

Clinigen Group plc Privacy Policy

Clinigen respects your privacy and is committed to protecting your personal data. This privacy policy will tell you about how we look after your personal data when you visit our websites and tell you about your privacy rights and how the law protects you.

This privacy policy aims to give you information on how the Clinigen Group collects and processes your personal data through your use of its websites, including any data you may provide through these sites when you sign up to our newsletters, or submit any information or purchase a product or service from our online services such as Cliniport, Idis Online or Aseptics Online.

This website is not intended for children and we do not knowingly collect data relating to children, unless we have agreed this with you.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

1. WHO WE ARE

This privacy policy is issued on behalf of the Clinigen Group so when we mention "Clinigen", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Clinigen Group responsible for processing your data. For the avoidance of doubt this includes Quantum Pharma Group Limited and its affiliates. Clinigen Group plc is the controller and is responsible for this website.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

Clinigen Group plc
General Counsel

LegalandContracts@clinigengroup.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection (www.ico.org.uk). We

would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2. THE DATA WE COLLECT ABOUT YOU

Personal data means any data about an individual from which that person can be identified. It does not include data where the identifiers has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **identity data** including first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender;
- **contact data** including billing address, delivery address, email address and telephone numbers;
- **financial data** including bank account and payment card details;
- **medical/health data** provided to us by healthcare professionals, where required to support products ordered through our online services;
- **transaction data** including details about payments to and from you and other details of products and services you have purchased from us;
- **technical data** including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
- **profile data** including your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;
- **usage data** including information about how you use our website, products and services; and
- **marketing and communications data** including your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data**, such as statistical or demographic data, for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this

privacy policy.

Unless we have told you elsewhere in this policy or otherwise in writing, we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) through our websites. Nor do we collect any information about criminal convictions and offences through our websites.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise;
- **automated technologies or interactions.** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies;
- **third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - technical data from analytics providers or search engines, such as Google, based outside the EU;
 - where you have agreed to it, we may receive health information about you from your healthcare provider.
 - contact, financial and transaction data from providers of technical, payment and delivery services based inside or outside the EU.

- identity and contact data from publicly available sources such as Companies House based inside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. We have described below how we plan to use your personal data, and which of the legal bases we rely on to do so.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) health data (f)Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) necessary to comply with a legal obligation
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d)Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e)Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e)Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

	(e) Profile	
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Where we talk about **‘Legitimate Interest’** we mean the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We will not send you unsolicited marketing information without your consent, and we will get your express opt-in consent before we share your personal data with any company outside the Clinigen group of companies for marketing purposes.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message, or where we are processing your sensitive personal data.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any product/service purchase, warranty registration, product/service experience or other transactions.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- other companies in the Clinigen Group that may be based inside and outside of the EU and that may carry out centralised administrative and reporting activities as processors and joint controllers;
- External third parties such as:
 - Service providers acting as processors based inside or outside the EEA who provide outsourced services such as IT and system administration services;
 - Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based inside or outside the EEA who provide consultancy, banking, legal, insurance and accounting services; or
 - HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based inside or outside the EEA who require reporting of processing activities in certain circumstances; or
 - Regulatory authorities such as the MHRA.
- Third parties to whom we may choose to sell, transfer, or merge parts of our

business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Whilst we do not routinely do so, we may share your personal data within the Clinigen Group. This will involve transferring your data outside the European Economic Area (EEA).

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data.

Many of our external third parties are based outside the European Economic Area (EEA), and as a result their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. HOW SECURE IS MY DATA?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click the links below to find out more about these rights:

- **Request access to your personal data**

Commonly known as a data subject access request, this enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction of your personal data**

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Request erasure of your personal data**

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing of your personal data**

Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms, you can do so by contacting us. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing your personal data**

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request transfer of your personal data to you or a third party**

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Right to withdraw consent**

Where we are relying on consent to process your personal data, you may withdraw it at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to access your own personal data, please contact the Head of Group HR. If you wish to exercise any of the other rights set out above, please contact LegalandContracts@clinigengroup.com.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. WHERE TO SEEK FURTHER ADVICE

If you have any questions regarding this Policy or any related issue, you should contact Clinigen's General Counsel:-

Amanda Miller

Email: Amanda.miller@clinigengroup.com

Tel: 44 1932 824039

Mobile: 44 7764 784305

11. OWNERSHIP OF THIS POLICY

This Policy is owned by Clinigen's General Counsel.

This Policy supersedes all previous versions of Clinigen Group plc's Privacy Policy.