

## Privacy & Cookie Policy

**Aflofarm Farmacja Polska Sp. z o.o.** (“we, ‘our’, us”) recognises the importance of your privacy, and that you have a right to control how your personal information is collected and disclosed. We know that providing personal information is an act of trust and we take that seriously. We take great care to safeguard the personal information that we collect to ensure that our customers’ privacy is maintained and the way we collect and use cookies.

Aflofarm Farmacja Polska Sp. z o.o., organised and existing under the laws of Poland, seated at Partyzancka 133/151, 95-200 Pabianice, entered into the Register of Entrepreneurs of the National Court Register by the District Court for Łódź-Śródmieście XX Commercial Division with the KRS number 0000014115, share capital PLN 26,271,500.00, NIP: 731-18-21-205, REGON: 472871255, hereinafter also referred to as the “Aflofarm” is the Data Controller of Your personal data.

If you wish to make a complaint about the way in which we handle your personal information, please contact our Privacy Officer via email: daneosobowe@aflofarm.pl

We undertake to acknowledge and investigate any complaint promptly and will respond to written complaints within a reasonable time from the date of receipt.

### 1. Definitions:

**Website**-web page with the URL [...]

**Third Party Service Provider Website** – web page of our partners, service providers or customers.

**User** – a visitor to the website, web address [...], natural or legal person, to whom Data Controller provides services electronically or replies to enquiries via our contact form; **Website Owner** – the proprietor of the web page at the URL [...] Aflofarm Farmacja Polska Sp. z o.o., organised and existing under the laws of Poland, seated at Partyzancka 133/151, 95-200 Pabianice, entered into the Register of Entrepreneurs of the National Court Register by the District Court for Łódź-Śródmieście XX Commercial Division with the KRS number 0000014115, share capital PLN 26,271,500.00, NIP: 731-18-21-205, REGON: 472871255

**Device** – User’s end device and software through which the User gets access to the Website.

2. We have provided this privacy notice to you to describe our information collection and use practices at Aflofarm. This notice also describes the choices you can make about the way your information, including sensitive personal information, is collected, used, and under what circumstances shared. The notice applies to any cookies collected by us through the use of this Website and any other interactions with us.
3. Cookie Policy outlines rules for placing, storing and accessing data on User’s end device through which Website of Data Controller is accessed electronically. This policy also provides information on the lifetime of cookies (i.e. how long the cookie will remain on your device and whether these files can be accessed by any third parties).
4. Your personal data shall be processed by the Data Controller for the compliance with legal obligations to which the Controller is subject under 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, and repealing Directive 95/46/EC (the General Data Protection Regulation or ‘GDPR’).
5. When you visit our website, we may collect information on your browsing activity or as a visitor to the site that can be used to identify you as an individual. These data may include:
  - a. information on how you use our website, including your IP address, pages viewed, time spent on site and other statistics relating to your browsing behaviour;
  - b. technical information of devices used by you as a visitor to access our site and other technical data;

- c. session recording of mouse clicks, movement, scrolling, your activity on the website or other web pages or item viewed;
- d. any other data that a site visitor provides electronically via our contact form, if any, or email.

6. The types of personal information that we collect from you will depend on how you use the website (please note that your email address itself may contain data that can be deemed to be personal data) which can be processed by Aflofarm only to:

a) reply to your enquiry/submission regarding products of Aflofarm, collaboration or operations of Aflofarm - subject to the prior consent of the User to any such processing or where the processing of personal data is determined in the legal basis for compliance with the applicable regulations then at all times limited to the Data Controller's vested or legitimate interest – pursuant to Article 6 (1) (a) and (f) of GDPR;

b) the processing and handling of report on undesirable effect or adverse reaction under the Article 6 (1) (c) of GDPR Aflofarm is subject to as the Data Controller;

c) the processing and handling of complaints under the vested interest of Data Collector pursuant to Article 6 (1) (f) of GDPR;

d) deliver more targeted, enhanced or personalised content on product updates wherever you have consented us to provide any marketing content or other updated information about our product offering, products or services (article 6 (1) (a) of the GDPR and Article 172 of the Telecommunications Law and Article 10 (2) of the Act on Provided Services by Electronic Means).

The processing of personal data shall be carried out under Article 6 (1) (b) of the GDPR if so required for the purpose of executing or performing an agreement or contract to which User is the party or to take actions or measures, at the User's request, or as reasonably required prior to the execution thereof.

7. You are under no obligation to provide us with your personal information yet it is essential for the processing of your enquiry/submission on products, dealings with us or operations of Aflofarm, processing of reports of undesirable effect or adverse reaction, recruitment process or handling your complaints so that if you choose to withhold your personal information or revoke your consent we may not be able to provide you with the services or products that depend on the collection and use of that information.

Wherever the purpose is execution of contract or agreement, providing personal data is required by law for the execution and performance thereof. Personal information may be subject to the processing and storage by Aflofarm on grounds of legitimate or vested interest of Aflofarm wherever the legitimate interest of the Data Controller supersedes the legitimate interest or rights of the User. Whenever the legitimate interests of the Data Controller is superior to the vested interest and rights of the User, personal data can be collected, stored and processed to the extent required by law. In these cases, data can be stored and processed for compliance with law only. The lifetime of User's personal information depends on the type of information collected by the Data Controller. Aflofarm shall retain personal information of the User only as long as it is required or necessary to comply with the obligations and provisions set out in this Privacy Notice and Cookie Policy.

After this time, Aflofarm will delete or anonymise personal data of the User. In case it is not possible (for example in case information is saved in backup copies), the personal data will be isolated for further processing until deleted to the extent lawfully and technically possible.

8. Data Controller shall take reasonable steps to protect and safeguard your personal information from modification, interference, misuse, disclosure, loss, erasure or destruction or unauthorised access.

9. Data Controller shall ensure transparency of the processing of personal data so that you are always aware of what information we collect, the purpose for which we collect it, how we use it, and under what circumstances we disclose it.
10. Data Controller shall safeguard and ensure confidentiality of the personal information processed by the Data Controller and access for data subjects to their personal information. In case of security incidents resulting in breach of personal data despite the applied safeguards and other security measures (breach of confidentiality, loss of accessibility or integrity) and any such breach might involve high likelihood of violating the rights or freedoms of subject data breach, you will be notified by the Data Controller accordingly pursuant to the applicable regulations.
11. Data Controller will take every reasonable step to make sure its authorised employees, contractors and other third party agents or service providers are aware of our privacy commitment and our obligations in the collection, use and disclosure of personal information and submit to the obligation of compliance with the appropriate privacy laws when processing your personal data.
12. Data Controller performs ongoing monitoring of risk and safeguards applied. If necessary, additional measures aimed to protect privacy of you data are deployed.
13. The recipients of your personal data will only be (1) authorised employees and staff or other persons acting for and on behalf of Aflofarm, (2) third parties collaborating with or partnering to Aflofarm, i.e. third party telecommunications system and service providers (telecommunication infrastructure and facilities, electronic mail, IT systems used by Aflofarm), (3) supervisory authorities, governmental bodies and other public offices or third party agencies for compliance with applicable laws and regulations (4) statutory auditors and other counselling professional bodies.
14. If the processing of User's personal data is based on the User's consent, you may, at any time, revoke your consent to the processing of your personal data, legality of the data processing carried out until the revocation remains unaffected by the revocation.
15. By visiting and using our Website you consent to receiving marketing and advertising material which is an integral part thereof. The integral part shall also include online banners where Aflofarm can advertise its services and provide you with updated information about product offering or other marketing content.
16. At any time you have the right to access your personal data, including the right to delete it or to restrict or limit the processing or the rights to data transfer. If you wish so, please contact us at [daneosobowe@aflofarm.pl](mailto:daneosobowe@aflofarm.pl). If you think your data protection rights have been violated, you can lodge a complaint with the Polish Data Protection Authority Officer.

If you are dissatisfied with the way in which we hold, handle and process your personal data you may revoke your consent to the processing of your personal data under your legitimate interest.

17. Any matters not covered by this Privacy Policy shall be construed and governed by the applicable law.
18. From time to time, our policies will be reviewed and may be revised. We reserve the right to change our Privacy Policy at any time and notify you by posting an updated version of the policy on our website.
19. Social media networks

We keep public accounts with social networks like: Facebook and LinkedIn, Instagram so that we have access to personal data of users or browsers of these profiles (comments, likes, UIDs). Any personal information of such visitors shall be processed to make website/platform work or work more efficiently, also to enable site owners to provide targeted content by providing personalised, more enhanced content promoting events and services or products for the purposes of statistics and analytics, to seek damages or defend against any claims brought or filed against Aflofarm. The processing of personal data in social media is pursuant to the

legitimate interest of the Data Controller (article 6 (1) (f) of GDPR consisting in promoting and advertising its brand, trade name, improve its reliability or functionality and quality of services provided and, if necessary, to seek damages or injunctive relief and defend against claims brought or filed against Data Controller.

Third Party Service Provider: LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA

Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>

Third Party Service Provider: Facebook Ireland Ltd., 4 Grand Canal Square, Dublin 2, Ireland

Privacy Policy: <https://www.facebook.com/about/privacy/>

Third Party Service Provider: Facebook Ireland Ltd. (Instagram), 4 Grand Canal Square, Dublin 2, Ireland

Privacy Policy: <https://privacycenter.instagram.com/policy/>

## Cookies

20. **What are cookies?** Cookies are small text files that are placed on your computer, a smartphone or other mobile device by websites that you visit or a browser. They are widely used in order to enable tracking of an individual's browsing or website activity, to make websites work, or work more efficiently, as well as to provide information to the owner of the site.

21. **What types and categories of cookies do we use?**

- a. **First-party cookies** – these cookies are installed and collected by the Website on and from the end terminal or device of the User;
- b. **Third-party cookies** - these cookies are installed and collected by second or third party websites on and from the end terminals or devices of users.
- c. **Session cookies** - these cookies are temporary and enable websites to recognize their users and the information provided when they navigate through a website. Session cookies only retain information about a user's activity for as long as they are on the website. Once the web browser is closed, the cookies are deleted.
- d. **Permanent (persistent) cookies** - these cookies remain in operation even after the web browser has closed. Cookies are not deleted after the session is over unless the cookie settings are configured for cookies to be deleted after the end of the session. These cookies are saved on the device of the visitor to the site and are used to remember website settings to enable the website owner to provide personalised user browsing experience. The lifetime of cookies is defined by your settings for the website or remain on the device until deleted by the User by clearing browsing history of his/her browser.
- e. **Strictly necessary cookies** - these cookies enable you to move around our website and use its basic features, such as accessing secure areas of the website. These cookies save information required for the website to function properly and to enable core functionality of our Website. These cookies do not require User's consent under privacy laws nor do they collect personal information from your mobile device. The lifetime of cookies is defined by your opt-for or opt-out settings for the browser. You can block or restrict access to cookies under the browser cookie settings however this can impair functionality of the Website. Check the list of strictly necessary cookies.
- f. **Analytics cookies** - these cookies track how you use you navigate and interact with a website. These cookies enable us to collect information of your site performance and follow actions of site visitors to improve the way our website works and to improve use experience. We use Google Analytics to analyse the behaviour of visitors to our Website. The information collected by means of the cookies

about your use of this website is generally transferred to a Google server in the USA and stored there. For analytics cookies please see the list below.

- g. Advertising cookies** - we wish to display advertising that is targeted, personalised and customised to your preferences and interests and collect information on its effectiveness. For this reason, we and our partners in advertising use various cookies. They are used to track traffic on the Website. Some of these cookies enable tracking of your activity or behaviour on our Website (like products or items viewed), collect information to customise or personalise third party advertising. In this way you can see our advertising banners on other websites that are customised or personalised to your preferences (i.e. if you browse for our products the advertising of these products can pop up in other websites domains. The lifetime of these cookies is up to 6 months.

## **22. Security**

The mechanism of cookies does not allow for downloading any personal data or any confidential information from the User's device. It is virtually impossible to transfer viruses, Trojan, spyware or malware to the User's Device.

First-party cookies - these first-party cookies used by the Data Controller are safe for the User's terminal devices.

## **23. Purposes for which Cookies are used**

By using our site, you consent to our privacy policy. By default, browsing software enables placing cookies on your device. This ensures access to all functions or parts on our Website. At any time a visitor to websites may change browser settings if you do not wish to receive any cookies. If you wish to restrict or block the cookies which are set automatically by our website, or indeed any other website, or to consent each time under privacy and security settings for cookies to be placed on your device, you can do this through your browser or Website settings.

Access to the Website - the Data Controller may store information about the User's preferences and settings regarding the Website in Cookies in order to improve site performance and facilitate user experience on the Website.

Your personal data will be profiled and matched to your preferences or interests depending on your activity on the Website, content or items viewed based on collected statistics on your website behaviour aimed to improve site performance.

Serving multimedia services – the Website and external websites use Cookies to serve multimedia services to Users.

## **24. No links to external websites**

Our Website does not have any links to external third party websites and no third party cookies are collected or stored by the Data Controller.

## **25. Terms and Conditions for Website's access to User's mobile device**

The User can at any time change settings under privacy and security settings for Cookies, deleting and access to cookies set by our website including revocation of your consent (providing it is not to the contrary of the lawfulness of activity throughout the validity of consent).

Information on disabling Cookies in most popular browsers and mobile devices are available at:

**Firefox:** <https://support.mozilla.org/pl/kb/blokowanie-ciasteczek>

**Chrome:** <https://support.google.com/chrome/answer/95647?hl=pl&co=GENIE.Platform%3DDesktop#zippy=>

**Internet Explorer:** <https://support.microsoft.com/pl-pl/windows/usuwanie-plik%C3%B3w-cookie-i-zarz%C4%85dzanie-nimi-168dab11-0753-043d-7c16-ed5947fc64d>

**Opera:** <https://help.opera.com/pl/touch/settings/>

**Safari:** <https://support.apple.com/pl-pl/guide/safari/ibrw850f6c51/mac>

Given the multitude of technological solutions, it is not possible to provide precise guidelines on how specific terms and condition for storing or accessing cookies using the settings of all available websites end devices and software installed in this device. However, in most cases, it can be done by selecting "Tools" or "Settings" to configure cookie settings or manage privacy while browsing the Internet. Detailed information is usually provided by the manufacturer of a given device or browser in the instructions for use or on the relevant website.

The User may at any time delete all Cookies placed on User's device while visiting our Website using the tools available on the User's Device.

## **26. Right to restricting or blocking Cookies.**

Due to restricting or blocking storage and access to Cookies on User's Device, you may not be able to use all functions of our Website.

We are not responsible for limited functionality of our Website due to restricting or blocking storage and access to Cookies by the User or visitor to the site.

## **27. Third Party Access to Cookies**

1) If you have given your consent, our Website uses Google Analytics. Google Analytics is a web analytics service provided by Google LLC, USA. Google Analytics uses cookies that enable an analysis of your use and behaviour on our Website. Google Analytics does not store or process personal information that could be used to identify a person. The information collected is limited to information on Your device, browser, location and how you use our Website (sites visited, frequency, duration and recurrence of your visits to our Website). For highest security standards, we enabled IP anonymization feature in Google Analytics.

Provider: Google Ireland Limited, Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland

Privacy Policy: <https://policies.google.com/privacy?hl=de>

Warunki: <https://marketingplatform.google.com/about/analytics/terms/us/>

Rezygnacja: <http://tools.google.com/dlpage/gaoptout?hl=de>

Privacy settings: [https://myaccount.google.com/privacycheckup?utm\\_source=pp&utm\\_medium=Promo-in-product&utm\\_campaign=pp\\_intro&pli=1](https://myaccount.google.com/privacycheckup?utm_source=pp&utm_medium=Promo-in-product&utm_campaign=pp_intro&pli=1)

**More about Google Analytics:** If you have given your consent, this website uses Google Analytics 4, a web analytics service provided by Google LLC. The responsible party for users in the EU/EEA and Switzerland is Google Ireland Limited, Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google").

**Scope of processing:** Google Analytics uses cookies that enable an analysis of Your use of our websites. Google Analytics 4 has IP address anonymization enabled by default. Due to IP anonymization, your IP address will be shortened by Google within member states of the European Union or in other states party to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there. According to Google, the IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

Recipients of the data are/may be, in particular:

- Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (as processing party under Article 28 GDPR).
- Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA
- Alphabet Inc, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA

It cannot be ruled out that US authorities may access the data stored by Google. The lifetime of cookies is 14 months.

2) Our third party partners in advertising use their cookies under their own privacy policies (inter alia to receive more personalised, targeted or customised advertising that is displayed on websites operated by these partners). We advise you to read the list of partners in advertising. Advertising cookies do not store any personally identifiable information about users. They are limited inter alia to information (...) [like location, or whether you clicked on our advertising and whether it lead to finalised purchase, etc.”]

## **28. Changes to the Privacy and Cookie Policy**

1) From time to time, our policies will be reviewed and may be revised. We reserve the right to change our Privacy & Cookie Policy at any time.

2) Any revisions to our Privacy & Cookie Policy will be notified to you by posting an updated version of the policy on our website.

3) Changes to this Policy shall become effective upon publication.