

## **PHARMAOFFER PLATFORM PRIVACY POLICY STATEMENT**

Your personal privacy is important to us. Access to your personal data is subject to strict security controls and we will not share it with third parties. This Privacy Statement complies to the EU General Data Protection Regulation (GDPR) EUR 2016/679.

### **Art 1. Definition of the service**

#### **Art 1.1**

The Pharmaoffer Platform is an online marketplace that brings together the global availability of pharmaceutical raw materials in an extensive database.

Producers and Traders, either represented by legal entities or single person companies, of raw materials (“**Supplier(s)**”) can amongst others, after opening a Pharmaoffer account (“**Pharmaoffer Account**”), upload their product portfolio and quality documents.

Anyone who is interested to buy these products, either represented by legal entities or single person companies, (“**Buyer(s)**”) can search the extensive database and, after opening a Pharmaoffer Account, sent inquiries to Suppliers in order to obtain quotations. Apart from this Buyers can after approval of the Supplier, download producer and product related documents and information. Without approval of the Supplier it is always possible to download the Certificates of Analyses.

#### **Art 1.2**

Buyers can upgrade any received inquiry to an order. After explicit confirmation of that order by the Supplier and by the Buyer, the order becomes final and is accepted by both Buyer and Supplier subject to a positive Financial and Quality Validation executed by Pharmaoffer. By doing so, both Buyer and Supplier agree that they have entered into a contract directly with each other.

Pharmaoffer is not and does not become a party to this contract. Nor is Pharmaoffer a participant in any contractual relationship between Buyers and Suppliers, nor is Pharmaoffer acting as an Agent in any capacity for any Buyer and/or Supplier.

Pharmaoffer is only involved in the financial clearance of the transaction between Buyer and Supplier.

#### **Art 1.3**

Buyers and Suppliers and any other visitors of the website Pharmaoffer.com hereinafter together also refer to as “**User(s)**”.

### **Art 2 Identification Data**

If you are registering a Pharmaoffer Account for a Buyer or Supplier or for both, you represent and warrant that you have the authority to legally bind that entity and grant us all permissions and licenses provided in our Terms of Service.

In this process of opening a Pharmaoffer Account and executing a Financial and Quality Validation personal data of representatives of Suppliers and Buyers are collected and further processed only to the extent necessary. Personal data includes: name, surname and contact details like email address and (mobile-)telephone number.

In certain cases other data may be collected such as: function within the Supplier or Buyer organisation, copy passport, country of residence and nationality.

We also automatically receive and record data information on our server logs from your browser including your IP address, cookie information and the pages your visit. This information is not linked to your account and will not be used to identify you.

### **Art 3 Why do we process your data?**

There are three main reasons why we process your personal data.

One is that in order to fully render the services offered, Pharmaoffer needs to have a contact person(s) that has the authority to legally represent the Supplier or Buyer organisation.

The second is that in the event that you want to subscribe to our newsletter we need your

correspondence data. In the process of opening a Pharmaoffer Account you will be asked if you want to subscribe to our newsletter. If so your data will be added to our newsletter list.

In the event you want to unsubscribe to our newsletter please send an email to [info@pharmaoffer.com](mailto:info@pharmaoffer.com) and your data will be unlisted from our newsletter list without any further questioning.

The third is that we utilize the Google Analytics Demographics to analyse all visitors of our website. Users can opt-out of Google Analytics if they prefer so.

#### **Art 4 Who has access to your information and who is it disclosed to?**

All Pharmaoffer employees with access to the admin functionality of our website have access to your personal data as well as some contractors responsible for technical IT aspects as well as financial aspects. The CEO of Pharmaoffer or the CFO and CMO of Pharmaoffer together has the authority to issue or withdraw employees to or from the list of employees having access to the admin functionality of our website. They control also a list on which all employees names are stated who has current access to this admin functionality. Each person on this list has access to your personal data via a personal user ID and password.

The contractor has signed a contract with Pharmaoffer which legally binds them to comply with applicable legislation on the protection and processing of personal data, and more specifically with Regulation (EC) No 45/2001.

No personal data is shared with other third parties.

This will only be done when:

- 1) we have your consent to share information;
- 2) we respond to subpoenas, court orders or legal process and are obliged to do so;
- 3) we find that your actions on our website violate the Terms of Service.

#### **Art 5 How do we protect and safeguard your information?**

Our website and all data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored on the servers of Trans-iX B.V. the operations of which abide the General Data Protection Regulation (GDPR) EUR 2016/679.

#### **Art 6 Access to your personal data**

Other than your access to your dashboard of your Pharmaoffer Account you have no direct access to the data stored on our server. If you wish to modify or delete your personal data you can edit your data on the dashboard of your Pharmaoffer Account. If you want to know what personal data is stored on your behalf you can also send an email to [info@pharmaoffer.com](mailto:info@pharmaoffer.com) and you will receive a reply within 15 working days.

#### **Art 7 How long is your data kept?**

All your personal data received and stored – either by Pharmaoffer, Trans-iX B.V. or the contractor – are erased after a 5 years non used period has ended.

#### **Art 8 Further information**

If you have any further questions regarding this Privacy Policy Statement please send an email to [info@pharmaoffer.com](mailto:info@pharmaoffer.com) and will answer your question.

#### **Art 9 Changes to this Privacy Statement**

This Privacy Statement is effective as of May 25<sup>th</sup>, 2018, has been changed on August the 22<sup>nd</sup>, 2018 and will remain in effect except with respect to any changes in its provision in the future, which will be in effect immediately after posted on our website.