



I. Privacy Policy of ICE Japan

International Chemical Entity Japan Co., Ltd. (“**ICE Japan**”) hereby declares to promote the protection of Personal Information, in regard to the handling of Personal Information of Users (the “**Users**”, “**you**” or “**your**”) of ICE Japan’s products, services or websites, through setting out the privacy policy as defined below (this “**Policy**”), and shall treat the Personal Information appropriately.

Article 1 (Personal Information)

“**Personal Information**” in this Policy means “Personal Information” as defined in the Act on the Protection of Personal Information of Japan (Act No. 57 of 2003; “**Personal Information Protection Act**”); and therefore, means information which can identify a specific living individual by name, date of birth or other description contained in such information; or which includes a code that can identify a specific individual.

Article 2 (Purpose of Use of Personal Information)

ICE Japan may acquire and use Personal Information of Users of ICE Japan’s Services within the scope necessary for the following purposes. If ICE Japan seeks to use such Personal Information beyond the following purposes, ICE Japan will obtain the prior written consent of the Users whose Personal Information is concerned:

- (a) to perform or introduce the products and services (the “**Products**”) manufactured and sold by ICE Japan, including pharmaceutical products; and
- (b) to respond to inquiries and feedback from Users through the website.

Article 3(Management and Protection of Personal Information)

ICE Japan will carefully and closely manage Personal Information and will not disclose or provide such Personal Information to any third parties without the prior written consent of Users whose

Personal Information is concerned, except in the following circumstances and shall take precautional and correctional measures to an illegal access to Personal Information, risks of loss, destruction or leakage of Personal Information considering a security perspective:

- (a) if such disclosure of Personal Information is necessary for the protection of the life, body, or property of a person and it is difficult to obtain the consent of such person;
- (b) if such disclosure of Personal Information is necessary for improving public health or promoting the sound growth of children and it is difficult to obtain the consent of the person whose Personal Information is concerned;
- (c) if such disclosure of Personal Information is necessary for cooperating with a state organ, a local government, or an individual or a business operator entrusted by such state organ or local government in executing the affairs required by laws and regulations, and if obtaining the consent of the person whose Personal Information is concerned is likely to hinder the execution of such affairs; and
- (d) if it is permitted by laws and regulations.

Article 4 (Privacy Policy for Use of Websites)

The web services of ICE Japan are operated under the management of ICE S.P.A., an Italian corporation and the parent company of ICE Japan, as part of the International Chemical Entity Group (“**ICE Pharma Group**”). For the privacy policy regarding the use of the website, please refer to the section "II. Privacy Policy for Use of ICE Pharma Group Websites" below.

Article 5 (Joint Use of Personal Information)

ICE Japan may jointly use Personal Information of Users to the extent necessary for the following scope and purpose of use:

<Purpose of Joint Use>

For the purposes as set out in Article 2 above.

<Scope of Personal Information for Joint Use>

The following information received for the purposes described in Article 2 above:

- Information related to identity verification (name, address, phone number, email address, etc.)
- Information related to transactions (transaction details, purchase history, etc.)
- Information related to payments (financial institution account, etc.)
- Online identifiers such as cookie IDs, device information, etc.

<Persons for Joint Use>

ICE S.P.A.

The Republic of Italy is recognized under Japan's Personal Information Protection Act as a foreign country that has a personal information protection system deemed to have a level of protection for individual rights and interests equivalent to that of Japan.

<Person Responsible for Managing Personal Information>

International Chemical Entity Japan Co., Ltd. (Representative Director and President:
Kailashdeep Sharma)

Article 6 (Procedures for Amending Privacy Policy)

ICE Japan will review the content of this Policy appropriately and endeavor to improve this Policy. The content of this Policy can be amended unless otherwise stipulated in laws, regulations, and this Policy. The amended Policy will be valid when notified to all Users or uploaded on ICE Japan's website in accordance with ICE Japan's procedures.

Article 7 (Compliance with Laws, Regulations and Norms)

ICE Japan will comply with the laws and regulations in Japan and other rules that are applicable to the Personal Information ICE Japan retains.

Article 8 (Response to Complaints and Consultations)

ICE Japan will respond appropriately and promptly to any consultation regarding complaints, disclosure request, amendment request and suspension of use from Users as to the handling of his or her Personal Information. ICE Japan will respond appropriately and promptly to any request for disclosure, correction, addition, deletion, refusal of use or provision regarding Personal Information.

Article 9 (Security Measures)

As to Personal Information provided by Users to ICE Japan shall be protected from illegal access, loss, destruction, falsification, leakage and other issues through organizational, physical, personal and technical measures such as restricting access to Personal Information files, recording access logs, and taking security measures to prevent illegal access from outside. If, by chance, any leakage and other incidents are occurred, ICE Japan will make report to the relevant authorities in accordance with the Personal Information Protection Act and relevant guidelines, and as per instructions to be given by the authorities, will take required measures to avoid an occurrence of similar incidents or the same type of incidents.

Article 10 (Address)

Address of ICE Japan is:

Address: 1-2 Keiseisaku, Jobanmisawamachi, Iwaki City, Fukushima Prefecture 971-8136

Article 11 (Customer Desk)

For inquiries concerning ICE Japan's policy of handling of Personal Information, please contact us as below at:

Address: 1-2 Keiseisaku, Jobanmisawamachi, Iwaki City, Fukushima Prefecture 971-8136

TEL: +81-246-44-5411

E-mail: info@icepharma.co.jp

II. Privacy Policy for Use of Websites of ICE Pharma Group

Information pursuant to EU regulation 2016/679 (GDPR)

This information is given pursuant to art. 13 of the European Regulation 2016/679 on the protection of personal data (hereinafter “GDPR”) and subsequent amendments and additions and the Italian reference legislation, including Legislative Decree no.101 of August 10, 2018, by the company **Ice spa – via Sicilia, 8/10 – 42122 Reggio Emilia – vat number 01227810353** (hereinafter also only “**Company**”), in its capacity as *Data Controller*, and is provided to those who interact with the web services of the *Company* accessible at the address <https://www.icepharma.com>

This information is provided with the aim of informing the user about the methods of *processing of the relevant personal Data*.

This *Data* may be collected because you voluntarily disclose it (for example, by writing to the *Company* through the “contact” section) or simply by analyzing the pages you browse on the site. The *Personal Data* processed through the site are specified in the following paragraphs.

Types of data collected and purposes

While browsing the site <https://www.icepharma.com> the *Data Controller* may acquire information about the visitor, in the following ways.

Browsing data

The computer systems and software procedures used to run this website acquire, during their normal operation, some data whose transmission is implicit when using Internet communication protocols. This information **CANNOT be associated with identified data subjects or include personal data**. This data category only includes IP addresses, URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained as answer, the numerical code indicating the status of the answer given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's computer environment.

These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and are deleted immediately after processing; currently the data on web contacts do not persist for more than 30 days.

Data provided voluntarily by the User

The optional, explicit and voluntary sending of electronic mail to the addresses mentioned on this site involves the acquisition by the Company of the sender's e-mail address and any other data eventually requested such as name, surname, address, telephone number (landline or mobile phone).

The data acquired in this way will be used only to process the user's request; to send the information specifically requested; to fulfil any obligations laid down by current laws, regulations or Community legislation and to satisfy any requests from the Authorities (tax, judicial, etc.)

They will not be used for marketing purposes without your prior express consent and will not be sold, transmitted, given or passed on to third parties in any way.

The legal basis for the processing of Personal Data for the purposes set out in the preceding sections is contained in Articles 6(1)(b); 6(1)(c), 6(1)(f), 9(2)(a), 9(2)(b) of EU Regulation 2016/679.

Optionality of data providing

Apart from that which is specified for browsing data, the user is free to provide or not personal data and browse anyway the various sections of the site, but failure to provide them will make it impossible to obtain any reply to requests made to **ice spa**.

Cookies

Cookies are used on our website to provide users with a better service and experience. For any information about this type of data and its *Processing*, please refer to the specific section <https://www.icepharma.com/cookies-policy>

Processing rules and modalities

Personal data are processed by computer and/or telematic tools for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures are observed to prevent the loss of data, illicit or incorrect use and unauthorized access.

The *Processing* is carried out by means of organizational methods and logic strictly related to the purposes indicated.

Data recipients

In addition to the *Data Controller*, the data may be accessed by some internal staff tasked with processing involved in the organization of the

site or in the provision of services (administrative staff, system administrators or other employees, all of whom are committed to confidentiality where they are not subject to specific formal legal obligations) formally appointed as *Authorized Persons to the Data processing* i.e. external persons/entities (such as third party technical service providers, hosting providers, IT companies, business partners responsible for processing online requests or other external consultants) formally appointed as *Data Processors* by the *Data Controller*. The updated list of the *Data Processors* can always be requested from the *Data Controller* by sending a specific communication to the addresses indicated in the “Contact details” section of this information.

Personal Data Protection

The *Data Controller* has implemented a study on the impact and risk assessment in relation to the *Data processing* according to GDPR regulations: it has, therefore, implemented specific security measures, observed by all staff tasked with the processing, to prevent data loss, illegal or incorrect use and unauthorized access.

These measures take into account:

- state-of-the-art technology
- the costs of its implementation
- the nature of the data
- the risk of processing

The purpose is to protect them from accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access, and other forms of unlawful processing. Moreover, when managing your personal data, **ice spa**:

- collects and processes personal data that are adequate, relevant and not excessive, as required to meet the above purposes

- ensures that such personal data remains up-to-date, accurate and appropriately erased

Retention times

Browsing data are deleted immediately after processing; at present, web contact data are not retained for more than 30 days.

Personal data are processed by computer and/or automated tools for the time strictly necessary to achieve the purposes for which they were collected. The data of the User who interacted through the section “Contacts” or “request for online services” will be erased after 12 months from the completion of the last useful contact.

Rights of the data subject

As Data Subject, you enjoy the rights under Art. 15 et seq. GDPR, namely the following rights:

1. to obtain from the Data Controller confirmation as to whether or not your personal Data are being processed and, if so, to obtain access to the Personal Data and the following information: -the purposes of the processing; -the categories of Personal Data concerned; -the recipients or categories of recipients to whom the Personal Data have been or will be disclosed, in particular if they are recipients from third countries or international organizations; -where possible, the proposed storage period of Personal Data or, if this is not possible, the criteria used to determine that period -if the Data are not collected directly from the data subject, any available information on their source; -the existence of an automated decision-making , including profiling and, at least in such cases, significant information on the logic used, as well as the importance and the envisaged consequences of such processing for the data subject.

2. to obtain from the Data Controller the rectification of your incorrect Personal Data without undue delay. Taking into account the purposes of the processing, the data subject has the right to obtain the integration of incomplete personal Data, even by providing a supplementary declaration.
3. to obtain from the Data Controller the erasure of your Personal Data without undue delay, if any of the following reasons apply: (a) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (b) the data subject withdraws the consent on which the processing is based in accordance with GDPR Article 6(1)(a) or Article 9(2)(a), and if there is no other legal ground for the processing; (c) the data subject objects to the processing pursuant to Article 21(1) and there is no overriding legitimate grounds for the processing, or the Data Subject objects to the processing pursuant to GDPR Article 21(2); (d) the Personal Data have been unlawfully processed; (e) the Personal Data must be erased for compliance with a legal obligation imposed by the Union or Member State law to which the Data Controller is subject; (f) the Personal Data have been collected in connection with the offer of information society services referred to in GDPR Article 8(1).
4. to obtain from the Data Controller the restriction of the processing when one of the following applies: (a) the accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the Personal Data; (b) the processing is unlawful and the data subject opposes the erasure of the Personal Data and requests the restriction of their use instead; (c) the Data Controller no longer needs the personal Data for processing purposes, but the Personal Data are necessary for the establishment, exercise or defence of legal claims; (d) the Data Subject has objected to the processing pursuant to GDPR Art. 21(1), pending the verification as to whether the legitimate grounds of the Data Controller prevail over those of the Data Subject.

5. to receive in a structured, commonly used and machine-readable format your Personal Data provided to a Data Controller and transmit such Data to another Data Controller without hindrance from the Data Controller to which the Personal Data have been provided where: a) the processing is based on consent or on a contract; b) the processing is carried out by automated means. In exercising his or her rights in relation to Data portability, the data subject has the right to have the Personal Data transmitted directly from one Data Controller to another, where technically feasible.
6. to object at any time, on grounds relating to your particular situation, to the processing of your Personal Data pursuant to GDPR Art. 6(1) (e) or (f), including profiling on the basis of those provisions.
7. not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you similarly significantly affects you.
8. to lodge a complaint with a supervisory authority.

Contact details

For any need or to exercise the rights referred to in the preceding article write to the *Data Controller* **of ice s.p.a. –via sicilia, 8/10 – 42122 reggio emilia** or send an e-mail to privacy@icepharma.com

Changes to this privacy policy

Any future changes or additions to the processing of personal data as described in this Privacy Policy will be posted on the following site:

[Privacy Policy – ICE Pharma](#)