

EU Privacy statement



Contents

INTRODUCTION.....	3
PROCESSING ACTIVITIES.....	4
1. CUSTOMERS.....	4
2. SUPPLIERS	5
3. WEBSITE & WEBSHOP USERS.....	5
4. WEBSITE VISITORS	6
5. VISITORS	7
SECURITY PRECAUTIONS	8
DATA TRANSFERS	9
1. EXTERNAL DATA PROCESSORS	9
2. EXTERNAL RECIPIENTS.....	9
3. OUR ROLE AS DATA CONTROLLER	9
RIGHTS OF DATA SUBJECTS.....	11
1. RIGHT OF ACCESS.....	11
2. RIGHT TO RECTIFICATION.....	11
3. RIGHT TO BE FORGOTTEN	11
4. RIGHT TO RESTRICT PROCESSING	12
5. RIGHT TO DATA PORTABILITY	12
6. RIGHT TO OBJECT	13
COOKIES	14
CONTACT DETAILS	15

This Statement applies to the processing of personal data in the EU by Fagron for the purposes described herein.



Introduction

The purpose of this Privacy Statement is to provide transparency about Fagron's point of view regarding privacy and the processing of personal data. Our goal is to demonstrate that Fagron handles personal data with care and in accordance with the applicable legislation such as the General Data Protection Regulation (GDPR).

Our strategy is focused on optimizing and innovating customized pharmaceutical care in order to widen the therapeutic options of prescribers worldwide. As the leading global company in pharmaceutical compounding, we are supporting the unique selling point of customized medication and improving patients' quality of life.

In order to succeed we strongly believe in our mission to lead the future of compounding. "Customer is number 1" is an important Fagron value, which means that it is our top priority to act in the customers' interest. This value also applies when it concerns the processing of personal data. "Transparency" is one of the Fagron family rules which translates itself into this Privacy Statement, providing a clear and understandable explanation of the processing of personal data.

Fagron processes personal data of the following categories of persons (hereinafter also called: data subjects):

- Customers;
- Suppliers;
- Website & webshop users;
- Website visitors;
- Visitors;
- Employees & applicants, which are out of scope in this Privacy statement.

Processing activities

1. Customers

What type of personal data do we process?

Fagron serves different customer groups within the pharmaceutical industry, including pharmacies, hospitals and clinics. We process certain kinds of personal data of the professionals representing our customers.

Fagron processes the following data types of customers:

- Name
- Contact information (e-mail address, telephone number)
- Job title

What is the purpose of processing?

Fagron processes personal data of customers for the following purposes:

- providing our customers with an adequate sales order processing system;
- providing our customers with the best possible service.

What is the legal ground for processing?

Legal obligation

We have a legal obligation to process certain kinds of personal data under the applicable pharmaceutical laws and regulations, such as the GxP-standards. In general, we have the obligation to know our customers and to keep track of who are receiving our products. These are low sensitive data types such as names, telephone numbers and email addresses that we store in our systems.

Contract

We also need to process this personal data in the performance of the sales contracts with our customers.

What is the retention period?

Fagron retains the personal data in accordance with the applicable legal retention period or as long as necessary for the purpose of processing.

2. Suppliers

What type of personal data do we process?

Fagron processes the following data types of suppliers:

- Name
- Contact information (e-mail address, telephone number)
- Job title

What is the purpose of processing?

Fagron processes the personal data of suppliers for the following purposes:

- guarantee a correct handling of the ordering process;
- comply with contractual obligations.

What is the legal ground for processing?

Contract

Fagron needs to process the personal data in order to fulfil her contractual obligations towards her suppliers.

What is the retention period?

Fagron retains the personal data in accordance with the applicable legal retention period or as long as necessary for the purpose of processing.

3. Website & webshop users

What type of personal data do we process?

Fagron processes the following data types of website users with an account:

- Name
- E-mail address
- Profession
- Newsletter preferences
- Online behavior within our website

What is the purpose of processing?

Fagron processes personal data of website users in order to maintain the user accounts and deliver the requested services, such as the webshop service. We

may also contact these data subjects via surveys to ask their opinion about our services in order to provide them with the best online experience possible.

What is the legal ground for processing?

Consent

Fagron will ask written consent from the data subject where applicable, to process the personal data via the website.

Legitimate Interest

Fagron may also have a legitimate interest in processing the personal data for direct marketing purposes. We will always balance our legitimate interest against the interest of the data subject to decide what the impact is of the processing. We will make sure that we take care of the rights of the data subjects and inform them about the possibility to object to the processing in an easy accessible format.

What is the retention period?

Fagron retains the personal data in accordance with the applicable legal retention period or as long as necessary for the purpose of processing.

4. Website visitors

What type of personal data do we process?

Fagron processes the following data types of website visitors:

- Online behaviour within our website

What is the purpose of processing?

Fagron processes the online behaviour of website visitors for maintenance and improvement of the website.

What is the legal ground for processing?

Legitimate Interest

Fagron has a legitimate interest in processing the personal data for marketing and communication purposes. We will always balance our legitimate interest against the interest of the data subject to decide what the impact is of the processing. We will make sure that we take care of the rights of the data subjects and inform them about the possibility to object to the processing in an easy accessible format.

What is the retention period?

Fagron retains the personal data in accordance with the applicable legal retention period or as long as necessary for the purpose of processing.

5. Visitors

What type of personal data do we process?

Fagron processes the following data types of visitors to our facilities:

- Name
- Contact information

What is the purpose of processing?

Fagron processes the personal data of visitors for the following purposes:

- ensuring security and safety within our compounding facilities;
- identification of individuals in case of misconduct.

What is the legal ground for processing?

Legal obligation

Fagron has a legal obligation to register visitors to our compounding facilities, according to the GxP-standards.

What is the retention period?

Fagron retains the personal data in accordance with the applicable legal retention period or as long as necessary for the purpose of processing.

Security precautions

Fagron secures your personal data from unauthorized access, use or disclosure. Fagron secures the personal identifiable information you provide on computer servers in a controlled and secured environment. When personal data is transmitted to other websites, it is protected by Secure Socket Layer (SSL) security, which encrypts all sensitive information before sending unrecognizable.

Next to our standard processes and procedures, regular technical and functional checks and formal audits are being executed by independent parties to identify risks in a timely fashion with regards to our global IT and data landscape. As standard measure, all information, traffic and data are always encrypted.

Data transfers

1. External data processors

Fagron uses external processors for a number of supporting activities. We only use processors that provide sufficient guarantees of appropriate technical and organizational measures for security. In case personal data is being processed by the external processor, there is always a processing agreement in place.

2. External recipients

Under certain circumstances Fagron discloses personal data to external recipients. This only occurs when the data subject has a legitimate expectation of Fagron to do so. Examples include legal obligations to disclose personal data to public authorities.

3. Our role as data controller

When Fagron processes personal data as part of a sales contract with our customers, we do not process personal data on behalf of our customers. We process the personal data on behalf of ourselves in the capacity of data controller. This means that we have our own responsibility to comply with the applicable privacy laws and regulations when processing the personal data of our customers. As a consequence, there is no need for a processing agreement between Fagron and her customers.

Customers may expect that Fagron processes any personal data with the highest level of caution and that we secure our systems with the appropriate measures to safeguard their privacy.



Rights of data subjects

1. Right of access

Every data subject has the right of access to the personal data that Fagron is processing. Upon request we will provide you with a copy of information regarding your personal data that we are processing. We intend to comply with such a request within one month of receipt, but we may extend this period with two months in complex cases, in which case we will inform you about the reasons of delay. Fagron reserves its right to charge a reasonable fee in case of an excessive request.

2. Right to rectification

You may request that your personal data will be rectified in case the information is incorrect. Fagron intends to comply with the request within one month of receipt but may extend this period once with two months in complex situations, in which case we will inform you about the reasons of delay. If applicable, we will inform the recipients of the personal data about any rectifications.

3. Right to be forgotten

You have the right to request Fagron to erase your personal data if one of the following circumstances is applicable:

- the purpose of processing no longer exists;
- you have withdrawn your consent;
- you object to the processing;
- the processing is unlawful;
- there is a legal obligation to delete your personal data;

Fagron retains the right to limit the right to be forgotten in the following cases:

- Fagron has a legal obligation to process your personal data;
- processing is necessary for the establishment, exercise or defense of legal claims;
- processing is necessary to ensure the high standards of our medicinal products;
- the request for erasure is manifestly unfounded or excessive.

Fagron intends to comply with your request within one month after receipt. We may extend this period with two months in complex situations, in which case we will inform the data subject about the reasons of delay. In case we refuse your request for erasure, we will timely inform you about the reasons for our decision and your rights in this matter.

4. Right to restrict processing

You may request to restrict the processing of your personal data in the following circumstances:

- your personal data is not accurate;
- you have objected to the processing and Fagron is considering whether the legitimate interests of Fagron override yours;
- the processing is unlawful;
- Fagron no longer needs your personal data, but you need the data to establish, exercise or defend a legal claim.

Fagron shall timely inform you about the method which will be used to restrict the processing of your personal data.

Fagron may refuse your request in case it is manifestly unfounded or excessive. We intend to act upon your request within one month after receipt. We may extend this period with two months in complex situations and we will always inform you about the reasons of the delay or refusal and your rights in this matter.

5. Right to data portability

In certain circumstances you have the right to data portability, which means that you have the right to obtain and reuse your personal data across different services. This also indicates that your personal data must be provided to you in an easy accessible format, which makes it possible to move/copy/transfer personal data from one IT environment to another. This needs to take place in a safe and secure way.

The right to data portability only applies in the following circumstances:

- the personal data is provided to Fagron by an individual;
- the processing is based on the individuals' consent or for the performance of a contract;
- the processing is carried out by automatic means.

We intend to act upon your request within one month after receipt. We may extend this period with two months in complex situations and we will always inform you about the reasons of the delay and your rights in this matter.

6. Right to object

You may object to the processing of your personal data on grounds related to your situation and if one of the following circumstances applies:

- the processing is based on the legitimate interests of Fagron;
- Fagron processes your personal data for direct marketing purposes;

Fagron is not obliged to comply with the right to object, if the processing does not concern direct marketing and if:

- Fagron has a legitimate interest that overrides your interests;
- Fagron needs to process your personal data for the establishment, exercise or defense of a legal claim.

Cookies

Fagron is committed to protecting your privacy and developing technology that gives you the most powerful and safe online experience. Fagron uses cookies to improve the usability of the website.

What are cookies?

Cookies are small text files. When you visit the Fagron website these small text files are temporarily stored on your computer. Cookies are used to monitor the preferences of website visitors and improve their user experience. For example, cookies give insight in the webpages that are visited and how visitors move from one webpage to another. Cookies also measure how many people visit a webpage and how long they stay on that page. With this information Fagron optimizes the website.

Are cookies safe?

Cookies are safe. They do not save any personal data or other sensitive information related to individuals. Moreover, it is not possible to trace personal data via cookies or send spam or any other undesirable e-mails.

How to change my cookie settings?

In your browser settings you can specify how websites should handle cookies on your computer. For example, you can define your settings in the following way:

- ask for a notification if a website wants to place a cookie;
- refuse third-party cookies;
- delete cookies;

Contact details

For any additional information, questions and/or complaints about this Privacy Statement or the processing of personal data by Fagron, please contact the Privacy Officer at the contact information below:

Fagron Belgium	Fagron Global Service Center
Auralie Blauwbloeme HR Business Partner Venecoweg 20A 9810 Nazareth Tel: +32 9 216 24 13 E-mail: auralie.blauwbloeme@fagron.be	Fagron B.V. Attn. Privacy Office Lichtenauerlaan 182 3062 ME Rotterdam E-mail: privacy@fagron.com

