

# **PERSONVERN**

## **Aspen Pharma Ireland Limited Website Privacy Policy**

### **Introduction to this Website Privacy Policy**

This web site (the "Site") is owned and operated by the Aspen Group ("Aspen"). At Aspen, our unique entrepreneurial culture sets us apart. We are committed to patients, healthcare professionals and alliance partners, our employees and the community. Protecting Personal Data and respecting privacy are fundamental parts of this commitment, and this privacy policy set forth below helps to demonstrate this commitment to visitors and users of Aspen-owned websites. As a result, we have instituted this website privacy policy ("Privacy Policy"). Aspen is providing this Privacy Policy to explain how we collect, use, disclose and protect the Personal Data you submit to us when accessing and using the Site. Aspen is the controller within the meaning of applicable data protection laws. Aspen-owned websites are an Aspen-controlled web programme where Aspen owns, approves and/or engages audiences on behalf of Aspen.

In general, you may visit the Site and view its content while remaining anonymous by not providing any Personal Data. If you do not agree with this Privacy Policy, please do not provide us any information and do not use the Site.

As used in this Privacy Policy, "we," "our" and "us" means Aspen and its affiliates.

### **The meaning of Personal Data**

"Personal Data" is defined in data protection laws applicable in your country. It includes any information relating to an identified or identifiable natural person. This means any individual who can be identified directly or indirectly by reference to an identifier such as name, identification number, location data, online identifiers (for example, IP addresses – if they can be used to identify you) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Put simply, this includes data which either by itself or with other data held by us or available to us, can be used to identify you.

### **Important notice about international transfers**

We are part of the Aspen Group which has databases in different jurisdictions. We may transfer your data to one of the Group's databases outside your country of domicile. These other countries will either have different data protection laws than your country of residence or they will not have data protection laws. They may not be deemed by the European Commission as providing adequate protection for Personal Data. Even if the country to which the data is to be transferred does not require us to provide adequate protection for your data, we will nonetheless seek to ensure that data transfers to Aspen Group databases in that country are adequately protected. This may, for instance, be ensured by means of the European Commission's Standard Contractual Clauses.

### **The categories of Personal Data we may collect, the purpose and the lawful basis**

Personal Data collected from you include the following:

Categories of Personal Data	Purpose	Lawful basis
Contact information (e.g. full name, postal address, e-mail address, employer/business and professional information, job titles, telephone and fax numbers)	Managing and responding to your queries.	GDPR, art. 6(1)(b) and (f): Performance of contract and legitimate interests – it's important that we can respond to your enquiries.
Browsing information (IP address, browser information)	Monitoring and producing statistical information regarding the use of our platforms, and analysing and improving their functionality.	GDPR, art. 6(1)(f): Legitimate interests – we need to perform this limited routine monitoring to make sure our website work properly, to diagnose any problems with our server and administer our Site
All information	Establishing and enforcing our legal rights and obligations and monitoring to identify and record fraudulent activity Complying with instructions from law enforcement agencies,  any court or otherwise as required by law For our general record-keeping and customer relationship management Managing the proposed	GDPR, art. 6(1)(f): Legitimate interest (see column on left)

	<p>sale, restructuring or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organisation Resolving any complaints from or disputes with you</p>	
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In summary, we need certain categories of Personal Data because that is necessary in order to administer any contract with you (where relevant). Certain other Personal Data is processed for our legitimate interests in cases where this does not result in prejudice to you.

**Data anonymisation and use of aggregated information**

We may convert your Personal Data into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from that data. We may use this aggregated data to conduct market research and analysis, including to produce statistical research and reports.

In particular, we use technology to collect anonymous information about the use of this Site. For example:

1. We use technology to track which pages of our Site visitors view. We also use technology to determine which web browsers our visitors use. This technology does not identify you personally, it simply enables us to compile statistics about our visitors and their use of our Site.
2. Certain pages of this Site may contain hyperlinks to other pages of it. We may use technology to track how often these links are used and which pages on our Site our visitors choose to view. Again this technology does not identify you personally — it simply enables us to compile statistics about the use of these hyperlinks.

We use this anonymous data to improve the content and functionality of this Site and consider areas and subjects which are attracting interest so that we can focus our e-mail updates (for those that wish to receive such communications). This allows us to better understand our Site visitors’ interest areas generally and therefore to improve our Site and products and services we offer.

**Cookies and analytic tools**

We may from time to time use cookies on our Site. Cookies are small text files that your web browser leaves on your hard drive to recognize you as a repeat user of our Site, track your use of our Site and target advertising. This allows for personalization of certain aspects of your visit to our Site. Information gathered from cookies in this way is only used on an aggregate basis. Unless a visitor specifically provides their identity to us, e.g., by registering at our Site, providing information through

an online form or sending us correspondence from the Site, we will not know the identification of individual visitors. We may use cookies to store preferences; record session information; develop information about Site visitors' preferences and interests; record past activity at a website in order to provide better service when you return to our Site; or customize web page content based on information you voluntarily provide.

The cookies that our Web sites may deploy can be divided into four categories:

*1. Strictly Necessary Cookies*

These cookies are essential, because they enable you to move around our Web sites and use certain features, e.g., to access secure areas of the Web site or in connection with information searches. Without these cookies, certain services you may ask for could not be provided.

*2. Performance Cookies*

These cookies may be used to collect information about how you use our Web sites, for example which pages you visit most often. These cookies do not collect information that identifies you. These cookies are only used to learn how our Web sites are performing and make relevant improvements.

*3. Functionality & Profile Cookies*

These cookies may be used to allow our Web sites to store information about choices that you make and provide you with more personal features. We may also use such cookies to ensure that onsite marketing and experience is relevant to you. The information these cookies collect may be anonymous and they cannot track your browsing activity on other Web sites.

*4. Advertising Cookies*

These cookies may be used to deliver advertisements that are more relevant to you and your interests. They are usually placed by advertising networks with our permission.

We use Google Analytics, a web analysis service of Google Inc. (Google) on our Site. Google Analytics uses cookies, i.e. text files stored on your computer to enable analysis of website usage by you. Information generated by the cookie about your use of this website is usually transmitted to a Google server in the United States and stored there. In case of activated IP anonymization on this website, however, your IP address is previously truncated by Google within member states of the European Union or in other states which are party to the agreement on the European Economic Area. Only in exceptional cases is a full IP address transmitted to a Google server in the United States and truncated there. On behalf this website's owner, Google will use this information to evaluate your use of the website, compile reports about website activities, and provide the website's operator with further services related to website and Internet usage. The IP address sent from your browser as part of Google Analytics is not merged with other data by Google. You can prevent storage of cookies by appropriately setting your browser software; in this case, however, please note that you might not be able to fully use all functions offered by this website. In addition, you can prevent data generated by the cookie and relating to your use of the website (including your IP address) from being collected and processed by Google, by downloading and installing a browser plug-in from the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>

We use Google Analytics on our Site with the extension "anonymizeIP()", IP addresses being truncated before further processing in order to rule out direct associations to persons.

You can disable cookies using your Internet browser settings. Please consult your browser's help function for information on how to disable cookies. Note that if you disable cookies, certain features of our Site may not function properly.

### **Disclosure of your Personal Data to third parties**

We may disclose your Personal Data to third parties, including but not limited to as follows:

1. within our group of companies for the purposes of use described in this Privacy Policy;
2. to third parties who supply services to us and who help us and our group of companies to operate our business. For example, sometimes a third party may have access to your Personal Data in order to support our information technology;
3. to our legal and other professional advisers;
4. as necessary in order to comply with a legal requirement, to protect vital interests, to protect the security or integrity of our databases or this Site, to take precautions against legal liability;
5. to regulatory authorities, courts and governmental agencies to comply with legal orders, legal or regulatory requirements and government requests; and

### **Security of Personal Data**

We endeavour to use appropriate technical and physical security measures to protect Personal Data which is transmitted, stored or otherwise processed by us, from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access, in connection with our Site. These measures include computer safeguards and secured files and facilities. Our service providers are also selected carefully and required to use appropriate protective measures. In certain areas, Aspen uses industry-standard TLS1.2-encryption to protect data transmissions. Most current browsers support the level of security needed to use these areas.

In particular, we endeavour to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including as appropriate: (a) pseudonymisation (such as where data is separated from direct identifiers so that linkage to an identity is not possible without additional information that is held separately) and encryption, (b) ensuring the ongoing confidentiality, integrity, availability and resilience of systems and services used to process your Personal Data, (c) ensuring the ability to restore the availability and access to Personal Data in a timely manner in the event of a physical or technical incident; and (d) ensuring a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational security measures.

### **Retention period or criteria used to determine the retention period**

We keep your Personal Data for as long as it is necessary to do so to fulfil the purposes for which it was collected as described above.

The criteria we use to determine data retention periods for Personal Data includes the following: (i) Retention in case of queries. We will retain it for a reasonable period after the relationship between us has ceased (up to 6 months) in case of queries from you; (ii) Retention in case of claims. We will retain it for the period in which you might legally bring claims against us (in Denmark this means we will retain it for 10 years) if and to the extent we have entered into any contract with you; (iii) Retention in accordance with legal and regulatory requirements. We will consider whether we need to retain it after the period described in (ii) because of a legal or regulatory requirement.

If you would like further information about our data retention practices please contact us (see "Contact Us" below).

### **Your rights under data privacy laws**

You have various rights under data privacy laws in your country. These may include (as relevant): the right to request access to the Personal Data we hold about you; the right to rectification including to require us to correct inaccurate Personal Data; the right to request restriction of processing concerning you or to object to processing of your Personal Data, the right to request the erasure of your Personal Data where it is no longer necessary for us to retain it; the right to data portability including to obtain Personal Data in a commonly used machine readable format in certain circumstances such as where our processing of it is based on a consent; the right object to automated decision making including profiling (if any) that has a legal or significant effect on you as an individual; and the right to withdraw your consent to any processing for which you have previously given that consent. You can also lodge a complaint with the Norwegian Data Protection Agency. For further information, please go to <https://www.datatilsynet.no/>.

Please see “Contact Us” if you wish to exercise any of these rights (as relevant).

### **Links to Other Websites**

This Site may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of these third-party websites or any association with their operators. We do not control these websites and are not responsible for their data or privacy practices. We urge you to review any privacy policy posted on any site you visit before using the site or providing any Personal Data.

### **Updated and changes to this Privacy Policy**

We may decide to change this Privacy Policy. If the change is fundamental or may significantly affect you, we will provide you with the updated Privacy Policy in advance of the change actually taking effect. We encourage you to review the content of this Privacy Policy regularly.

### **Contact Details**

If you have any queries or complaints about our compliance with this Privacy Policy, or if you would like to make any recommendations or comments to improve the quality of our Privacy Policy, please email us at [inforequest@ie.aspenpharma.com](mailto:inforequest@ie.aspenpharma.com)

There are Terms and Conditions associated with your usage and viewing of this site. Please view these [here](#).

Be sure to include your email address and telephone number with your correspondence.

Alternatively, write to

Aspen Nordic, branch of Aspen Pharma Ireland Limited, Borupvang 3, 2750 Ballerup, Denmark

Phone: +45 44 48 00 44

Last updated: July 2024