

PRIVACY POLICY

OT4B SAS
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The following policy applies to the processing of personal data ('personal data' or 'data') carried out by OT4B in the course of its activities.

This privacy policy may be adapted in accordance with the legislative and regulatory context and the recommendations issued by the Commission Nationale de l'Informatique et des Libertés (CNIL), the French data protection regulator.

1. LEGAL FRAMEWORK

The processing of personal data within the European Union is governed by the 'General Data Protection Regulation' (GDPR) of 27 April 2016 ([Regulation \(EU\) 2016/679](#)) and in France by [Law No 78-17 of 6 January 1978 on data processing, files and freedoms \(as amended\)](#).

2. PROCESSING OF PERSONAL DATA BY OT4B

What are personal data?

Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified directly (e.g. surname/first name) or indirectly (e.g. telephone number, IP address or voice recording/image). The potential to identify a natural person may result from one item of data or a combination of several items of data.

Data collection and use by OT4B

OT4B ensures that the principle of data minimisation is applied by collecting and processing only data that are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (management of staff, management of contacts and contracts with its partners including healthcare personnel, fulfilment of pharmacovigilance obligations, monitoring of patients receiving specific treatments (see below), management of optional cookies used on the site <https://www.ot4b.com>, etc.).

You can contact us for further details about the various data processing operations carried out by OT4B and, in accordance with CNIL Decision No 2022-106 of 22 September 2022, [you can consult here the information notice](#) providing details of the data processing carried out in relation to the compassionate use program with Oxytocin 44.44 IU/mL nasal spray solution.

Basis and objectives of processing

OT4B ensures that its processing of personal data is lawful and that each processing operation is supported by a relevant legal basis:

- the data subject has given consent to the processing of his/her personal data for one or more specific purposes;

- processing is necessary for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures at the data subject's request;
- processing is necessary for compliance with a legal obligation to which the controller is subject;
- processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- or processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

OT4B keeps personal data for no longer than is necessary for the purposes for which those data are processed.

Data recipients

In most cases, OT4B will not transfer data outside the European Union. Any transfers that might be necessary will comply with the requirements of the GDPR.

OT4B may be required to communicate certain data to service providers and/or subcontractors, after ensuring that sufficient guarantees are provided regarding compliance with regulations on the protection of personal data processed on behalf of OT4B.

OT4B may also need to communicate data to legal or administrative authorities, in accordance with the applicable legal requirements.

Rights of data subjects

The individuals whose data are processed have the following rights in relation to the data, depending on the circumstances and the applicable legislation:

Right of access: the right to obtain access to information processed by OT4B.

Right to rectification: the right to request rectification of your information if it is inaccurate or incomplete.

Right of withdrawal: the right to request the erasure or deletion of your information if there are no compelling reasons for OT4B to continue using it.

Right to restriction of processing: the right to 'block' or prevent further use of your information in certain circumstances.

Right to data portability: in certain circumstances, the right to obtain and use your data in a structured, commonly used and machine-readable format.

Right to object: in certain circumstances, the right to object to certain types of processing.

Please note: these rights may be restricted based on requirements linked to the purpose for which the data are processed and the basis on which they are processed.

To exercise your rights or ask any questions, please contact OT4B in writing at the above address or by e-mail at **dataprivacy@ot4b.com**. Please give precise details about the data concerned and the reasons for your request.

In accordance with Article 15(3) of the GDPR and where a request is manifestly excessive OT4B may:

- charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested, or*
- refuse to act on the request.*

Updating the personal data protection policy

This policy might need to be updated. For this reason, OT4B encourages you to regularly check its website www.ot4b.com.