

DATA PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA IN ACTIVITIES RELATED TO PHARMACEUTICAL AND MEDICAL SERVICES

This Data Privacy Notice applies to the processing of personal data by Biocodex Oy in situations concerning medical information enquiries, product complaints and pharmacovigilance activities. We collect personal data in the aforementioned situations from our customers and our customers' contacts.

At Biocodex Oy, we are committed to handling your personal data in a responsible and secure manner. Please contact us if you have any questions regarding the processing of personal data.

Controller

Biocodex Oy
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+358 9 329 59100
info@biocodex.fi
(hereinafter "we" or "Biocodex Oy")

Contact person in matters concerning the register

Data Privacy Coordinator
Metsänneidonkuja 8, PO Box 52, 02101 Espoo
+358 9 329 59100
dataprivacy@biocodex.fi

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

Biocodex processes your personal data for the following purposes:

- Promoting drug and patient safety and complying with legal obligations
- Collection of pharmacovigilance data
- Maintaining and promoting the professionalism of healthcare professionals by providing information about medicines
- Providing accurate, up-to-date and timely information about medical enquiries
- Receiving and responding to complaints
- Delivery of our products and services

The basis for processing your personal data is primarily our statutory obligation when we collect your personal data in connection with medical information enquiries and pharmacovigilance activities.

The basis of the processing is the execution of the contract when we process personal data in connection with complaints and the delivery of our products and services.

What data do we process?

We collect the following personal data in connection with product complaints and medical questions:

- **Contact information**, such as name, email address and street address.
- *information about the complaint or information request and its content*

In drug safety situations, we also collect the following personal data:

- **reporter's name**, contact information and occupation
- **patient's initials**, date of birth and/or gender
- **health information**, such as medication used, adverse effects or special situations experienced, and medical history information such as conditions, operations and previous medications
- **any other information**, such as the time and place of the event and other essential information related to the event.

From where do we receive data?

We receive data directly from you and from authorized personnel representing the relevant healthcare organization, such as a pharmacy or hospital.

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

We use subcontractors who process personal data for us and on our behalf. We have outsourced IT administration to an external service provider whose servers store data. The external service provider in question manages the server and keeps it secure. We may also transfer personal data within the company between subsidiaries and the headquarters in France.

We do not transfer personal data outside the EU or EEA.

Personal data can be disclosed to Marketing Authorization Holders who are Biocodex's customers in the EU in order to fulfill legal obligations. Data can be disclosed to the authorities in accordance with the requirements of legislation or a special request.

How do we protect data and how long do we keep it?

Systems containing personal data may only be used by those employees who, due to their job duties, have the right to process customer data. Each user has a personal username and password for the system. The data is collected in secure databases, which are protected by firewalls, passwords and other technical means. The databases and their backups are in locked premises and can only be accessed by certain pre-designated persons.

We keep personal data as long as necessary for the purpose of the processing.

Personal data related to medical information enquiries will be stored for two (2) years, after which they will be deleted.

In accordance with the guidelines for good distribution practices (2013/C 68/01), personal data included in complaints is stored for six (6) years.

Medicinal products and serious medical devices safety events

We store personal data as per the legal requirement: In the EU, 10 years after the expiration of the global marketing authorization of the medicine and in Finland 50 years after the expiration of the medicine's marketing authorization.

When providing pharmacovigilance services to marketing authorization holders, we store data for the duration of the contract. At the end of the service relationship, we transfer all personal data to the marketing authorization holder in accordance with the agreement.

Food supplements and non-serious medical devices safety events

We store personal data for the duration of each service contract. At the end of the service relationship, we transfer all personal data to the contract partner in accordance with 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 are not incompatible, outdated or incorrect in terms of the purpose of the processing. We will correct or delete such data without delay.

What are your rights as a data subject?

In relation to your personal data, you have the following rights:

- the right to inspect the data we have stored
- request that incorrect and missing data be corrected
- object to the processing of your personal data if you feel that your personal data has been processed in violation of the law
- the right to prohibit the use of data for direct marketing
- the right to request the deletion of data if data processing is not necessary
- to the extent that the processing of your personal data is based on consent, the right to withdraw your consent.

We will process the deletion request and delete the data if there is a justified reason for the deletion, or we will state the reason why processing the data is necessary

If there is a legal basis or obligation for processing your personal data, we have the right not to delete the data you requested. Such data is, for example, material related to accounting, for the disposal of which we comply with the provisions of the Accounting Act.

Who can you contact?

All contacts and requests related to this privacy statement must be submitted in writing to the email address: dataprivacy@biocodex.fi

Changes to the Data Privacy Notice

If we make changes to this Data Privacy Notice, we will post the new version on our website and indicate the date of the change. If the changes are significant, we may also inform you about it by other means, for example by sending an email or publishing a bulletin on our website.

We recommend that you visit our website regularly to notice any changes made to this privacy notice. Please review these privacy protection principles from time to time to ensure you are aware of any changes.

This notice was last updated on 23.9.2022