

Privacy notice

This privacy notice (this “Notice”) is issued by Crescent Pharma Limited and its UK affiliates (together, “Crescent Pharma”, “we”, “us” and “our”). Except where stated otherwise, Crescent Pharma Limited (company number 04750933) acts as the controller of the personal data processed through this website for the purposes of the UK GDPR and the Data Protection Act 2018.

This Notice explains why you can trust us with your personal data, how and why we use it (including how we share it), and the data protection rights available to you, which include the right to withdraw your consent. It also sets out specific information for Website Users and the use of Cookies.

How we use your personal data

This Notice applies to the processing of your personal data where:

- we correspond with you by email or other similar means of communication;
- we hold online meetings with you using third-party teleconferencing tools; or
- you visit or use our UK websites and other digital properties (such as apps) or platforms (each, a “Site”), noting that each Site may have its own supplementary privacy notice.

We will only process your personal data in accordance with applicable law and where we have a lawful basis for doing so, as set out below. We will use your personal data for the purposes for which it was collected, unless we reasonably consider that we may process it for a further purpose that is compatible with the original purpose. Where we intend to use it for a new or incompatible purpose, we will notify you beforehand and, where required by law, obtain your consent.

We implement appropriate technical and organisational measures, including physical security and access controls together with sound practices for the collection, storage and processing of information, to protect your personal data against accidental loss and unauthorised access, use, alteration or disclosure.

We retain your personal data for no longer than is necessary, in accordance with the retention periods set out in our Records and Information Management policy. In most cases, contractual and financial information (including complaints, customer training and correspondence) is retained for no more than 11 years. In the pharmaceutical sector, however, certain personal data must be kept by law for periods that may be shorter or longer than this. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process the data and whether those purposes can be achieved by other means, and any applicable legal requirements (applying the longest such period where relevant). When personal data is no longer required, we take reasonable steps to delete it or to anonymise it (irreversibly removing any identifiers). Certain retention periods are described in the specific sections below that may apply to you. If you would like further information, please Contact Us.

We collect personal data about you directly through our interactions with you and, in some cases, indirectly through a third-party service provider who may also act as a joint controller. Such data may include your first name and surname, business address, email address and telephone number, which we process as necessary for the performance of a contract with you, to comply with a legal obligation, or in reliance on our legitimate interests.

Where we do not collect your personal data directly from you, we may obtain it from third-party sources, including our group companies and affiliates, our service providers and business partners, healthcare professionals and organisations, publicly available sources and registers, and social media or other online platforms. In such cases, the categories of personal data we obtain typically include your name, contact details,

professional and business information, and details of your interactions with us. Where required, we will identify the specific source of your personal data on request.

In limited circumstances, particularly in connection with pharmacovigilance, adverse event reporting, product safety and medical information enquiries, we may process special category data, such as information concerning your health. Where we do so, we rely on one or more of the conditions in Article 9 of the UK GDPR together with Schedule 1 to the Data Protection Act 2018, including that the processing is necessary for reasons of public interest in the area of public health (such as ensuring the safety of medicinal products) and for compliance with our legal and regulatory obligations. We process special category data only to the extent necessary for these purposes and apply appropriate safeguards.

Where we are required to collect your personal data by law or under the terms of a contract with you, and you do not provide that data when requested, we may be unable to perform the contract we have or are seeking to enter into with you, or to comply with our legal obligations. In that event, we may need to decline to provide, or to discontinue, the relevant product or service, and we will notify you accordingly at the relevant time.

We may also process your personal data where necessary to comply with a legal obligation, including:

- meeting our tax, accounting, regulatory, pharmacovigilance, advertising, compliance and other legal obligations;
- detecting, investigating, preventing or reporting activities that may breach our policies or be unlawful, such as fraud, terrorism, misrepresentation, security incidents or crime;
- handling dispute resolution and legal claims, complying with legal and self-regulatory obligations, and conducting investigations where necessary (including disclosure in connection with regulatory queries, legal process or litigation), and maintaining records of any consents (including preferences or other settings) to enable us to comply with data protection law;
- carrying out due diligence, such as prior to setting up a trading account; or
- facilitating mergers and acquisitions involving our group companies.

We also have a legitimate interest in processing your personal data to manage and operate our business, to promote our products, services and events, and to manage, operate and improve our Sites and our communications with you. We may use techniques such as artificial intelligence to process and analyse data contained in records of our communications and online meetings with you (including your voice and image), our other interactions with you, survey responses (where applicable), and your marketing preferences, including any consents you have given us.

Automated decision-making. Although we may use techniques such as artificial intelligence and profiling to analyse and improve our communications and services, we do not take decisions that produce legal effects concerning you, or that similarly significantly affect you, based solely on automated processing. Should this change, we will provide you with meaningful information about the logic involved and the significance and envisaged consequences of such processing, and you will have the right to obtain human intervention, to express your point of view and to contest the decision.

Depending on the nature of your interaction with Crescent Pharma, we may collect additional personal data for other purposes.

Sharing your personal data

We may share your personal data with the following categories of recipient, in each case only to the extent necessary for them to perform their functions:

- external consultants, professional advisers and agents;
- other companies within the Crescent group worldwide, both within and outside the European Economic Area, which may provide group services such as pharmacovigilance, HR, finance, compliance, legal, marketing and IT. Where we transfer your personal data outside the UK, we rely on the UK adequacy regulations made by the Secretary of State (following consultation with the UK ICO), which determine that the level of protection for personal data in the relevant country is broadly equivalent to that under UK law. For transfers to countries not covered by UK adequacy regulations, such as India, we rely on the International Data Transfer Agreement (IDTA) or the UK Addendum to the EU standard contractual clauses, which contractually ensure that your personal data receives essentially the same degree of protection as it would under UK law;
- third-party service providers that process your personal data on behalf of Crescent Pharma and are bound by contractual obligations to keep it confidential and appropriately secure, to a standard equivalent to that expected in the UK or regarded as adequate by the UK ICO, such as:
 - providers of IT support, website hosting, CRM hosting, event management and analytics services;
 - investment houses for the purposes of benefits management, together with training providers and providers of enquiry and other database hosting and support; and
 - providers of HR, finance, travel and administration services;
- government authorities (including tax authorities), regulatory agencies (such as the European Medicines Agency or its local equivalent), law enforcement officials and pharmaceutical self-regulatory bodies such as EFPIA in Europe;
- service providers such as banks, postal service providers, lawyers and auditors, where necessary for the performance of our relationship with you, the protection of our legitimate interests or compliance with our legal obligations. We require such providers to comply strictly with all applicable data protection laws, as well as with the specific rules applicable to their activities and to the protection of the information they process in the course of that activity; and
- in the event that our business is sold or combined with another business, our advisers, any prospective purchaser's advisers and any new owners of the business, together with third parties (and their advisers) with whom we merge or which we acquire in the future.

Your Rights and withdrawing consent

Under applicable law, you may be entitled to ask Crescent Pharma for a copy of your personal data, to have it corrected or erased, to restrict its processing, or to have certain data transferred to another organisation. You may also have the right to object to some processing (in particular where we do not need to process the data to meet a contractual or other legal requirement, or where we use it for direct marketing). These rights may be limited in certain circumstances, for example where we can demonstrate that we are legally required to process your personal data.

Where you have consented to the processing of your personal data, you may withdraw that consent at any time by informing us.

Withdrawing your consent will not affect the lawfulness of any processing carried out before the withdrawal, nor will it affect any processing of your personal data undertaken in reliance on a lawful basis other than consent.

You have the right to opt out of, or change your preferences for, any direct marketing (such as emails promoting our products, services and events) at any time. You may do so by contacting us using the details set out below. For certain Sites, you may also be able to change some of your marketing preferences online or in-app.

You may be resident in a country that affords privacy rights similar to those described above. If you have any concerns about how we process your personal data, wish to exercise any of your rights, or wish to obtain further information, you may contact us using the details set out below.

Contact Us

If you have any concerns or questions about how we process your personal data, wish to exercise any of your rights, or wish to make a data protection complaint, you may contact the Crescent Pharma Data Protection Office at privacy@crescentpharma.com

We will handle data protection complaints in accordance with applicable data protection law. We will acknowledge receipt of a complaint within 30 days, take appropriate steps to investigate it without undue delay, keep you informed where appropriate, and notify you of the outcome.

We hope to be able to resolve any queries you may have about the way in which we process your personal data. If your concerns remain unresolved, you also have the right to lodge a complaint with the UK Information Commissioner's Office (ICO) via its "Make a complaint" service, or with the relevant data protection authority in your country.

Website Users

When you visit or use a Site, we may collect personal data about your device and your use of the Site, such as your IP address, device identifiers, browser type, operating system, referring pages, pages viewed, and the dates and times of your visits. We collect this information through cookies and similar technologies (see "Cookies" below) and use it to operate, secure, maintain and improve our Sites, to understand how they are used, and to personalise your experience.

Our legal basis for this processing is our legitimate interest in operating and improving our Sites and keeping them secure and, where required by law, your consent (for example, in respect of non-essential cookies). Where our processing relies on consent, you may withdraw it at any time as described in this Notice.

Cookies

Our Sites use cookies and similar technologies (such as pixels, tags and local storage) to enable the Sites to function, to remember your preferences, to measure and analyse traffic and performance and, where you consent, for advertising and marketing purposes. Cookies are small files placed on your device when you visit a Site. Analytics information is generally aggregated and used to improve website performance and the user experience.

We use strictly necessary cookies, which are required for the Site to operate and do not require your consent, as well as functional, analytics and advertising cookies, which we set only where you have given your consent. You may accept or reject non-essential cookies, and change your preferences at any time, using the cookie banner or cookie settings tool on the relevant Site, or by adjusting your browser settings. Blocking some cookies may affect your experience of the Site and the services we are able to offer.

Changes to this Notice

We may update this Notice from time to time to reflect changes in our practices or in legal requirements. Where changes are material, we will take reasonable steps to bring them to your attention. This Notice was last updated in July 2026.