

ELPEN PHARMACEUTICAL CO INC

Employee Privacy Notice

Contents:

- 1. Scope of the Privacy Notice**
- 2. Definitions**
- 3. Processing Manager**
- 4. Data Protection Officer (DPO)**
- 5. Collection and processing of employees' personal data**
- 6. Processing purposes**
- 7. Legal basis of processing**
- 8. Recipients and transfer of personal data**
- 9. Storage and security of personal data**
- 10. Employee rights**
- 11. Amendments and updates to this Privacy Statement**
- 12. Contact details**

1. Scope of this Privacy Notice

ELPEN PHARMACEUTICAL CO INC (hereinafter referred to as "ELPEN" or "our company") considers its Human Resources as its most important asset, pursuing long and stable partnerships with its employees, as well as the building of mutual trust and security relations, in framework of a safe working environment. Today it employs more than 800 people.

ELPEN fully respects the privacy of its employees personal data and makes every effort to protect them, in full compliance with existing legislation and the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, hereafter referred to as "GDPR").

This Privacy Statement aims to inform the employees of our company regarding the way and purpose of the collection and processing of their personal data by ELPEN, as well as explain

their rights and choices about these data, by providing all the necessary information to them under Articles 12 and 13 of the GDPR.

This Privacy Statement is related only to personal data collected and processed in the framework of the employment relationship of a natural person with our company and is not relevant in any other collection and processing of personal data, which ELPEN may undertake in other relationships - partnerships with natural persons and / or other activities processing. ELPEN may provide its employees with additional informational notices about processing and general protection of their personal data, at where appropriate, their collection and depending on the purpose of the treatment. These notices are completed in each case here.

2. Definitions

For the purposes of this Privacy Notice:

“Personal data”: means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one whose identity can be directly or indirectly, in particular by reference to an identifier identity, such as name, identity number, location data, online identity ID or one or more factors that are specific to physical, genetic, psychological, economic, cultural or social identity of that natural person.

“Special categories of personal data”: means personal data which reveal racial or ethnic origin, political, religious or philosophical beliefs or participation in trade union, as well as the processing of genetic data, biometric data for the purpose of indisputably identifying a person, health data or data concerning sex life of natural person or sexual orientation.

“Health data”: means personal data related to the physical or mental health of a natural person, including the provision of healthcare services, which reveal information about the state of health.

"Processing": means any act or series of acts carried out with or without the use of automated means in personal data or in personal data sets such as collection, registration, organization, structuring, storage, adaptation or alteration, recovery, search for information, use, disclosure by transfer, dissemination or any other form of disclosure, association or combination, limitation, deletion, or destruction.

“Processing manager”: means the natural or legal person, a public authority, a service or other entity that, alone or jointly with others, determines the purposes and the way personal data are processed; when the purposes and manner of such processing are determined by EU law or the law of a Member State, the controller or the specific criteria for his appointment may be provided for by Union or national law of a Member State.

"Processing person": means the natural or legal person, the public authority, service or other entity processing personal data on behalf of the controller.

"Data Protection Officer": means the natural person designated by the Data Protection Officer processor and the processor for the reasons defined by law, on the basis of his / her professional qualifications and his / her qualifications expertise in the field of law and practice in regard with data protection, with the main task of participating in all the issues related to the protection of personal data.

"Consent" of the data subject: any indication of will, free, specific, explicit and in full knowledge that the subject agrees, by a statement or a clear positive action, with the processing of his/her personal data

"Violation of personal data" means a breach of security leading to accidental or illegal destruction, loss, alteration, unauthorized use, disclosure or access to personal data transferred, stored or otherwise processed

"Existing legislation": The provisions of Greek, Union or other legislation to which ELPEN falls under and set personal data protection issues such as:

- Law 2472/1997 on the Protection of Individuals from processing personal data,
- Law 3471/2006 on the protection of personal data and privacy in the electronic communications sector and amending the 2472/1997,
- Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 on the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications) as it has been amended,
- Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons against data processing staff and the free movement of such data; and repealing Directive 95/46 / EC (General Protection Regulation) Data), hereafter referred to as GDPR, and any applicable laws.

3. Processing manager

Processing Manager, as the legal entity that determines the purposes and the way personal data are processed according to the GDPR, ELPEN PHARMACEUTICAL CO INC is considered to be ELPEN.

ELPEN PHARMACEUTICAL CO INC

95 Marathonos Avenue, 190 09, Pikermi, Attica, Greece

Telephone: +30 211 1865 000 (internal 200).

Email: info@elpen.gr

Website: www.elpen.gr

4. Data Protection Officer (DPO)

Data Protection Officer (DPO) for ELPEN has been set up according to articles 37 et seq. of the GDPR, Ms Georgia Chatzitheodorou

Georgia Chatzitheodorou, Attorney-at-law, DPO ELPEN

95 Marathonos Avenue, 190 09, Pikermi Attica, Greece.

Email: dpo@elpen.gr

5. Collection and processing of employees' personal data

The personal data of employees who may be subject to processing by ELPEN is, in principle, the standard personnel data which potential candidates themselves are likely to provide to the company in their application for recruitment, including information contained in their CV. In addition, in personal data to processing are included those collected by our company directly from its employees during the recruitment and / or during and for the needs of the employment relationship. In this context, special categories of personal data may be provided to ELPEN, in particular data related to health.

Particularly:

A. Personal data collected by the subject of these data, that is, the prospective employee concerned, before being recruited, and when applying for a hiring from our company (may) be:

Name, Specialty, Address, Phone, E-mail, Date of Birth, Place of birth, Nationality, Citizenship, Identity Card Number (ID), Marital Status, Protected Members, Military Obligations, Driving capability, Driver's license for a car / motorcycle, Studies, Knowledge of foreign languages, Professional experience, Recommendations, Individual medical history, any other information that the subject himself states in his CV.

B. Personal data collected by the employer during the procedure of his recruitment, for the completion of this process, and during the work relationship in addition to the above, (may) be:

Father's name, Mother's name, Social Security Number (AAIC) number, Tax Registration Number (NIC) and Public Finance Service (FVO), Identity Card, Driving license, Copies of diplomas, Past service marks, Status of stamps by social security, Certificates of previous experience, Tax clearance, a copy of a recent public corporation bill or rent contract, bank account number and IBAN, medical examinations (if required), Employee Identification Number, Job Position, Salary, Marital Status, Personal and Emergency Phone number, Spouse Full Name, personal information about dependent persons and members living with them.

Finally, before hiring, during the interview process with the jobseekers, and during the employment relationship, employees, as well as all the executives and heads of the company, are subject to evaluation by their superiors, according to the standard ELPEN policy and its commitment to continuous progress and development. The data associated with the evaluation process include only general and not personalized references to the employee's performance (e.g. "good", "very good", "excellent").

6. Processing purposes

Any kind of collection and processing of employees' personal data from ELPEN is executed in accordance with the existing legislation, in full compliance with the General Data Protection Regulation and with utmost respect for the principles under which the law governs the processing in order to ensure security and confidentiality.

Our company collects and processes personal employees' data such as those referred above in detail, which are intended to serve specific purposes, always within the framework of the employment relationship, before, during and after its expiration. In particular, such objectives are:

- a. Receiving, collecting, ranking and examining CVs and recruitment applications.
- b. The general communication with the employees.
- c. Searching for and selecting suitable candidates.
- d. The call to interview and evaluation during the interview of the candidates.
- e. Sending a job offer and receiving, collecting and keeping hiring documents of young employees.
- f. The drafting, signing, observing and monitoring of the implementation of job contracts.
- g. Maintaining a company's business records file.
- h. Updating and changing employee data.
- i. Management of payroll, permits and teamwork insurance of employees.

- j. Managing eventual termination of employee collaboration.
- k. Management of the training and evaluation of employees.
- l. Compliance with legal obligations of the company as an employer.
- m. Management of benefits to employees by decision of the company.

ELPEN conducts the evaluation and selection of suitable candidates and the assessment of its employees on the basis of defined criteria and trusting the judgments of its staff (cf. responsible), according to its policies, without resorting to automated making of decisions.

7. Legal basis of treatment

The processing of personal data of its employees by ELPEN is entirely lawful and is based on the conditions set forth by the existing national and EU legislation, and in particular the General Regulation for Data Protection.

Our company collects and processes personal data of its employees and candidates, in so far as such processing is necessary for the performance of a contract of which the data subject is a party or to take action at the request of the data subject before the conclusion of a contract, in accordance with Article 6 (1) (b) of the GDPR.

In addition, the company may process personal data when it is necessary for the company's own compliance as a responsible person processing, with a legal obligation under Article 6 (1) (c) of the GDPR, such as compliance with obligations arising for the employer by Labour legislation. Where appropriate, it is possible for the subject of the data to have consented to the processing of his or her personal data for one or more specific purposes, in accordance with Article 6 (1) (a) of the GDPR, such as, e.g. on the voluntary mission of his CV in the published addresses of our company. Also, in some cases, processing of personal data is necessary for the legitimate interests pursued by ELPEN as responsible processing, pursuant to Article 6 (1) (f) of the GDPR, to the extent that they are e.g. the selection and recruitment of the appropriate candidate for a specific position or the assessment of the employee's performance and his response to the obligations under the employment contract.

Concerning the collection and processing of specific categories of personal data, in particular, data concerning the health of employees, ELPEN does so, on the one hand, when processing is necessary for the execution of its obligations and the exercise of its specific rights as the controller or the individual employee as a subject of the data in the field of labour law and social law insurance and protection, in accordance with Article 9 (2) (b) and on the other hand, when processing is necessary for preventive reasons or professional medical practice (e.g. Law 3850/2010), assessment of the employee's ability to work, in accordance with Article 9 (2) (h) of the GDPR.

8. Recipients and transfer of personal data

The personal data of ELPEN's employees and candidates are processed by Human Resources staff and the staff of the Accounting Department of our company, the superiors and Head of the Department of the company, to which the company employees belong and, as the case may be, by the members of the Management of the company.

In addition, the recipients of personal data are public services, authorities and entities to which the data are notified in accordance with the provisions of the current legislation and in accordance with the respective obligations of ELPEN as an employer.

Our company may be required to disclose to third parties, such as governmental and judicial authorities, certain personal data of an employee, in accordance with existing legislation, as well as the foundation, support or exercise of legal claims against a employee and protection of the company rights from the employment relationship.

In addition, our company may disclose personally her employees' data to cooperating third parties for which it receives corresponding consent from data subjects, such as in third insurance company in the context of the implementation of a group program insurance of employee. In any case, ELPEN ensure the existence of appropriate safeguards for the safe process of this data from third parties.

ELPEN in no way trades and usually does not transfer personal data of its employees to third countries or international organizations and is bound by a clear obligation to inform the data subject, in case it intends to do so. In the event of a merger and / or acquisition of the company, employees' personal data may be communicated to third parties, following clear notification.

9. Storage and security of personal data

ELPEN takes the appropriate technical and organizational measures to keep employees' personal data safe, ensuring an appropriate level of security against potential risks. The systems and the data processing services are monitored on a permanent basis with a view to ensure that they are kept as safe as possible and protected against loss, destruction, misuse and / or unauthorized use or access.

Data integrity and limited access only by the authorized and competent persons of the company act as a guideline for each individual processing activity of personal data. ELPEN has put in place specific policies for the protection of personal data managing as the Process Manager, including data of its employees, and has put in place procedures to deal with incidents of personal data breaches. It looks for the continuous training of its personnel

responsible for data processing, which acts only after explicit authorization to do so and always conforms with the company's instructions.

Personal data of employees are stored by ELPEN only for as long as it is required to fulfil the purpose for which their collection was carried out as described in this Statement about Privacy, based on their nature, the contractual relationship that governs its storage and the related legal obligations of the company. The data are maintained, in any case, only for a reasonable period of time and they are subsequently deleted when the purpose of their processing ceases to exist, in accordance with existing legislation.

10. Employee rights

In the context of existing legislation, and in particular of the General Regulation for the Data Protection, employees retain the following rights, to the extent that their data are processed by ELPEN, for which, in any case, can communicate with the company using the contact information listed below:

1. Learn about the processing of personal information data from our company.
2. Have access to or request a copy thereof.
3. Request correction or completion of these data if they believe they are incorrect, inaccurate or incomplete.
4. Request the deletion of their personal data. In this case, ELPEN will delete them unless there is one of the legitimate reasons on the basis of which it is entitled or required to maintain the data.
5. Appeal for some or all processing purposes of their personal data or request for the processing to be limited under the legal conditions and as far as possible.
6. Revoke their consent to the collection and processing of these personal data from ELPEN, as far as it is the legal basis for the processing.
7. Submit a complaint to the competent supervisory authority, in this case to Privacy Authority.

11. Amendments and updates to this Privacy Statement of Employees

ELPEN reserves the right to modify and / or update this Privacy Statement at any time, whenever is deemed necessary. In update and / or substantial changes to this Privacy Notice, this will be communicated to the interested parties in a way that our company finds more convenient and efficient, always in order to ensure a thorough and clear precedent

employees notification and / or receive their consent where is required, while its "update date" will be amended.

12. Contact details

The subjects of the personal data referred to in this Privacy Statement may contact our company for possible questions, comments, etc. about the present but also the general ELPEN Data Protection Policy, to exercise any of their above mentioned rights, to make a request or to ask for access to and / or correct their personal information.

ELPEN PHARMACEUTICAL CO INC

95 Marathonos Avenue, 190 09, Pikermi, Attica, Greece.

Telephone: +30 211 1865 000 (internal 200).

Email: info@elpen.gr

Website: www.elpen.gr

Data Protection Officer (DPO)

Georgia Chatzitheodorou, Attorney-at-law, DPO ELPEN

95 Marathonos Avenue, 90 09, Pikermi, Attica, Greece.

Email: dpo@elpen.gr