

Data Protection Policy

In INNOVIS PHARMA (hereinafter referred to as the “Company” or “we”) we try to meet the needs of the visitors of the website [www. innovispharma.gr](http://www.innovispharma.gr) (the “Website”) by using responsibly the information collected through the Website. We are committed to respect your privacy and comply with applicable laws on data protection and privacy.

Processing of your personal data is governed by these terms, by the relevant provisions of Greek and EU legal framework on data protection, including the General Data Protection Regulation (2016/679) and the relevant decisions, guidelines and regulations issued by the Hellenic Data Protection Authority.

This Personal Data Policy (the "Policy") forms an integral part of our Website and may be subject to modifications. We advise you to regularly check our Personal Data Policy to remain informed and updated on any amendments. By visiting and navigating through our Website you agree to this Personal Data Policy and to the Cookie Policy as in force at the time. When substantial amendments are made, we will ensure that a relevant notice is posted for the visitors of our Website.

This Policy explains how we collect, process and/or use information that we receive via our website and the emails we send that link to this Policy, as amended from time to time. This Policy also describes how we collect, process, use and share the personal information you provide us with. It also describes your choices regarding use, access, transfer, correction and deletion of your personal information.

1. Information we collect

We collect information about you to provide our services. In order to provide our services to you in the best possible manner and to fulfil our contractual obligations, it is essential for us to be able to collect and use the data described in this Policy.

1.1 Information we collect

i. Communication

When you submit your data in our contact form, we collect and retain your data exclusively for the purposes mentioned below. In this context, we collect data that you chose to provide to us, such as you name, surname, email, and telephone number.

iii. Pharmacovigilance Service

When you submit requests to Pharmacovigilance Service, we collect and retain the data required by sector specific legislation, as well as any other data you chose to disclose. In particular, when disclosed, we will collect and process, the following data, indicatively:

- The name and surname of the individual requesting information or reporting adverse events;
- Contact details of the individual requesting information or reporting adverse events (telephone number, email)
- Any data that you voluntarily disclose in your message

1.2 Information We Collect Automatically

When you use the Website, your device is automatically providing information to us, so we can respond and customize our response to you. The type of information we collect by automated means generally includes technical information about your computer, such as your IP address or other device identifier, the type of device you use, and operating system version. The information we collect may also include usage information and statistics about your interaction with the Website. That information may include the URLs of our web pages that you visited, URLs of referring and exiting pages, page views, time spent on a page, number of clicks, platform type, location data (if you have enabled access to your location on your mobile device), and other information about how you used the platform.

This information is collected by using Cookies & other similar Tracking Technologies. We strongly advise you to review our Cookies Policy below.

2. Why we collect your information

We process your data exclusively for the below purposes:

<i>Purpose</i>	<i>Explanation</i>
Communication	When you submit your data in our contact form, we will use them to communicate with you and provide the information and/or services required. Processing of your data is necessary to perform the requested service.
Pharmacovigilance Service	We process your data for reasons of public interest in the field of public health and, in particular, to ensure high standards of quality

	and safety of medicines or medical devices or other formulations. Data collected are transmitted to the competent authorities in anonymous format. When we collect data on behalf of the marketing authorization holders, we normally transmit to them anonymous data, unless transmission of data including your name and surname is required for following-up or based on our contract with the marketing authorization holder.
Improvement of services	We maintain your data and the history of use of our services to produce statistics that allow us to better assess how visitors interact with our Website and to improve its content and structure. The processing of data is based on the legitimate interest of the company in monitoring visitors' response to its services and improving its services.
Legal Obligations & Claims	When a legal obligation is in place, we will provide your data to the competent authorities. We will maintain and process your data to the extent necessary to establish, exercise or support legal claims
Newsletters and marketing material	If you provide your consent by registering your data in the field for subscription to our Newsletter, we will register your data and send you Newsletters and updates on our services and events.

3. Recipients of your data

Access to your data may only be provided to our duly authorised employees or business partners who act on our behalf for the above purposes of processing, by offering us IT services for the registration and storage of your data and/or for the operation of our website and/or pharmacovigilance services. Data collected by Pharmacovigilance are transferred to the marketing authorization holder and the competent authorities when required based on law or regulation and/or contract. When necessary for the purposes of the specific processing, your data will be transferred to affiliate companies of Innovis Pharma. Your data are not transferred to countries outside the European Economic Area (EEA), to third countries and international organisations.

4. Duration of processing

Retention periods can vary significantly based on the type of information and how it is used. Our retention periods are based on criteria that include legally mandated retention periods, pending or potential litigation, our intellectual property or ownership rights, contract requirements, operational directives or needs, and historical archiving.

We will retain your data for the period required to respond to your contact request and for one (1) year after completing processing and archiving your request. Data collected are kept in digital format and with safety at Company's premises.

Regarding the sending of newsletters, we will keep your email as long as you remain subscribed to our newsletter service. You can withdraw your consent at any time. After you withdraw your consent, the company will not be able to send you newsletters.

Data collected for pharmacovigilance purposes are retained for as long as the product's authorization is in force and for 10 years afterwards. When we collect data on behalf of the marketing authorization holder, we will retain your data for the duration of our agreement with the marketing authorization holder. Upon termination of our agreement, we will transfer your data to the marketing authorization holder and delete it from our records. Data collected are kept in hard copies and in digital format and with safety at Company's premises or at the premises of third parties that offer pharmacovigilance services to the Company.

5. Your rights

Our company ensures your rights with respect to processing of personal data and ensures that you may exercise them.

You have the right to request:

8.1 Access to your personal data and information on which data do we process, the purposes of processing, the recipients and the duration of processing.

8.2 Rectification of your personal data if it is inaccurate or incomplete.

8.3 Deletion of your personal data, unless their processing is necessary for the exercise of the legal rights of the Company or of third parties, for the fulfillment of a legal obligation, for public interest reasons or for defending our legal rights before judicial or other Authorities.

8.4 Restriction of processing of your personal data only for specific purposes.

8.5 Ask for the portability of your data, that is to receive the data you have provided in a structured, commonly used format, or ask to send it to a third party designated by you.

8.5 To object to the processing and to withdraw at any time your consent to the processing of your personal data, when processing is based on consent.

If you have any request or question regarding this policy, you may email us or send us a written request, using our contact details set out below. If you wish to exercise any of the above rights, we advise you to ask for our “Data Subject Request Form” and submit it to the following contact details.

INNOVIS PHARMA

44 Kifissias Av.,

15125, Maroussi, Attica

Tel.: +30 2162005600

dpo@innovispharma.gr

If you believe that your data protection rights have been violated, you have the right to lodge a complaint with the Hellenic Data Protection Authority (www.dpa.gr).

Privacy Notice – Operation of CCTV

1. Controller

INNOVIS PHARMA

2. Purpose and lawfulness of data processing

We use a CCTV for the purpose of protecting persons and goods. Processing is necessary for the purposes of our legal interests, as a controller (article 6 par. 1. f, GDPR).

3. Our legal interest for data processing

Our legal interest consists in the need to protect our facilities and goods against illegal acts, such as thefts. The same applies to the safety of life, physical integrity, health, as well as the property of our staff and third parties who are legally in the supervised area. We only collect

image data and limit the operation of CCTV only to areas where we have assessed that there is an increased likelihood of committing illegal acts, e.g. theft, as at the entrance, without focusing on areas where the privacy of the persons whose image may be taken may be excessively restricted, including their right to respect their personal data.

4. Recipients of your data

The data is accessible only by our competent / authorized staff in charge of the safety of the facilities. The data shall not be transmitted to third parties, except in the following cases: a) to the competent judicial, prosecutorial and police authorities when it includes information necessary to investigate a criminal act involving persons or goods of the controller, b) to the competent judicial, prosecutorial and police authorities when requesting data, legally, in the context of exercising of their duties, and c) to the victim or perpetrator of a criminal act, in the case of data which may constitute evidence of the act.

5. How long we keep your personal data

We keep your data for fifteen (15) days, after which they are automatically deleted. In case an incident takes place during this period, we will isolate part of the video and keep it for up to one (1) more month, in order to investigate the incident and initiate legal proceedings to defend our legal interests, while if the incident concerns any third party, we will keep the video for up to three (3) more months.

6. Rights of data subjects

Data subjects have the following rights:

- Right of access: you have the right to be informed if we process your image and, if applicable, receive a copy.
- Right to restriction: you have the right to ask us to restrict the processing of your personal data, such as not deleting personal data that you consider as necessary to establish, exercise or support legal claims.
- Right to objection: you have the right to object to the processing of your personal data
- Right to erasure: you have the right to ask us to delete your personal data

You can exercise your rights by sending an e-mail to dpo@innovispharma.gr or a letter to our postal address or by submitting the request to us in person. In order for us to look in a request

related to your image, you need to inform us when you were in the range of the cameras and give us a picture of you to make it easier for us to identify your data and mask the data of third parties. Alternatively, we give you the opportunity to visit our facilities to show you the relevant images of you. In addition, please note that the exercise of the right to object or delete your personal data, does not imply the immediate deletion of data or the amendment of the processing. In any case, we will answer you in detail as soon as possible, within the deadlines set by the GDPR.

7. Right to lodge a complaint

If you believe that your data protection rights have been violated, you have the right to lodge a complaint with the Data Protection Authority, Kifissias 1-3, 115 23, Athens, <https://www.dpa.gr/>, tel. (+30) 2106475600.