

# Data Protection Policy

Pint-Pharma GmbH

Last updated	17-03-2020
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## Definitions

<b>PINT</b>	means Pint-Pharma GmbH
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Data Protection Coordinator</b>	means the person responsible for data protection within PINT
<b>Data Protection Register</b>	means a register of all systems or contexts in which personal data is processed by PINT.

PINT-PHARMA GMBH operates the [www.pint-pharma.com](http://www.pint-pharma.com) website

This page is used to inform website visitors regarding our policies with the collection, use, and disclosure of Personal Information if you decide to use our website.

If you choose to use our Website, then you agree to the collection and use of information in relation with this policy. The Personal Information that we collect are used for providing and improving our services. We will not use or share your information with anyone except as described in this Privacy Policy.

### 1. Data protection principles

PINT is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to

ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## **2. General provisions**

- a. This policy applies to all personal data processed by PINT.
- b. The Data Protection Coordinator shall take responsibility for PINT's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

## **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, PINT shall maintain a Data Protection Register.
- b. The Data Protection Register shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to PINT shall be dealt with in a timely manner.

## **4. Lawful purposes**

- a. All data processed by PINT must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests
- b. PINT shall note the appropriate lawful basis in the Data Protection Register.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in PINT's systems.

## **5. Data minimisation**

- a. PINT shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## **6. Accuracy**

- a. PINT shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, PINT shall put in place

an archiving policy for each area in which personal data is processed and review this process annually.

- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## **8. Security**

- a. PINT shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, PINT shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the supervisory authority and eventually to the affected individuals.

## **10. Contact with us**

For a better experience while using our site, we may require you to provide us with certain personally identifiable information, including but not limited to your e-mail address, name, phone number and address. The information that we collect will be used to contact or identify you.

If you contact us by means of a form on the website or by e-mail, your data will be stored for six months to process the request and in case of follow-up questions. We will not share this information without your consent.

## **11. How do we collect your data?**

You directly provide PINT with most of the data we collect. We collect data and process data when you:

- Use or view our website via your browser's cookies.
- Voluntarily contact us regarding pharmacovigilance matters or general issues.

## **12. How we use the personal data**

**PINT** uses the collected personal data for various purposes:

- To provide customer support
- To gather analysis or valuable information so that we can improve our services
- To detect, prevent and address technical issues
- To comply with pharmacovigilance regulations

### **13. Legal basis for collecting and processing personal data**

PINT's legal basis for collecting and using the personal data described in this Data Protection Policy depends on the personal data we collect and the specific context in which we collect the information:

- Processing your personal data is in PINT's legitimate interests for the purposes of providing customer support
- PINT needs to comply with the law when gathering pharmacovigilance information

### **14. Log Data**

Whenever you visit our site, we collect information that your browser sends to us that is called Log Data. This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser version, pages of our site that you visit, the time and date of your visit, the time spent on those pages, and other statistics.

### **15. Cookies**

Our website uses so-called cookies. These are small text files that are stored on your device using the browser. They do no harm.

We use cookies to make our offer user-friendly. Some cookies remain stored on your device until you delete them. They allow us to recognize your browser on your next visit. If you do not desire this action to occur, you can set up your browser so that it informs you about the setting of cookies and you allow them only on a case to case basis. The deactivation of cookies may limit the functionality of our website.

### **16. Data processing outside the EU / EEA**

Your data is at least partly processed outside the EU / EEA, namely in our affiliate companies in Colombia and Argentina.

A series of data are transmitted to our affiliate in Colombia for the provision and performance of IT services, including but not limited to server administration, IT support, system and data backup. The appropriate level of protection results from standard contractual clauses according to Art. 46 para. 2 lit. c of the General Data Protection Regulation. You have the option to receive a copy of them on request.

Likewise, the affiliate in Colombia subcontracts part of its obligations under article 11 of the standard contractual clauses, with the consent of the data exporter, for purposes of:

- SAP:
- hosting

- server mirroring and backup as part of its disaster prevention and business continuity plan, through a server located in Argentina.

It does so by way of a written agreement with the company IFX NETWORKS COLOMBIA SAS which imposes the same obligations on the latter as are imposed on the affiliate in Colombia under the standard contractual clauses.

Furthermore, regarding the server mirroring and backup, Argentina ensures an adequate level of protection pursuant to article 45 of the General Data Protection Regulation.

## **17. Your rights**

In principle, you have the rights to information, access, rectification, erasure, restriction, data portability and objection regarding your stored data. If you believe that the processing of your data violates the data protection law or otherwise your data protection claims have been violated in any way, you can complain to us at [dataprotection@pint-pharma.com](mailto:dataprotection@pint-pharma.com) or before the data protection authority.

You can reach us under the following contact details:

### **Pint-Pharma GmbH**

Wipplingerstrasse 34 Top 112-119

A-1010, Vienna (Austria)

Central line: +43 1 259 47 35

You can contact our Data Protection Coordinator under [dataprotection@pint-pharma.com](mailto:dataprotection@pint-pharma.com)

## **18. Changes to this Privacy Policy**

We may update our Privacy Policy from time to time. Thus, we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately, after they are posted on this page.