

WEBSITE PRIVACY POLICY

Thank you for your interest in our company! The protection of your personal data is particularly important to us, and we take your rights to privacy and data protection very seriously. For this reason, we process your data in accordance with the EU General Data Protection Regulation ("**GDPR**") and any local data protection provisions. With this privacy policy, we are happy to inform you about what data we process about you when you visit our website besremi.info ("**Website**").

CONTROLLER:

AOP Orphan Pharmaceuticals GmbH
Leopold-Ungar-Platz 2
1190 Vienna
Tel.: + 43 1 503 72 44
(„we“, „us“)

DATA PROTECTION OFFICER:

Alona Klammer
data-protection@aoporphan.com.

1. PERSONAL DATA, PURPOSES AND LEGAL BASIS

1.1. CONTACT

When you contact us – e.g. by e-mail, telephone or via the contact form – we process the personal data provided: Typically, this is your name, contact details (e.g. telephone number and/or email-address) and the content of your request. The processing is necessary in order to deal with your enquiry and to reply to you. It is therefore carried out within the framework of our (pre-) contractual obligations towards you pursuant to Art 6 Para 1 lit b GDPR. The processing of this data is not legally required. However, we cannot properly process and respond to your enquiries without this information.

If you send us any material (e.g. scans of documents, invoices or images) when contacting us, we will also process the personal data contained therein. If these documents contain data of third parties, it is your responsibility to inform the respective data subject about the disclosure of the data and to ensure that the transmission is based on an appropriate legal basis.

1.2. LOG-IN

Access to this website is restricted and available by invitation only. Users receive an access link and a password to enter the website. No registration is required and users are not requested to provide any personal data in order to access or use the website.

The access credentials are not linked to an identifiable individual. As a result, no personal data is processed in connection with the creation of access credentials, the log-in process, or the use of the website content.

Since no personal data is processed, the provisions of the GDPR do not apply to the access and use of the website within this section.

1.3. REPORTING OF ADVERSE DRUG REACTIONS

In case you report to us an adverse drug reaction (ADR) we will process the personal data you provide us and, in some cases, further data that we require to document the ADR: Name, contact details, occupation, firm (if applicable) of the reporter and the relationship to the patient concerned; further details about the drug and the ADR. In addition, we process the patient's data relevant for the respective report. It can include name, sex, contact details, age, height and weight, ethnicity, and relevant patient history. We are legally required to process this data due to our pharmacovigilance duties based on the directive 2001/3/EC on the Community code relating to medicinal products for human use and IR 520/2012 on the performance of pharmacovigilance activities. The processing is thus based on Art 6 Para 1 lit c GDPR if you are the reporter and Art 9 Para 2 lit l GDPR if you are the patient.

If you report an ADR on behalf of a patient, please make sure that this patient is informed about the reporting and information you provide us.

2. DATA RETENTION

We process your data only as long as it is necessary for the fulfilment of the respective purpose. We retain data in connection with your enquiries for a period of six months to be able to respond to any follow-up questions.

Data from adverse drug reaction reports is retained as long as the respective product is authorised and for at least 10 years after the marketing authorization has ceased to exist according to Art 12 IR 520/2012. The name of the patient is anonymized as soon as it is not required for any possible queries.

We may further process this data if there are indications that the data is required for the assertion or defense of our claims in a particular case. The retention of data in this regard is subject to statutory warranty periods or periods of limitation. This retention beyond the original purpose is carried out in based on our legitimate interests in accordance with Art 6 Para 1 lit f and, if applicable, Art 9 Para 2 lit f GDPR.

3. COOKIES

We use cookies to provide you with the best possible experience on our website. Cookies are small text files that the web browser stores on your device.

3.1. Technically necessary cookies

We use technically necessary cookies for the operation of the Website. This type of cookies does not process any personal data and is usually retained only for the duration of the session. The cookies provide for a proper functioning of the Website and are thus activate based our legitimate interests (Art 6 Para 1 lit f GDPR).

3.2. Analytic and third party cookies

We also use analytic and third party cookies only after your voluntary consent according to Art 6 Para 1 lit a GDPR via the cookie banner by clicking on the button "Allow all services" or checking the respective boxes and saving the settings. Please access the cookie banner via the button "Cookie Settings" in the footer for further information.

If you do not wish to set any analytical and third party cookies, simply do not check any boxes and click on the "Reject al services" button. You can change your settings and revoke your consent by unchecking the boxes at any time without giving reasons via "Cookie Settings" in the Website footer. In addition, you have the option to delete/deactivate cookies at any time via your browser settings.

4. DATA TRANSFER

4.1. Processors

If required in the course of our activities, we transfer your personal data to the following external recipients:

- a) IT service provider, cloud services, data hosting and processing or similar services;
- b) providers of software solutions and tools that support us in our activities.

Our processors are carefully selected and regularly audited. They process the data based on processing agreements exclusively on our behalf and on the basis of our documented instructions.

4.2. Controller

In addition, we transmit your personal data - insofar as necessary - to the following recipients, who act as independent data controllers:

- a) external third parties who advise and support us to the extent necessary on the basis of our legitimate interests (e.g. legal representatives and insurance companies, auditors and consultants, etc);

- b) courts, authorities and other public bodies to the extent required by law or on a case-by-case basis (e.g. local drug and health authorities; tax authority, data protection authority, civil courts, etc).

4.3. Recipients outside of the European Union

When providing our services, your personal data may be transferred to recipients who are either located or process data outside the European Union. If there is no adequacy decision pursuant to Art 45 GDPR for the respective third country, we implement suitable guarantees to maintain the level of data protection according to Art 44 GDPR. This usually involves the conclusion of standard contractual clauses pursuant to Art 46 Para 2 lit c GDPR or the existence of binding corporate rules due to Art 47 GDPR. If necessary due to legal conditions in the respective country, we also implement supplementary measures in order to take the special data protection situation into account. Upon your request, we will gladly provide you with a copy of the respective appropriate guarantees with a specific data recipient.

If no such appropriate guarantees are available for the data transfer, we can base the processing on your express consent in individual cases pursuant to Art 49 GDPR. In this case, we will inform you separately.

5. DATA SUBJECT RIGHTS

As a data subject, you have the right to information about the personal data processed about you. Furthermore, you have the right to rectification, erasure and restriction of processing or to data portability. You also have the **right to object** to the processing of your personal data if this results from your particular situation or if your personal data is processed for direct marketing purposes. If the processing is based on your voluntary consent, you can withdraw this consent at any time, free of charge and without giving reasons, with effect for the future, e.g. by sending an email to data-protection@aoporphan.com.

Furthermore, you have the right to complain to the competent supervisory authority. In Austria, it is the Austrian Data Protection Authority, accessible at dsb.gv.at.

However, before you contact the authority, if you want to exercise your data protection rights or have any other questions about data protection, please **contact us directly** using the contact details listed above. We will be happy to provide you with advice and answers at any time.