or contract and/or attend to certain requests, to the extent that your personal data are necessary for such purposes.

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4.6. TRANSFERS OF PERSONAL DATA

humanova will transfer the personal data of the Data Subject domestically to the following entities:

DATA BANK	COMPANY/ ENTITY	PURPOSE OF THE TRANSFER	LOCATION
Pharmacovigilance and technovigilance	DIGEMID - General Directorate of Medicines, Supplies and Drugs	Adverse event reporting	Av. Parque de las Leyendas 240, San Miguel
Marketing Activities	Emblue Peru S.A.C.	Marketing and advertising email service	Calle Coronel Inclán 237, Miraflores District, Lima Province and Department, Peru.
Employees	MEPSO Salud S.A.C.	Occupational Health Services	Av. Caminos Del Inca 244 Urb. Tambo De Monterrico, Santiago De Surco District, Lima Province and Department, Peru.
Ethics Line	Ernst & Young Asesores Empresariales S. Civil de R.L.	Ethics Line management services	Av. Victor Andres Belaúnde 171 Urb. El Rosario, San Isidro District, Lima Province and Department, Peru.

humanova will transfer the personal data of the Data Subject internationally (outside the Republic of Peru) to the following entities:

DATA BANK	COMPANY/ ENTITY	PURPOSE OF THE TRANSFER	LOCATION
Confia Program participants	Amazon Web Services	Data storage service	United States.
Confia Program participants	Microsoft Corporation	Corporate email services, cloud storage, collaborative tools and technology support.	United States.
Marketing Activities			
Employees			
Suppliers			
Applicants			
Healthcare professionals	Salesforce, Inc.	CRM services for the management and tracking of interactions with healthcare professionals and medical visits.	United States.

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DATA BANK	COMPANY/ ENTITY	PURPOSE OF THE TRANSFER	LOCATION
Employees	SAP SE	Enterprise resource management (ERP), administrative, financial, logistics and human resources processes.	Germany.
Suppliers			

humanova cares about the integrity and security of the transferred personal data of the Data Subject, and therefore establishes contractual clauses with the recipients of the personal data in order to guarantee their proper use and adequate protection.

humanova will not transmit or disclose the personal data or information provided by the Data Subject to third parties who have no right to know it, except in cases where it is contractually and/or legally required. **humanova** will also share the personal data of the Data Subject in particular by virtue of a police, administrative or judicial order or request in accordance with applicable laws.

4.7. EXERCISE OF ARCOP RIGHTS

Any Data Subject has the right to exercise, with respect to their personal data, the following rights (hereinafter, "ARCOP Rights"):

- Rights of information:** Allows the Data Subject to be informed clearly, expressly and in detail about the processing of their personal data before it is collected. This includes the purpose, the identity of the data controller, possible transfers and the existence of mechanisms to exercise their rights.
- Right of access:** Allows the Data Subject to know whether their personal data are being processed, as well as to access complete information related to them, including the source of collection, purpose, uses and recipients of their data.
- Right to portability:** Allows the Data Subject to obtain a copy of their personal data in an interoperable format in order to provide it to another owner or controller of a data bank, provided that this is technically possible. Data derived, inferred or constructed by **humanova** from the personal data of the Data Subject may not be subject to portability.
- Right of rectification:** Allows the Data Subject to request the updating, inclusion or modification of their personal data when it is inaccurate, incomplete or outdated, thus ensuring the truthfulness and accuracy of the information.
- Right of cancellation:** Allows the Data Subject to request the deletion or removal of their personal data from the databases when they are no longer necessary for the purpose for which they were collected, or when the relationship that gave rise to their processing has ended.
- Right of opposition:** Allows the data subject to refuse the processing of their personal data on legitimate and well-founded grounds, provided that there are no legal obligations preventing it.
- Right of revocation:** Allows the Data Subject to revoke at any time the consent previously given for the processing of their data, unless a legal provision requires

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the retention or processing of the data.

Accordingly, any Data Subject may, at any time, revoke the consent expressly given to **humanova** to use their personal data, as well as limit such use; however, the Data Subject must take into account the consequences set out in the last paragraph of item 4.5, depending on the data in question, which will be duly communicated to them. Notwithstanding the foregoing, **humanova** may reject, in whole or in part, the exercise of any right requested by the Data Subject, if such exercise: *i)* prevents **humanova** from processing personal data that is absolutely necessary for the conclusion and/or performance of a contractual relationship with the Data Subject in question, *ii)* for reasons based on the protection of the rights and interests of third parties, *iii)* where it may hinder ongoing police, administrative and/or judicial actions or investigations or, *iv)* where so provided or permitted by applicable law.

Any Data Subject may, at any time and free of charge, exercise any of their ARCOP Rights. To this end, **humanova** will handle and respond to the requests received in accordance with the Procedure for handling requests for ARCOP rights and in accordance with the following considerations:

- i. Channels for receiving requests:
 - Corporate email: datospersonalesperu@humanovalab.com
 - Physical filing office: Jirón Ecuador 787, Cercado de Lima, Lima – Peru
- ii. Response periods:

Right of access	20 business days
Inquiries	10 business days
Rectification	10 business days
Cancellation	10 business days
Opposition	10 business days
Portability	10 business days

If any Data Subject considers that their request to exercise their rights has not been addressed, they may file a complaint with the National Personal Data Protection Authority, by going to the Filing Office of the Ministry of Justice and Human Rights located at Calle Scipión Llona No. 350, Miraflores District, Lima Province and Department, Peru.

4.8. ASSIGNMENT OF POSITION

Should **humanova** in the future transfer ownership of the data bank and/or change the data processor, by accepting this Policy the Data Subject also accepts such fact in advance, in a prior, express, informed and unequivocal manner; with the obligation of **humanova** to inform the identity and address of the new owner or processor of the personal data bank in question, as well as their applicable obligations and/or limitations, to the corresponding Data Subjects at least thirty (30) calendar days before the effective date on which the change takes place. During that period, the Data Subject who does not agree with the change to be made may express their disagreement with it and request the cancellation of their personal data from **humanova**, in accordance with the procedure previously described for that purpose.

If the Data Subject does not express any objection to the reported change and does not

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initiate a request for cancellation of their personal data on that basis, they will be deemed to agree with the reported change, which will take full effect from the date on which it effectively takes place.

In the specific case of the assignment of the contractual position with respect to the ownership of the data bank in question, after the reported change takes effect, **humanova** will cease to have any responsibility with respect to any event occurring from the date of the assignment. The new owner and, therefore, controller of the data bank will assume each and every one of the obligations established in this Policy regarding the processing, safeguarding and/or retention of the personal data of the Data Subject, as well as all obligations applicable to such capacity.

4.9. SECURITY AND PROTECTION MEASURES

In order to prevent the loss, misuse, alteration, unauthorized access and/or theft of the personal data or information provided by the Data Subject, **humanova** has adopted the levels of security and personal data protection legally required, and has installed all technical means and measures within its reach for this purpose; all in accordance with the provisions of the Law, its Regulations and the Security Directive.

In this regard, **humanova** has implemented and uses industry standards for protecting the confidentiality of the personal data of its Data Subjects and declares that it employs various security measures to prevent unauthorized access.

4.10. CHANGES OR MODIFICATIONS TO THE POLICY

humanova reserves the right to change or modify this Policy in the future. The use and processing of personal data will be governed by the version of the Policy in force at the time of collection, and its subsequent changes or modifications.

If **humanova** makes changes to this Policy, it will notify the Data Subject in advance by any of the following means:

- By means of a communication addressed to the Data Subject, at the physical or electronic address provided (including email, SMS message, WhatsApp or other similar app, telephone call, and any other means registered by the Data Subject) and/or,
- Through the Website, applications and/or digital platforms by means of a notice, banner, pop-up or any other suitable or available means for that purpose.

The Data Subject will be bound by and subject to the changes made to this Policy if, after receiving the corresponding notice of change, they continue: i) accessing and/or purchasing on the Website, ii) requesting or using any of the Services and/or submitting reports and/or claims after such changes effectively come into force.

4.11. DATA OFFICER AND CONTACT DETAILS

To resolve general inquiries about privacy and personal data protection, **humanova** has a Personal Data Officer, whose contact details are: Sofia Carolina Grados Gutiérrez, with email sgradosg@humanovalab.com.

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The Data Subject may also contact **humanova** on any matter relating to their personal data or to exercise their ARCOP rights through the following email address: datospersonalesperu@humanovalab.com.

5. REFERENCES

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6. REVISION HISTORY

Revision No.	Description of Change
00	This policy is implemented as part of compliance with Law No. 29733 - Personal Data Protection Law, its Regulations and other complementary provisions issued by the competent authority

7. GLOSSARY

For the purposes of this Policy, the terms indicated below shall have the following meaning:

- **Anonymization:** Procedure by which personal data are processed in such a way that it is no longer possible to identify the data subject.
- **National Personal Data Protection Authority (ANPDP):** Competent body responsible for supervising compliance with personal data protection regulations in Peru.
- **Personal Data Bank:** Organized set of personal data, automated or not, regardless of its medium, that allows access to the data according to specific criteria.
- **Data Blocking:** Measure by which personal data are temporarily retained, restricting their processing, until their subsequent deletion or pursuant to a legal requirement.
- **Consent:** Free, prior, express, informed and unequivocal expression of will by which the data subject accepts the processing of their personal data.
- **Personal Data:** Any information that identifies or makes identifiable a natural person through means that can reasonably be used.
- **Sensitive Data:** Personal data relating to physical, moral or emotional characteristics, facts or circumstances of private life, personal habits, racial or ethnic origin, economic income, political opinions, religious convictions, union membership, biometric information or health-related data.
- **Health Data:** Information related to the physical or mental health status of a person, as well as the provision of health services.
- **Data Processor:** Natural or legal person who processes personal data on behalf of the owner of the personal data bank.
- **Purpose of the processing:** The specific, explicit and legitimate purpose for which **humanova** collects, uses, stores, shares or deletes personal data
- **Cross-Border Data Flow:** International transfer of personal data to a recipient located outside the national territory.
- **Security Incident:** Event that compromises the confidentiality, integrity, availability or authenticity of personal data.
- **Personal Data Protection Law:** Law No. 29733 and its complementary regulations governing the protection of personal data in Peru.

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- **Personal Data Protection Officer (ODP):** Person designated by the organization to oversee compliance with obligations related to personal data protection.
- **Proportionality:** Principle according to which only the data strictly necessary to fulfill the declared purpose should be collected.
- **Anonymization Procedure:** Set of technical and organizational measures aimed at preventing the identification of data subjects.
- **Data Controller:** Natural or legal person who determines the purposes and means of the processing of personal data.
- **Information Security:** Set of technical, organizational and legal measures aimed at protecting personal data against unauthorized access, loss, alteration, destruction or disclosure.
- **Personal Data Subject:** Natural person to whom the personal data being processed belong.
- **Transfer of Personal Data:** Communication of personal data to another natural or legal person, public or private, national or foreign.
- **Processing of Personal Data:** Any technical operation or procedure, automated or not, that enables the collection, recording, organization, storage, retention, modification, extraction, consultation, use, blocking, deletion, transfer or any other form of processing of personal data.
- **ARCOP Rights:** Rights of access, rectification, cancellation, opposition and portability that data subjects may exercise with respect to their personal data.
- **Pharmacovigilance:** Science and activities related to the detection, assessment, understanding and prevention of adverse reactions or any other medicine-related problem.
- **Pseudonymization:** Processing of personal data whereby they can no longer be attributed to a specific data subject without the use of additional information that is kept separate and protected.

8. ANNEXES

Not applicable.

