

1. Scope

The current policy refers to the collection, processing and handling of personal and sensitive personal data of Health Professionals.

2. Policy

It is the company's policy

- To collect only the data that are necessary in order to provide Health Professionals high quality and value adding services regarding our products and to ensure continuous improvement of our services.
- To handle the Health Professionals' data we collect with respect, keeping them strictly confidential from any third party and using them only within the purpose of our business activities.
- To give Health Professionals the right to request the updating and / or deletion of their personal data from our corporate records and data basis and to comply with such requests immediately.
- To ensure maximum information, IT systems and data basis security and to protect them from malicious violation with all available technological tools.

3. Special issues

3.1. Data and information

Personal data we collect by Health Professionals include

- Name
- Contact information (telephone numbers, e-mail, address, etc)
- Professional data (education, specialty, employer, etc)
- Personal data (date of birth, etc)

Moreover, within the framework of our business activities and especially of relevant surveys, studies or discussions it is possible to collect information regarding views and opinions of Health Professionals for our products and activities and regarding the level of service with provide, as well as information about their preferences and interests that allow the company to provide individualized services.

The above data and information are collected mainly through personal contact of our employees (medical / pharmaceutical reps, product managers, marketing personnel, scientific personnel, etc) with Health Professionals. For the collection of the above data and information additional sources may be used, such as social media, professional directories, business cards and sigs, etc.

Our company makes provisions for the updating of Health Professionals personal data every three (3) years.

3.2. Use of data and Information

Personal data of health professionals are used by the company for personal, telephone, mail or electronic communication with them with the scope

- to provide them with scientific information about products and services
- to conduct promotional activities and to inform them for research initiatives, within the applicable laws
- to conduct or to cooperate for the conduct of studies, surveys, programs, trainings, events etc, within the applicable laws
- to exchange views, information and know-how for the promotion of health and quality of life
- to cooperate for joint social action, within the applicable laws
- to respond to questions and request for additional information, samples and orders, when allowed by the applicable laws
- to continuously improve the quality and effectiveness of our products / services

Moreover, personal data of Health Professionals may be used for the compliance of the company to legal obligations, internal and external audits and for the analysis of trends and the in depth understanding of clients and partners requirements.

3.3. Sharing of data and information

It is possible that the company shares Health Professionals' data with public authorities, with other companies of the OFET Group (Uni-pharma SA & InterMed SA) or with approved partners, such as IT&T providers, business consultants, auditors and business partners, taking all necessary and appropriate measures for ensuring data privacy and protection.

3.4. Data and information protection measures

The company takes all necessary technological and other measures for the protection of Health Professionals personal data from unauthorized access, use, disclosure, alteration or destruction, such as contract terms, confidentiality agreements, firewalls, etc.

3.5. Consent and rights

The company uses and processes Health Professionals' data only after their explicit and clear consent, while Health Professionals reserve the right (a) to request at any time access to and alteration, correction or destruction of their data kept by the company, (b) to withdraw their consent for the keeping, processing and use of their data, (c) to

request the limitation of the use of their data and (d) to submit complaints for possible violation of this policy and the applicable data protection law.

3.6. Relevant Documents

CG-F01.1 «Letter of Consent»