



Chinese Addendum to Privacy Notice – Interactions with Healthcare Professionals and Commercial Contacts

隐私声明 - 与医疗专业人员和商业联系人的互动的中文增编

This addendum to the Privacy Notice – Interactions with Healthcare Professionals and Commercial Contacts (the “**Privacy Notice**”) applies to you if your personal data is being processed by Grifols Group, including Grifols Pharmaceutical Technology (Shanghai) Co., Ltd. and Grifols Pharmaceutical Technology (Shanghai) Co., Ltd. Beijing Branch (collectively, “**Grifols**”) in mainland of the People’s Republic of China (“**Mainland China**”). These terms are set out in addition to and form an integral part of the Privacy Notice above. In the event of any conflict or inconsistency between the Privacy Notice and this Chinese Addendum, the terms of this Addendum shall govern and prevail.

Entrusted Processing

For the purposes described in the Privacy Notice, we may retain other companies and individuals to perform services on our behalf to provide relevant operation and service support, which process your personal data in relation to the purposes mentioned in Section 3 of the Privacy Notice, including:

- Data analysis companies;
- Information technology service providers;
- Website/system server hosting companies;
- Travel agencies;
- Marketing agencies;
- Event organizers;
- Media agencies;
- Providers operating in the anticorruption sector;
- Financial Entities;

These third parties may be provided with access to personal data needed to perform their functions, but they will not use such data other than on Grifols’ behalf or subject to contracts that protect the confidentiality of the data.

Sharing with Third Parties

We will not provide your personal data to third parties in violation of law (such as without your consent, where consent is required). For the purpose of global business management and accomplishing the purposes listed in Section 3 of the Privacy Notice, only to the extent necessary and lawful, we may share your personal information with [Grifols Affiliates](#) located in or outside Mainland China.

Grifols may share personal data with governmental authorities, regulatory authorities, and law enforcement authorities for purpose of complying with our statutory obligations. Grifols may also disclose your personal data to third parties if this is required by law, a statutory provision or legal decision or if such communication is required in order to protect and defend its rights.



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Sensitive Information

For the purposes stated in the Privacy Notice, the types of sensitive personal data we may collect and use include:

- When you sign the contract with Grifols in relation to financial issues, we will collect your ID/passport number or financial data, in order to enter into an agreement with you and pay to you (if applicable).

We will process your sensitive personal data in strict accordance with PRC laws and regulations, only when necessary to provide you with Grifols products and services and obtain your separate consent before our collection. Sensitive Personal Information refers to the personal data that is likely to result in damage to the personal dignity of any natural person or damage to his or her personal or property safety once disclosed or illegally used, including such information as biometric identification, religious belief, specific identity, medical health, financial account and whereabouts and tracks, as well as the personal data of minors under the age of 14.

Cross-border Data Transfers

We may transfer your personal data outside of Mainland China as is necessary for Grifols' international business management, including for the purposes set out in Section 3 of the Privacy Notice (where applicable). Our data transfers to overseas recipients will be in accordance with PRC laws and regulations, including those on cross-border data transfer.

You may check the name and contact information of the overseas recipient, the purpose and method of processing, the types of personal data processed and the mechanism in which you can exercise your rights as a data subject by referring to the **list of overseas recipients**.

Individual Rights

You are entitled to the following rights under the Chinese Personal Information Protection Law.

(1) Right of Access and Modification

You may access or modify your personal information via the contact details set out in this addendum.

(2) Right to Obtain a Copy of Your Personal Information



Chinese Addendum to Privacy Notice – Interactions with Healthcare Professionals and Commercial Contacts

隐私声明 - 与医疗专业人员和商业联系人的互动的中文增编

You have the right to obtain a copy of your personal data. If you need a copy of your personal data collected by us, you may contact us through the contact details set out in this addendum.

(3) Right to Withdraw Consent

If you wish to withdraw your consent to other use of your personal data, you may contact us through the contact details set out in this addendum. If you withdraw your consent to the use of personal data, you may not be able to use relevant products and/or services.

(4) Right to Restrict or Object Processing

You have the right to restrict or object processing of your personal data by others. You may contact us through the contact details set out in this addendum.

(5) Right to Unsubscribe Notifications and Messages

If you choose not to receive any notifications or marketing or promotional messages from us, please contact us through the contact details set out in this addendum.

(6) Right of Deletion

You have the right to request that your personal data be deleted if: (a) we violate laws or regulations in collecting or using your personal data; (b) we have no lawful basis for collecting your personal data or you withdraw your consent; (c) we collect or use your personal data in violation of our agreement with you; (d) you deregister your account; or (e) we no longer provide products or services for you.

Please note that if the personal data you have requested to delete is necessary for the performance of certain services, we may not continue to provide such services to you. This will not, however, prevent us from providing other services that are not related to that personal data.

Contact Us

If you wish to exercise any of your rights under the Personal Information Protection Law of China, you may make your request or complaint at privacy@grifols.com

Your request or complaint will be processed, and we will respond to you as soon as possible after receiving your request. We may need to verify your identity if you are requesting information about yourself or a close relative.

Last update: August 2022



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隐私声明 - 与医疗专业人士和商业联系人的互动的中文增编

List of Overseas Recipients

Overseas Recipients	Types of Shared Data	Country	Purposes of the Transfer
Grifols (HK) Limited	Vendors' contact details, customers' contact details, financial accounts.	Hong Kong	Accounting services
Grifols S.A.	IT systems users' data; and other personal information stored in IT systems	Spain	IT services
Grifols (HK) Limited	Third parties' data required in due diligence process; HCPs personal information in compliance process	Hong Kong	Compliance program, FMV calculation, due diligence process.
Grifols S.A.		Spain	
GSSNA Inc		USA	
Grifols S.A.	Third parties' personal information	Spain	Management of corporate functions: Internal Audit, Whistleblowing channel
Grifols (HK) Limited	Customers' contact details	HK	Post sales technical services
Grifols International S.A.	HCPs, commercial contacts and potential commercial contacts' identification data, contact details and professional data	Spain	Marketing activities
Grifols Viajes S.A. Grifols Asia Pacific Pte. Ltd.	HCPs and other individuals' identification data (name, ID, passport etc.)	Spain Singapore	Travel and events management services
Grifols S.A.	HCPs identification data, contact details and professional data	Spain	Scientific & Medical Affairs activities
GSSNA Inc		USA	
For additional information related to the Overseas Recipients, you are welcome to contact the Company at privacy@grifols.com			



Chinese Addendum to Privacy Notice – Interactions with Healthcare Professionals and Commercial Contacts

隐私声明 - 与医疗专业人员和商业联系人的互动的中文增编

本隐私声明 - 与医疗专业人员和商业联系人的互动 (“**隐私声明**”) 的增编适用于您的个人数据被基立福集团, 包括基立福医药科技 (上海) 有限公司和基立福医药科技 (上海) 有限公司北京分公司 (总称 “**基立福**”) 在中华人民共和国大陆 (“**中国大陆**”) 处理的情况。该条款是对上述隐私声明的补充, 并构成其不可分割的一部分。如果隐私声明与本中文增编间有任何冲突或不一致, 应以本增编的条款为准。

委托处理

为了隐私声明中所述的目的, 我们可能会聘请其他公司和个人代表我们提供相关的运营和服务支持, 这些公司和个人可能会就隐私声明第 3 条中所述的目的处理您的个人数据, 其中包括:

- 数据分析公司;
- 信息技术服务提供者;
- 网站/系统服务器托管公司;
- 旅行社;
- 营销机构;
- 活动组织者;
- 媒体机构;
- 在反腐部门运作的供应商;
- 金融实体;



Chinese Addendum to Privacy Notice – Interactions with Healthcare Professionals and Commercial Contacts

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这些第三方可以获得履行其职能所需的个人数据，但他们不会在代表基立福或遵守保护数据保密性的合同之外使用这些数据。

与第三方共享

我们不会在违反法律的情况下将您的个人数据提供给第三方（例如，在需要同意的情况下，未经您同意）。为了全球业务管理和完成隐私声明第 3 条所列的目的，只有在必要和合法的范围内，我们可能会与位于中国大陆或境外的[基立福关联公司](#)分享您的个人信息。

为遵守我们的法定义务，基立福可能会与政府当局、监管机构和执法机构分享个人资料。如果法律、法定条款或法律决定要求，或者为了保护 and 捍卫其权利而需要这样的沟通，基立福也可能向第三方披露您的个人资料。

敏感信息

为了隐私声明中所述的目的，我们可能收集和使用的敏感个人数据类型包括：

- 当您与基立福就财务问题签订合同时，我们将收集您的身份证/护照号码或财务数据，以便与您签订协议并向您付款（如适用）。

我们将严格按照中国的法律法规处理您的敏感个人资料，只有在为您提供基立福产品和服务的必要情况下才会进行处理，并在收集之前获得您的单独同意。敏感个人信息是指一旦披露或被非法使用可能导致任何自然人的个人尊严受到损害或其人身或财产安全受到损害的个人数据，包



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括生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息，以及未满 14 周岁的未成年人的个人信息。

数据跨境转移

我们可能会根据基立福国际业务管理需要将您的个人数据转移到中国大陆以外的地方，包括隐私声明第 3 条中规定的目的(如适用)。我们向海外接收方的数据转移将符合中国的法律和法规，包括关于跨境数据转移的法规。

您可以参照**海外接收方名单**，查看海外接收方的名称和联系信息、处理的目的和方法、处理的个人数据类型以及您作为数据主体行使权利的机制。

个人权利

您有权按照《中国个人信息保护法》行使以下权利：

(1) 查阅和修改的权利

您可以通过本增编中列出的联系方式行使查阅和修改权。

(2) 要求获得个人信息副本的权利

您有权获得一份个人信息副本。您可以通过本增编中列出的联系方式与我们联络，行使索取副本权。

(3) 撤销同意的权利



Chinese Addendum to Privacy Notice – Interactions with Healthcare Professionals and Commercial Contacts

隐私声明 - 与医疗专业人员和商业联系人的互动的中文增编

您可以通过本增编中列出的联系方式与我们联系，行使撤销同意权。如果您撤销对个人数据使用的同意，您可能无法使用相关产品和/或服务。

(4) 限制或反对处理的权利

您有权限制或反对他人对您的个人信息进行处理。您可以通过本增编中列出的联系方式与我们联系。

(5) 取消订阅通知和信息的权利

如您选择不再接收我们的通知、营销或促销信息，请通过本增编中的联系方式与我们联系。

(6) 删除的权利

在下列情况下，您有权要求删除您的个人数据：(a) 我们在收集或使用您的个人数据时违反了法律或法规；(b) 我们在收集您的个人数据时没有合法依据或您撤回了同意；(c) 我们在收集或使用您的个人数据时违反了我们与您的协议；(d) 您取消了账户的注册；或(e) 我们不再为您提供产品或服务。

请注意，如果您请求要删除的个人数据对于执行某些服务是必要的，那么我们可能不会继续向您提供这类服务。但是，这不会阻止我们提供其他与该个人数据无关的服务。

联系我们

如果您希望行使《中国个人信息保护法》下的任何权利，您可通过 privacy@grifols.com 提出要求或投诉



Chinese Addendum to Privacy Notice – Interactions with Healthcare Professionals and Commercial Contacts

隐私声明 - 与医疗专业人员和商业联系人的互动的中文增编

我们将处理您的要求或投诉，并在收到您的要求后会尽快答复。如果您要求提供关于您自己或近亲的信息，我们可能需要核实您的身份。

最后一次更新：2022年8月

海外接收方名单

海外接收方	分享数据类型	国家	传输目的
Grifols (HK) Limited	卖方联系方式、客户联系方式、财务账号。	香港	财务服务
Grifols S.A.	IT 系统用户数据；以及其他存储在 IT 系统中的个人信息	西班牙	IT 服务
Grifols (HK) Limited	尽职调查中所需的第三方数据； 合规过程中的医护人员 (HCP) 个人信息	香港	合规程序、公平市场价值 (FMV) 计算、尽职调查。
Grifols S.A.		西班牙	
GSSNA Inc		美国	
Grifols S.A.	第三方个人信息	西班牙	公司职能部门的管理：内部审计部、举报渠道
Grifols (HK) Limited	客户联系方式	香港	邮政销售技术服务



Chinese Addendum to Privacy Notice – Interactions with Healthcare Professionals and Commercial Contacts

隐私声明 - 与医疗专业人员和商业联系人的互动的中文增编

海外接收方	分享数据类型	国家	传输目的
Grifols Viajes S.A.	医护人员、商业联系人和潜在商业联系人的识别信息、联系方式和职业资料	西班牙	营销活动
Grifols Viajes S.A. Grifols Asia Pacific Pte. Ltd.	医护人员和其他个人的识别资料 (姓名、身份证、护照等)	西班牙 新加坡	旅行和活动管理服务
Grifols S.A.	医护人员的识别资料、联系方式和职业资料	西班牙	科学和医学事务活动
GSSNA Inc		美国	
如需获得与海外接收方有关的其他信息, 欢迎与公司联系, 电子邮件: privacy@grifols.com :			