

Personal Data Protection Policy

PROMED d.o.o.

Version: 1.0

Applicable from 16 November 2022

1. INTRODUCTORY INFORMATION

Promed d.o.o. takes the security of your personal data very seriously.

Whenever we process your personal data, we make sure we comply with the applicable Slovenian and European law, in particular the Personal Data Protection Act (Official Gazette of the RS, No. 94/07) and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation or GDPR).

The purpose of this Personal Data Protection Policy (hereinafter: the Policy) is to inform you about the collection and processing of personal data that we carry out. This Policy also defines the methods of collecting your personal data, the purposes of collection, security measures and third parties with whom we may share your personal data and your rights related to personal data protection.

This Policy shall apply to:

- all users of our website www.promed.si (hereinafter: the Website),
- e-newsletter subscribers,
- inquires about our service and product range, via telephone, e-mail, printed forms or online forms,
- our suppliers and customers,
- medical professionals that we cooperate with in the direct marketing of our products,
- individuals reporting the adverse effects of medicinal products (pharmacovigilance).

2. PERSONAL DATA CONTROLLER

This Policy shall apply to all personal data collected and stored by PROMED, d.o.o., Leskoškova cesta 9d, 1000 Ljubljana (hereinafter: Promed, we or us).

Promed is the data controller of your personal data collected and processed by Promed and as such it is responsible for the processing and storing of your personal data.

Contact with the controller:

In addition to our authorised data protection officer, you can contact us using the contact information below if you have any questions regarding this Policy or the collection and/or processing of your personal data by Promed:

- info@promed.si stating “personal data protection” as the subject.
- 01 520 23 02
- PROMED d.o.o., Leskoškova 9e, 1000 Ljubljana, with the inscription “personal data protection”.

This Policy does not regulate contractual relationships between Promed and contractual processors.

3. DEFINITIONS

Below are some basic definitions of the terms used herein.

For the purposes of this Policy, the terms below shall have the meaning defined in this Chapter.

Processing means any activity related to personal data, such as collection, storage, access and all other forms of using personal data;

Personal data means any information relating to an identified or identifiable natural person ('data subject'), in particular a name, an identification number, online identifiers as well as factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Controller means the legal person that determines the purposes and means of the processing of your personal data. For the purposes of this Policy, the controller of personal data is Promed.

Processor means a natural or legal person who processes personal data on behalf of the controller. The processors we use are stated herein;

Medical professionals mean natural persons who are active in the medical and pharmaceutical profession (including hospitals, healthcare centres, pharmacies, etc.) with whom we cooperate;

EGP means the European Economic Area comprising all EU Member States, Iceland, Norway and Lichtenstein.

4. PERSONAL DATA PROCESSING

Promed only processes your personal data based on clearly expressed and lawful purposes specified herein. In collecting and processing personal data, we are guided by the data minimisation principle and therefore regularly ensure that only personal data that is necessary for each specific purpose of the processing are processed.

We also ensure the transparency of personal data processing and will therefore inform you about processing in advance by referring you to the Policy or, if necessary, in a separate notification.

We obtain your personal data when you provide it (e.g. upon subscribing to our e-newsletter or reporting an adverse effect of a medicinal product), as well as from public data records (such as published e-mail addresses on websites of healthcare institutions).

4.1. Which personal data do we collect?

Promed can collect the following personal data:

- Basic personal data (name, surname);
- Basic contact data (telephone number, office telephone number, e-mail address, office e-mail address, business address);
- Basic data about the company/institution that you work for (name of the company, your function in the company);
- Basic data about your profession (your education, specialisation information).

We strive to keep the personal data that we collect and process accurate, complete and up to date. We therefore request that you notify us of any change to your personal data by emailing info@promed.si as soon as possible, with the subject line "PDP – Change of personal data". We will correct and complete your personal data in the shortest time possible.

4.2. What is the legal basis for data processing?

Your personal data can be processed based on the following legal basis:

- the conclusion and implementation of a **contract** you have concluded with us;
- processing on the basis of your explicit **consent**, while you have the right to withdraw the given consent at any time;

- the processing of personal data can also be performed on the basis of our **legitimate interests** (when processing data based on legitimate interest, we will explicitly define this within this Policy. We will also process the data on the basis of legitimate interests taking into account your rights and freedoms).
- The processing of personal data is carried out whenever it is imposed by **legislation** (this includes data that we keep for the purpose of implementing the procedures of reporting adverse effects of medicinal products).

The obligation to provide personal data applies only to the personal data that we collect on the basis of legislative requirements.

The provision of personal data that we need in order to implement the contract is voluntary. However, if you do not provide us with all the personal data we need to fulfil our contractual obligations, we will not be able to provide the services that are the subject of the respective contract.

Consent is always freely given and without any negative consequences. However, be advised that we will not be able to provide certain services (such as sending e-newsletter) without your consent or after you withdraw your consent.

4.3. The purposes of processing

We will only process your data on the basis of pre-determined, explicit and lawful purposes. We undertake not to process your personal data in a manner incompatible with the purposes defined herein.

We will use your personal data for the following purposes:

- **The conclusion and implementation of the contract.** This includes the data needed to execute an order, communicate with you about the implementation of the contract, check the payment and fulfil other obligations arising from the contract.
- **Sending the e-newsletter** about novelties and changes in our product and service range.
- **Communicating with you regarding your inquiries** (answering your inquiries made over the internet or over the telephone). We provide such communication on the basis of our legitimate interest to ensure effective communication and the improvement of the Company's performance.
- **Marketing our products directly to individual medical professionals.** This includes direct marketing communication with individuals with whom we cooperate and individuals with whom we wish to participate in the future. Personal data is processed on the basis of our legitimate interest in the efficient operation of the Company.
- **Transmitting personal data to third parties.** We may transmit your personal data to third parties in order to realise the purposes of personal data processing. Read more about the transmission of your personal data in Chapter 6 herein.
- **Controlling the safety of medicinal products** by collecting, detecting, evaluating and preventing adverse effects of medicinal products.
- **Compliance with legal requirements.**
- **For the enforcement of any legal claims and dispute resolution.** Personal data may be disclosed when this is necessary to protect our business and to enforce and/or protect our rights. We will only disclose your personal data in the manner and under the conditions required by law.
- **For the purposes of statistical analyses.**

- **Retention of candidate data for vacant positions relating to candidates that have not been selected in the procedure.**

Promed may use your personal data for one or more of the said purposes.

Should the need arise to process personal data that is incompatible with the purposes set out above, we will duly inform you thereof in advance and, if necessary, request your consent.

You have the right to cancel the processing of personal data that is carried out on the basis of your consent at any time. You can withdraw your consent by contacting us through any of the contact information given in Chapter 2 herein.

4.4. How long do we retain your personal data?

We store personal data in accordance with the applicable legislation, namely:

- only as long as it is strictly necessary to achieve the purposes for which the data was collected;
- for the period prescribed by law; or
- for the period necessary for the implementation of the contract, which includes warranty periods and deadlines during which it is possible to file any claims on the basis of a concluded contract (e.g. 5 years after the fulfilment of contractual obligations).

When personal data is obtained on the basis of your consent, we retain it permanently or until you withdraw your consent (see Chapter 7 of this Policy for more information on how to withdraw your consent). If the purpose of collecting personal data has been achieved, we will erase the data even if you did not withdraw consent (for example, if the e-newsletter is discontinued, the personal data we need to send it will be deleted, even though you have not withdrawn consent).

We will delete, destroy or anonymise personal data for which the retention period has expired (e.g. because the statutory deadline has expired or because the consent has been withdrawn), in such a way that the reconstruction of personal data will no longer be possible.

5. PERSONAL DATA PROTECTION

In order to ensure an adequate level of personal data protection, Promed has adopted various technical and organisational measures, in particular:

- the regular operational checking and updating of computer hardware and software;
- limitation of access to personal data;
- creating regular backups that are adequately protected against unauthorised interventions;
- providing training to the Company's employees regarding the handling of personal data;
- controlling the conduct of the employees and contractual processors who process personal data, including conducting audits;
- setting up protocols in case of potential security incidents.

We protect your personal information against unlawful or unauthorised processing and/or access, and against deliberate or unintended loss, destruction or damage. We adopt all measures according to our technological capabilities (including the cost of implementing certain measures) and the assessed impact on your privacy.

In the event of a breach of personal data protection, Promed will inform the Information Commissioner, who is the competent supervisory authority in Slovenia, without any delay.

A potential breach of personal data protection involving a suspicion of a criminal offence will be reported by Promed to the police and the competent state prosecutor's office.

In the event of a breach of data protection that could significantly infringe the rights and freedoms of individuals, Promed will inform you about such an event without delay.

6. AUTOMATED DECISION-MAKING

We do not use automated decision-making, including profiling.

7. THE TRANSMISSION OF PERSONAL DATA

We may transmit your personal data to the third parties referred to in this chapter, but only when necessary to achieve the purpose for which it was collected. Any third party to whom we transmit personal data may only process the data for the purposes for which it was collected. All third parties with whom we cooperate are obligated to respect the applicable legislation in the field of personal data protection and the provisions of this Policy.

We may transmit your personal data to:

1. **associated companies;**
2. **contractual processors** providing certain services: in particular, these include lawyers, information system maintenance providers, external accounting, CRM maintenance providers, etc.
3. **if the law so requires** (e.g. tax authorities, court, regulatory bodies in the interest of public health protection, etc.).

We may also transmit your personal data to third parties outside the European Economic Area (EEA), where such data may be processed by us or by an individual third party. Whenever data is transmitted outside the European Economic Area, we will ensure that appropriate additional measures are taken to ensure the security of your personal data.

The measures referred to in the preceding paragraph consist primarily of agreements with third parties on the establishment of binding rules on personal data protection, the conclusion of a contract governing relations with regard to the protection of personal data and the verification of whether the third party holds any certificates that meet our standards of personal data protection.

8. THE RIGHTS OF THE DATA SUBJECTS

You have the following rights regarding personal data processing:

- 8.1. **The right of access to personal data:** we will provide you with information about whether we are processing your personal data and, if so, you can request access to the personal data and certain information on processing (which data is being processed and the source of this data).
- 8.2. **The right to the rectification of personal data:** on the basis of your request, we will rectify or complete incomplete or inaccurate data relating to you that we process.
- 8.3. **The right to request restriction of processing:** on the basis of your request, we will restrict the processing of your personal data; please note that the restriction of processing is a limited right that cannot be applied to all personal data processing (restriction of processing is possible, for example, if the accuracy or completeness of the personal data can be verified).

- 8.4. **The right to the erasure of personal data:** we will ensure the erasure of your personal data, but be advised that we cannot delete personal data that we keep due to legal requirements or on the basis of a contractual relationship.
- 8.5. **The right to a copy of your personal data:** on your request, we will send you your personal data in a structured, commonly used and machine-readable format.
- 8.6. **Withdrawal of consent:** you can withdraw your consent to use your personal data at any time. After withdrawal, we will erase all the data that we collected and processed on the basis of consent and discontinue further processing. You can withdraw consent through any of the contact information given in Chapter 2 of this Policy. The withdrawal of the consent has no negative consequences, but it may be impossible to provide certain services following withdrawal.
- 8.7. **The right to object to the processing of personal data,** which you may exercise when processing is being carried out for direct marketing purposes or for the transmission of your personal data to third parties for the purposes of direct marketing. You can object using the contact information given in Chapter 2 of this Policy.
- 8.8. **The right to data portability:** at your request, we will send you your personal data in a structured, commonly used and machine-readable format. You are entitled to provide this data to another controller of your choice.

You can exercise all these rights by contacting us through any means defined in Chapter 2 of this Policy. You can also contact us through this contact information if you need any additional information regarding your rights.

If you believe that the processing of your personal data has occurred in breach of the personal data protection, you have the right to file a complaint against us with the Information Commissioner, who is the authorised supervisory authority for the protection of personal data in Slovenia.

Promed reserves the right to request certain personal data (such as name, surname, e-mail address) for the purpose of identifying an individual, if any right referred to in this chapter is exercised.

9. FINAL PROVISIONS

Promed may change this Policy and shall inform you of such changes in advance. By continuing to use our services and/or our website after the new version of the Policy has entered into force, you agree to the changes made.

This Policy shall enter into force on: 16 November 2022