



Privacy Notice for Healthcare professionals

Last updated: July 21, 2026

1. About this Notice

- 1.1 This Privacy Notice ("**Notice**") explains how we (as defined below) collect, share and use any information that, alone or in combination with other information, relates to you ("**Personal Data**") ("**you**" and "**your**").
- 1.2 This Notice also sets out the rights that you have in relation to the Personal Data that we process about you and how you can exercise them.
- 1.3 Orano Med treats compliance with its privacy obligations seriously. This is why we have developed this Notice, which describes the standards that Orano Med applies to protect Personal Data.
- 1.4 For the purposes described in this this Notice, Orano Med Theranostics SAS ("**Orano Med**", "**we**", "**us**", "**our**") with registered office at 125 RUE EDOUARD VAILLANT – 94800, VILLEJUIF – FRANCE and registered under number 980626055 generally acts as the data controller for your Personal Data. In certain circumstances, other companies within the Orano Med group may also process your personal data as independent controllers where they independently determine the purposes and means of the processing. This may occur, for example, in connection with medical, clinical research and scientific affairs, or other group-wide business operations). As a data controller, Orano Med is responsible for ensuring that the processing of Personal Data complies with applicable data protection law, and specifically with the General Data Protection Regulation.
- 1.5 Please take the time to read this Notice carefully. If you have any questions or comments, please contact our DPO via g-orn-oranomed-dpo@orano.group.

2. What Personal Data does Orano Med collect and why?

- 2.1 The types of Personal Data that we may collect about you, and the reasons why we process it, include:

Why we collect it	Types of Personal Data	Legal basis
Clinical trials /studies Your personal data is processed to: • assess and manage your participation in conduction clinical trials/studies,	Identification data (e.g., name, address), contact details (e.g., email address, phone number), professional information (such as qualifications), affiliation with a healthcare institution or research site, answers adverse events	Legal obligation (Art. 6(1)(c) GDPR)

and ensure compliance with regulatory and specific requirements in the context of clinical trials/studies		
Research activities including the assessment of patient eligibility and the conduct of surveys aimed at collecting operational feedback	Identification data (e.g., name, address), contact details (e.g., email address, phone number), professional information (such as qualifications), affiliation with a healthcare institution or research site, and input on research	Legal obligation (Art. 6(1)(c) GDPR): to comply with pharmacovigilance obligations; or legitimate interest (Art. 6(1)(f) GDPR)
Trainings: give or attend training	Identification data, contact details, role and working place	Legitimate interest (Art. 6(1)(f) GDPR): Support scientific training and knowledge sharing
Event management: participation in advisory boards or expert panels (e.g. Steering Committees or Data and Safety Monitoring Board)	Identification data, contact details, affiliation with a healthcare institution or research site, area of expertise	Performance of a contract with you (Art. 6(1)(b) GDPR) or Legitimate interest (Art. 6(1)(f) GDPR): inform, support and improve its research and development activities.
Administrative management: finance, accounting and transparency requirements (French transparency platform)	Identification data, contact details, affiliation with a healthcare institution or research site, financial details, tax data, payment and reimbursement details	Legal obligation (Art. 6(1)(c) GDPR and anti-gifts law): or legitimate interest (Art. 6(1)(f) GDPR)
IT management: ensure operability and security of information systems when we assign you an account	Identification data, login credentials, access logs, affiliation with a healthcare institution or research site, financial details	Legitimate interest (Art. 6(1)(f) GDPR): integrity and proper functioning of our internal systems
Pharmacovigilance and patient safety reporting	Identification data, contact details, role in reported event,	Legal obligation (Art. 6(1)(c) GDPR)

	answers to product complaints and adverse events	
Handling complaints, disputes and legal claims	Identification data, contact details, professional information, correspondence, relevant supporting documentation	Legal obligation (Art. 6(1)(c) GDPR) and/or legitimate interest (Art. 6(1)(f) GDPR) in defending legal rights

If we ask you to provide any other Personal Data not described above, then the Personal Data we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect that Personal Data.

- 2.2 From time to time, we may receive Personal Data about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your Personal Data to us.
- 2.3 The types of Personal Data we collect from third parties may include contact details and professional information relating to health care professionals provided by research institutions, clinical sites or other relevant third parties. We use this Personal Data we receive from these third parties to verify and update the accuracy of our records about you.
- 2.4 In general, we will use the Personal Data we collect from you only for the purposes described in this Notice or for purposes that we explain to you at the time we collect your Personal Data. However, we may also use your Personal Data for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

3. Who does Orano Med share your Personal Data with?

- 3.1 We may disclose your Personal Data to the following categories of recipients:
- (a) to **our group companies** for purposes consistent with this Notice. We take precautions to allow access to Personal Data only to those staff members who have a legitimate business need for access and with a contractual prohibition of using the Personal Data for any other purpose.
 - (b) to **our third party vendors, services providers and partners** who provide data processing services to us, or who otherwise process Personal Data for purposes that are described in this Notice or notified to you when we collect your Personal Data. This may include disclosures to third party vendors and other service providers we use in connection with the services they provide to us, including to support us in areas such as managing résumé/CV information, IT platform management or support services, infrastructure and application services, marketing, data analytics, business travel service providers;
 - (c) to **any competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, including without limitation the French

transparency platform (<https://transparence.sante.gouv.fr/pages/accueil/>), (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;

- (d) to **our auditors, advisors, legal representatives and similar agents** in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the Personal Data for any other purpose;
- (e) to **a potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your Personal Data only for the purposes disclosed in this Notice; and
- (f) to any other person if you have provided your prior consent to the disclosure.

4. How we protect your privacy

4.1 We will process Personal Data in accordance with this Notice, as follows:

- (a) **Fairness:** We will process Personal Data fairly. This means that we are transparent about how we process Personal Data and that we will process it in accordance with applicable law.
- (b) **Purpose limitation:** We will process Personal Data for specified and lawful purposes, and will not process it in a manner that is incompatible with those purposes.
- (c) **Proportionality:** We will process Personal Data in a way that is proportionate to the purposes which the processing is intended to achieve.
- (d) **Data accuracy:** We take appropriate measures to ensure that the Personal Data that we hold is accurate, complete and, where necessary, kept up to date. However, it is also your responsibility to ensure that your Personal Data is kept as accurate, complete and current as possible by informing Orano Med of any changes or errors. You should notify your Orano Med point of contact (or our generic DPO email address) of any changes to the Personal Data that we hold about you (e.g. a change of address).
- (e) **Data security:** We use appropriate technical and organisational measures to protect the Personal Data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Data.
- (f) **Data processors:** We may engage third parties to process Personal Data for and on behalf of Orano Med. We require such data processors to process Personal Data and act strictly on our instructions and to take appropriate steps to ensure that Personal Data remains protected.
- (g) **International data transfers:** Your Personal Data may be transferred to, and processed in, countries other than the country in which you are resident. These

countries may have data protection laws that are different to the laws of your country.

Specifically, our servers are located in France, and our group companies and third-party service providers and partners operate in the United States. This means that when we collect your Personal Data we may process it therein.

However, we have taken appropriate safeguards to require that your Personal Data will remain protected in accordance with this Notice. This includes implementing the European Commission's Standard Contractual Clauses for transfers of Personal Data between our group companies, which require all group companies to protect Personal Data they process from the EEA in accordance with European Union data protection law.

(h) **Data Retention:**

We retain your personal data only for as long as necessary to fulfil the purposes for which such data are collected and processed, in accordance with applicable laws and our internal retention policies.

In particular:

- personal data relating to professional interactions with healthcare professionals (including contact details, professional information, records of scientific or medical exchanges, participation in meetings, events or advisory boards) are generally retained for the duration of the professional relationship and thereafter for a period of 5 years, unless a longer retention period is required or permitted by applicable law;
- personal data processed to comply with our legal or regulatory obligations (including pharmacovigilance, product safety, transparency and anti-corruption requirements) are retained for the **statutory retention periods** imposed by applicable laws;
- where personal data are processed on the basis of consent, such data are retained until the consent is withdrawn or expires, and thereafter for any additional period required to demonstrate compliance with our legal obligations.

At the end of the applicable retention period, personal data are securely deleted or anonymised, in accordance with our internal procedures, unless further retention is required by law or for the establishment, exercise or defence of legal claims.

5. Your data protection rights

5.1 You have the following data protection rights:

- (a) If you wish to **access, correct, update or request deletion** of your Personal Data, you can do so at any time by contacting us via g-orn-oranomed-dpo@orano.group.

- (b) In addition, in certain circumstances, as stipulated in the applicable data protection legislation, you can **object to processing** of your Personal Data, ask us to **restrict processing** of your Personal Data or **request portability** of your Personal Data. Again, you can exercise these rights by contacting us via g-orn-oranomed-dpo@orano.group.
- (c) If we have collected and process your Personal Data with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data conducted in reliance on lawful processing grounds other than consent.
- (d) You have the **right to opt-out of marketing communications** we may send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we may send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided above.
- (e) If you have a complaint or concern about how we are processing your Personal Data then we will endeavour to address such concern(s). If you feel we have not sufficiently addressed your complaint or concern, you have the **right to complain to a data protection authority** about our collection and use of your Personal Data. For more information, please contact the:

Commission nationale de l’informatique et des libertés (CNIL)

3 Place de Fontenoy, TSA 80715, 75334 Paris Cedex 07, France

<https://www.cnil.fr>

- (f) You have the right to define general or specific directives regarding the use and disclosure of your personal information after your death according to the French Data Protection Act.

5.2 We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

6. Updates to this Notice

6.1 We may update this Notice from time to time in response to changing legal, technical or business developments. When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Notice changes if and where this is required by applicable data protection laws.

6.2 You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Notice.