

HCP/HCO Methodological Note Template

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SIFI Spa Methodological note for HCP/ORDM/HCO disclosure 2025

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1 Definitions

1.1 Recipients

Consultant ophthalmologists who are experts in treating corneal infections

1.2 Kind of ToVs

Contracted Services – Fees, Expenses

Contribution to Cost of Events – Registration Fees, Travel & Accommodation

2 Disclosure's Scope

2.1 Products concerned

None

2.2 Company concerned

SIFI Spa

2.3 Excluded ToVs

None

2.4 ToVs date

March – May 2025

2.5 Direct ToVs

All are fees for services

2.6 Indirect ToVs

None

2.7 Non-monetary ToVs

None

2.8 ToVs in case of partial attendances or cancellation and refund

None

2.9 Cross-border activities

Cost of events was for congresses in Prague, Czech Republic, Germany

2.10 R&D

None

2.11 Voluntary disclosure

None

3 Specific considerations

3.1 Country unique identifier

Not included

3.2 Self-incorporated HCP

Fu Enterprises Ltd

3.3 Multi-year agreements

None

3.4 Country specificities

None

3.5 Quality Checks

Purchase orders for all HCPs, contracts signed]

4 Data protection legal basis

4.1 Consent collection

Contracts signed by all HCPs]

Recipients are aware of disclosure requirements

4.2 Legitimate interests

Recipients will be made aware of the process

5 Form of disclosure

5.1 Date of publication

30/6/26]

5.2 Disclosure platform

Disclosure UK – www.disclosureuk.org.uk

5.3 Disclosure language

English]

6 Disclosure financial data

6.1 Currency

GBP

6.2 VAT included or excluded

Not including VAT

6.3 Calculation rules

EURO to GBP – 1 EURO = 0.86 GBP (26/5/26)

7 Additional Information

None