Privacy Policy for the social media websites of Bionorica SE

Last updated: August 2021

We, Bionorica SE, are not only committed to protecting your health, but also to protecting your data and therefore your privacy. This Privacy Policy is designed to inform you regarding

- the personal data we collect, store, process, block and delete (collectively referred to as "data processing") when you visit our social media sites,
- the purpose for which we use the data;
- how you can object to the use of such data or withdraw your consent; and
- your rights as a data subject, e.g. how you can revoke your declared consent and exercise additional rights to information, rectification, objection and deletion with respect to your data.

1. Controller

The (data) "controller", as defined in the GDPR, is:

Bionorica SE Kerschensteinerstr. 11 -15 92318 Neumarkt, Germany Phone: +49 (0) 9181 231-90 Fax: +49 (0) 9181 231-265 Email: info@bionorica.de

You can contact our company data protection officer by email at <u>datenschutz@bionorica.de</u> or by post at the above address to "The Data Protection Officer".

2. Scope of validity

This Privacy Policyapplies to your visit to our following social media websites:

- Facebook: <u>https://www.facebook.com/Bionorica-SE-243614439450748</u>
- Xing: https://www.xing.com/companies/bionoricase
- Instagram: <u>https://www.instagram.com/bionorica_se/</u>
- Kununu: https://www.kununu.com/de/bionorica
- YouTube: https://www.youtube.com/channel/UCC3CpRIMaeXf70UYok1HIA
- LinkedIn: <u>https://www.linkedin.com/company/bionorica-se/</u>

We reserve the right to change this Privacy Policy at any time with effect for the future. The current version is available on our website. Please visit our website regularly to consult the applicable data protection provisions.

The following information relates to the information provided on Bionorica's social media websites.

The operation of the Facebook page and the other social networking sites serves to provide sustainable and transparent information and communication with customers (e.g. pharmacies, doctors), employees and potential consumers. The legal basis for the operation of the fan page and the other social networking sites is Art. 6 sentence 1 lit. f GDPR; the fan page and the Bionorica social networking websites are designed to perform tasks in the context of public relations.

These are in addition to the existing information and communication offers and websites of Bionorica SE. If you have any questions regarding the information we provide on the social media websites, please contact us on 09181-231-90 or info@bionorica.de.

3. Your rights

You determine what happens to the personal data we have collected, and we will assist you with this. As a data subject, you have the right to access pursuant to Art. 15 GDPR, the right to rectification in accordance with Art. 16 GDPR, the right to erasure pursuant under Art. 17 GDPR, the right to restriction of processing pursuant to Art. 18 GDPR and the right to data portability under Art. 20 GDPR. Your rights of access and erasure are subject to the limitations stipulated in §§ 34 and 35 BDSG (German Federal Data Protection Act). You also have the right to lodge a complaint with a competent data protection supervisory authority (Art. 77 GDPR and § 19 BDSG).

Furthermore, you have the right to object in accordance with Art. 21 GDPR. You may object to the processing of personal data on the basis of Art. 6 para 1 e or f GDPR at any time without giving the reasons for such objection.

4. Additional information on Facebook, etc.

You can also find more information about Facebook and other social networking websites and how to protect your data on <u>www.youngdata.de</u>, a service (youth portal) of the independent data protection authorities of the Federal and state governments.

5. Privacy Policies for the individual social media websites of Bionorica SE

i. Privacy Policy for the Bionorica websites on Facebook

Bionorica SE uses the technical platform and services of Facebook Ireland Ltd, 4 Grand Canal Square Grand Canal Harbour, Dublin 2, Ireland for the information service it offers.

Therefore, please note that the use of the Facebook page and its functionality is on your own responsibility. This applies in particular to use of the interactive functions (e.g. comments, sharing, rating, etc.). Facebook processes personal data regarding your account, IP address and the end devices you are using; cookies are used for data collection. These are small files that are stored on your end devices. The Facebook Data Policy describes in general terms what information Facebook receives and how the data is used. It also contains information on how to contact Facebook, the options for raising an objection and the settings for ads. The Data Policy is available at the following link: https://de-de.facebook.com/about/privacy. Facebook's full Data Policy is available here: https://www.facebook.com/policy.

The information may be used by Facebook to provide Bionorica, as operators of the Facebook sites, with statistical information on the use of the Facebook page, e.g. gender and age distribution. Facebook may also display additional information or advertisements to you based on your preferences. Facebook provides more information on this at the following link: <u>http://de-de.facebook.com/help/pages/insights</u>.

The data collected about you in this context will be processed by Facebook Ltd. and may be transferred to countries outside the European Union.

If you visit one of our social media websites (e.g. Facebook), you will initiate the processing of your personal data during the visit. In this case, we are jointly responsible with the operator of the respective social networking sites for the data processing operations within the meaning of Art. 26 GDPR, provided we actually make a joint decision with the operator of the social networking website on the data processing and we also have an influence on such processing. As far as possible, we have concluded joint responsibility agreements with the operators of the social networking websites in accordance with Art. 26 GDPR, in particular the Page Controller Addendum of Facebook Ireland Ltd. Your rights (right to access pursuant to Art. 15 GDPR, right to restriction of processing pursuant to Art. 18 GDPR, right to data portability pursuant to Art. 20 GDPR and right to lodge a complaint pursuant to Art. 77 GDPR) can generally be asserted both against us and against the operator of the respective social networking sites (e.g. Facebook).

Please note that, despite the joint responsibility with the operators of social networking websites pursuant to Art. 26 GDPR, we do not have total control over the data processing conducted by the individual social network operators. The corporate policy of the respective provider has a significant influence on our options. In the event of an assertion of the rights of data subjects, we can only forward these requests to the operator of the social networks.

The way in which Facebook uses the data generated from visits to Facebook pages for its own purposes, the extent to which activities on the Facebook site are assigned to individual users, the period of time Facebook stores this data and whether data from a visit to the Facebook website is transferred to third parties is neither conclusively nor clearly stated by Facebook and is not known to us.

When you access a Facebook page, the IP address assigned to your end device is transmitted to Facebook. According to Facebook, this IP address is anonymised (for "German" IP addresses) and deleted after 90 days. Facebook also stores information about the end devices of its users (e.g. as part of the "registration notification" function) which may enable Facebook to assign IP addresses to individual users.

If you are currently logged in to Facebook as a user, a cookie will appear on your end device with your Facebook ID. This enables Facebook to track that you have visited this page and how you have used it. This also applies to all other Facebook pages. Facebook buttons embedded in websites enable Facebook to log your visits to such websites and to assign them to your Facebook profile. This data may be used to offer you content or ads which are tailored to your interests.

If you want to prevent this, log out of Facebook or disable the "Keep me logged in" function, delete the cookies present on your device and close and restart your browser. This will delete any Facebook information which could be used to identify you personally. This enables you to use our Facebook page without revealing your Facebook ID. A Facebook login screen will appear when you access interactive features on the website (like, comment, share, messages, etc.). Once you have logged in, you will again be identified by Facebook as a specific user. Alternatively, you can use a different browser to visit our Facebook page.

Please visit the following Facebook support pages for more information on how to manage or delete your personal information: <u>https://de-</u><u>de.facebook.com/about/privacy#</u>.

As the provider of the information service, Bionorica neither collects nor processes any further data arising from your use of our service.

You can find the current version of this Privacy Policy under the "Data Policy" section on our Facebook page.

If you have any questions about our information offering on the social web, please contact us by phone +49 (0)9181 231-90 or via email (info@bionorica.de).

ii. Privacy Policy for the Bionorica Instagram website

Bionorica SE uses the technical platform and services of Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA to provide the information service it offers.

Therefore, please note that the use of the Instagram website and its functionality is on your own responsibility. This applies in particular to use of the interactive functions (e.g. comments, sharing, etc.).

When you visit our Instagram site, Instagram collects your IP address and additional information on your PC in the form of cookies. This information is used to provide us, as the operator of the Instagram websites, with statistical information regarding the use of the Instagram site.

The data collected about you in this context will be processed by Instagram Inc. and may be transferred to countries outside the European Union. The Instagram Data Policy describes in general terms what information Instagram receives and how the data is used. The Data Policy also contains information on how to contact Instagram and the setting options for ads. The Data Policy is available at the following link: https://help.instagram.com/519522125107875.

The way in which Instagram uses the data generated from visits to Instagram websites for its own purposes, the extent to which activities on the Instagram site are assigned to individual users, the period of time Instagram stores this data and whether data from a visit to the Instagram site is passed on to third parties, is neither conclusively nor clearly stated by Instagram and is not known to us.

When you access an Instagram website, the IP address assigned to your end device is transmitted to Instagram. According to Instagram, this IP address is anonymised (for "German" IP addresses) and deleted after 90 days. Instagram also stores information about the end devices of its users (e.g. as part of the "registration notification" function) which may enable Instagram to assign IP addresses to individual users.

If you are currently logged in to Instagram as a user, a cookie with your Instagram ID will appear on your end device. This enables Instagram to track that you have visited this website and how you have used it. This also applies to all other Instagram sites. Instagram buttons embedded in websites enable Instagram to log your visits to such websites and to assign them to your Instagram profile. This data can be used to offer you content or ads which are tailored to your interests.

If you want to prevent this, log out of Instagram or disable the "Keep me logged in" function, delete the cookies present on your device and close and restart your browser. This will delete any Instagram information which could be used to identify you personally. This enables you to use our Instagram site without revealing your Instagram ID. An Instagram login screen will appear when you access interactive features on the website (like, comment, messages, etc.). Once you have logged in, you will again be identified by Instagram as a specific user.

Please visit the Instagram Help Center for information on how to manage or delete your personal information.

As the provider of the information service, Bionorica neither collects nor processes any further data arising from your use of our service.

You can find the current version of this Privacy Policy under the "Data Policy" section on the respective Instagram site.

If you have any questions about our information offering on our social networking websites, please contact us by phone +49 (0)9181 231-90 or via email (in-fo@bionorica.de).

iii. Privacy Policy for the Bionorica LinkedIn website

We maintain an online presence on <u>www.linkedIn.de</u>. Bionorica SE uses the technical platform and services of LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland (hereinafter: LinkedIn).

The use of this service is not necessary to contact us or to receive information about Bionorica. The information we publish via this service can also be accessed in the same or similar form on our corporate website www.bionorica.de.

Therefore, please note that the use of the LinkedIn service and its functionality is on your own responsibility. This applies in particular to use of the interactive functions, e.g. sharing.

LinkedIn is the sole data controller for the processing of personal data when you visit our LinkedIn site. For more information on the processing of personal data by LinkedIn, please visit <u>https://de.linkedin.com/legal/privacy-policy? l=de_DE</u>.

When you visit, follow or engage with our LinkedIn company site, LinkedIn processes personal data to provide us with anonymised statistics and insights. This provides us with insights into the types of actions users perform on our site ("insights" pages). In particular, LinkedIn therefore processes data you have already submitted to LinkedIn via the information in your profile, such as data on function, country, industry, seniority, company size and employment status. LinkedIn will also process information about how you interact with our LinkedIn company website, e.g. whether you are a follower of our LinkedIn company website. The insights pages do not provide us with your personal data. We only have access to the aggregated insights pages. Nor can we draw conclusions about individual members using the information collected from the insights pages. This processing of personal data in the context of insights is carried out by LinkedIn and Bionorica as joint controllers. The processing serves the performance of a public duty. The evaluation of the types of actions performed on our LinkedIn company website is used in the context of public relations to improve our company website based on these findings. The legal basis for this processing is Art. 6 para 1 lit. f) GDPR. We have entered into a joint controller agreement with LinkedIn which sets out the allocation of data protection obligations between Bionorica and LinkedIn. The agreement is available at: https://legal.linkedin.com/pagesjoint-controller-addendum. (Opens in a new tab)

The following therefore applies:

LinkedIn and Bionorica have agreed that LinkedIn is liable for enabling you to exercise your rights in accordance with the GDPR. You can use the following link to contact LinkedIn regarding this

(<u>https://www.linkedin.com/help/linkedin/ask/PPQ?lang=de</u>) or via the contact details in the Data Policy. You can contact the data protection officer at LinkedIn Ireland via the following link: <u>https://www.linkedin.com/help/linkedin/ask/TSO-DPO</u>. You can also contact us via our contact details provided to exercise your rights regarding the processing of personal data in the context of the insights pages. In this event, we will forward your request to LinkedIn.

LinkedIn and Bionorica have agreed that the Irish Data Protection Commission is the lead supervisory authority supervising the processing of insight sites. You may lodge a complaint with the Irish Data Protection Commission (see www.dataprotection.ie) or any other supervisory authority at any time.

Please note that, in accordance with the LinkedIn Data Policy, personal data is also processed by LinkedIn in the USA or other third countries. LinkedIn states that it only transfers personal data to countries for which an adequacy decision has been issued by the European Commission in accordance with Art. 45 GDPR or based on the appropriate safeguards in accordance with Art. 46 GDPR.

If you have any questions about our information offering on our social network sites, please contact us by phone +49 (0)9181 231-90 or via email (info@bionorica.de).

iv. Privacy Policy for the Bionorica XING website

XING is a social networking site of the operator XING SE, with its registered office in Hamburg. The site enables members to essentially manage their professional and private contacts and make new contacts. Organisations can post a website with a logo and short profile in XING, post news and initiate discussion groups.

A personal profile with administrator rights must be assigned to the company profile. Group dialogues may only take place via the personal profile of a natural person.

Individuals must be registered as a user to use the network functions. A free basic version and a paid version with additional functions are available. Unlike other social networks, XING is based more on the combination of personal and electronic contact and is less commercial and less visual. The network focuses on professional exchanges on specialist topics between individuals who share the same professional interests. In addition, XING is often used by companies and other organisations to recruit staff and to present themselves as attractive employers. For this purpose, XING is linked to the employer review platform, kununu.

XING provides more information on the following link: <u>https://corporate.xing.com/de/unternehmen/</u>.

XING is currently only used by Bionorica SE to a very limited extent through a short profile and occasional posting of news primarily relating to current vacancies. A thematic discussion group has not yet been incorporated, but may be in the future.

You can view the current information on data protection at <u>https://privacy.xing.com/de/datenschutzerklaerung</u>.

Bionorica SE neither collects nor processes personal data via XING.

If you have any questions about our information offering on the social web, please contact us by phone +49 (0)9181 231-90 or via email (info@bionorica.de).

v. Privacy Policy for the Bionorica kununu website

Our website uses the "kununu" button provided by the social network site kununu, which is operated by kununu GmbH, Fischhof 3 Top 7, A - 1010 Vienna, Austria. If you access a page on our website that contains the button, your browser establishes a direct link to the kununu servers. The content of the button is transmitted by kununu directly to your browser, which then integrates it into the website.

Please note that Bionorica, as the provider of the sites, has no knowledge of the content of the data transmitted or the use of such by kununu.

We have no influence on the scope of the data that kununu collects via the button. The purpose and scope of the data collection, further processing and use of the data by kununu, your rights in this respect and the options for protecting your privacy are available in the kununu Data Policy: <u>http://www.kununu.com/info/agb</u>.

If you do not want kununu to be able to assign your visit to our websites to your user account, please log out of your kununu user account prior to visiting our sites.

If you have any questions about our information offering on the social web, please contact us by phone +49 (0)9181 231-90 or via email (info@bionorica.de).

vi. Privacy Policy for the Bionorica YouTube website

We have integrated YouTube videos into our online offer which are stored on http://www.YouTube.com and can be played directly from our website, among others. In principle, when you access a website that contains embedded videos, your IP address has already been sent to YouTube/Google, and cookies are installed on your computer. However, we have embedded our videos in "Extended data protection mode", i.e. no data about you as a user is transmitted to YouTube/Google if you do not play the videos. Only when you click on the video to play will the following data be transmitted:

- IP address
- Date and time of the request
- Time zone difference from Greenwich Mean Time (GMT)
- Content of the request (actual page)
- Access status/HTTP status code
- Volume of data transferred in each case
- Website, from which the request originated
- Browser
- Operating system and interface
- Language and version of the browser software
- Hardware used (PC, smartphone etc.)
- Location (if Google Maps is activated)

We have no influence on this transmission of data.

When you visit our website and play videos, YouTube/ Google receives the information that you have accessed the respective sub-page of our website. This data is directly assigned to your account if you are logged in to Google If you do not wish to be associated with your YouTube profile, please log out before activating the button. YouTube/Google also stores data if you do not have a Google user account, in particular: IP address, search queries, browser and operating system version.

YouTube/Google stores the above data as usage profiles and uses them for the purposes of advertising, market research and/or designing its website based on needs. In particular, this evaluation is carried out (even for users who are not logged in or users without a corresponding account) to provide needs-based advertising and to inform other users of the social networking sites about your activities on our website. You have a right to object to the creation of these user profiles and must contact YouTube to exercise your right.

Information on the third-party provider: YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA: <u>https://policies.google.com/technologies/product-privacy?hl=de</u> and <u>https://policies.google.com/privacy?hl=de&gl=de</u>.

The information collected by the cookies set by this provider is generally sent to a server in the USA and stored there. If data is transferred to the USA, such transfer is subject to standard contractual clauses.

Bionorica SE neither collects nor processes personal data via YouTube. The transfer of personal data by Google, in particular to third countries, is outside the scope of responsibility of Bionorica SE. Bionorica cannot be held liable in this respect.

If you have any questions about our information offering on the social web, please contact us by phone +49 (0)9181 231-90 or via email (info@bionorica.de).

6. Reporting of adverse drug reactions (ADRs) and potential quality defects (QDs)

Adverse reactions (e.g. side effects) or QDs may arise in connection with the consumption or use of medicinal products. As a manufacturer of plant-based medicinal products, we are legally obliged to track, assess and report ADRs/QDs to the competent authorities to ensure the highest level of safety for consumers of our medicinal products. Therefore, we are also required by law to screen and track your comments on our social media channels regarding ADRs/QDs. In general, we recommend you disclose the minimum amount of personal data (in particular with respect to your health) on our social media channels. You can also report ADRs/QDs directly to us via: info@bionorica.de. Please contact your doctor or pharmacist immediately if you develop an ADR with a Bionorica product or notice a QD. If you still choose to post an ADR/QM on our social media channels, we will be obliged to collect and process your personal data to fulfil our legal obligations. We may also contact you and request further information.

We take the security of our users very seriously and are therefore committed to compliance with all the data protection regulations at a European and national level. Furthermore, Bionorica is legally obliged to also report ADRs/QDs to the relevant health authorities, in which case, we only share your information in a pseudonymised form. In addition, we may also share this information with other Bionorica Group companies if such data is required to submit reports to the health authorities responsible for the various companies. The legal basis for the processing of your personal data is the fulfilment of our legal obligations in the context of pharmacovigilance notifications or the protection of our legitimate interests, which consist in particular in ensuring the high safety and quality standards of Bionorica products (Art. 9 para 2 lit. i GDPR, Art. 6 para 1 lit. c GDPR or Art. 6 para 1 lit. f GDPR and § 22 para 1 no. 1 lit. c BDSG) or, if you provide public information about your health in comments, Art. 9 para 2 lit. e GDPR.

For more information on how Bionorica manages the personal data of consumers (e.g. in the context of drug safety), please visit: <u>https://www.bionorica.de/de/service/datenschutz/datenschutz-verbraucher.html</u>.