

NEWBURY PHARMACEUTICALS PRIVACY STATEMENT

1. INTRODUCTION

Newbury Pharmaceuticals AB is committed to protecting personal data. This privacy statement describes why and how we collect and use personal data (other than personal data concerning members of our staff) and provides information about individuals' rights. We may use personal data provided to us for the purposes described in this privacy statement or as otherwise stated when the data is collected.

The data controllers are Newbury Pharmaceuticals AB with registered offices at Medicon Village, 223 81 Lund, +46 (0) 46 12 11 20.

To find out more about our specific processing activities and about your rights in relation to the processing, please go to the relevant sections of this statement.

2. CATEGORIES OF PERSONAL DATA

2.1 CUSTOMER AND PARTNER CONTACTS

We collect and process personal data about employees/individuals otherwise associated with Newbury Pharmaceuticals AB customers and partner businesses ("customer and partner contacts") for the purpose of managing the relationship and administering and developing our services and business, as further set out in this section.

Data Controller: Newbury Pharmaceuticals AB with whom the customer or partner has or has had a contractual relationship – or that would be the appropriate contracting party.

What information do we collect about you?

Information you give us:

- **Your name and contact information** (such as your email and telephone number) so that we can identify you and contact you in relation to the purpose for which you gave us your contact details, and for other purposes relating to our products and services that we think may be of interest to you, as further set out in the schedule below;
- **Your job title and employer** so that we can identify you for the above purposes;
- **Your former job title and employer** if your status changes during the course of our contractual relationship and during the retention period.

Information we may collect about you:

- **Your name, job title, employer and contact information** if we have not received this information directly from you, so that we can identify you and contact you regarding the products and services we offer;

- **Photographs of you** if you attend one of our events or an event in which we participate;
- **Footage from video surveillance** of you entering and leaving our offices in Lund (where applicable).

What do we do with your information?

If you represent a current or former customer or partner:

Type of personal data	Purpose of the processing	Legal basis for the processing ("why is the data processing necessary?")	How long do we keep the data?
Your name and contact information, current job title and employer	To provide information about us and our products and services. To administer, manage and develop our business, products and services, including fulfilling any contractual obligations towards the customer/partner. To make your contact information available to our staff for the above purposes and to describe the nature of the relationship. To perform analytics on sales intelligence, customer satisfaction and progress against business objectives. To comply with any applicable laws.	To perform our contractual obligations towards the customer/partner. To pursue our legitimate interest of promoting our products and services and to better understand the needs of customers and partners. Where applicable, to comply with a legal obligation.	For as long as we have a contractual relationship with the customer/partner and, thereafter, for as long as we need to keep a record of a customer/partner contact. We may store your contact details in our CRM system for as long as we think that you may have a professional interest in our products and services.
Your former job title and employer	To provide information about us and our products and services. To administer, manage and develop our business, products and services, including fulfilling any contractual obligations towards the customer/partner. To make your contact information available to our staff for the above purposes and to describe the nature of the relationship. To perform analytics on sales intelligence, customer satisfaction and progress against business objectives. To comply with any applicable laws.	To perform our contractual obligations towards the customer/partner. To pursue our legitimate interest of promoting our products and services and to better understand the needs of customers and partners. Where applicable, to comply with a legal obligation.	For as long as we have a contractual relationship with the customer/partner and, thereafter, for as long as we need to keep a record of a customer/partner contact. We may store your contact details in our CRM system for as long as we think that you may have a professional interest in our products and services.
Photographs/ recordings of events in which you may appear	To inform about events that we have organised, or participated in, in marketing communications or on social media.	To pursue our legitimate interest of documenting events for marketing purposes. We will only share such pictures/recordings on social media or for other public marketing purposes with your consent.	For as long as we have an interest in using the material for marketing purposes. We will remove any pictures/recordings posted on social media if you withdraw your consent or we no longer have a need to show the material on social media.
Video surveillance footage if you visit the reception of our Lund office.	To look into incidents.	To pursue our legitimate interest of preventing and dealing with incidents.	For three months after the footage was recorded.

If you represent a potential customer or partner:

Type of personal data	Purpose of the processing	Legal basis for the processing ("why is the data processing necessary?")	How long do we keep the data?
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Your name and contact information, current job title and employer	To provide information about us and our products and services. To administer, manage and develop our business, products and services. To make your contact information available to our staff for the above purposes and to describe the nature of the relationship. To perform analytics on sales intelligence, customer satisfaction and progress against business objectives.	To perform our contractual obligations towards the customer/partner. To pursue our legitimate interest of promoting our products and services and to better understand the needs of customers and partners.	For as long as we think that you may have a professional interest in our products and services.
Your former job title and employer	To provide information about us and our products and services. To administer, manage and develop our business, products and services, including fulfilling any contractual obligations towards the customer/partner. To make your contact information available to our staff for the above purposes and to describe the nature of the relationship. To perform analytics on sales intelligence, customer satisfaction and progress against business objectives. To complying with any applicable laws.	To perform our contractual obligations towards the customer/partner. To pursue our legitimate interest of promoting our products and services and to better understand the needs of customers and partners. Where applicable, to comply with a legal obligation.	For as long as we think that you may have a professional interest in our products and services.
Photographs/ recordings of events in which you may appear	To inform about events that we have organised, or participated in, in marketing communications or on social media.	To pursue our legitimate interest of documenting events for marketing purposes. We will only share such pictures/recordings on social media or for other public marketing purposes with your consent.	For as long as we have an interest in using the material for marketing purposes. We will remove any pictures/recordings posted on social media if you withdraw your consent or we no longer have a need to show the material on social media.
Video surveillance footage if you visit the reception of our Lund office.	To look into incidents.	To pursue or legitimate interest of preventing and dealing with incidents.	For three months after the footage was recorded.

With whom may we share your information?

Social Media platforms (such as Facebook, Twitter, LinkedIn, my Newsdesk): If you attend one of our seminars as a speaker, we may state your name on social media. With your permission, we may also post pictures on in which you appear that we have taken at events on our social media sites.

Sales and marketing service partners: We may engage external sales and marketing consultants to help us identify customers who may have an interest in our services.

With other companies within the Newbury Pharmaceuticals AB who are not joint controllers: The controller(s) of your data may share this information with other companies within the Newbury Pharmaceuticals AB if they are engaged as subcontractor or if it is otherwise necessary for the above-stated purposes.

Divestiture: We may need to disclose your personal data to third parties in the event that we sell or liquidate any part of our business or assets.

Legal compliance: We will disclose or share your personal data to comply with any legal obligation or to protect the rights, property, or safety of the Newbury Pharmaceuticals AB companies, our clients, or others.

2.2 SUPPLIERS

We collect and process personal data about employees and individuals otherwise associated with suppliers for the purpose of enquiring about, and receiving, products and services; managing the relationship; and administering and developing our business, as further set out in this section.

Data Controller: Newbury Pharmaceuticals AB with whom or partner has or has had a contractual relationship – or that would be the appropriate contracting party.

What information do we collect about you?

Information you give us

- **Your name and contact information** (such as your email and telephone number) so that we can identify you and contact you in relation to the purpose for which you gave us your contact details (such as to receive information about the supplier’s products and services and to manage our relationship);
- **Your job title and employer** so that we can identify you and assess the supplier’s products and services in relation to our needs;
- **Your former job title and employer** if your status changes during the course of our contractual relationship and during the retention period.

Information we may collect about you

- **Your name, job title, employer and contact information** if we have not received this information directly from you or your colleague, so that we can identify you and contact you regarding the products and/or services offered by the supplier;
- **Footage from video surveillance** of you entering and leaving our offices in Lund (where applicable).

What do we do with your information?

If you represent a current or former supplier:

Type of personal data	Purpose of the processing	Legal basis for the processing (“why is the data processing necessary?”)	How long do we keep the data?
Your contact information (including name), job title and employer.	To receive information about the supplier and its products and services. To administer, manage and develop our business, products and services, including fulfilling any contractual obligations towards the supplier. To manage security, quality and risk in our operations. To comply with any applicable laws.	To pursue our legitimate interest of managing our business. To perform our contractual obligations towards the supplier.	For as long as we have a contractual relationship with the customer/partner and, thereafter, for as long as we need to keep a record of a customer/partner contact or have an interest in the supplier’s products and services.
Your former job title and employer	To administer, manage and develop our business, products and services, including fulfilling any contractual obligations towards the supplier. To manage security, quality and risk in our operations. To comply with any applicable laws.	To pursue our legitimate interest of managing our business. To perform our contractual obligations towards the supplier.	For as long as we have a contractual relationship with the customer/partner and, thereafter, for as long as we need to keep a record of a former customer/partner contact.

Video surveillance footage if you visit the reception of our Lund office.	To look into incidents.	To pursue or legitimate interest of preventing and dealing with incidents.	For three months after the footage was recorded.
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If you represent a potential supplier:

Type of personal data	Purpose of the processing	Legal basis for the processing (“why is the data processing necessary?”)	How long do we keep the data?
Your contact information (including name), job title and employer.	To receive information about the supplier and its products and services. To administer, manage and develop our business, products and services. To manage security, quality and risk in our operations. To comply with any applicable laws.	To pursue our legitimate interest of managing our business.	For as long as we have an interest in the supplier’s products and services.
Video surveillance footage if you visit the reception of our Lund office.	To look into incidents.	To pursue or legitimate interest of preventing and dealing with incidents.	For three months after the footage was recorded.

With whom may we share your information?

With other companies within the Newbury Pharmaceuticals AB who are not joint controllers: The controller(s) of your data may share this information with other companies within Newbury Pharmaceuticals AB if they may have an interest in the supplier’s products or services or if it is otherwise necessary for the above-stated purposes.

Divestiture: We may need to disclose your personal data to third parties in the event that we sell or liquidate any part of our business or assets.

Legal compliance: We will disclose or share your personal data to comply with any legal obligation or to protect the rights, property, or safety of the Newbury Pharmaceuticals AB companies, our clients, or others.

2.3 VISITORS TO OUR WEBSITE

We capture the IP addresses of website visitors to enable us to carry out forensics analyses in the event of security breaches. Please see our **cookie statement** for information on how we use cookies.

We may receive personal data from visitors who ask us to contact them by filling in a contact form on our website. Please see our **privacy notice for contact forms** for further information on how we process such data.

Visitors who are interested in career opportunities are also able to send an email to us through the website. Such messages will contain the user’s email address, as well as any additional information the user may wish to include in the message (such as their CV). Please see our **privacy notice to job candidates** for further information on how we process such data.

2.4 VISITORS TO OUR OFFICES

We have security measures in place at our offices, including video surveillance at our headquarters in Lund. Images captured through video surveillance are securely stored and only accessed on a need to know basis (e.g. to look into an incident). Recordings are typically automatically overwritten after three months, unless an issue is identified that requires investigation (e.g. as unauthorized entry).



We require visitors to our Lund office to sign in at reception (providing their name, job title and employer as applicable). Visitor records are securely stored and only accessible on a need to know basis, for instance to look into an incident and to manage fire safety.

3. WHERE DO WE STORE AND PROCESS YOUR PERSONAL DATA?

We strive to process all personal data within the EEA. If we have to transfer personal data to countries outside the EEA, we make sure that the transfer complies with applicable data protection laws. Any transfer made to a country not determined by the European Commission as providing an adequate level of protection for personal data, will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU, such as the European Commission approved standard contractual clauses

4. YOUR RIGHTS TO ACCESS, RECTIFICATION AND ERASURE

Your right to object to the processing: You have the right to object to any processing carried out based on legitimate interests pursued by us or third parties.

Your right to access your data: You may request a transcript of records if you would like to know and verify the information we process with respect to yourself.

Your right to rectify your data: You have the right to correct inaccurate or incomplete information we process about yourself.

Your right to request that we restrict or erase your data (“right to be forgotten”): You have the right to request that we restrict or delete your personal data, insofar as this personal data is no longer necessary for the purpose it was collected. However, certain legal obligations prevent us from immediately deleting parts of your data.

You can contact us at dataprivacy@newburypharma.com.

5. GDPR STATEMENT - for when a safety information report is collected.

Newbury is a pharmaceutical company and must collect safety information about the medicinal products we market and sell. We collect safety information like adverse drug reactions and other events in connection to Newbury products, and we report these to the regulatory authorities in Europe. The data collected about you might be health data like concomitant medicines etc. It is up to you what you want to share with Newbury. The collection of data is done to better understand the safety profile of the Newbury medicinal products and since it is a legal obligation. The data you share with us might be shared with regulatory authorities. Only staff in the Newbury pharmacovigilance department will have access to the data provided by you.

You may contact Newbury at any time if you would like to access your personal data or require information about the personal data that we hold about you. You may request restriction of the processing of your personal data, and you may also request the correction of it. Please note that you do not have a right of objection or a right to erasure, as we process and store personal data to perform our legal obligations under safety and quality reporting laws.

5.1 Privacy statement applicable for medical information (only)

You have sent a medical question to Newbury. In order to ensure the question is answered correctly we track some personal information about you. Only staff working with pharmacovigilance and medical information in Newbury will have access to this information. The personal data will be kept for a period of 6 months in accordance with the relevant EU and national regulations. In accordance with the law, you have the right to access, rectify and delete your personal data or to object to it, which you may exercise by contacting Newbury Pharmaceuticals AB. You also have the right to file a complaint with a supervisory authority.

6. COMPLAINTS

If you don't agree with the way we process your data, please reach out to us at dataprivacy@newburypharma.com and we will try to resolve the problem. You also have the right to report concerns to the relevant supervisory authority:

Datainspektionen

Phone: 08-657 61 00

E-mail: datainspektionen@datainspektionen.se

Post: Datainspektionen, Box 8114, 104 20 Stockholm

For the contact details to other national data protection authorities, please refer to:

http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080