

PRIVACY POLICY

I. GENERAL PROVISIONS

Company SALUS, Ljubljana, d.d. and its affiliates respect your right to privacy and are committed to ensuring the highest level of protection of your personal data. This Privacy Policy describes how we collect, use, store and protect your personal data and ensure compliance with applicable laws, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 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).

II. DATA CONTROLLER

The controller of your personal data is SALUS, Ljubljana, d.d., Litostrojska cesta 46A, 1000 Ljubljana, Slovenia, registration number: 5002796000, telephone number: +386 (0)15899100, electronic contact form available at www.salus.eu.

In certain cases, the controller may also be another affiliated company. More details are set out in the section Information for Individuals set out later in this Privacy Policy.

III. DEFINITIONS

Terms used in this Privacy Policy have the same meaning as set out in the General Data Protection Regulation. Brief explanations of these terms are provided below:

Personal data means any information relating to an identified or identifiable natural person.

Processing means any operation or set of operations which is performed on personal data and includes, in particular, collection, organisation, storage, alteration, consultation, retrieval, as well as erasure and destruction of such data.

Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing.

Processor means the natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller.

IV. THE PURPOSE AND THE LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

All personal data will be treated confidentially and used only for the purposes for which it was collected. We are committed to the principle of data minimisation, which means that we collect, store and process only the data we need to fulfil the purposes for which it was collected.

The processing of your personal data may be based on one of the following legal bases:

- **Consent:** We will process your personal data if you give us your consent to do so. The provision of data on this basis is always voluntary and does not adversely affect you if you do not give your consent.
- **Contractual relationship:** personal data is processed where it is necessary for the conclusion, performance or completion of a contract with you.

- **Law:** we process your personal data where required to do so by law (e.g. tax law). You are obliged to provide the data that we are required to process due to legal obligations.
- **Protection of the vital interests of the data subject:** personal data is processed where necessary to protect the vital interests of the data subject.
- **Legitimate interests:** processing of your personal data may be carried out for the legitimate interests of the controller.

V. PERSONAL DATA RETENTION PERIOD

We store the personal data we process in accordance with applicable laws and only for as long as is necessary to fulfil the purposes for which the data was collected.

If we collect and process personal data on the basis of your consent, we will keep the data permanently or until the consent is withdrawn. However, in the event that the purpose for which we processed the data is fulfilled, we will delete your data even if you do not withdraw your consent.

When we process personal data on the basis of a contractual relationship, we retain the data for the entire duration of the contract, including any guarantee periods or other periods arising from the contract.

If the law provides a retention period of personal data, we will retain it in accordance with such legal provisions.

VI. DISCLOSURE OF DATA TO THIRD PARTIES

The Controller may disclose your personal data to third parties. Third parties' access to and processing of the data by such third parties is limited to the purposes for which such data was collected. Any third parties to whom we may disclose your personal data are obliged to comply with applicable law.

We may disclose your personal data to:

- our affiliated companies.
- companies that provide support services for usual operating of the company (postal service providers, shipping service providers, files and media destruction service providers, IT service providers in the context of software servicing and maintenance, legal service providers, website administrator and webmaster, etc.).
- public administration bodies and courts, when we are required so to do by law.
- to organisations or institutions in the field of healthcare, where we are required so to do by law (e.g. notification of adverse events of medicines to the Public Agency for Medicinal Products and Medical Devices - pharmacovigilance).

We will take appropriate measures to ensure that your personal data is only accessible by employees of any of the above third parties who need access to your personal data to carry out their services. We restrict access to personal data to employees of both the controller and of its affiliated companies. All employees who have access to personal data are obliged to protect the personal data they process.

Your personal data may also be processed by third parties outside the European Economic Area, which includes countries that may not provide the same level of protection of personal data as is in place within the European Economic Area. In accordance with the relevant data protection and privacy regulations, we will take appropriate measures to ensure that your personal data, in each transfer, remains protected and secure. We will define these measures by entering into appropriate contractual frameworks that specify the protection of personal data.

VII. PERSONAL DATA PROTECTION METHODS

Your personal data is protected against breaches, misuse and access by unauthorised persons.

Personal data is stored in physical and electronic files, which are protected by appropriate technical and organisational measures. All paper documents containing your personal data are stored in secure premises and our computer systems are protected by technical and organisational measures to prevent accidental or intentional destruction, loss, damage, alteration and unauthorised disclosure of, or access to, your personal data.

Upon expiry of the retention period or revocation of consent, the data (including any copies) is immediately and irretrievably and permanently deleted. Any storage media on which the personal data is located is destroyed or permanently deleted.

Should a personal data breach occur, we will immediately notify the competent supervisory authority of the breach. For Slovenia, the competent supervisory authority for the protection of personal data is the Information Commissioner. You can find out more about the functions of the competent authority on its website. Where a personal data breach gives rise to suspicion that a criminal offence may have been committed, we will also immediately report this to the police or the competent prosecutor's office. Should a personal data breach occur where there is a high risk to the rights and freedoms of natural persons whose personal data we process, we will notify you of such breach without undue delay.

VIII. RIGHTS OF DATA SUBJECT WITH REGARD TO PERSONAL DATA PROCESSING

The controller ensures the exercise of all your rights in relation to the processing of personal data to which you are entitled under the General Data Protection Regulation. Details are set out in the information for data subjects available below in this Privacy Policy.

IX. INFORMATION TO DATA SUBJECTS

The information for data subjects is provided to inform them about the purpose, the legal basis for the processing of personal data and the rights of a data subject in relation to the processing, as follows:

- 1) Information for data subjects, attending SALUS events available at the [following link](#).
- 2) Information for data subjects related to the handling of data on adverse events of medicinal products and complications of medical devices available at the [following link](#).

X. TRANSITIONAL AND FINAL PROVISIONS

We reserve the right to adapt this Privacy Policy from time to time, as necessary, to the real situation and legislation in the field of protection of personal data. Therefore you are invited to check the current version before each transfer of personal data to be acquainted with any changes and amendments.