

## **DATA PROTECTION POLICY**

Data Protection Policy of Technophar Equipment and Services (2007) Ltd.

### **1. Who is the Data Controller of your data?**

The Data Controller relating to the different processes regarding the management of users, customers, potential customers, collaborators and suppliers is **Technophar Equipment and Services (2007) Ltd.**, with registered office at 3265 Jefferson Blvd., Windsor, ON N8T 2W7, Canada

For the purposes of our data protection policy, the contact telephone number is +519 946 0800, and the contact email is [feedbackgroup@technophar.com](mailto:feedbackgroup@technophar.com)

### **2. What kind of data do we have about you and how have we obtained them?**

The categories of personal data that Technophar Equipment and Services (2007) Ltd. deals with about its users are:

- Identification data
- Postal or electronic addresses
- Commercial information
- Economic and transaction data
- Images

In no case do we treat specially protected data. All the aforementioned data we have obtained or directly from you through the presentation of a commercial offer, contractual proposal, sending a contact form, your participation in an event or session organized by our staff, etc. or through your company to provide identification data and other information necessary to carry out the purpose of the contractual relationship between the parties. It will be an obligation of yours or your company to provide us with the updated data in case of modification.

### **3. For what purpose do we process your data?**

At Technophar Equipment and Services (2007) Ltd. we process the data provided by interested persons to manage different activities derived from specific procedures carried out in sales, after-sales service, supplier management, quality of services, etc. In this way, we process the personal information you have provided:

- to make it easier for us to fulfil a contract or take steps linked to a contract: this is relevant where you make a purchase of our products. This includes verifying your identity; communicating with you; and providing customer services and arranging the delivery or other provision of products or services;
- to conduct our business and pursue our legitimate interests, in particular:
  - we will use your information to provide products and services you have requested, and respond to any comments or complaints you may send us;
  - we monitor use of our websites and online services, and use your information to help us monitor, improve and protect our products, content, services and websites, both online and offline;

- to allow you access to certain limited-entry areas of our site.
- where you give us consent:
  - we will send you direct marketing in relation to our relevant products and services, or other products and services provided by us, our affiliates and carefully selected partners;
  - we place cookies and use similar technologies in accordance with our cookies policy and the information provided to you when those technologies are used. More information about how we use cookies is contained in the "Use of Cookies" section;
  - For purposes which are required by law, including in response to requests by government or law enforcement authorities investigating.

#### 4. How long will we keep your data?

The personal data related to individuals linked to our users that Technophar Equipment and Services (2007) Ltd. collects through the different contact and / or information collection forms will be kept if the deletion is not requested by the interested party. The data provided by our subscribers will be kept while the commercial relationship between the parties is maintained, respecting in any case the minimum legal terms of conservation according to the matter.

In any case, Technophar Equipment and Services (2007) Ltd. will keep your personal data for a period that is reasonably necessary considering our needs to respond to issues that arise or solve problems, make improvements, activate new services and meet the requirements required by applicable legislation. This means that we can keep your personal data for a reasonable period even after you have stopped using our products or have stopped using this website. After this period, your personal data will be deleted from all Data Controller and Data Processor systems.

#### 5. What is the basis of legitimacy for the processing of your data?

According to the type of data processing, we summarize in the following the basis of legitimization of said data processing:

PURPOSE OF PROCESSING ACTIVITY	BASIS OF LEGITIMATION
Registration of people accessing the facilities for access control and security through the use of a magnetic card.	Legitimate interest of the Data Controller
Surveillance and control of access to facilities.	Legitimate interest of the Data Controller
Analyze the risk about a potential client.	Legitimate interest of the Data Controller
Accounting, tax, administrative and customer billing management.	Execution (pre) contract; Regulatory obligation
Management of contracting by clients legal persons in physical, electronic or telephone form.	Execution (pre) contract
External quality audits performed by customers to assess the degree of satisfaction with the order.	Legitimate interest of the Data Controller; Execution (pre) contract
Customer complaints / complaints service.	Consent of the affected; Legitimate interest of the Data Controller
Management of information requests that arrive through web forms or social networks.	Consent of the affected
Marketing operations through physical means (fairs, etc.) to attract new customers.	Consent of the affected

Operations in the contact data of natural persons who provide services in legal entities	Legitimate interest of the Data Controller
Management of supplier data to make payments-transfers and direct debits / accounting / tax and billing	Execution (pre) contract
Data processing of suppliers / collaborators-prescribers to respond to the debt requirements by third parties (trade credit embargoes)	Regulatory obligation
Candidate search, evaluation and selection processes	Consent of the affected
Operations in matters in judicial phase (civil, administrative and / or criminal). Legal records	Consent of the affected; Execution (pre) contract
Control possible incidents in the loading and unloading area of the company	Legitimate interest of the Data Controller

Regarding the referenced legitimation base, you are obliged to provide personal data, if you do not provide your personal data, your contract can not be executed, legal obligations or derived from the public powers.

## **6. To which recipients will your data be communicated?**

Technophar Equipment and Services (2007) Ltd. will never share your personal data with any third company that intends to use them in their direct marketing actions, except in the case that you have expressly authorized us to do so.

We inform you that we can provide your personal data to public administration bodies and competent authorities in those cases that Technophar Equipment and Services (2007) Ltd. receive a legal requirement by said Authorities or in the cases that acting in good faith, we consider that such action is reasonably necessary to comply with a judicial process; to answer any claim or legal claim; or to protect the rights of Technophar Equipment and Services (2007) Ltd. or its customers and the general public.

To be able to satisfy the different needs arising from the accounting, tax and administrative management of our clients and suppliers, it may be necessary for their data to be communicated by Technophar Equipment and Services (2007) Ltd. to our main company, as we operate under the umbrella of Roquette Frères S.A.

The companies of our group are located abroad, both within and outside the European Union, in countries that can offer a level of protection not comparable to UE. However, in these last cases, our Group has adopted all the guarantees required by national and European regulations on data protection in order to guarantee compliance by the addressees of the data reported on the necessary security measures with respect to the treatment of said data.

Technophar Equipment and Services (2007) Ltd. can provide your personal data to third parties (for example, Internet service providers that help us manage our website or carry out the contracted services, support companies and IT maintenance, logistics companies, agencies and tax and accounting advice, etc.). In any case, these third parties must maintain, always, the same levels of security as Technophar Equipment and Services (2007) Ltd. in relation to your personal data and, when necessary, they will be bound by legal commitments to keep your personal data private and secure, and in order to use only the information following specific instructions of Technophar Equipment and Services (2007) Ltd.

## **7. What are your rights as affected or interested person?**

Anyone has the right to obtain confirmation on whether Technophar Equipment and Services (2007) Ltd. is processing personal data concerning them, or not.

Interested persons can request the right of access to their personal data, as well as receive them in a common format and mechanized reading if the processing is carried out by electronic means (portability right).

Likewise, interested persons may request the right to rectify inaccurate data or, if appropriate, request its deletion when, among other reasons, the data is no longer necessary for the purposes for which it was collected.

In addition, in certain circumstances, the interested parties may request the limitation of the processing of their data, or in certain circumstances and for reasons related to their particular situation, the interested parties may exercise their right to oppose the processing of their data. Technophar Equipment and Services (2007) Ltd. will stop processing the data, except for compelling legitimate reasons, or the exercise or defence of possible claims or in those exceptions established in the applicable regulations.

Likewise, we inform you that you have the right to withdraw your consents granted at any time, without affecting the legality of the treatment based on the consent prior to its withdrawal.

Likewise, the User is informed that at any time he / she can exercise the rights by writing to us using the contact data that appear in Section 1, 'Data Controller' and / or 'Data Processor' of the present Policy of Protection of Data and Privacy of Technophar Equipment and Services (2007) Ltd. attaching a copy of a personal identification document.

You will also have the right to file a claim with the Canada Data Protection Agency, especially when you have not obtained satisfaction in the exercise of your rights.

## **8. Protection of data of the users of the website**

In accordance with the current Regulation (EU) 2016/679, Technophar Equipment and Services (2007) Ltd. informs that the personal data of the Users of the website will be treated for the treatment activity indicated in each form of data collection of our website by Technophar Equipment and Services (2007) Ltd. Said treatment of your data will be covered in your own consent. By clicking on the "SEND" button, the User consents to the processing of their data by Technophar Equipment and Services (2007) Ltd.

Likewise, we inform you that except, legal obligation or express consent on your part, Technophar Equipment and Services (2007) Ltd. will not give your data to third parties.

Likewise, the User is informed that at any time they may exercise the rights of access, rectification or deletion of data as well as having other rights recognized in this document and regulated in the Regulation (EU) 2016/679, notifying Technophar Equipment and Services (2007) Ltd. Canada, e-mail: [feedbackgroup@technophar.com](mailto:feedbackgroup@technophar.com)

## **9. Other information**

### **9.1 Security measures**

Technophar Equipment and Services (2007) Ltd. adopts the security levels required by the European and United Kingdom's regulations in force in data protection considering the state of the art, the costs of application and the nature, scope, context and purposes of the treatment described, as well as the risks of probability and severity variables for their rights and freedoms as a person.

### **9.2 Data processing of minors**

Under the GDPR UE 679/2016, minors under 16 can give their consent to the contracting of services of the information society, such as registration in a forum, the completion of a contact form, etc.

However, it will be the responsibility of Technophar Equipment and Services (2007) Ltd. to verify the accuracy of the indicated age by the minor.

For data processing of minors under 16 years of age, such data collection will always be done under the express consent of the parents or legal guardians.

### **9.3 Modifications of our Data Protection and Privacy Policy**

Occasionally, Technophar Equipment and Services (2007) Ltd. You can make modifications and corrections in this section of Data Protection Policy for Customers, Suppliers and Users. Please check this section regularly to see what changes may have existed and how they may affect you.

### **9.4 Why is it necessary to accept this Data Protection and Privacy Policy?**

This section of the Data Protection Policy for Users, Clients and Suppliers of the Technophar Equipment and Services (2007) Ltd website provides you in an easily accessible way all the necessary information so that you can know the type of data that Technophar Equipment and Services (2007) Ltd maintain on users and clients, the purposes pursued, the rights that data protection regulations recognize you as an affected person and how to exercise those rights. Therefore, with the deliberate sending of your personal data through our means of contact and / or with the beginning of the commercial relationship with our company, we consider that you acknowledge and accept the processing of your personal data as described in this policy. This personal information will only be used for the purposes for which you have provided it, or certain national or regional regulations enable us to do so.

In any case, we must warn you that a refusal on your part to provide certain requested information could hinder the development of the contractual relationship between the parties with possible serious consequences at the time of providing the various benefits contemplated in the commercial contract with the contracting party.

If you have any questions regarding this section of Data Protection Policy for Users and Customers of Technophar Equipment and Services (2007) Ltd. please contact the company using the address provided in the first section 'Responsible for Processing Activity' and we will be happy to assist you and answer any additional questions you may want to ask us.

## **10. Applicable legislation**

These Conditions will be governed always by the provisions of European and Canadian legislation on the protection of personal data and privacy.