

## DATA PRIVACY STATEMENT

The protection of data subjects in relation to the processing of personal data is a fundamental right and everyone has the right to the protection of personal data concerning him or her. The principles and rules on the protection of data subjects with regard to the processing of their Personal Data should respect their fundamental rights and freedoms, in particular their right to the protection of Personal Data.

During regular business activities, OPTIMAPHARM is collecting, processing and using different Personal Data from different data subjects for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

In accordance with General Data Protection Regulation (2016/679), Personal Data means any information relating to an identified or identifiable natural person (data subject); an identifiable data subject is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that data subject.

These Personal Data are obtained and processed fairly, lawfully and transparently. It must be obtained for a specified and legitimate purpose, must be adequate, relevant and not excessive for those purposes, must not be processed in any manner incompatible with that purpose and not kept longer than is necessary for that purpose. Data are kept up to date, processed in accordance with the data subject's rights and kept safe from unauthorised access, accidental loss or destruction in order to ensure security, integrity and confidentiality. They are kept in accordance with applicable regulations and ethical standards for the storage, reporting and documentation of personal data. OPTIMAPHARM does not use automated decision-making and profiling based on special categories of personal data.

The data subject has the right to access Personal Data and obtain from OPTIMAPHARM, without undue delay, rectification of inaccurate Personal Data concerning him or her. OPTIMAPHARM collects and processes Personal Data only with the consent of the data subject. The data subject has the right to withdraw his/her consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on the consent before its withdrawal.

### Transfers of personal data

OPTIMAPHARM as a controller can transfer Personal Data outside the EU if it is necessary for the execution of contracts between OPTIMAPHARM and the data subject or for fulfilling legal obligations. In that case OPTIMAPHARM, at the time when personal data are obtained, provides the data subject with information about intends to transfer Personal Data to a third country and specify which country or international organisation with a name of organisation. Transfer of Personal Data is only allowed to countries which provide adequate level of data protection; through model contracts or binding corporate rules; or by complying with an approved certification mechanism or Privacy Shield Frameworks when transferring personal data from the European Union and Switzerland to the United States.

OPTIMAPHARM may entrust processing of Personal Data to a Third Party. A Third Party may be engaged only for conducting activities for which it is registered and should provide sufficient guarantees for the security and confidentiality of the data. Mutual rights and obligations of OPTIMAPHARM and the Third Party should be regulated by a written agreement.

In that case OPTIMAPHARM, at the time when personal data are obtained, provides the data subject with information about the intention to transfer Personal Data to Third the Party, Third Party details and the reason.

### **Rights of the Data Subject**

It is Data Subject's legal right to check which Personal Data is collected and processed; to access Personal Data and check whether Personal Data is collected by OPTIMAPHARM accurately and up to date; to require Personal Data to be rectificated or erased ('right to be forgotten'). Data Subject right is to restrict the processing or portability of Personal Data. In addition, Data Subject can withdraw the consent for collecting and processing Personal Data at any time.

In order to manage his rights the Data Subject can submit a written request to the official address: **OPTIMAPHARM d.d., Ulica grada Vukovara 284, 10000 Zagreb, addressed to „Data Protection Officer“** (NOTE: replace with relevant local OPTIMAPHARM legal entity name and address, as applicable for non-EU countries and delete this instruction before distribution).

The Data Subject has the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him.

The Data Subject rights to object can be realized by submitting the object in writing to the following instances:

1. **OPTIMAPHARM d.d., Ulica grada Vukovara 284, 10000 Zagreb, addressed to „Data Protection Officer“**
2. **Croatian Personal Data Protection Agency, Fra Grge Martića 14, 10 000 Zagreb. E-mail: azop@azop.hr**

(NOTE: replace with relevant local OPTIMAPHARM legal entity name and address and local Data Protection Agency name and address, as applicable for non-EU countries and delete this instruction before distribution).