

PRIVACY NOTICE

FOR THE VIFOR PHARMA GROUP

CONFIDENTIAL HELPLINE

1. What is the purpose of this privacy notice?

This privacy notice explains how we, Vifor Pharma Management AG, collect and use the Personal Data provided to us through or in connection with the Confidential Helpline. It also explains your rights in relation to your Personal Data.

Further information about the Confidential Helpline and associated procedures is available in the Vifor Pharma Group's Internal Misconduct Reporting Policy.

2. Definitions

"Confidential Helpline" means a system established for collecting (also anonymously) and handling reports of alleged misconduct.

"Investigators" means selected persons to whom the Head of Compliance Department assigns and delegates responsibility for investigating reports of alleged misconduct. In some cases the investigators may be external to the company e.g. outside counsel.

"Messenger" means any internal or external person who reports any identified or potential violations of applicable laws or regulations or the Vifor Pharma Group's Code of Conduct and Business Ethics or other internal regulations.

"Personal Data" means any information relating to an identified or identifiable person. A person is "identifiable" if it is possible to determine, directly or indirectly, his/her identity from one or more pieces of information.

3. What Personal Data do we collect and why?

As a publicly listed company, Vifor Pharma has a legal obligation to establish and maintain a compliance program. A system allowing potential misconduct to be reported confidentially is an important component of such a program.

Personal Data collected through or in connection with the Confidential Hotline and any subsequent investigation is used to verify and investigate the alleged violation and for subsequent follow-up action such as disciplinary procedures or reporting to law enforcement or other public authorities.

Messengers submitting reports in good faith will be protected from retaliation.

The content of a report made through the Confidential Helpline is within the Messenger's discretion. Personal Data could be included in such reports or could be added in the course of subsequent investigation, case handling or follow-up actions. Personal Data collected through or in connection with the Confidential Helpline could include the following categories of information to the extent it relates to an identified or identifiable person:

- name, address, title / function;
- contact details such as telephone number, email address;
- alleged facts of the violation;
- information collected during case handling and investigation;
- investigation reports;
- other information relating to the alleged misconduct and the persons concerned.

It cannot be excluded that sensitive Personal Data such as information concerning health or ethnicity could be reported or otherwise collected through or in connection with the Confidential Helpline.

You are entitled to submit your report anonymously. If you identify yourself when submitting a report, we will disclose your identity to those who need to know to follow up on the report. Where a report leads to an investigation by a law enforcement or other public authority or in case of judicial proceedings, if your identity is known to us we could be required by applicable law to disclose your identity to safeguard the rights of defence of the person about whom allegations of misconduct were made. Provided that you submitted your report in good faith, your identity will not be otherwise disclosed without your consent.

In case of web submission by the Messenger the operator of the Confidential Helpline collects the IP address for IT security purposes. This is not passed on to Vifor Pharma.

4. Who will receive access to the Personal Data?

Personal Data will be exported to the servers of the Confidential Helpline in the European Union. The companies operating the Confidential Helpline and providing transcription and translation services, also located in the European Union, will have access to the information in order to perform their services. Personal Data will be accessible to authorized personnel of the Vifor Pharma Group's operational headquarters in Switzerland. Further access will be granted to selected persons inside or outside the Vifor Pharma Group to the extent required for the investigation and follow-up actions. Outside counsel or other external advisors may need to be engaged. The foregoing persons will be appointed on a strict need-to-know basis and will be required to keep the Personal Data confidential. It may also be necessary to report the Personal Data to law enforcement or other public authorities.

It is unlikely that Personal Data collected about persons located in Switzerland, the EU or the UK will need to be made available outside that region. If it is necessary to transfer the data outside that region, where the recipients are located in countries not deemed by the European Commission to provide adequate protection, the Personal Data will be protected by officially approved standard contractual clauses or other appropriate safeguards in compliance with applicable law. A copy of the standard contractual clauses is available from the Group Data Protection Officer (GroupDPO@viforpharma.com).

5. For how long will we retain your Personal Data?

The Investigator will delete or anonymize the Personal Data once it is no longer required for case handling, investigation or follow-up purposes unless legitimate reasons exist to retain the information such as to comply with legal retention periods or to defend possible legal claims.

6. What are your privacy rights?

You may access your Personal Data subject to the privacy of third parties and the confidentiality of the Vifor Pharma Group's confidential business information. Within the limits of applicable law and Vifor Pharma's legitimate interest in assuring a proper investigation of alleged misconduct, you may require your Personal Data to be erased, that errors be corrected or that processing of your Personal Data be restricted. You may also object to our processing of your Personal Data or exercise your right of data portability where applicable.

You are entitled to lodge a complaint with the data protection authority in the country where you live if you are dissatisfied with the way we handled your Personal Data.

If you wish to exercise your privacy rights please contact us as specified below.

7. How can you contact us?

If you have any questions about this privacy notice or if you wish to exercise your privacy rights, you may contact us in any of the following ways:

- Our Group Data Protection Officer:
Vifor Pharma Management Ltd.
Flughofstrasse 61
P.O. Box
CH-8152 Glattbrugg
Switzerland
Tel. + 41 58 851 80 00
GroupDPO@viforpharma.com
- The "controller" of the Personal Data:
Vifor Pharma Management Ltd.
Flughofstrasse 61
P.O. Box
CH-8152 Glattbrugg
Switzerland
Tel. + 41 58 851 80 00
- Our representative in the EU / EEA for data privacy purposes:
Vifor Pharma Deutschland GmbH
Baierbrunner Strasse 29
D-81379 Munich
Germany
dataprivacy_EEArep@viforpharma.com
- Our representative in the UK for data privacy purposes:
Vifor Pharma UK Ltd.
Second Floor, Waterfront
Watermans Business Park
Kingsbury Crescent
Staines-upon-Thames
TW18 3BA
United Kingdom
Tel: +44 01276 853 600
infovpuk@viforpharma.com