

# DETAILED INFORMATION MODEL FOR THE DATA PROTECTION AND PRIVACY POLICY ON THE WEBSITE

November 1, 2018



## Confidentiality and Data Protection Policy

DCS Pharma Iberia, S.L. (hereinafter the Entity) is committed to due diligence and compliance with the Data Protection regulations. As the central concept of this duty and commitment, the Data Protection Channel (DATAPROTECT line) has been incorporated, which contains the fundamental elements of Data Protection, all managed, supervised and accredited by BONET consulting, a leading company specialising in Regulatory Compliance and Data Protection.

Below is the detailed information about the confidentiality and Data Protection Policy in compliance with the provisions of article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation or GDPR).

Details of the Controller and contact details of the Data Protection Officer (DPO):

Identity	DCS Pharma Iberia, S.L.
Address	C/Roger de Flor 211 baixos, ES-08025 Barcelona
Telephone	+ 34 93 323 99 09
E-mail	bcn@dcspharma.com
DPO contact details	i.oleart@dcspharma.com
Data Protection channel	www.dataprotect-line.com/dcs-pharma

## Purposes of processing

The Entity will process the information provided to us by the data subjects for the following purposes:

- Managing their assistance, visits and meetings at our facilities, as well as management and production of the services/products contracted.
- Managing any type of request, suggestion or query about our professional services that may be made to us by the data subjects.
- Informative and commercial communications: processing of their data for the purpose of informing them about activities, items of interest and general information related to our business and the services/products contracted.
- Managing the data provided by job applicants by means of their Curriculum Vitae (CV) for the purposes of the selection and recruitment processes.

For the successful outcome and progress of their assistance and for managing the above purposes, the owner consents to the processing of their data for the above purposes, all within the strictest compliance with the Data Protection regulations and the policy that we describe. They may exercise their rights at any time (see specific section).

## Data conservation criteria

- Management of services/products contracted with the Entity: the personal data provided in the contracts, offers and/or service proposals, as well as that of the rest of people whose intervention is necessary, will be conserved during the time that the contracted services are in effect. At the end of the provision of the contracted service(s), the personal data will be conserved in cases that could lead to responsibilities with the Entity and/or in compliance with other regulatory frameworks that are applicable to the Entity or a regulation with status of law that requires its conservation. The personal data will be maintained in a way that allows the identification and exercise of the Rights of the data subjects and under the legal and organisational technical measures that are necessary to guarantee its confidentiality and integrity.
- Curriculum Vitae Management: the Entity, as a general rule, keeps Curriculum Vitae for a maximum period of one year. At the end of this period it will automatically be destroyed, in compliance with the principle of data quality.
- Others: the rest of the data and information provided by the user by any means will be conserved for the time that is necessary for meeting the purpose for which it was collected.

## Legitimation

The legal grounds that authorize the Entity to process the personal data of users, customers and potential customers are as follows:

- The consent of the data subject for the processing and management of any request for information or query about our services and products.
- The Consent provided by job Applicants for the purposes of selection and recruitment.
- The framework of provision and/or contracting of services/products with the Entity.
- The legitimate interest in sending informative and commercial communications and/or promotional offers related to the activity of the Entity and the services/products contracted by email or any other means.

## Recipients

For management and internal control purposes, the personal data will be sent to the parent company, DCS Pharma AG located in Switzerland, which will have access to it.

## Origin

The personal data is obtained directly from the data subject and from our employees. The categories of personal data provided to us by our employees are as follows:

- Personal details.
- Postal or email addresses.
- Data provided by and/or consented to by the data subjects related to and necessary for the management and production of the service/product requested.

## Rights

**Right of Access, Rectification and Erasure:** data subjects have the right to obtain confirmation as to whether or not we are processing personal information about them at the Entity. Data subjects have the right to access their personal details, as well as to request rectification of inaccurate data or to request its erasure when, amongst other reasons, the data is no longer necessary for the purposes for which it was collected.

**Right to Restriction and Opposition:** in certain circumstances, data subjects may request restriction of the processing of their data, in which case we will only conserve it for the exercising or defence of claims. In certain circumstances and for reasons related to their specific situation, data subjects may oppose the processing of their data. The Entity will no longer process their data in this case, except for compelling legitimate reasons, or for the exercise or defence of possible claims.

These rights may be exercised on our Data Protection Channel, see specific section.

## Data Protection Channel / DATAPROTECT - line

The Entity has implemented a Data Protection Channel, encompassing the greatest commitment, rigour and professionalism in matters of security, experience, independence and knowledge in the processing of the communications received.

The Data Protection Channel has been set up via a web platform, developed and managed by an independent external expert, to offer and guarantee our commitments as stated above.

Through the Data Protection Channel, you will be able to communicate and process the exercising of your Rights (see previous section) and report any indication or knowledge that you may have of possible security violations (breaches) and/or possible non-compliance or irregularities concerning the Data Protection regulations or this policy of the Entity.

Details of access to the Data Protection Channel are provided at the beginning of this policy.

## Assistance and support

Data subjects may ask the Entity any questions about the processing of their personal data or the interpretation of our policy by contacting the Data Protection Officer (DPO) at their address indicated at the start of this policy.

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