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## **DATA PRIVACY**

At Biocodex, Privacy and data protection rights are very important to us.

Data protection is the safeguarding of the Privacy of individuals in relation to the processing of personal data. We have collected our Data Privacy Notices on this site, please select your country of residence from the above links to Access the notices in your language.

Inquiries about data Privacy at Biocodex Nordics should be addressed to:

[dataprivacy@biocodex.fi](mailto:dataprivacy@biocodex.fi)

or

Data Privacy

Metsänneidonkuja 4, P.O. Box 52, FI-02101 Espoo

+358 9 329 59100

## COOKIE POLICY

### Use of cookies

Certain BIOCODEX websites may employ an industry-wide technology called cookies. A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are.

A cookie will typically contain the name of the domain from which the cookie has come, the 'lifetime' of the cookie, and a value, usually a randomly generated unique number.

Two types of cookies may be used on this website; 'session cookies', which are temporary cookies that remain in the cookie file of your browser until you leave the site, and 'persistent cookies', which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

### When you visit our website we send you a cookie. Cookies may be used in the following ways:

To help us recognize you as a unique visitor (just a number) when you return to our website and to allow us to tailor content or advertisements to match your preferred interests or to avoid showing you the same adverts repeatedly.

To compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website. We cannot identify you personally in this way. Certain BIOCODEX websites may use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to compile anonymous, aggregated statistics as described above. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

### Disabling/enabling cookies

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our site if cookies are disabled.

There are a number of ways to manage cookies. Please refer to your browser instructions or help screen to learn more about these functions. For example, in Internet Explorer, you can go to the Tools/Internet options/Security and Privacy Tabs to adapt the browser to your expectations. If you use different computers in different locations you will need to ensure that each browser is adjusted to suit your cookie preferences.

### Controls for your privacy needs

Some modern browsers have a feature that will analyze website privacy policies and allow a user to control their privacy needs. These are known as 'P3P' features (Privacy Preferences Platform).

You can easily delete any cookies that have been installed in the cookie folder of your browser. For example, if you are using Microsoft Windows Explorer:

- open 'Windows Explorer'
- click on the 'Search' button on the tool bar
- type "cookie" into the search box for 'Folders and Files'
- select 'My Computer' in the 'Look In' box
- click 'Search Now' Double click on the folders that are found
- 'Select' any cookie file
- hit the 'Delete' button on your keyboard

If you are not using Microsoft Windows Explorer, then you should select 'cookies' in the 'Help' function for information on where to find your cookie folder.

The Interactive Advertising Bureau is an industry body which develops standards and guidelines to support online business processes. Its website gives further details about cookies, web beacons and suchlike, and explains how they can be managed and disabled.

## EVENTS DATA PRIVACY NOTICE

### Controller

Biocodex

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

(hereafter "we" or "**Biocodex**")

### Contact person for register matters

Data Privacy Officer

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

### Name of register

Events data register

### What is the legal basis for and purpose of the processing of personal data?

The basis for processing personal data is to fulfil the Biocodex business purpose, e.g. the legitimate interest of the company based on customer relationship or other connection or; the performance of a contract.

The purpose of the processing of personal data is:

- to be able to facilitate events
- keep up to date client/customer/partner requirements
- fulfill the contractual obligations

### What data do we process?

We process the following personal data of the customer or other data subject in connection with the customer register:

- ***basic information of the data subject*** such as name\*, birth date, customer number\*;
- ***contact information\* of the data subject*** such as email address, phone number, address;
- ***information regarding the company and its contact persons***, such as business ID and names, contact information and occupation of the contact persons;
- ***event participation details and possible information regarding the event***, such as dietary details;
- ***other possible information collected based on the consent of the data subject***

Providing the information marked with a star is a prerequisite for our contractual relationship and/or customer relationship. We cannot deliver the product and/or service without the necessary information.



### From where do we receive information?

We receive data primarily from the following sources: from the data subject himself, from the population register, from the authorities, from contact information serviceproviders and from other similar reliable sources.

For the purposes described in this privacy notice, personal data may also be collected and updated from publicly available sources and based on information received from authorities or other third parties within the limits of the applicable laws and regulations.

### To whom do we disclose data and do we transfer data outside of EU or EEA?

Biocodex has business partners and third-party service partners within the European Economic Area (the “EEA”). We may transfer personal data to our partners in the EU/EEA countries but not outside. Such partners include IT service providers, catering companies, travel companies and other similar service providers.

### How do we protect the data and how long do we store them?

Only those of our employees, who on behalf of their work are entitled to process customer data, are entitled to use a system containing personal data. Each user has a personal username and password to the system. The information is collected into databases that are protected by firewalls, passwords and other technical measures.

The databases and the backup copies of them are in locked premises and can be accessed only by certain pre-designated persons.

We store the personal data for as long as is necessary considering the purpose of the processing. We regularly assess the need for data retention in light of the applicable legislation. In addition, we take reasonable measures to ensure that the personal data in the register is not incompatible, obsolete or inaccurate considering the purpose of the processing. We rectify or delete such information without delay.

### What are your rights as a data subject?

As a data subject you have a right to inspect the personal data concerning yourself, which is stored in the register, and a right to require rectification or erasure of the data, provided that the request has a legal basis. You also have a right to withdraw or change your consent.

As a data subject, you have a right, according to EU’s General Data Protection Regulation (applied from 25.5.2018) to object processing or request restricting the processing and lodge a complaint with a supervisory authority responsible for processing personal data.

For specific personal reasons, you also have the right to object to profiling and other processing operations, when the processing of your data is based on our customer relationship with you. In connection with your request, you will need to identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

As a data subject you have the right to object to processing at any time free of charge, including profiling in so far as it relates to direct marketing.

#### Who can you be in contact with?

All contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section “Contact person for register matters”.

#### Changes in the privacy notice

Should we make amendments to this privacy notice we will place the amended statement on our website, with an indication of the amendment date. If the amendments are significant, we may also inform you about this by other means, for example by sending an email or placing a bulletin on our homepage. We recommend that you regularly visit our webpage and notice possible amendments to this privacy notice. Review these privacy protection principles from time to time to ensure you are aware of any amendments made.

## E-LEARNING DATA PRIVACY NOTICE

### Data privacy notice, e-learning

#### Controller

Biocodex

22 rue des Aqueducs– 94250 Gentilly Cedex –

France [+33 \(0\)1 41 24 30 00](tel:+332141243000)

[DPO@biocodex.com](mailto:DPO@biocodex.com)

(hereafter "we" or "Biocodex")

### Contact person for register matters

Data Privacy Officer

22 rue des Aqueducs– 94250 Gentilly Cedex –

France [+33 \(0\)1 41 24 30 00](tel:+332141243000)

[DPO@biocodex.com](mailto:DPO@biocodex.com)

### Name of register

e-Learning data register

### What is the legal basis for and purpose of the processing of personal data?

The basis for processing personal data is to fulfil the Biocodex business purpose, e.g. the legitimate interest of the company based on customer relationship or other connection.

The purpose of the processing of personal data is:

- keep track of e-Learning participants
- to follow e-Learning attendance volumes
- to develop e-Learning courses
- to keep up to date client/customer details for Marketing purposes

### What data do we process?

We process the following personal data of the customer or other data subject in connection with the customer register:

- **contact information\* of the data subject** such as email address; geographical location
- **information regarding the company and its contact persons**, such as pharmacy chain details, contact information and occupation of the contact persons; name of the hospital or clinic or medical center
- **possible direct marketing prohibitions and consents\***

Providing the information marked with a star is a prerequisite for our contractual relationship and/or customer relationship. We cannot deliver the product and/or service without the necessary information.

### From where do we receive information?

We receive data primarily from the following sources: from the data subject himself, from the website where subjects register for the elearning and from our Marketing database.

### To whom do we disclose data and do we transfer data outside of EU or EEA?

Biocodex has business partners and third-party service partners within the European Economic Area (the "EEA"). We may transfer personal data to our partners in the EU/EEA countries but not outside. Such partners include IT service providers and digital agencies. They process the data on behalf of us and we have written agreements with them in order to protect your personal data in accordance with regulations.

### How do we protect the data and how long do we store them?

Only those of our employees, who on behalf of their work are entitled to process customer data, are entitled to use a system containing personal data. Each user has a personal username and password to the system. The information is collected into databases that are protected by firewalls, passwords and other technical measures.

The databases and the backup copies of them are in locked premises and can be accessed only by certain pre-designated persons.

We store the personal data for 3 years.

We regularly assess the need for data retention in light of the applicable legislation. In addition, we take reasonable measures to ensure that the personal data in the register is not incompatible, obsolete or inaccurate considering the purpose of the processing. We rectify or delete such information without delay.

### What are your rights as a data subject?

As a data subject you have a right to inspect the personal data concerning yourself, which is stored in the register, and a right to require rectification or erasure of the data, provided that the request has a legal basis. You also have a right to withdraw or change your consent.

As a data subject, you have a right, according to EU's General Data Protection Regulation (applied from 25.5.2018) to object processing or request restricting the processing and lodge a complaint with a supervisory authority responsible for processing personal data.

For specific personal reasons, you also have the right to object to profiling and other processing operations, when the processing of your data is based on our customer relationship with you. In connection with your request, you will need to identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

As a data subject you have the right to object to processing at any time free of charge, including profiling in so far as it relates to direct marketing.

### Who can you be in contact with?

All contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section two (2).

### Changes in the privacy notice

Should we make amendments to this privacy notice we will place the amended statement on our website, with an indication of the amendment date. If the amendments are significant, we may also inform you about this by other means, for example by sending an email or placing a bulletin on our homepage. We recommend that you regularly visit our webpage and notice possible amendments to this privacy notice. review these privacy protection principles from time to time to ensure you are aware of any amendments made.

## GRANT APPLICANTS DATA PRIVACY NOTICE

### Controller

Biocodex

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

(hereafter "we" or "**Biocodex**")

### Contact person for register matters

Data Privacy Officer

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

### Name of register

Grant Applicants' data register

### What is the legal basis for and purpose of the processing of personal data?

The basis for processing personal data is to fulfil the Biocodex business purpose, e.g. the legitimate interest of the company based on customer relationship or other connection or; the performance of a contract.

The purpose of the processing of personal data is to collect personal details from Grant Applicants, managing the application process and to fulfil contractual obligations.

### What data do we process?

We process the following personal data of the Grant Applicants in connection with the Grant Applicants' register:

- **basic information of the data subject** such as name, birth date, social security number, bank account number, username and/or other identifier;
- **contact information of the data subject** such as email address, phone number, home address;
- **information regarding the research institute and its contact persons**, such as names and contact information;
- **curriculum vitae and research plan of the data subject**, such as affiliation, publication record, estimated budget and schedule of the project and research group's details
- **other possible information collected based on the consent of the data subject.**

### From where do we receive information?

We receive all data for the Grant Applicants' data register from the data subjects directly and handle all information as confidential.

### To whom do we disclose data and do we transfer data outside of EU or EEA?

Biocodex has business partners and third-party service partners within the European Economic Area (the “EEA”). We may transfer personal data to our partners in the EU/EEA countries but not outside.

### How do we protect the data and how long do we store them?

Only those of our employees, who on behalf of their work are entitled to process customer data, are entitled to use a system containing personal data. Each user has a personal username and password to the systems. The information is collected into databases that are protected by firewalls, passwords and other technical measures.

The databases and the backup copies of them are in locked premises and can be accessed only by certain pre-designated persons.

We store the personal data for as long as is necessary considering the purpose of the processing. We regularly assess the need for data retention in light of the applicable legislation. In addition, we take reasonable measures to ensure that the personal data in the register is not incompatible, obsolete or inaccurate considering the purpose of the processing. We rectify or delete such information without delay.

### What are your rights as a data subject?

As a data subject you have a right to inspect the personal data concerning yourself, which is stored in the register, and a right to require rectification or erasure of the data, provided that the request has a legal basis. You also have a right to withdraw or change your consent.

As a data subject, you have a right, according to EU’s General Data Protection Regulation (applied from 25.5.2018) to object processing or request restricting the processing and lodge a complaint with a supervisory authority responsible for processing personal data.

### Who can you be in contact with?

All contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section “Contact person for register matters”.

### Changes in the privacy notice

Should we make amendments to this privacy notice we will place the amended statement on our website, with an indication of the amendment date. If the amendments are significant, we may also inform you about this by other means, for example by sending an email or placing a bulletin on our homepage. We recommend that you regularly visit our webpage and notice possible amendments to this privacy notice. Review these privacy protection principles from time to time to ensure you are aware of any amendments made.

## PRIVACY NOTICE FOR THE JOB APPLICANTS REGISTER

### Controller

Biocodex Oy  
Metsänneidonkuja 4, PL 52, 02101 Espoo  
+358 9 329 59100  
(hereafter "we")

### Contact person for register matters

Biocodex Data Protection Organization  
Metsänneidonkuja 4, PL 52, 02101 Espoo  
+358 9 329 59100  
[dataprivacy@biocodex.fi](mailto:dataprivacy@biocodex.fi)

### What is the purpose and the legal basis of processing personal data?

The purpose of processing personal data is to receive and to process job applications and to manage our recruitment processes. We process data related to the recruitment process of the people who have applied for our positions to enable contacting the applicant and for the decision making when filling in the positions.

The legal basis for processing personal data is:

- our legitimate interest, which is based on the need to process personal data for recruitment purposes, and which is formed of the connection between us
- your consent, which can be requested for example in the following situations:
  - collecting personal data from references
  - processing personal data in aptitude assessments
  - processing personal data when executing medical tests

### What data do we process?

We process the following personal data in connection with the job applicant register:

- *basic information* such as name, date of birth, language, username and/or other identifier, password;
- *contact details* such as private email address, private phone number, home address;
- *information regarding the position in question* such as information of the nature and type of the employment and information of the contact persons designated for the application process, salary request, information of the beginning of the job. More specific details appear in the job search advertisement;
- *important information regarding suitability that you have provided us in connection with the recruitment process and other information of yourself, your background etc.* such as a photograph, information regarding study and education, occupation, information regarding work history (such as employers, starting date and duration of employment and nature of the duties), language skills, other special skills and competence, description of personal features, different kinds of certificates and



evaluations and references to the portfolios, profiles and other sources on the Internet and references and personality and aptitude assessments performed based on your consent and information regarding them;

- *information regarding the proceeding of the recruitment process* such as information of following interviews or the interruption of the recruitment process;
- *other information that you have provided us voluntarily* in connection with the recruitment process or specifically published for professional purposes such as a LinkedIn profile or information we have separately collected based on your consent.

Providing your data is a requirement for us to be able to move forward in the application process.

#### From where do we receive information?

The source of information saved in the register is primarily you as a job applicant. Other sources of information are used within the limits of the applicable regulations. We may use recruitment consultants if needed.

By submitting a job application, you consent for us to collect information from your profile published for professional purposes to the extent that collecting data is necessary and related to job performance taking into consideration the open position.

#### To whom do we disclose and transfer data, and do we transfer data outside the EU or EEA?

By rule, we do not disclose data from the register to external parties, unless we have requested and gotten your consent for the disclosure of data for e.g. aptitude assessments. We disclose personal data in a manner permitted and obligated by the current legislation to parties, who based on legislation, collective agreements and/or contract have the right to receive data from the register, such as the employment authorities. We may also disclose data for other purposes in accordance with local legislation.

We process data ourselves and use subcontractors for processing personal data on our behalf. In addition, we use subcontractors for processing personal data for the following services:

- Financial and HR management (incl. payroll and accounting)
- recruitment services
- IT management

We have ensured the protection of your data by making necessary contracts with the subcontractors. We cannot name all our subcontractors, in part due to projects in development, so we have decided on naming only the types of subcontractors. Most of these systems and their providers are available up-to-date through your own access to the databases i.e., you use the systems at your work.

Personal data is not transferred outside the EU/EEA.

### How do we protect the data and how long do we store them?

Only those of our employees, who on behalf of their work have the right to process personal data, are entitled to use the systems containing personal data. Each user has a personal username and password to the system. The data is collected into databases, that are secured with firewalls, passwords, and other technical measures. The communications between the server and the user's browser are secured. The persons processing data are bound by professional secrecy. The databases and their backups are in locked premises secured by access control and camera surveillance and can be accessed only by certain pre-designated persons.

We store personal data for only as long as it is necessary due to the purpose of use. In principle data can be used for twelve (12) months for job search. The data is destroyed in two (2) years, if you become our employee, we store the data you have provided as a job applicant and the information related to the recruitment process as a part of your HR profile according to our privacy notice regarding our employee register.

We evaluate the need to store data regularly considering the applicable legislation. In addition, we take care of such reasonable measures which ensure that no incompatible, outdated, or inaccurate personal data, taking into account the purpose of the processing, is stored in the register. We correct or erase such data without delay.

### What are your rights as a data subject?

You have the right to inspect the personal data stored in the register concerning yourself and the right to demand rectification or erasure of the data. Insofar as the processing is based on consent, you also have the right to withdraw or change your consent. Withdrawing your consent does not affect the lawfulness of processing before the withdrawal of the consent.

You have the right to object or to demand restriction of the processing of your data and to lodge a complaint with the supervisory authority.

On grounds relating to your particular situation, you also have the right to object other processing activities when the legal basis of processing is the legitimate interest. In connection with your request, you shall identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

### Who can you be in contact with?

The contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section two (2).

## LECTURE FEES DATA PRIVACY NOTICE

### Controller

Biocodex

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

(hereafter "we" or "Biocodex")

### Contact person for register matters

Data Privacy Officer

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

### Name of register

Lecture Fees Data Privacy Notice

### What is the legal basis for and purpose of the processing of personal data?

The basis for processing personal data is to fulfil the Biocodex business purpose, e.g. the legitimate interest of the company based on customer relationship or other connection or; the performance of a contract.

The purpose of the processing of personal data is:

- maintain a table of client/customer/partner contact persons
- keep up to date client/customer/partner requirements and contact information for Lecture Fees' purposes
- fulfill the contractual obligations

### What data do we process?

We process the following personal data of the customer or other data subject in connection with the customer register:

- *basic information of the data subject such as name\*, birth date, social security number\*, customer number\*, bank account number\*, username and/or other identifier\*;*
- *contact information\* of the data subject such as email address, phone number, home address;*
- *information regarding the company and its contact persons, such as business ID and names, contact information and occupation of the contact persons;*
- *possible direct marketing prohibitions and consents\**
- *event participation details and possible information regarding the event,*
- *information regarding the customership and contract, such as information of past and existing contracts and orders.*
- *other possible information collected based on the consent of the data subject.*

Providing the information marked with a star is a prerequisite for our contractual relationship and/or customer relationship. We cannot deliver the product and/or service without the necessary information.

#### From where do we receive information?

We receive data primarily from the following sources: from the data subject himself, from the population register, from the authorities, from contact information service providers and from other similar reliable sources.

For the purposes described in this privacy notice, personal data may also be collected and updated from publicly available sources and based on information received from authorities or other third parties within the limits of the applicable laws and regulations. Data updating of this kind is performed manually or by automated means.

#### To whom do we disclose data and do we transfer data outside of EU or EEA?

Biocodex has business partners and third-party service partners within the European Economic Area (the "EEA"). We may transfer personal data to our partners in the EU/EEA countries but not outside.

#### How do we protect the data and how long do we store them?

Only those of our employees, who on behalf of their work are entitled to process customer data, are entitled to use a system containing personal data. Each user has a personal username and password to the system. The information is collected into databases that are protected by firewalls, passwords and other technical measures.

The databases and the backup copies of them are in locked premises and can be accessed only by certain pre-designated persons.

We store the personal data for as long as is necessary considering the purpose of the processing.

We regularly assess the need for data retention in light of the applicable legislation. In addition, we take reasonable measures to ensure that the personal data in the register is not incompatible, obsolete or inaccurate considering the purpose of the processing. We rectify or delete such information without delay.

#### What are your rights as a data subject?

As a data subject you have a right to inspect the personal data concerning yourself, which is stored in the register, and a right to require rectification or erasure of the data, provided that the request has a legal basis. You also have a right to withdraw or change your consent.

As a data subject, you have a right, according to EU's General Data Protection Regulation (applied from 25.5.2018) to object processing or request restricting the processing and lodge a complaint with a supervisory authority responsible for processing personal data.

For specific personal reasons, you also have the right to object to profiling and other processing operations, when the processing of your data is based on our customer relationship with you. In connection with your request, you will need to identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

As a data subject you have the right to object to processing at any time free of charge, including profiling in so far as it relates to direct marketing.

#### Who can you be in contact with?

All contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section two (2).

#### Changes in the privacy notice

Should we make amendments to this privacy notice we will place the amended statement on our website, with an indication of the amendment date. If the amendments are significant, we may also inform you about this by other means, for example by sending an email or placing a bulletin on our homepage. We recommend that you regularly visit our webpage and notice possible amendments to this privacy notice. Review these privacy protection principles from time to time to ensure you are aware of any amendments made.

## GDP MEDICAL INFO QUESTIONS DATA PRIVACY NOTICE

### Controller

Biocodex

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

(hereafter "we" or "Biocodex")

### Contact person for register matters

Data Privacy Officer

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

### Name of register

MEDICAL INFORMATION QUESTIONS

### What is the legal basis for and purpose of the processing of personal data?

The basis for processing personal data is to fulfil the Biocodex business purpose, e.g. the legitimate interest of the company based on customer relationship or other connection or; the performance of a contract.

The purpose of the processing of personal data is;

- The objective of the information given on a medicine is to maintain and promote the professional expertise of the healthcare professionals related to the use of medicines, as well as to promote patient safety.
- The aim of the handling medical information questions is to provide accurate, up to date and timely information to customers
- fulfilment of contractual obligations and other undertakings of the company,
- national regulations for collecting and processing personal data
- legislative regulations for collecting and processing personal data

### What data do we process?

We process the following personal data of the customer or other data subject in connection with the customer register:

- *basic information of the data subject such as name\**;
- *contact information of the data subject such as email address\*, street address\**;

Providing the information marked with a star is a prerequisite for our contractual relationship and/or customer relationship. We cannot deliver the requested information without the necessary information.

### From where do we receive information?

We receive data primarily from the data subject himself and from the authorised personnel representing a relevant healthcare organisation, such pharmacy or hospital.

### To whom do we disclose data and do we transfer data outside of EU or EEA?

We disclose information to the following parties:

We use subcontractors that process personal data on behalf of and for us. We have outsourced the IT-management to an external service provider, to whose server the data is stored. The server is protected and managed by the external service provider. We may also transfer personal data between Biocodex affiliates (between Biocodex Nordics and the Headquarters in France).

We do not disclose personal data outside of EU/EEA.

### How do we protect the data and how long do we store them?

Only those of our employees, who on behalf of their work are entitled to process customer data, are entitled to use a system containing personal data. Each user has a personal username and password to the system. The information is collected into databases that are protected by firewalls, passwords and other technical measures. The databases and the backup copies of them are in locked premises and can be accessed only by certain pre-designated persons.

We store the personal data for as long as is necessary considering the purpose of the processing. According to the Good Distribution Practice (GDP (2013/C 68/01)) requirements, we store the data for six (6) years.

We regularly assess the need for data retention in light of the applicable legislation. In addition, we take reasonable measures to ensure that the personal data in the register is not incompatible, obsolete or inaccurate considering the purpose of the processing. We rectify or delete such information without delay.

### What are your rights as a data subject?

As a data subject you have a right to inspect the personal data concerning yourself, which is stored in the register, and a right to require rectification or erasure of the data, provided that the request has a legal basis. You also have a right to withdraw or change your consent.

As a data subject, you have a right, according to EU's General Data Protection Regulation (applied from 25.5.2018) to object processing or request restricting the processing and lodge a complaint with a supervisory authority responsible for processing personal data.

For specific personal reasons, you also have the right to object to profiling and other processing operations, when the processing of your data is based on our customer relationship with you. In connection with your request, you will need to identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

### Who can you be in contact with?

All contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section two (2).

### Changes in the privacy notice

Should we make amendments to this privacy notice we will place the amended statement on our website, with an indication of the amendment date. If the amendments are significant, we may also inform you about this by other means, for example by sending an email or placing a bulletin on our homepage. We recommend that you regularly visit our webpage and notice possible amendments to this privacy notice. review these privacy protection principles from time to time to ensure you are aware of any amendments made.



## GDP PRODUCT COMPLAINTS DATA PRIVACY NOTICE

### Controller

Biocodex

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

(hereafter "we" or "Biocodex")

### Contact person for register matters

Data Privacy Officer

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

### Name of register

PRODUCT COMPLAINTS

### What is the legal basis for and purpose of the processing of personal data?

The basis for processing personal data is to fulfil the Biocodex business purpose, e.g. the legitimate interest of the company based on customer relationship or other connection or; the performance of a contract.

The purpose of the processing of personal data is;

- delivery and development of our products and services (if possible, describe how the products and services are developed),
- fulfilment of contractual obligations and other undertakings of the company,
- national regulations

### What data do we process?

We process the following personal data of the customer or other data subject in connection with the customer register:

- *basic information of the data subject such as name\**;
- *contact information of the data subject such as email address\*, street address\**;

Providing the information marked with a star is a prerequisite for our contractual relationship and/or customer relationship. We cannot deliver the product and/or service without the necessary information.

### From where do we receive information?

We receive data primarily from the data subject himself and from the authorised personnel representing a relevant healthcare organisation, such pharmacy or hospital.

### To whom do we disclose data and do we transfer data outside of EU or EEA?

We disclose information to the following parties:

We use subcontractors that process personal data on behalf of and for us. We have outsourced the IT-management to an external service provider, to whose server the data is stored. The server is protected and managed by the external service provider.

We do not disclose personal data outside of EU/EEA.

### How do we protect the data and how long do we store them?

Only those of our employees, who on behalf of their work are entitled to process customer data, are entitled to use a system containing personal data. Each user has a personal username and password to the system. The information is collected into databases that are protected by firewalls, passwords and other technical measures. The databases and the backup copies of them are in locked premises and can be accessed only by certain pre-designated persons.

We store the personal data for as long as is necessary considering the purpose of the processing. According to the Good Distribution Practice (GDP (2013/C 68/01)) requirements, we store the data for six (6) years.

We regularly assess the need for data retention in light of the applicable legislation. In addition, we take reasonable measures to ensure that the personal data in the register is not incompatible, obsolete or inaccurate considering the purpose of the processing. We rectify or delete such information without delay.

### What are your rights as a data subject?

As a data subject you have a right to inspect the personal data concerning yourself, which is stored in the register, and a right to require rectification or erasure of the data, provided that the request has a legal basis. You also have a right to withdraw or change your consent.

As a data subject, you have a right, according to EU's General Data Protection Regulation (applied from 25.5.2018) to object processing or request restricting the processing and lodge a complaint with a supervisory authority responsible for processing personal data.

For specific personal reasons, you also have the right to object to profiling and other processing operations, when the processing of your data is based on our customer relationship with you. In connection with your request, you will need to identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

### Who can you be in contact with?

All contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section two (2).

### Changes in the privacy notice

Should we make amendments to this privacy notice we will place the amended statement on our website, with an indication of the amendment date. If the amendments are significant, we may also inform you about this by other means, for example by sending an email or placing a bulletin on our homepage. We recommend that you regularly visit our webpage and notice possible amendments to this privacy notice. review these privacy protection principles from time to time to ensure you are aware of any amendments made.

## MARKETING DATA PRIVACY NOTICE

### Controller

Biocodex

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

(hereafter "we" or "Biocodex")

### Contact person for register matters

Data Privacy Officer

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

### Name of register

MARKETING Data Privacy Notice

### What is the legal basis for and purpose of the processing of personal data?

The basis for processing personal data is to fulfil the Biocodex business purpose, e.g. the legitimate interest of the company based on customer relationship or other connection or; the performance of a contract.

The purpose of the processing of personal data is;

- maintain a table of client/customer contact persons
- keep up to date client/customer requirements and contact information for Marketing purposes
- fulfill the contractual obligations

We use automated decision-making (including profiling) to identify e.g. the data subjects' personal profiles, online behaviour, age and consumer habits. We use this information for example to identify target marketing groups and to develop our services.

### What data do we process?

We process the following personal data of the customer or other data subject in connection with the customer register:

- *basic information of the data subject such as name\*, birth date, customer number\*, username and/or other identifier\*, password, gender, mother tongue;*
- *contact information\* of the data subject such as email address, phone number, home address;*

- *information regarding the company and its contact persons*, such as business ID and names, contact information, occupation, position in the company, education and specialisation, graduation year, gender and age of the contact persons;
- *possible direct marketing prohibitions and consents\**
- *event participation details and possible information regarding the event, such as dietary limitations*
- *information regarding the customership and contract*, such as information of past and existing contracts and orders.
- *other possible information collected based on the consent of the data subject.*

Providing the information marked with a star is a prerequisite for our contractual relationship and/or customer relationship. We cannot deliver the product and/or service without the necessary information.

### From where do we receive information?

We receive data primarily from the following sources: from the data subject himself, from the population register, from the authorities, from contact information service providers and from other similar reliable sources.

For the purposes described in this privacy notice, personal data may also be collected and updated from publicly available sources and based on information received from authorities or other third parties within the limits of the applicable laws and regulations. Data updating of this kind is performed manually or by automated means.

### To whom do we disclose data and do we transfer data outside of EU or EEA?

Biocodex has business partners and third-party service partners within the European Economic Area (the "EEA"). We may transfer personal data to our partners in the EU/EEA countries but not outside.

### How do we protect the data and how long do we store them?

Only those of our employees, who on behalf of their work are entitled to process customer data, are entitled to use a system containing personal data. Each user has a personal username and password to the system. The information is collected into databases that are protected by firewalls, passwords and other technical measures. The databases and the backup copies of them are in locked premises and can be accessed only by certain pre-designated persons.

We store the personal data for as long as is necessary considering the purpose of the processing.

We regularly assess the need for data retention in light of the applicable legislation. In addition, we take reasonable measures to ensure that the personal data in the register is not incompatible, obsolete or inaccurate considering the purpose of the processing. We rectify or delete such information without delay.

### What are your rights as a data subject?

As a data subject you have a right to inspect the personal data concerning yourself, which is stored in the register, and a right to require rectification or erasure of the data, provided that the request has a legal basis. You also have a right to withdraw or change your consent.

As a data subject, you have a right, according to EU's General Data Protection Regulation (applied from 25.5.2018) to object processing or request restricting the processing and lodge a complaint with a supervisory authority responsible for processing personal data.

For specific personal reasons, you also have the right to object to profiling and other processing operations, when the processing of your data is based on our customer relationship with you. In connection with your request, you will need to identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

As a data subject you have the right to object to processing at any time free of charge, including profiling in so far as it relates to direct marketing.

### Who can you be in contact with?

All contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section two (2).

### Changes in the privacy notice

Should we make amendments to this privacy notice we will place the amended statement on our website, with an indication of the amendment date. If the amendments are significant, we may also inform you about this by other means, for example by sending an email or placing a bulletin on our homepage. We recommend that you regularly visit our webpage and notice possible amendments to this privacy notice. review these privacy protection principles from time to time to ensure you are aware of any amendments made.

## SALES DATA PRIVACY NOTICE

### Controller

Biocodex

22 rue des Aqueducs– 94250 GentillyCedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

(hereafter "we" or "Biocodex")

### Contact person for register matters

Data Privacy Officer

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

### Name of register

SALES Data Privacy Notice

### What is the legal basis for and purpose of the processing of personal data?

The basis for processing personal data is to fulfil the Biocodex business purpose, e.g. the legitimate interest of the company based on customer relationship or other connection or; the performance of a contract.

The purpose of the processing of personal data is;

- maintain a table of client/customer contact persons
- keep up to date client/customer requirements and contact information for Sales purposes
- fulfill the contractual obligations

### What data do we process?

We process the following personal data of the customer or other data subject in connection with the customer register:

- *basic information of the data subject such as name\*, birth date, customer number\*, username and/or other identifier\*, password, gender, mother tongue;*
- *contact information\* of the data subject such as email address, phone number, home address;*
- *information regarding the company and its contact persons, such as business ID and names, contact information, occupation, position in the company, education and specialisation, graduation year, gender and age of the contact persons;*
- *possible direct marketing prohibitions and consents\**
- *event participation details and possible information regarding the event, such as dietary limitations*

- *information regarding the customership and contract*, such as information of past and existing contracts and orders.
- *other possible information collected based on the consent of the data subject*.

Providing the information marked with a star is a prerequisite for our contractual relationship and/or customer relationship. We cannot deliver the product and/or service without the necessary information.

#### From where do we receive information?

We receive data primarily from the following sources: from the data subject himself during meetings, visits, events and calls, from the population register, from the authorities, from contact information serviceproviders and from other similar reliable sources.

For the purposes described in this privacy notice, personal data may also be collected and updated from publicly available sources and based on information received from authorities or other third parties within the limits of the applicable laws and regulations. Data updating of this kind is performed manually or by automated means.

#### To whom do we disclose data and do we transfer data outside of EU or EEA?

Biocodex has business partners and third-party service partners within the European Economic Area (the "EEA"). We may transfer personal data to our partners in the EU/EEA countries but not outside.

#### How do we protect the data and how long do we store them?

Only those of our employees, who on behalf of their work are entitled to process customer data, are entitled to use a system containing personal data. Each user has a personal username and password to the system. The information is collected into databases that are protected by firewalls, passwords and other technical measures. The databases and the backup copies of them are in locked premises and can be accessed only by certain pre-designated persons.

We store the personal data for as long as is necessary considering the purpose of the processing.

We regularly assess the need for data retention in light of the applicable legislation. In addition, we take reasonable measures to ensure that the personal data in the register is not incompatible, obsolete or inaccurate considering the purpose of the processing. We rectify or delete such information without delay.

#### What are your rights as a data subject?

As a data subject you have a right to inspect the personal data concerning yourself, which is stored in the register, and a right to require rectification or erasure of the data, provided that the request has a legal basis. You also have a right to withdraw or change your consent.



As a data subject, you have a right, according to EU's General Data Protection Regulation (applied from 25.5.2018) to object processing or request restricting the processing and lodge a complaint with a supervisory authority responsible for processing personal data.

For specific personal reasons, you also have the right to object to profiling and other processing operations, when the processing of your data is based on our customer relationship with you. In connection with your request, you will need to identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

As a data subject you have the right to object to processing at any time free of charge, including profiling in so far as it relates to direct marketing.

#### Who can you be in contact with?

All contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section two (2).

#### Changes in the privacy notice

Should we make amendments to this privacy notice we will place the amended statement on our website, with an indication of the amendment date. If the amendments are significant, we may also inform you about this by other means, for example by sending an email or placing a bulletin on our homepage. We recommend that you regularly visit our webpage and notice possible amendments to this privacy notice. review these privacy protection principles from time to time to ensure you are aware of any amendments made.

## PHARMACOVIGILANCE DATA PRIVACY NOTICE

### Controller

Biocodex

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

(hereafter "we" or "Biocodex")

### Contact person for register matters

Data Privacy Officer

22 rue des Aqueducs– 94250 Gentilly Cedex –

France +33 (0)1 41 24 30 00

[dpo@biocodex.com](mailto:dpo@biocodex.com)

### Name of register

PHARMACOVIGILANCE DATA REGISTER

### What is the legal basis for and purpose of the processing of personal data?

*Medicinal products and serious medical devices safety events*

The basis for processing personal data in relation medicinal products is the performance of a pharmacovigilance services within Biocodex, which include the performance of contracts and legal requirements

.

The purpose of the processing of personal data is;

- fulfill the contractual obligations
- to fulfil the legal requirements of collecting personal details in a situation of pharmacovigilance

*Food supplements and non-serious medical devices safety events*

The basis for processing personal data is to fulfil the Biocodex business purpose, e.g. the legitimate interest of the company based on customer relationship or other connection or; the performance of a contract.

The purpose of the processing of personal data is;

- personal consent
- fulfill the contractual obligations

### What data do we process?

We process the following personal data of the customer or other data subject in connection with the customer register;

- **basic information of the following data subjects**
  - reporter name\*, contact information\*, occupation\*;
  - patient name\*/initials\*, date of birth, gender, medical information\*, contact information;
- **contact information of the data subject** such as email address, phone number, street address;
- **medical information** used medicines, experienced undesirable effects or special situations, medical history details such as illnesses, operations, previous medications etc.
- **we may also collect other possible information** such as time and place of incident and other relevant details relating to the incident.

Providing the information marked with a star is a prerequisite for our contractual relationship and/or customer relationship. We cannot deliver the product and/or service without the necessary information.

#### From where do we receive information?

We receive data primarily from the following sources e.g.spontaneous reports from health care professionals, consumers and patients, authorities, literature, clinical and market research studies.

We may also receive personal details internally from our product complaints team and through our medical information queries.

For the purposes described in this privacy notice, personal data may also be collected and updated from publicly available sources and based on information received from authorities or other third parties within the limits of the applicable laws and regulations. Data updating of this kind is performed manually.

#### To whom do we disclose data and do we transfer data outside of EU or EEA?

Data can be disclosed to the applicable Biocodex Pharmacovigilance employees with access limitations, to the customers of Biocodex Pharmaceutical services in EU, but personal data is encrypted, as agreed in special service agreement / in accordance with legislative requirements.

Data is disclosed to authorities in accordance with legislative requirements or a special request.

#### How do we protect the data and how long do we store them?

We store pharmacovigilance data in paper and electronic format and ensure only those of our employees, who on behalf of their work are entitled to process customer data, are entitled to use a system containing personal data. Each user has a personal username and password to the system. The information is collected into databases that are protected by firewalls, passwords and other technical measures. The databases and the backup copies of them are in locked premises and can be accessed only by certain pre-designated persons.

#### Medicinal products and serious medical devices safety events

We store personal data as per the legal requirement; in EU 10 years after the expiry date of the medicine's marketing authorization globally, and in Finland 50 years after the expiry date of the medicine's marketing authorization.

In the case where we are providing pharmacovigilance services to MAH (marketing authorization holders) we store the information for the duration of the contract. When the service relationship ends, we transfer all personal data to the MAH partner as specified in the contract.

#### *Food supplements and non-serious medical devices safety events*

We store the personal data for the duration of the related service contract. When the service relationship ends, we transfer all personal data to the partner as specified in the contract.

We regularly assess the need for data retention in light of the applicable legislation. In addition, we take reasonable measures to ensure that the personal data in the register is not incompatible, obsolete or inaccurate considering the purpose of the processing. We rectify or delete such information without delay.

#### **What are your rights as a data subject?**

As a data subject you have a right to inspect the personal data concerning yourself, which is stored in the register, and a right to require rectification of the data, provided that the request has a legal basis.

As a data subject, you have a right, according to EU's General Data Protection Regulation (applied from 25.5.2018) to object processing or request restricting the processing and lodge a complaint with a supervisory authority responsible for processing personal data.

For specific personal reasons, you also have the right to object to processing operations, when the processing of your data is based on our customer relationship with you. In connection with your request, you will need to identify the specific situation, based on which you object to the processing. We can refuse the request of objection only on legal grounds.

As a data subject you have the right to object to processing at any time free of charge.

Who can you be in contact with?

All contacts and requests concerning this privacy notice must be submitted in writing or in person to the person mentioned in section two (2).

#### **Changes in the privacy notice**

Should we make amendments to this privacy notice we will place the amended statement on our website, with an indication of the amendment date. If the amendments are significant, we may also inform you about this by other means, for example by sending an email or placing a bulletin on our homepage. We recommend that you regularly visit our webpage and notice possible amendments to this privacy notice. Review these privacy protection principles from time to time to ensure you are aware of any amendments made.