



WEBSITE PRIVACY POLICY

This Privacy Policy regulates the processing of the personal data that you, as a User, candidate or client or potential client, share with us through the Website (www.suanfarma.com), our social profiles and in the events and commercial actions that we organise.

1. DATA CONTROLLERS. The Suanfarma Group entity that is responsible for the processing of your personal data is:

SUAN FARMA S.A.U. (hereinafter referred to as "SUANFARMA") with registered office at Calle Einstein 8, 28108, Alcobendas, Madrid, dpo@suanfarma.com

2. PURPOSES OF PROCESSING. Your personal data will be processed for the following purposes:

- a) **Relationship as User.** To carry out any necessary action or management with the User.
- b) **To exchange data with the entities of the SUANFARMA Group.** We may communicate your data to any of the entities for the purposes of fulfilling any of the purposes set out in this policy and to deal with any request you send us as a User.

You can review the list of entities and their contact details in the "[Group Entities](#)" section at the bottom of the Website.

- c) **Analysis and internal studies.** To use your personal data to improve the products and services we offer by carrying out analyses and internal studies, reports and statistics that allow us to adapt SUANFARMA's activity and commercial information.
- d) **Sending quality surveys.** We will send you quality surveys about the products and services we offer.

- e) **Sending of commercial communications.** We will send you commercial communications about our own products and services by electronic means in accordance with your activity and habits. In each of the commercial communications you will find a mechanism to show your opposition to this reception.
- f) **We will send you our regular newsletter.** We will send you our periodic newsletter electronically. In each mailing you will find a mechanism for you to opt out of receiving it.
- g) **Customer service or contact with SUANFARMA.** When you contact us (even if you are not a SUANFARMA customer) through our Customer Service Department or through the means of contact set up for this purpose and provide us with your details, we process them in order to manage and deal with the request or queries that you make or wish to make, contact you in relation to these requests or queries and forward them to the corresponding customer service department or department. We inform you that we may record calls to the customer service telephone service for quality and security reasons.
- h) **Social media.** We may process your data when you interact with and use our social media profiles in accordance with the provisions of this privacy policy.
- i) **Commercial actions, fairs, congresses, activities, conferences, physical or virtual events organised by SUANFARMA.** In this case we can process your data to confirm your attendance, send you a reminder of the day and time, identify you and contact you.

In the event that you provide us with your contact details, through any member of our staff, in any of the above actions, we may process your data to contact you for professional contact purposes and to send you any information that has been agreed within the framework of such actions.

- j) **Recording and image capture.** To record and capture your image, name and/or voice and to use the images in which you appear recorded or

photographed, on the occasion of the conferences, meetings and other activities that are held, as well as for their editing and editing with the aim of being published and exhibited through the internal and external communication channels owned by SUANFARMA. In this case, SUANFARMA will provide you with the corresponding authorisation for the use of image rights (name, voice and image).

k) Recruitment processes: work with us. To manage the different selection processes open and/or future by companies related to SUANFARMA. In this case, we will provide you with the corresponding privacy policy that regulates the processing of data in the context of the selection process.

3. LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA. The legal bases on which we process your data for the purposes indicated are as follows:

PURPOSES	LEGAL BASIS
User Relationship	The legal basis for the processing is the relationship that binds us as a User of the Website and legitimate interest.
Exchange data with the entities of the SUANFARMA Group.	We process your data on the basis of the pre-contractual and contractual relationship in the event that the user is a potential customer or client and on the basis of our legitimate interest.
Internal analysis and studies	We process your data on the basis of our legitimate interest.
Sending quality surveys	We process your data on the basis of our legitimate interest.
Sending commercial communications	The legal basis for processing your data is the express consent you give us and our legitimate interest in those cases in which there is a relationship with

	SUANFARMA and in which the information we send you is related to the products and services you have purchased or contracted.
Sending of a regular newsletter	The legal basis for processing your data is the express consent you give us and our legitimate interest in those cases where there is a relationship with SUANFARMA.
Customer service or contact with SUANFARMA	The legal basis for the processing is the pre-contractual relationship established with SUANFARMA, the execution of the contract that binds us in the case of being a SUANFARMA customer and compliance with legal obligations that may correspond to us depending on the query you make or the question you ask us, as well as the legitimate interest to provide you with the customer service you have requested, including the possibility of recording the conversation for quality and security reasons.
Social media	The legal basis for the processing of this data is the fulfilment of legal obligations and the legitimate interest of SUANFARMA.
Commercial actions, fairs, congresses, activities, conferences, physical or virtual events organised by SUANFARMA.	We process the data you provide to us on the occasion of your participation in the aforementioned actions, in which

	<p>case, you voluntarily provide us with your data and give us your express consent. If you are a customer, we will process your data to manage your participation in the activity or event organised by us on the basis of the contractual relationship that binds us as a SUANFARMA customer or on the basis of legitimate interest in the framework of commercial and professional contact actions and relations.</p>
<p>Recording and image capture</p>	<p>We will process your name, image and voice that we may obtain through the recording and capturing of images on the basis of the express consent that you provide to us.</p>
<p>Recruitment processes: work with us</p>	<p>The data are processed on the basis of the pre-contractual relationship and the express consent you provide us with to keep your data for future selection processes.</p>

4. CATEGORIES AND TYPES OF PERSONAL DATA. The categories and types of data to be processed are classified into identification data and professional contact data.

Within each of these categories of data are the following types of data that we will request from you or that you will provide to us at some point in our relationship:



- **Identification and professional contact details:** Name and surname, postal address, delivery address, date of birth, telephone number and e-mail address.

We would appreciate it if the information you provide us with is up to date and accurate. In the event that the information you provide is false, incomplete, inaccurate or not up to date, SUANFARMA reserves the right to terminate the contracted services or any other contract that may have been signed.

5. PERSONAL DATA OF THIRD PARTIES. In the event that you provide us with data from third parties with whom you have some kind of relationship, we will process the data because we understand that you have notified these third parties and referred them to this privacy policy so that they are aware of how we process their data. However, we will inform them of this privacy policy as soon as we have the opportunity to do so.

6. RECIPIENTS OF THE DATA. In order to be able to provide you with our services and offer you our products, it is necessary for us to allow access to your personal data to third party SUANFARMA collaborators, managers or service providers. These SUANFARMA partners, operators or service providers may only process the personal data to provide the relevant products and services. Therefore, they may not use them for their own purposes or pass them on to third parties. Where necessary, the following categories of third parties may learn about your data for the purposes set out in this policy:

- SUANFARMA Group companies.
- Companies that support our telephone and online customer services.
- Companies that manage the SUANFARMA website and social profiles.
- Auditors, consultants, and other similar firms providing consulting and auditing services.
- Companies providing marketing and advertising services.
- Other companies that provide services to SUANFARMA and that need access to the data in order to be able to provide the specific service.



We may also be required by law to disclose your information to public bodies, authorities or agencies. If this is the case, we only disclose what is strictly necessary.

Your personal data may also be processed and communicated to the various parties involved and their service providers in the context of preparatory and review actions and acts prior to commercial transactions of any kind, such as and/or substitution in the activity, including but not limited to merger, spin-off, global transfer of assets and liabilities, contribution or transfer of business or branch of business activity, or any business and/or corporate restructuring operation of a similar nature, as provided for by commercial legislation; as well as within the framework of the aforementioned commercial operations.

We do not give your data to third parties for commercial purposes, we will send you commercial information about our products and services.

7. INTERNATIONAL DATA TRANSFERS. Within the framework of data communications to other companies of the Group to which SUANFARMA belongs, data may be transferred outside Spain, to countries located within and outside the European Economic Area and to countries that do not offer the same level of protection as Spain. SUANFARMA will adopt the necessary legal measures, which include subscribing the corresponding standard contractual clauses that may be applicable.

8. STORAGE PERIODS. As a general rule, the data provided will be kept for the time necessary to carry out the purpose for which they were collected and to ensure compliance with the various legal obligations corresponding to SUANFARMA. In determining the appropriate retention period for personal data, SUANFARMA will apply its corresponding data retention policy and will take into account the amount, nature and sensitivity of the data; the purposes for which the personal data are processed; and, finally, the applicable legal, regulatory or other requirements.

9. RIGHTS. You may, under the terms established in the data protection regulations in force at any time, and in accordance with the regulations, revoke at any time the authorisation granted for the processing and transfer of personal



data, as well as exercise your rights of access, rectification, deletion, opposition, the right to request the limitation of the processing of your personal data, the right to portability and the right to file a complaint with the Spanish Data Protection Agency. To do so, you may contact SUANFARMA with proof of your identity by sending an e-mail to dpo@suanfarma.com.

10. MODIFICATION OF THE PRIVACY POLICY

SUANFARMA is committed to complying with the fundamental principles of privacy and data protection. We therefore regularly review our privacy policy to ensure that it is up to date and complies with data protection principles at all times. This privacy policy may be amended from time to time as necessary to keep it up to date with the latest developments and to comply at all times with applicable law. Any future changes to our privacy policy will be made available to you, posted on this page and, where appropriate, notified to you by email.

Written by	Suan Farma Holding, S.L.
Reviewed by	Legal & Compliance Department
Date	1 June 2023
Version	1.0