

Privacy Policy

This website [www.sobivirtual.com] (hereinafter referred to as the "website") is operated by Swedish Orphan Biovitrum s.r.o., identification number: 281 71 276, with its registered office at Na strži 1702/65, Nusle, 140 00 Prague 4, Czech Republic (hereinafter referred to as "Sobi" or "operator") with the aim of creating and operating a platform for sharing materials intended for healthcare professionals, specifically a collection of materials originating, for example, from webinars, recorded seminars and similar events.

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council 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) (hereinafter referred to as the "Regulation") and law of Czech Republic, provides information on the rules for the processing of personal data during your interaction with Sobi in connection with the use of this website.

This privacy policy explains:

- what personal data we process about you and for what purpose in connection with your visit to Sobi's website, your registration on the website and in connection with the use of services provided through this website and communication between us in connection with your visit and use of the website (hereinafter collectively referred to as "use of the website"),
- what rights you have in relation to Sobi's processing of your personal data.

This privacy policy only applies to the areas specified above. For other areas where personal data of natural persons is processed, Sobi has issued separate privacy notices (e.g. for pharmacovigilance/drug safety, clinical trials and other areas). Information on the principles and procedures for processing can be found in these separate notices.

Please read this privacy policy carefully and do not hesitate to contact us if you have any questions.

1/ Identification details of the controller

Swedish Orphan Biovitrum s.r.o., identification number: 281 71 276, with its registered office at Na strži 1702/65, Nusle, 140 00 Prague 4, Czech Republic, is responsible for processing your personal data when you use this website, as it decides why and how it is processed and thus acts as the "data controller" of this personal data.

Sobi does not have a designated data protection officer. If you have any questions regarding the processing of your personal data, please contact us at cee-dataprivacy@sobi.com

2/ What kind of personal data do we process?

Sobi processes personal data about persons:

- who have registered on the website,
- who have visited the website and agreed to the processing of cookies, provided that the scope of the data obtained allows for the identification of the person (even without subsequent registration on the website),
- who have contacted Sobi to report adverse effects, complaints about Sobi products and medical information, or other requests via forms or other means of communication listed on the website,
- who have contacted technical support in connection with the above activities.

3/ What personal data we process about you and from whom we obtain it

For the purposes of registration on the website, we process the following data about you: title, first name, surname, email address, country, job position, and possibly other data specified in the table below.

If you send us a question via the "Q&A" section of the website, we process the following data about you: first name, surname, e-mail address, and possibly other data specified below in the table, including personal data that you yourself entered directly into the form.

If you contact Sobi (regarding reporting of adverse effects, product complaints, etc.) by means other than the "Q&A" section or when providing technical support, we process primarily your e-mail address and other data that you provide in the relevant communication.

In some cases, the processing of personal data may be based on the legal basis of the consent of the data subject. If the consent concerns a child under the age of 16 (or any other lower age specified by local laws in your place of residence - under Czech law, this refers to individuals who are under the age of 15), the consent must be given by an authorised person who is the child's legal representative.

4/ Purpose, scope, legal basis and duration of personal data processing when using the website

When using the website, Sobi processes your personal data for the following purposes:

- **registration and creation of a user account** – *this purpose applies if you register on the website,*
- **participation in a planned event** – *this purpose applies if you register as a registered user for an upcoming event (in the case of events that have already taken place, it is not necessary to register for them in order to view them retrospectively),*
- **sending commercial communications** – *this purpose applies if we send you commercial communications consisting of newsletters, information about upcoming events, products and other news, and you give your consent to this,*
- **management of changes to user accounts** – *this purpose applies if you contact technical support to make changes to your registered details,*
- **keeping records of received and sent mail** – *this purpose applies if you contact Sobi or technical support by e-mail or post to resolve any issues related to the use of the website, Sobi's activities, the provision of medical information, etc. (including via Q&A),*
- **exercising the rights of the data subject** – *this purpose applies if you contact us with a request to exercise your rights relating to the processing of your personal data,*
- **proving, exercising, defending or contesting legal claims in the event of legal disputes** – *this purpose applies if Sobi or a processor processing your data on behalf of Sobi defends its rights and exercises its legal claims in legal disputes.*

We only process and store personal data for specific purposes if the conditions specified in italics for each purpose are met. If these conditions are met, personal data will be processed to the following extent, on the following legal basis and for the following storage period:

Purpose	Scope of personal data	Legal basis	Processing period
Registration and creation of a user account	title, first name, surname, email address, country, job position	Fulfilment of contractual obligations	For the duration of the user account, but no longer than 5

			years from registration
Participation in a planned event	Title, first name, surname	Fulfilment of contractual obligations	For the duration of the user account, but no longer than 5 years from participation in the event
Sending commercial communications	Email address	Consent of the data subject	Until you revoke your consent, but no longer than 10 years from the date of consent
Handling of suggestions and complaints	E-mail address/first name, last name, address, and content of the e-mail/letter to the extent provided by the data subject	Legal obligation	For a period of 10 years from the resolution of the suggestion/complaint
Management of changes to user accounts	title, first name, last name, email address, country, job position, personal data to the extent provided by the data subject	Fulfilment of contractual obligations	For the duration of the user account, but no longer than 5 years from making last change of user account
Keeping records of received and sent mail	E-mail address/first name, last name, address, and content of the e-mail/letter to the extent provided by the data subject	Legitimate interest	For a period of 5 years from the date of sending/receiving the mail
Exercising the rights of the data subject	Personal data to the extent provided by the data subject	Legal obligation	For a period of 5 years from the date of exercising your rights
Proving, exercising, defending or contesting legal claims in the event of legal disputes	Personal data necessary for the relevant legal claims	Legitimate interest	For a period of 3 years from the final conclusion of legal disputes (final conclusion can be, in particular, but not exclusively, these situations: legally binding conclusion of court proceedings and out-of-court settlement of a dispute)

5/ How we share your personal data

We will only disclose your personal data to the extent necessary, and we will always maintain the confidentiality of the data recipient. The recipients of your personal data are mainly:

- our employees,
- other companies in the Sobi Group,
- our independent agents and brokers (if any),
- partners to whom we provide data for the purpose of analysing website traffic and your behaviour on the website,
- partners who provide us with their services, who ensure the technical operation of the website for us, and operators of technologies that we use for our services,
- legal service providers and lawyers,
- partners cooperating in the organisation of planned events,
- the authority in your country that monitors compliance with personal data protection principles,
- courts, law enforcement authorities,
- the authority in your country that collects information on the adverse effects of medicines, medical devices and dietary foods,
- other authorised entities to whom data is disclosed for the purpose of fulfilling our legal or contractual obligations.

We select the partners to whom we entrust your personal data very carefully. We only work with those who are able to ensure such technical and organisational security of personal data that no unauthorised or accidental access to your data or other misuse of your data can occur. All these partners are authorised to process your data exclusively on the basis of a personal data processing agreement in which they undertake to maintain confidentiality. They may not use the data provided for any purposes other than those for which we have made it available to them.

In the case of external partners, your personal data may be accessed by **processors and/or sub-processors** who ensure the proper functioning of the website, the management of your user account, or other processes related to the website. These are typically these categories of partners :

- providers of technical support, registration records and participation in planned events: TAJPAN s.r.o., registered office: Vážska 1, 821 07 Bratislava, ID No.: 35 910 828, Slovak Republic.

6/ Personal data security

We take reasonable measures to protect your personal data from loss, misuse, unauthorised access, disclosure, alteration or destruction using security measures that provide protection at the level of industry standards. However, no data stored or transmitted over the Internet can be guaranteed to be completely secure. As a result, to the extent permitted by applicable law, we make no express or implied warranty regarding the security or integrity of any personal data.

7/ Transfer of data outside the European Economic Area

Personal data may be made available or transferred to recipients based in countries outside the European Union (hereinafter referred to as the "EU") and the European Economic Area (hereinafter collectively referred to as the "EEA"). The level of legal protection of personal data is not the same in all these countries and may not provide the same level of protection as guaranteed by the regulations governing the protection of personal data in the EEA or in the country where you live. In the event of such a transfer, Sobi will take reasonable steps and security measures in advance to ensure the security

of your data and is responsible for ensuring that the transfer is carried out using "standard contractual clauses" approved by the EU or another method in accordance with applicable law. If you have any questions about the methods we use to protect personal data transferred outside the EEA, you can contact us at cee-dataprivacy@sobi.com.

8/ Information regarding your rights in relation to the processing of personal data

Whenever we process your personal data, we take reasonable steps to ensure that your personal data is accurate and up to date for the purposes for which it is collected. We will provide you with the opportunity to exercise the following rights under the conditions and within the limits set out in applicable law:

- **The right to request access to personal data under Article 15 of the Regulation**

The data subject has the right to request confirmation from the controller as to whether their personal data is being processed; if so, the data subject has the right to access this data (a copy of the personal data being processed). Confirmation will be provided in writing, primarily electronically.

- **Right to rectification of personal data pursuant to Article 16 of the Regulation**

The data subject has the right to have the controller rectify inaccurate personal data concerning him or her without undue delay and to have incomplete personal data completed.

- **Right to erasure of personal data pursuant to Article 17 of the Regulation**

The data subject has the right to request the controller to erase personal data concerning him or her, for example in a situation where the personal data are no longer necessary for the purposes for which they were collected or processed, or if he or she withdraws consent to the processing of personal data, objects to the processing of personal data pursuant to Article 21(1) of the Regulation, or if the personal data are processed unlawfully. para. 1 of the Regulation, or if the personal data is processed unlawfully. The controller shall erase such personal data without undue delay. The controller shall not erase such personal data if there is an obligation to continue processing the personal data, e.g. due to a legal obligation, public interest in the field of health or for archiving purposes in the public interest, for scientific or historical research purposes or for statistical purposes, if the exercise of the right to erasure would seriously impede the achievement of the objectives of such processing (see Article 17 of the Regulation for more details).

- **Right to restriction of processing under Article 18 of the Regulation**

If the data subject contests the accuracy of the personal data for a period enabling the controller to verify the accuracy of the personal data, the processing is unlawful and the data subject objects to the erasure of the personal data and requests the restriction of their use instead, the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, the exercise or defence of legal claims, or if the data subject objects to the processing of personal data pursuant to Article 21(1), until it is verified whether the legitimate grounds of the controller override those of the data subject, the data subject has the right to request the restriction of the processing of personal data.

- **Right to data portability pursuant to Article 20 of the Regulation**

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format, and to transmit those data to another controller, where the processing is based on the data subject's consent to the processing of personal data or where the processing is necessary for the performance of a contract to which the data subject is party. The exercise of this right shall not affect the right to erasure of personal data.

- **Right to object to the processing of personal data pursuant to Article 21 of the Regulation**

Where the processing of personal data is based on the legitimate interests pursued by the controller or where the controller processes personal data for direct marketing purposes, the data subject shall have the right to object to the processing of personal data concerning him or her. If the controller fails to demonstrate a legitimate interest, or if the data subject objects to the processing of personal data for direct marketing purposes, the controller shall no longer process such personal data.

- **Right to the ineffectiveness of automated individual decision-making, including profiling, pursuant to Article 22 of the Regulation**

You may request human intervention in any automated decision-making process related to the processing of your data that has a significant or legal effect, and if such processing is not based on your consent, is not permitted by law, or is not necessary for the performance of a contract. When processing your personal data on our part, there is no automated decision-making or profiling .

- **Right to lodge a complaint with a supervisory authority pursuant to Articles 77 and 79 of the Regulation**

If the data subject considers that the personal data concerning him or her are being processed in breach of the Regulation, he or she has the right to lodge a complaint with the personal data protection authority in the Czech Republic (Czech: *Úřad pro ochranu osobních údajů*, see this [link](#)) or in the country where the data subject lives or works.

- **Right to withdraw consent**

If we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time without affecting the lawfulness of the processing prior to such withdrawal. You can withdraw your consent via cee-dataprivacy@sobi.com.

If you have any questions, requests or complaints regarding the processing of your personal data, or if you wish to withdraw your consent, please contact us at cee-dataprivacy@sobi.com.

9/ Use of cookies

Our website uses cookies. A cookie is a file containing an identifier (a string of letters and numbers) that a web server sends to a web browser and which the browser stores. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies can be either "persistent" or "session" cookies: a persistent cookie will be stored in the web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, expires at the end of the user's session when the web browser is closed.

Cookies cannot contain any information that personally identifies the user, but the personal data we store about you may be linked to the information stored in and obtained from cookies.

You can set the scope of cookies that we process about you in connection with your use of the website in your website preferences and you can disable their processing (except for essential technical metadata without which the website would not function properly or at all).

For more information about cookies, please see our Cookie Policy.

10/ Links to other websites

The websites operated by Sobi contain links to several sites that we believe may offer useful information to visitors to our websites. This privacy policy and the obligations arising from it do not apply to such websites (unless the website is owned by Sobi and directly links to this policy). We recommend that you contact these websites directly to obtain information about their privacy policies, security, data and data collection. Sobi cannot be held responsible for any actions or content provided by such third-party websites, nor for the scope and legality of the processing of your personal data on such websites.

11/ Changes to this privacy policy

Personal data protection is not a one-off matter for us. The information we are required to provide to you in connection with our processing of personal data may change or become outdated. For this reason, we reserve the right to amend and change these terms and conditions at any time and to any extent. In the event of significant changes to this policy (i.e. any changes that have a significant impact on your rights), a temporary notice will be posted on our website.

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