



INFORMATION NOTICE PURSUANT
ART. 13 REGULATION (EU)
2016/679 ON 27th APRIL 2016



INFORMATION NOTICE PURSUANT ART. 13 REGULATION (EU) 2016/679 ON 27th APRIL 2016

According to the European Regulation nr. 2016/679 ("GDPR") any person who carries out personal data processing is required to inform the data subject (i.e. the person whom data belong to) on some elements qualifying data processing, which must be carried out with fairness, lawfulness and transparency, protecting the confidentiality and rights of the data subject.

GENERAL PRINCIPLES OF DATA PROCESSING

Data processing will be performed through collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction and will be carried out by the data controller, data processor and persons authorized to process data.

Personal Data will be processed lawfully, fairly and in a transparent manner; will be collected for specified, explicit and legitimate purposes and processed in a manner that is not incompatible with such purposes; they will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed, accurate and up-to-date; they will be processed with the utmost confidentiality, mainly with electronic and automated means, and stored both electronically and on paper, and on any other type of suitable means, in accordance with the principles of the General Data Protection Regulation, the requirements given by the supervisory authority and, in any case, in such a way as to ensure adequate level of security, including protection, with adequate technical and organizational measures, from non-authorized or unlawful processing, or even accidental loss. Data will be stored in

a manner that permits the identification of the data subjects for the extent strictly necessary to the achievement of the purposes for which they were processed.

Alira Health Group, (as defined below) undertakes the responsibility to observe specific security measures in order to prevent data loss, illegitimate or unfair use and unauthorized access, in full compliance with statutory and regulatory provisions.

The personal data voluntarily provided by yourself (both by email and other means of communication, or by spontaneous sending of your curriculum vitae through the website at the time of your application), will be stored in Alira Health Group's database exclusively for the purposes specified above and for the time required by the relevant legislation.

IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLERS

Data Controllers are the Joint Controllers, ("Alira Health Group") as reported in the Co-controlling agreement available through our data privacy web page at <https://alirahealth.com/privacy-policy/>

For the purposes of exercising the rights provided for in the GDPR, and for any request relating to your personal data, you may contact the Data Controller by sending a communication to the following e-mail address: dataprivacy@alirahealth.com

PURPOSES AND LEGAL BASIS OF DATA PROCESSING

The personal data provided by the candidate will be processed by the Data Controller exclusively for the activity of research and selection of personnel and in particular (a) carry out the necessary evaluations regarding the possible establishment of a working relationship or collaboration with our company;

(b) in the event of a positive evaluation, to prepare the necessary documentation for the establishment of the employment or collaboration relationship.

The data processing is lawful pursuant to Art. 6, letter b) of the European Regulation 679/2016 as it is aimed at implementing pre-contractual measures at the request of the data subject.

Where the processing concerns particular categories of data (for example, in the event that the CV refers to the candidate's membership of protected categories), the processing of the data provided for the purposes of research and selection of personnel is legally based on the consent of the person concerned pursuant to art. 9 lett. a) of European Regulation 679/2016.

RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Personal data acquired by the undersigned company are not subject to dissemination. These data may be communicated within the company and be known by the persons tasked with data processing only if previously permitted by the data subject pursuant to art. 6, lett. a) and art. 9 lett. a) for the above purposes.

It is hereby specified that for the aforementioned purposes and pursuant to art. 6, lett. a) and art. 9 lett. a), Alira Health Group will communicate your data the companies belonging to the Alira Health Group, and namely:

- **Alira Health Boston, LLC**, whose registered office is at 1, Grant Street, Suite 400, Framingham, MA 01702, USA,
- **Alira Health SL**, whose registered office is at Carrer de Balmes, 206 – Atico 2, 08006 Barcelona Spain
- **Alira Health SAS. Address:** whose registered office is at 12 rue Charlot, 75003 Paris France
- **Alira Health Group Holdings, LLC**, whose registered office is at 1 Grant Street, Framingham, MA 01702 USA
- **Wellmera AG**, whose registered office is at Badenstrasse 3, 4057 Basel, Switzerland

- **Alira Health GmbH.** whose registered office is at Kurfurstenstrasse 22 80801 Munich, Germany
- **CROS NT S.r.l.**, sole shareholder company, whose registered office is at Via Germana no. 2, (37136) Verona, Italy, in the person of its pro tempore legal representative.
- **CROS NT Ltd**, sole shareholder company whose registered office is at Chancellors House, Brampton Lane, Hendon NW4 4AB, London, UK;
- **CROS NT, LLC**, sole shareholder company, whose registered office is at 1340 Environ way, Chapel Hill, NC, 27517-4430, USA (hereinafter also referred to as CROS NT or the "Data Controller");
- **CROS NT DE GmbH**, sole shareholder company under liquidation, Business Address: Konrad-Adenauer-Allee 1 86150 Augsburg (Germany)

Now therefore, together also referred to as "Alira Health Group"

For the above purposes, the processing activities will be carried out in the same manner by the companies listed above.

For the purposes of maintenance of this website, Alira Health Group may use third parties, who therefore may have access to your data. However, these individuals will be appointed as Data Processors or authorized persons tasked with data processing, and will receive adequate operating instructions, particularly in relation to the adoption of the security measures.

TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

Alira Health Group is going to transfer your personal data for the purposes specified to the members of Alira Health Group in compliance with art. 44 and following of the GDPR.

PERIOD OF STORAGE OF PERSONAL DATA

Personal data provided will be processed by the undersigned company for the purposes previously specified; they will be stored for the time necessary to achieve the aforementioned purposes (12 months), and in any case until the data subject withdraws the consent to data processing.

RIGHTS GRANTED TO THE DATA SUBJECT

Data Subjects are entitled to obtain access to personal data from the Data Controller, for free and without any limitation to third parties' rights and freedoms. Particularly, they have the right to receive confirmation of whether or not their own personal data are being processed, and to receive the following information:

- a) the origin of the personal data, in case they were not collected from the data subject;
- b) the categories of personal data;
- c) the purpose and modality of treatment;
- d) the existence of an automated process, profiling included, and in that case the logic applied, the importance and any expected consequence of such processing for the data subject;
- e) updating or rectification;
- f) the deletion or limitation of the processing of their data (anonymization, blocking of unlawful data processing, including those whose storage is not required in relation to the purposes for which they were collected or then processed);

g) the recipients or the categories of recipients to whom personal data have been or will be communicated, especially if they belong to international organizations or third countries (in the latter case, the data subject has the right to be informed of the existence of adequate guarantees pursuant to article 46 relating to data transfer);
h) when possible, the expected period of storage of personal data or, in case it is not possible, the criteria used in order to determine such period.

Data Subjects have the right to withdraw their consent to data processing and to oppose data processing. Anyhow, the withdrawal of consent to data processing shall not affect the lawfulness of data processing based on the consent given before its withdrawal.

Data subjects also have the right to data portability.

RIGHT TO LODGE A COMPLAINT

Data subjects have the right to lodge a complaint to the Supervisory Authority.

MANDATORY OR OPTIONAL NATURE OF DATA COMMUNICATION

The communication of your personal data is optional. The refusal to communicate them will prevent the company from pursuing the purposes specified in this information notice.

EXISTENCE OF AN AUTOMATED DECISION-MAKING PROCESS

The undersigned company does not use any automated decision-making process.