

FARENTA OY CUSTOMER REGISTER – PRIVACY NOTICE

Date of issue 24 May 2018

1. Controller

Farenta Oy (hereinafter **Farenta**)
Orionintie 5
02200 Espoo
Finland

2. Name of the Personal Data File

Farenta Oy Customer Register

3. Lawfulness and Purposes of Personal Data Processing

Farenta Net is an entity of electronic services built for the needs of the pharmaceutical field. Farenta Net connects the pharmaceutical field together by offering its users useful and forward-looking electronic solutions to support and strengthen the operations.

Farenta Net gathers all important notices of the pharmaceutical field and web pages in one place for the pharmacy personnel to support the customer service. Farenta Net is the only channel for the pharmaceutical industry operators to reach pharmacies, hospital pharmacies and dispensaries.

The data subject referred to in this document is the user of Farenta Net or other type of customer of Farenta, or a pharmacy's contact person for the emergency message service.

The grounds for processing of the personal data is either fulfilment of an agreement concluded between Farenta and the data subject or the legitimate interest of the data controller or a third party, such as the customer himself/herself. Farenta's legitimate interests consist of providing, maintaining and developing Farenta Net and Farenta's other services, as well as managing and developing Farenta's customer relationships, business functions and communications. To fulfil said legitimate interests, Farenta may e.g. communicate with the data subject, process personal data to compile summaries, statistics and other compilations regarding Farenta Net, send emergency messages, organise training and other events, maintain an intranet, conduct research, as well as market and provide other type of information on Farenta's services and the products and services of its customers. Farenta may use customer related personal data also for improving customer experience by developing the services and analysing the customer's interests.

In some cases, Farenta may also process personal data on the basis of the data subject's consent. Farenta obtains the data subject's consent for e.g. conducting market research, real world evidence trials or follow-up studies on the use of a specific product.

Maintaining the customer register is necessary for Farenta to enable the provision of Farenta Net as well as to establish and maintain good customer relationships.

4. Content of the Register

Farenta's customer base consists of pharmacists and other professionals in the pharmaceutical and healthcare field as well as legal entities and authorities. In order to establish and maintain a customer relationship, Farenta may process personal data of natural persons, who are acting as either sole traders or representing and/or working for Farenta's customer companies and other legal entities. Farenta may also collect personal data of a prospective customer's representatives.

The personal data Farenta may collect and process includes the following personal data:

- name
- address
- phone number
- e-mail address
- information on employer

- title (such as responsible pharmacist and key account manager)
- username
- password
- cookie data

5. Regular Sources of Information

Personal data in Farenta's customer register is mainly collected from the data subject himself/herself or his/her employer. Personal data may also be collected during the course of use of Farenta Net. Some information may also be collected from the authorities or publicly available sources within the limits of the applicable laws and regulations.

6. Data Disclosure and Transfers

Personal data from the customer and sales register may be disclosed to Farenta's auditors, insurance companies and different governmental authorities/agencies (or similar) for the purposes of their regulatory tasks. Personal data may also be disclosed to other companies within the Oriola Group for purposes compatible with the processing purposes defined in this privacy notice. The disclosure of data will be carried out in accordance with applicable law.

Personal data may be transferred outside of the European Union or the European Economic Area, if it is necessary to carry out the purposes of the data processing. In such case, appropriate technical and organisational measures, such as the use of EU Commission's standard contractual clauses, will be carried out to ensure a sufficient level of data protection in accordance with the applicable data protection regulation. Upon the data subject's request in accordance with section 10 of this privacy notice, Farenta will provide a copy of these measures to the data subject.

7. Data Retention

Farenta manages the personal data within the customer register during the customer relationship and regularly deletes and corrects unnecessary and outdated data. When the relationship between the data subject and Farenta becomes passive, Farenta retains the personal data only for as long as the personal data is necessary for Farenta's genuine needs and the regulatory requirements Farenta is subject to.

8. Data Security

Farenta strives for the highest possible level of information security in all its activities. The premises are protected by an electronic access control system and 24-hour electronic surveillance. A separate area and lockable storage space have been designated for confidential work. The personnel are obliged to maintain professional secrecy.

Information networks are protected by firewalls and intrusion detection and prevention systems. Data is transferred to and from clients using secured communication solutions (VPN, SSL VPN) according to customer needs. The use of systems and data is limited to only those needing them in their work, and the use of the services requires an individual, protected user ID.

The operating systems and programmes are up-to-date and protected with antivirus and anti-malware programmes. The users of Farenta Net can be identified using the strong identification AATU pharmacy identifier key. Farenta and its service providers monitor the safety and integrity of the ICT environment and have implemented technical measures to prevent and detect any safety breaches that may threaten the personal data.

9. Data Subject's Rights

Right to Object to Direct Marketing

The data subject has the right to object to direct marketing at any time. The data subject may use the right by contacting Farenta in accordance with section 10 of this privacy notice.

Access to Information

The data subject has the right to obtain information of the personal data concerning him/her, which Farenta is processing, and obtain a copy of such personal data. For submitting such request, please refer to section 10 of this privacy notice. Use of this right is primarily free of charge.

Right to Rectification, Erasure and Restriction

The data subject is entitled to have any personal data that is inaccurate, outdated, unnecessary or contrary to the purposes of data processing corrected or erased. The data subject may primarily correct or erase any inaccurate, outdated, unnecessary data in the Farenta Net himself/herself. Requests concerning rectification and erasure may be presented in accordance with the instructions in section 10 of this privacy notice.

The data subject is also entitled to request Farenta to restrict processing of the data subject's personal data for example when the data subject is waiting for Farenta's response to his/hers access or erasure request.

Right to Object Personal Data Processing

On grounds relating to his/her particular situation, the data subject is entitled to object processing of personal data concerning him/her, provided that the processing is based on the data controller's legitimate interest.

Data subject may send his/her request to restrict the processing in accordance with section 10 of this privacy notice. In this request, the data subject shall define the particular situation based on which data subject is objecting the data processing. Farenta may decline the request on statutory grounds.

Right to Withdraw Consent

Where the processing of personal data is based on the data subject's consent (e.g. electronic direct marketing or participation in follow-up studies), the data subject has the right to withdraw this consent by notifying Farenta in accordance with the instructions in section 10 of this privacy notice.

Right of Data Portability

To the extent that the data subject has himself/herself submitted data to the register, which are processed in order to execute the agreement between Farenta and the data subject or are processed under his/her consent, the data subject has the right to obtain a copy of such data in a commonly used and machine-readable format and transmit such data to another data controller (if technically possible).

Right to Lodge a Complaint

If the data controller does not follow the applicable data protection regulation, a data subject is entitled to lodge a complaint with a competent data protection authority.

10. Contact Details

Farenta Oy
Orionintie 5
02200 Espoo
Finland
E-mail: farentaverkko@farenta.fi
Tel: +358 10 4398 220

Data protection officer
E-mail: GDPR-DPO@oriola.com
Tel: +46-701 981 322

The data subject may contact the data controller in all questions and matters relating to personal data processing or rights of the data subject. Data subjects may use their rights by sending e-mail or post to the above-mentioned addresses.