

Pharmacist.eu – Privacy Policy

Valid as of May 14, 2020.

As part of the Pharmacist.eu account Service provision, we collect and process your personal data. This document sets out the principles and purposes of processing of this data and describes how we respect your rights and how you can enforce them.

Definitions

Pharmacist.eu/My – Pharmacist.eu spółka z ograniczoną odpowiedzialnością with its registered office in Józefów, ul. Piaskowa 52, 05-420, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register under KRS number 0000632366, REGON (registration no.) 365188044, NIP (tax identification no.): 5322061240;

Terms and Conditions – Terms and Conditions of the use of Pharmacist.eu e-mail account: https://pharmacist.eu/terms_and_conditions.pdf

Personal Data – shall mean any and all information about an identified or identifiable natural person through one or more specific factors determining the physical, physiological, genetic, mental, economic, cultural or social identity of a natural person, including the IP number of the device, location data, Internet identifier and information collected through cookies and other similar technology, and in particular User Data within the meaning of the Terms and Conditions.

Service – shall mean the Service within the meaning of the Terms and Conditions.

User/you – shall mean the User within the meaning of the Terms and Conditions.

GDPR – shall mean Regulation (EU) 2016/679 of the European Parliament and of the Council of April 7, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC, (General Data Protection Regulation).

Account – shall mean the Account within the meaning of the Terms and Conditions.

Policy – shall mean this Privacy Policy being an integral part of the agreement between the User and the Pharmacist.eu, in accordance with the provisions of the Terms and Conditions.

PURPOSES AND LEGAL BASIS OF PROCESSING OF DATA WITHIN THE SERVICE

1. Use of the Service

If you use the Service as a registered or unregistered User (i.e. you do not have an Account in the Service), Pharmacist.eu processes your Personal Data. This data shall be deemed to mean the IP address or other identifiers and information collected through cookies or other similar technologies. Your activity in the Service, including your Personal Data, is recorded in system logs. The information collected in the logs is processed primarily for the purpose of providing services, i.e. for:

- analytical and statistical purposes – to constantly improve the quality of services provided within the Service and adjust its features to your needs. Then the legal basis for the processing is the legitimate interest of the Pharmacist.eu consisting in conducting analyses of Users' activities and their preferences;
- detection, identification and counteracting threats to the stability and proper functioning of the Service;
- marketing Pharmacist.eu and other entities, in particular those related to the presentation of behavioural advertising – to inform you about the current offer and new features of the Service and about the offers of our business partners.

Detailed rules for processing personal data for marketing purposes are described in the "Marketing" section below.

2. Registration in the Service

When you decide to register in the Service, you must provide the data necessary to create and operate the Account (in particular: first and last name and e-mail address and other User Data within the meaning of the Terms and Conditions). Moreover, for the purpose of full provision of the Service, you should provide additional information to complete your professional profile. You can delete such data at any time, their provision is fully voluntary. The Personal Data you provide when you register with the Service and when you complete it is processed:

- in order to provide you with services related to the maintenance and operation of your Account within the Service. The legal basis for the processing of the data required during registration is the necessity of processing for the performance of the agreement, and in the scope of the data provided at the time of filling in the profile boxes, the User's Personal Data – the legal basis for processing is the User's consent;
- analytical and statistical purposes – so that we can continuously improve the quality of services provided by the Service and adjust its features to your needs.

The legal basis for the processing in this case is the legitimate interest of the Pharmacist.eu. We shall therefore analyse your activity in the Service and in your Account, how you use your Account and your preferences;

- in order to possibly establish, investigate or defend against claims – the legal basis for the processing is the Pharmacist.eu's legitimate interest in protecting its rights;
- for marketing purposes of the Pharmacist.eu and other entities – the rules for processing

personal data for marketing purposes are described in the “Marketing” section

3. Contact forms

We provide the opportunity to contact us using electronic contact forms. Use of this form requires provision of Personal Information necessary to contact you and answer your inquiry. You can also provide other data to facilitate your contact or inquiry. Data marked as mandatory are required for the purpose of receiving and handling the inquiry, and failure to do so results in the impossibility of handling the inquiry. The provision of other data is voluntary. The personal data you provide in the contact forms is processed:

- in order to identify the sender and handle their inquiry sent by the form provided – the legal basis for processing is the necessity of processing to perform the service provision agreement;
- for analytical and statistical purposes – the legal basis for the processing is the legitimate interest of the Pharmacist.eu in keeping statistics of inquiries submitted by the Users via the Account so that we can improve its features.

4. Customisation and adaptation of editorial content

Pharmacist.eu also processes your Personal Data in order to carry out activities aimed at adapting the content to your needs. These activities may consist of:

- providing customised content that is tailored to your declared preferences;
- delivering the content on the basis of your profile data, i.e. in the application form, in accordance with the provisions of the Terms and Conditions;
- providing content based on the analysis of your behaviour in the Service.

The legal basis for the processing of personal data for the purpose of personalisation and adaptation of editorial content is the Pharmacist.eu’s legitimate interest consisting in recommending commercial offers (which may constitute commercial information), including job offers that are tailored to your preferences and your activity.

MARKETING

Pharmacist.eu processes your Personal Data in order to carry out marketing activities that may consist in:

- displaying marketing content that is not tailored to your preferences (including contextual advertising);
- displaying marketing content corresponding to your interests (behavioural advertising);
- sending e-mail notifications of content of interest to you (newsletter service);

In some cases the Pharmacist.eu uses profiling to carry out its marketing activities. This means that via automatic data processing Pharmacist.eu assesses selected factors relating to natural persons in order to analyse their behaviour or to make forecasts of future behaviour. This includes the automatic processing of your Personal Data to analyse your behaviour and forecast future behaviour.

1. Contextual advertising

The Pharmacist.eu processes your personal data for marketing purposes in connection with the

advertising directed at you, including contextual advertising (i.e. advertising that is not tailored to your preferences). The processing of personal data for this purpose is carried out in connection with the fulfilment of the Pharmacist.eu's legitimate interest.

2. Behavioural advertising

The Controller and their trusted partners (listed below) process your Personal Data, including personal data collected through cookies and other similar technologies, for marketing purposes in connection with the targeting of behavioural advertising to you (i.e. advertising that is tailored to your preferences). The processing of Personal Data for this purpose also includes profiling. The use of personal data collected through this technology for marketing purposes, in particular to promote third party services and goods, requires your consent. This consent can be withdrawn at any time. You confirm that the withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of your consents before they were withdrawn.

3. Direct marketing

Your Personal Data may also be used by Pharmacist.eu to direct marketing content to you via various channels, i.e. by e-mail, text message (SMS) or telephone, provided that you have consented to these actions, which you can withdraw at any time. You confirm that the withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of your consents before they were withdrawn.

SOCIAL NETWORKS

Pharmacist.eu processes Personal Data of Users visiting its social media accounts (Facebook, YouTube, Instagram, Twitter, Pinterest, LinkedIn, Google+). The data is processed solely in connection with the provision of the Service, including for the purpose of informing Users about the activities of Pharmacist.eu and promoting various events, services and products. The legal basis for processing personal data for this purpose is the legitimate interest of Pharmacist.eu.

COOKIES

Cookies are small text files that are installed on your device when you browse the websites used to provide the Service regardless of whether you are registered and logged in or not. Cookies usually contain the domain name of the website from which they originate, the time they were stored on the terminal equipment and a unique number. In the Policy, information concerning cookies also applies to other similar technologies used within the Service.

1. "Service" cookies

We use "service" cookies primarily to provide services rendered electronically and to improve the quality of these services. In this connection, Pharmacist.eu and other providers of analytical and statistical services (see trusted partners) use cookies to store information or access information already stored in your telecommunications terminal equipment (computer, telephone, tablet, etc.). The cookies used for this purpose include:

- cookies with data entered by the User (session ID) for the duration of the session;
- authenticating cookies used for services requiring authentication for the duration of the

- session;
- security cookies, such as those used to detect authentication frauds within the website;
- media player session cookies (e.g. flash player cookies) for the duration of the session;
- persistent cookies to personalise your interface for the duration of a session or slightly longer;
- cookies used to monitor website traffic, i.e. data analytics, including cookies.

2. “Marketing” cookies

Pharmacist.eu and our trusted partners (listed below) also use cookies for marketing purposes, including in connection with the targeting of behavioural advertising to you. To this end, Pharmacist.eu and trusted partners* store information or access information already stored in your telecommunications terminal equipment (computer, telephone, tablet etc.). The use of cookies and personal data collected through them for marketing purposes, in particular to promote third party services and goods, requires your consent. This consent can be withdrawn at any time. You confirm that the withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of your consents before they were withdrawn.

DATA RECIPIENTS

Your data may be passed on to Pharmacist.eu’s service providers and government authorities.

1. Service providers for Pharmacist.eu

In connection with the provision of the Services, your Personal Data shall be disclosed to external entities, including in particular suppliers responsible for the operation of the Pharmacist.eu’s IT systems, such as:

- research companies,
- couriers and postal operators
- marketing agencies (with regard to marketing services, as described in detail in the three previous chapters),
- entities affiliated with Pharmacist.eu,
- entities providing service backup and data storage services,
- suppliers providing request handling services via contact forms,
- postal client suppliers,
- entities providing Service analyses and preparing Service statistics (as described above in the previous chapter).

The level of protection of personal data outside the European Economic Area (EEA) is different from that provided by European law. For this reason, we transfer your personal data outside the EEA with an adequate level of protection, primarily through:

- cooperation with entities processing personal data in countries for which a relevant European Commission decision has been issued;
- application of standard contractual clauses issued by the European Commission;
- application of binding corporate rules, approved by the competent supervisory authority;
- in case of data transfer to the U.S., cooperation with entities participating in the Privacy Shield

program, approved by the European Commission decision. We shall inform you about the intention to transfer personal data outside the EEA at the stage of data collection.

2. Public administration bodies

We reserve the right to disclose information to the competent authorities or third parties who request such information, on an appropriate legal basis and in accordance with applicable law.

USER RIGHTS

You have the following rights:

- right to access to the content of the data and request rectification/erasure/restriction of processing,
- right to data portability,
- right to object to the processing of data, and
- right to lodge a complaint with the supervisory authority responsible for personal data protection.

If you have registered for the provision of the Service and have given your consent to the processing of Personal Data, you may withdraw your consent at any time by sending a message to gdpr@pharmacist.org.

In the case of the data you have provided voluntarily, filling in your account boxes and the application form for the Service within the meaning of the Terms and Conditions, you may delete it at any time by editing the scope of information contained therein. For other categories of data or if you are an unregistered User of the Service, it is sufficient that you send your request to gdpr@pharmacist.org.

1. Right to object

You have the right at any time to object to the processing of your data for direct marketing purposes, including profiling. This processing is in our legitimate interest. You also have the right at any time to object to the processing of your data for reasons relating to your particular situation.

PERIOD OF PROCESSING OF PERSONAL DATA

We shall store your Personal Data for as long as you have an Account with the Service or do not withdraw your consent to the processing of the Personal Data you have included in the application form in the framework of your registration for the Service in accordance with these Terms and Conditions. This is necessary both for the proper provision of services specified in the Terms and Conditions and for marketing purposes. If you delete your Account or withdraw your consent to the

processing of your Personal Data, we shall cease processing your Personal Data, except to secure, prove or defend our claims or defend against claims made against Pharmacist.eu, or in other situations where the Pharmacist.eu is under a legal obligation to process Personal Data. If you withdraw your consent to the processing of your Personal Data, we shall either delete it or make it anonymous, however, with the provision that we shall process some of the data (name, surname, e-mail address, Account history and information about your consent) for a period of 6 years to establish, investigate or defend against possible claims. If you use any feature of the Service without being logged in, we shall process your Personal Data for the time that your equipment stores cookies, user agent and tabs and information on the website.

PERSONAL DATA SECURITY

We conduct ongoing risk analysis to ensure that your Personal Data is processed securely. Only authorised persons have access to your Personal Data and only to the extent necessary for the performance of their tasks. We make sure that all operations on your Personal Data are recorded and performed only by authorized employees and partners. Each of our partners ensures that we take appropriate security measures when processing your Personal Data.

CONTROLLER CONTACT DETAILS

The Controller of your Personal Data is Pharmacist.eu/My – Pharmacist.eu spółka z ograniczoną odpowiedzialnością with its registered office in Józefów, ul. Piaskowa 52, 05-420 Józefów

You can contact our Data Protection Officer for any matter relating to Data Protection at gdpr@pharmacist.org

AMENDMENTS TO THE POLICY

The protection of your Personal Data is a dynamic process subject to continuous changes. These changes are intended to protect your rights in the most effective way possible, therefore the Policy is subject to ongoing review and updating. We shall inform you of any changes by e-mail.

List of Pharmacist.eu's trusted partners

- Facebook Ireland Limited – running remarketing campaigns and measuring their effectiveness – Ireland (EEA)
- Google Ireland Limited (Google Adwords, DoubleClick Ad Exchange, DoubleClick for Publishers Small Business) – management of advertising campaigns, their analysis and measurement of traffic on websites used to provide the Service – Ireland (EEA)
- Google Incorporated (Google Analytics, Google Cloud Platform, G-Suite, Google Optimize, Google Tag Manager, Google Data Studio) – support of advertising campaigns, analysis of traffic on websites used to provide the Service and support of corporate e-mail, analysis of the use of the Service by the User – USA (outside EEA)
- Comvision sp. z o. o. – sending marketing information about the Service – Poland (EEA)
- Benhauer sp. z o.o. – conducting remarketing campaigns and measuring their effectiveness, e-mail marketing – Poland (EEA)

- Solwit SA – maintenance of G Suite accounts – Poland (EEA)
- dhosting sp. z o. o. – hosting service provider – Poland (EEA)