The Data Protection Regulation – or The General Data Protection Regulation (GDPR), as it is also called, contains rules on how personal data may be processed. The regulation came into force on 25 May 2018 and replaced the previous Personal Data Act (PuL).

### How we handle your personal data

In order to be able to offer you our services, we need to process your personal data. We care about your privacy and do not collect more data than we need. We never sell the data to third parties. It is important that you read and understand our data protection policy before ordering or using our services. If you have any questions about our data protection policy, you can always contact us at info@frostpharma.com. By ordering or using FrostPharma's services, you accept our data protection policy and our processing of your personal data. You also agree that FrostPharma uses electronic communication channels to communicate and send information to you. Here we explain how we collect and use your personal data. We also describe what rights you have.

#### Collection and use of data

What information do we collect?

This data protection policy covers all data that we collect, for example from websites, social media, contact by phone or email and at events/fairs. We may combine personal data collected in one way (e.g. a website) with personal data collected in another way (e.g. at trade fairs).

### Information You Provide to us

You may directly or indirectly provide us with information about yourself and your company in a number of different ways. Examples of this may be when you order our products and services or contact us on either our website, e-mail, letter or telephone. It can also be when you sign up for a course, a meeting, a seminar or similar, or when you sign up to receive newsletters or interact on our social media. This information can be:

- Personal and contact information name, address information, e-mail address, mobile phone number, your professional role, your workplace.
- Payment information billing address, reference person, other billing information.

#### **Information We Collect About You**

When you get in touch with us, we may collect information about (please note that we do not always necessarily collect all of the data mentioned below):

- Personal and contact information name, billing and delivery address, e-mail address, mobile phone number, your professional role, your workplace.
- Information about services and deliveries details about the services you subscribe to or purchase, e.g. ongoing consultancy services, assignments, projects or trainings and newsletters that you read.
- Financial information creditworthiness
- Historical information previous purchases, participation in trainings and meetings, payment history.

 Device information – e.g. IP address, language settings, browser settings, time zone, geographical information, operating system, platform and screen resolution (via statistical tools and newsletter systems).

The information you provide to us is necessary either to enter into a contractual relationship with us, or for other purposes. For example, this may be so that we can improve our information and services to you or carry out our assignment and our commitments to you as a customer. Personal identity numbers are only processed in exceptional cases for special services that require a legitimate identity. You can also read more about how we use cookies in our cookie policy.

### What do we do with the information?

Provide and improve our products and services

All data is used to provide and improve our products and services to our customers. Here you can see what data we process, in what situations and on what legal basis we base our use. Information marked with \* means that the information is voluntary and that we only collect it if you have chosen to provide it to us in the body text or on the phone.

## When you order products, services, training and sign an agreement with us

Category of data	Personal data
Business Information	Company/OrganizationOrganization
	number, Address information, Billing
	information
Contact Information	NameProfessional role, E-mail, Phone
	number, *Message
Service and Product information	Service Information, Product Information,
	Training Information

Legal basis: Perform our contractual obligations to you

## When you contact us via web form

Category of data	Personal data
Contact Information	Name, Professional Role, E-mail, Phone Number
Business Information	Company/Organization
Case information	*Message

Legal basis: Perform our contractual obligations to you and Legitimate Interest

# When you contact us by e-mail and phone

Category of data	Personal data
Contact Information	Name, Professional Role, E-mail, Phone
	Number
Business Information	Company/Organization
Case information	*Message

Legal basis: Perform our contractual obligations to you and Legitimate Interest

## When you receive information or offers from us via newsletters

Category of data	Personal data
Contact Information	Name, E-mail

Legal basis: Consent or Legitimate Interest

# When you are identifiable in images and videos that we publish

Category of data	Personal data
Photo/Video	Photographs, Mingle Pictures, Videos

Legal basis: Perform our contractual obligations to you or Legitimate Interest or Consent

## When you participate in our quality follow-ups and customer satisfaction surveys

Category of data	Personal data
Contact Information	Name
Business Information	Company/Organization
Case information	Answers and reviews*Answers to questions
	in body text

Legal basis: Legitimate interest and consent

## Will we share your information?

We will never sell your personal data to third parties without your permission. Sometimes we share your personal data with suppliers or subcontractors in order to be able to carry out our commitments to you. We comply with legal, technical and organizational requirements to ensure that your information is handled securely. If FrostPharma or a substantial part of

FrostPharma's assets is acquired by a third party, personal data about FrostPharma's customers may be shared with the third party in order for the assignment to continue.

### Where do we process your personal data?

We strive to always store your personal data within the EU/EEA. However, in certain situations, it may be processed outside the EU/EEA by a third party, such as a technology supplier or subcontractor. We will always take all reasonable legal, technical and organisational measures to ensure that your information is handled at the same level as the protection offered within the EU/EEA.

# How long do we keep your personal data?

We keep data for as long as it is necessary to fulfil the purpose for which the information was collected, or to carry out our obligations and as long as it is required by statutory retention periods, in particular with regard to accounting requirements.

### **Your rights**

If you are registered with us, you have several rights you should be aware of:

- You have the right to request an extract from the register free of charge, once a year.
- You have the right to have your personal data corrected if it is incorrect, incomplete
  or misleading and the right to restrict the processing of personal data until it is
  changed.
- You have the right to be forgotten, but deletion of personal data cannot take place if it is required for the performance of the agreement or if other Swedish or European law, court or authority decision says otherwise, and if it is based on legitimate interest. Should you think that there are no legitimate reasons or that the legitimate interest is incorrect, you have the right to object to the processing.
- You also have the right to withdraw consent, submit a complaint about the processing to the Swedish Data Protection Authority and object to direct marketing.

### **Changes of The Data Protection Regulation**

We may update this Privacy Policy from time to time. We will notify the changes on www.frostpharma.com and also inform you of the changes we have made to the data protection policy. You can always contact us if you want access to previous versions.

## **Contact Us**

We have a designated person responsible for data protection issues. If you have any questions about privacy and data protection, please contact us at info@frostpharma.com

FrostPharma's data controller is Fredrik Andersch, and the data processor is Linda Snihs. Address: Berga Backe 2, 182 53 Danderyd, Sweden Tel: +46 8 243660, Company registration number: 556814-1708.

#### **External address sources**

In order to enable communication with healthcare executives and to determine who has the right to receive drug information and/or drug samples, FrostPharma engages the company

Medmind AB. For more information about Medmind AB's Data Protection Policy, please see: http://medmind.se/gdpr.aspx