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|  | PRIVACY POLICY-CyMVO | | |
| | Effective Date: | 30-05-2021 | Version: |

1. Introduction

CyMVO (hereinafter referred to as the “Organization”) is committed to the protection of your privacy and security of your personal data. References in this Data Privacy Policy to “we”, “us”, “our” and “CyMVO” are references to CyMVO.

This Data Privacy Policy (hereinafter referred to also as the “Policy”) explains the type of personal data that we collect, and, the manner and/or method that we collect, transfer, process, use and disclose your personal data, as well as, the security practices that we apply in order to protect your personal data. Additionally, the Policy contains information, in connection to third parties that receive your data, as well as, information in association to your rights under local applicable Data Protection Laws, and, the relevant European Regulation of General Data Protection (hereinafter referred to as “GDPR”).

Certain key terms are used in this Policy such as ‘personal data’, ‘processing’, and, ‘Data Protection Laws’. These are defined in the “Key Definitions” section included in Annex 1.

This Policy applies to:

- End-Users (including, but not limited to, IT suppliers, pharmacies, and wholesalers),
- CyMVO’s website visitors,
- CyMVO’s suppliers and other associates and partners.

2. Application of national laws

This Data Protection Policy comprises the European accepted data privacy principles without replacing the existing Cyprus laws. Interrelated national law will take precedence in the event that it conflicts with the Data Protection Policy, or it has stricter requirements than this Policy.

In the event of any legal obligations contradicting the duties under this Data Protection Policy, this must be reported to the Data Protection Officer, and in the event of conflicts between national legislation and the Data Protection Policy a practical solution is required to meet the purpose of the Data Protection Policy.

3. Who controls the use of your personal data

The Cyprus Medicines Verification Organisation (registered as ΚΥΠΡΙΑΚΟΣ ΟΡΓΑΝΙΣΜΟΣ ΕΠΑΛΗΘΕΥΣΗΣ ΦΑΡΜΑΚΩΝ (Κ.Ο.Ε.Φ.)), is a private company limited by guarantee, of 23 Armenias Avenue, Office 102, 2003 Nicosia, Cyprus, with registration number HE 365968. CyMVO controls and is responsible for personal data covered by this Policy and is therefore a ‘data controller’ of the personal data collected for the purposes described in this Policy.

4. Queries and complaints

The Data Protection Officer (DPO) is appointed by the Management of CyMVO and is internally independent of professional orders works towards the compliance with national and European data protection regulations. He/she is also responsible for the Data Protection Policy and supervises its compliance.

If you have any queries or complaints in connection with our processing of your personal data, you can get in touch with us using the following contact details:

Zenon Michaelides
 Data Protection Officer
 23 Armenias Avenue, Office 102, 2003 Nicosia,
 Email: zinonas.michaelides@koef.org.cy

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Corporate website: <https://koef.org.cy/>

You have the right to lodge a complaint to the Office of the Commissioner for the Protection of Personal Data below if you believe we have not complied with the requirements of the GDPR with regard to your personal data.

1 Iasonos str., 1082 Nicosia

P.O.Box 23378, 1682 Nicosia

Tel: +357 22818456

Fax: +357 22304565

Email: commissioner@dataprotection.gov.cy

5. Principles for processing personal data

The following principles refer and apply to the processing of personal data:

- Lawfulness, fairness, and transparency

When processing personal data, the data subject rights must be protected, and personal data must be collected and processed in a legal and fair manner.

- Purpose Limitation

When collecting personal data, it should be collected for a specified, explicit and legitimate purpose.

- Data Minimisation

Personal data should be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

- Accuracy

Personal data should be accurate and kept up to date and reasonable steps should be taken to ensure that any inaccurate data in regard to the purposes for which it is processed, is erased or rectified without delay.

- Lawfulness of processing

CyMVO should ensure that processing of personal data is lawful and one of the following conditions applied:

i. Consent to personal data processing

Personal data can be processed for one or more specific purposes following consent to processing by the data subject. The declaration of consent must be obtained in writing or electronically for the purposes of documentation. Where consent is given verbally, the granting of consent must be documented. The data subject should also be informed that they have the right to withdraw his / her consent at any time.

In cases where consent is obtained through an intermediary on behalf of CyMVO, the intermediary should grant consent and provide required documentation.

ii. Personal data processing for a contractual relationship

Personal data of data subjects can be processed to establish, execute and terminate a contract. Prior to contract and during the contract initiation phase, personal data can be processed to requests of the prospect that relate to contract conclusion.

iii. Personal data processing pursuant to legal authorization

The processing of personal data is permitted if it is requested, required, or allowed under the national legislation or it is necessary for the performance of a task carried out in the public interest or

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in the exercise of official authority. The type and extent of data processing must be necessary for the legally authorised data processing activity and must comply with the relevant statutory provisions.

iv. Personal data processing pursuant to legitimate interest

Personal data can be processed if it is necessary for a legitimate interest of CyMVO under the applicable national law.

v. Consent

Personal Data must only process on the basis of one or more of the lawful bases set out in the GDPR, which include consent. Data subjects consent to processing of their personal data if they indicate agreement clearly either by a statement or positive action to the processing. Consent requires affirmative action so silence, pre-ticked boxes or inactivity are unlikely to be sufficient. Consent should be kept separate if a document or section is dealt with other matters.

Data subjects must be easily provided with the right to withdraw consent at any time and withdrawal must be promptly honored. Consent should be re-obtained if the purpose of processing changes and it has not been disclosed previously to the data subjects.

Unless there is another legal basis of processing or a contractual obligation, explicit consent is usually required for the processing of special categories of personal data, for automated decision-making and for cross border data transfers. Where explicit consent is required, a privacy notice should be captured to obtain explicit consent from data subjects.

Evidence of consent should be recorded and maintained in accordance with related policies and privacy guidelines in order to demonstrate compliance with consent requirements.

vi. Integrity and confidentiality

Personal data should be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage.

6. Storage Limitation

CyMVO will retain your personal data, in accordance with its record retention policy. This policy operates on the principle that we keep personal data for no longer than is necessary, for the purpose for which, the data was initially collected. The data is also kept in compliance with any and/or all legal requirements that are imposed upon CyMVO. This means that the retention period of your personal data, will vary, depending on the type of personal data that is retained, and, the purpose of its retention.

The below criteria are applied for the purpose of determining retention periods:

- Statutory and regulatory obligations – we have certain statutory obligations that state that we are to retain personal data for set periods of time.
- Business requirements – As we only collect personal data, for defined purposes, we assess how long we need to keep personal data in order to meet our reasonable business purposes, and, therefore serve the legitimate interests of CyMVO.
- CyMVO will permanently delete your personal data when the relevant retention period has expired.

7. Type of data

The type of data that CyMVO collects (both paper or electronic format), where appropriate and permitted by applicable data protection laws, may include:

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- Business identification information, including Name of Organization, email, location, address, telephone number, area code, contact person name and surname, Position in End-User Organization and IT provider. This information is kept until the termination of our agreement,
- Business related information, information provided to us during our contractual relationship with you and/or your organization such as participation agreements, emails, letters and modifications. This information is kept until the termination of our agreement,
- Any information you enter when submitting a contact form via our website (name and email),
- Any information you enter when submitting a support ticket via our website (name and email),

8. Policy for the Protection of Personal data

As an organization engaged in the implementation of the FMD legislation relating to medicinal products for human use, as regards the prevention of the entry into the legal supply chain of falsified medicinal products, we may sometimes need to process your data in pursuit of our legitimate interests, for example the continuation of our activities, fraud prevention, administrative purposes or the reporting of criminal offenses to the competent authorities.

We will only disclose information about you to third parties if we are legally required to do so.

If in the future we intend to process your personal data for a different purpose than the one we collected, we will provide you with information for this purpose and any other relevant information. We will also ask for your consent if this is deemed necessary.

9. Where do we collect personal data from?

Most of the personal data we collect will be provided by you through your interactions with us. CyMVO may also collect personal data from publicly available sources such as a company website, commercially published directory, etc or from external sources, such as the public authorities.

When you access our website, we do not collect any personal data.

10. Your obligations

Should you be aware of any data breach affecting any data held by the Organization, please report this to the appointed Data Protection Officer of CyMVO, whose contact information is announced in CyMVO's website, and, may be found also herein below.

Employees who process personal data on behalf of the Company have a duty to follow the GDPR, and, all policies enacted by the Company ensuring compliance thereto.

11. Legal basis for processing your information

We process your personal data to provide you with our services and to assist us in the operation of our business. Under data protection laws, we are required to ensure that there is an appropriate basis for the processing of your personal data, and we are required to let you know what that basis is.

There are various options under data protection laws, but the primary bases on which we process your personal data are:

- Performance of a contract or agreement with you – we collect and use your data primarily for the purpose of managing our working relationship with you, for example, to provide services, to communicate with you, and otherwise to fulfil any contractual obligations owed to you.
- Where required by applicable law - CyMVO may be required under local laws to maintain records that can include personal information, such as mandatory reporting. In particular, CyMVO processes personal data relating to pharmaceutical manufacturers, marketing authorization holders, wholesalers and persons authorized or entitled to supply medicines to

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the public, and other relevant parties, in order to fulfil its obligations under Commission Delegated Regulation (EU) 2016/161 of 2 October 2015 supplementing Directive 2001/83/EC of the European Parliament and of the Council by laying down detailed rules for the safety features appearing on the packaging of medicinal products for human use (and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the Republic of Cyprus).

- Initiation, establishment, exercise or defence of in court or out of court legal procedures.
- To fulfil our legitimate business interests - CyMVO also may process your personal data to pursue our legitimate business interests, which shall include planning for, conducting and monitoring the activities of CyMVO, providing service information, etc.
- Where you have consented - for certain types of information, CyMVO may rely on your consent to the use of such information. Our policy is to keep to the minimum necessary, any data where the basis for processing your consent is. In that event, you will have been asked for your explicit and specific consent, and you will be entitled to withdraw your consent at any time by contacting us using the contact details at the bottom of this policy. Please note that if you withdraw your consent, we may not be able to continue providing you with the service to which the consent related.

CyMVO will only use your data for the purposes for which it was collected, unless we reasonably consider that we need it for another purpose that is compatible with the original purpose. If we need to use your data for an unrelated but compatible purpose, we will notify you in advance of our use of your data and explain the legal basis for this. Note that we may process your data without your knowledge or consent where this is required or permitted by applicable law.

CyMVO will not use your personal data for any marketing or promotional purposes.

CyMVO does not carry out automated decision-making processes with personal data.

12. Who do we share your personal data with?

You should be aware that in certain circumstances, CyMVO may need to transfer or disclose your personal data to third parties (acting as data controllers or data processors), including our suppliers, legal advisors, auditors, other partners and service providers who render administration, technical and other support services to CyMVO, but will only do so where it is consistent with the purposes outlined above.

CyMVO may also disclose your personal data in response to a valid, legally compliant request by a competent authority or in response to a court order or otherwise in compliance with any applicable law, regulation, legal process or enforceable governmental request or other statutory requirement; to detect, prevent or otherwise address fraud, security or technical issues; or to protect against imminent harm to the rights, property or safety of CyMVO, its employees, its members or the public, as required or permitted by law.

CyMVO will ensure through contracts and data processing agreements that third parties with whom your personal data is shared, apply appropriate security measures to protect your data from loss, misuse and unauthorised access or disclosure.

13. Personal data of other individuals

In case you provide us with personal data relating to other individuals, you must ensure that the said individuals understand how their personal data will be used and processed by us. It is your responsibility to inform the said individuals about the content of this Policy and ensure that they have understood and accepted how we use their personal data.

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14. Security

CyMVO takes the security of your data very seriously and has implemented an information security policy which describes the technical, procedural and physical measures in place to protect your data from loss, misuse and unauthorised access or disclosure. CyMVO also maintains reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete and current.

Employees who handle personal data are trained on the information security policy and how to correctly collect, process, store and delete data in accordance with this Data Privacy Policy.

15. Rights of the data subject

You have various rights under data protection laws, subject to certain exemptions, in connection with the processing of your personal data:

15.1. Right to access

You have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data.

15.2. Right to rectification

Data subject might edit or change any personal data which is incomplete, inaccurate or incorrect. Upon a request for edit or change of personal data, CyMVO should ensure that appropriate documentation is obtained as a supporting evidence, where required.

15.3. Right to erasure

This is sometimes referred to as the 'right to be forgotten'. Data subject might request his/her data to be deleted, if the processing of such data has no legal basis or if the legal basis has ceased to apply. The same applies if the purpose behind the data processing has lapsed or ceased to be applicable for other reasons. Existing retention periods and conflicting interests meriting protection must be considered. CyMVO is responsible to ensure that any third parties processing data on their behalf would be informed and proceed with data erasure upon request of the data subjects.

15.4. Right to object

Data subject might object to his/her data being processed, and this must be taken into account if the protection of his/her interests takes precedence over interest of the Controller owing to a particular personal situation. This does not apply if a legal provision requires the data to be processed.

15.5. Right to restrict

Data subject might object that we no longer process your personal data for particular purposes or to process of his/her personal data for particular purposes of advertising or market/opinion research. The Controller should ensure that data are then blocked from these types of use.

15.6. Right to data portability

Data subject might request to receive the personal data concerning him or her, which he or she has provided to CyMVO in a structured, commonly used and machine-readable format and have also the right to have the personal data transmitted directly from one Controller to another, where technically feasible.

15.7. Right not to be subject to automated-decision making

Data subject might have the right to be informed about the existence of automated decision-making in relation to their personal data and not to be subject to a decision based solely on automated processing, unless such process is necessary for entering or performing a contract or is a legal obligation or is based on the explicit consent of the data subject.

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15.8. Right to complain

You have the right to lodge a complaint with the Data Protection Authority if you are unhappy with our processing of your personal data.

15.9. Right to withdraw your consent

When we process your personal data on the basis of your consent, you are free to withdraw that consent at any time by contacting us using the contact details below. Please note that if you withdraw your consent we may not be able to continue providing you with the service to which the consent related.

16. Handing of data subjects' requests

Prior processing with a request for exercising their data subject rights, CyMVO should verify the identity of the data subject following appropriate methods and means.

CyMVO should ensure that they take appropriate action on the request of the data subjects to exercise their rights without delay and in the latest within one month of receipt of the request. Information should be provided to the data subjects in writing or by electronic means.

CyMVO is not in a position to take action on the request of the data subject, they should inform the data subject without delay and at the latest within one month of the receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with the Supervising Authority.

For submitting a request, complete the "Contact Us" form which can be found in our website: <https://koef.org.cy/contact-us/>

One of our employees will provide you the Data Subjects Request and Complaints Handling Form to complete and return to CyMVO.

CyMVO maintains a registry of the data subjects' requests to ensure they are managed and handled within the specified timeframe.

17. Third party agreements

This section applies to the agreements between CyMVO and any third-party (processor, vendor, etc.) which is based in the EU.

In the event of personal data processing by a third-party on behalf of CyMVO, a Service Level Agreement (SLA) will be concluded, considering at least the following clauses:

- Third parties implement and apply the required technical and organisational protective measures to ensure an adequate level of data protection.
- Third parties process personal data only as per the instructions of CyMVO which must be documented.
- Third parties engage another processor prior specific or general written authorisation of CyMVO and communicate any amendments concerning the processing agreement in place.

CyMVO will ensure that any third party demonstrates compliance with their contract obligations by performing audits. Depending on the risk of data processing the reviews must be repeated on a regular basis during the term of the contract.

18. Data Transfers to third countries or international organizations

CyMVO currently does not transfer personal data outside the European Economic Area. In case we transfer your personal data to countries not providing an adequate level of personal data protection, we will take steps to ensure that personal data transferred is subject to appropriate safeguards, such as entering into data transfer agreements.

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19. Changes to this Policy

The provisions of this Data Privacy Policy may be amended by CyMVO from time to time so as to reflect any possible amendments to the relevant legal, legislative, and, regulatory framework. Any alteration or addition will be posted on our website at www.koef.org.cy.

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20. Annex 1 – Key Definitions:

“Data Protection Authority” means the Cypriot Data Protection Commissioner which is the supervisory authority in the Republic of Cyprus.

“Data Protection Laws” mean the General Data Protection Regulation (EU) 2016/679 (“GDPR”), The Protection of Natural Persons with regard to the Processing of Personal Data and on the Free Movement of Such Data Law 125(I) 2018 as amended and any EU or national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the Republic of Cyprus and any successor legislation to the GDPR.

“Consent” of the data subject means any freely given, specific, informed unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her – such as a written/electronic statement or an oral statement.

“Data Controller” means the legal person and/or organization which determines the purposes, and, means of the processing of personal data,

“Data Processor” means a person or company which processes personal data on behalf of the Data Controller,

“Personal Data” or “Data” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; “processing” means any operation which is performed on personal data, where automated or not, such as collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure by transmission, dissemination, alignment or combination, restriction, erasure or destruction.

“Special Categories of Data” mean personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data and data concerning health or a person’s sex life or sexual orientation.