	<b>Policy</b>	<b>Effective Date: 10/12/2018</b>
<b>Data Privacy</b>		<b>Document ID: POL-03 v1.0</b>

## 1 PURPOSE

The scope of this Privacy Policy is to outline the type and potential sources of personal data processed by Medwork, the purpose of processing and the privacy rights of individuals as per the applicable European [EU General Data Protection Regulation (GDPR)] and national legislation. It applies to all personal data stored either electronically and/or in hardcopy.

## 2 POLICY

### 3.1. Type and Sources of Personal Data

Personal data is any information that can be used to identify an individual, directly or indirectly.


Personal data may be obtained:

- Directly from individuals, as part of their business relationship with Medwork or through other interactions they may have with Medwork
- From publicly available sources (e.g. public registers, search engines, LinkedIn, Facebook, literature)
- From third parties (e.g. clients, including the clients' third parties, in connection with the services agreed, healthcare professionals or consumers providing Medwork with safety information in association with a medicinal product/medical device/cosmetic product).

The type of personal data collected by Medwork depends on the nature of an individual's relationship with Medwork and may include the following:

DATA SUBJECT	TYPE OF PERSONAL DATA
Personnel, consultants and job applicants	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth/age</li> <li>• Contact information (address, telephone number, email address)</li> <li>• Qualification and training information (education, experience, employment history, trainings, training performance, information provided in CVs)</li> <li>• Job-related information (job descriptions, daily-task recordings, performance/evaluation information)</li> <li>• Payroll and tax-related information (bank account number, salary, expenses, social security number, company credit-card numbers)</li> <li>• IT information (user names, access codes, access permissions, access logs, browser history)</li> <li>• Access control information (company access-card codes and access history/logs)</li> <li>• Other information (photographs, driving licences, identification card, company mobile telephone codes)</li> </ul>

Suppliers	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth/age</li> <li>• Contact information (address, telephone number, email address)</li> <li>• Qualification and training information (education, experience, employment history, trainings, training performance, information provided in CVs)</li> <li>• Information available in contracts/offers</li> </ul>
Clients (including clients' third parties and potential clients)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth/age</li> <li>• Contact information (address, telephone number, email address)</li> <li>• Qualification and training information (education, experience, employment history, trainings, training performance, information provided in CVs)</li> <li>• Professional information (job position, assignments)</li> <li>• Information available in contracts/offers</li> </ul>
Reporters of safety information/ product quality defects and medical information enquirers (healthcare professionals/consumers)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (address, telephone number, email address)</li> <li>• Profession</li> <li>• Relationship with the subject of the report (if applicable)</li> </ul>
Patients	<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth/age/age group</li> <li>• Gender</li> <li>• Contact information (address, telephone number, email address)</li> <li>• Weight and height</li> <li>• Information about the safety information/ incident/ undesirable effect</li> <li>• Medical history</li> <li>• Medical record number</li> <li>• Other data concerning health</li> </ul>
Personnel of organizations, competent authorities, government agencies and authorized bodies	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (address, telephone numbers, email address)</li> <li>• Professional information (job position, employment history)</li> </ul>
Individuals entering Medwork's facilities	<ul style="list-style-type: none"> <li>• Name</li> <li>• Contact information (address, telephone, email address)</li> <li>• Information (date and time) regarding entrance to Medwork's offices</li> <li>• CCTV data (*)</li> </ul>

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(\*) Medwork has installed security camera systems (CCTV) to monitor the entrances to its offices for security purposes. No cameras are installed inside the office areas. Data are stored for up to 6 months and are subsequently overwritten automatically.

### 3.2. Legal Basis and Purpose of Personal Data Processing

As per the applicable legislation, Medwork may process personal data on the following grounds (legal basis):

- based on an individual’s consent
- for the performance of a contractual agreement
- to comply with legal obligations
- for the purpose of its legitimate interest

Medwork may process personal data for the following purposes:

- To run its business efficiently and properly in consistency with standard business practices
- To exercise its rights and obligations defined in agreements or contracts
- To comply with legal/regulatory obligations, including but not limited to those related to pharmacovigilance
- To manage its relationship with clients, suppliers and other third parties
- To deliver its services and provide related guidance/advice
- To authorise, grant and monitor the access to the company’s systems, facilities, records, property, network and infrastructure
- To develop and carry out marketing activities
- To develop new ways to meet customer needs and grow its business
- To manage payments
- For legal proceedings

### 3.3. Protection, Disclosure and Retention of Personal Data

Medwork uses industry-standard administrative, technical and physical safeguards to protect personal data against theft, misuse, unauthorised access, modification, disclosure and destruction.


All personal data is stored and processed at Medwork’s facilities and a data storage/hosting partner within EU/EEA. Medwork may disclose personal data to its clients (including clients’ third parties), suppliers, competent authorities, government agencies or other parties, in connection with the purpose for which it was originally collected, if required by law or in connection with an investigation of suspected illegal activity.

Personal data shall be retained for as long as it is required to fulfil the purpose for which it was collected and for a maximum of 10 years. Personal data may be retained for a longer period of time if it cannot be deleted for legal/regulatory or technical reasons.

### 3.4. Data Subject Rights

As per the applicable legislation, data subjects have the following rights regarding their personal data:

- The right to be informed about the collection and use of their data
- The right to access their data
- The right to rectification, i.e. make corrections to inaccurate or incomplete information
- The right to erasure of their data
- The right to restrict processing of their data to certain limited purposes
- The right to data portability, i.e. receive a copy of their personal data or ask for a copy to be provided to a third party

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- The right to object to the processing of their personal data

Furthermore, data subjects have the right to lodge a complaint with the Greek Data Protection Authority, when they believe that their rights have been violated.

In any case, Medwork shall conform with any individual's request to exercise his/her data subject rights with the individuals' rights upon relevant request and as required by law.

### 3.5. Contact Information

Any request (including but not limited to requests related to the individual's rights listed above), question, complaint or other act with respect to Medwork's Data Privacy Policy shall be forwarded to the following address:

Mailing address: Medwork, 5 Chiou str., 16452 Argyroupolis, Greece

Email: [data-protection@medwork.gr](mailto:data-protection@medwork.gr)

### 3.6. Revision

Medwork reserves the right to make changes to this Data Protection Policy to reflect changes in its legal obligations or the processes applied. Any revision shall be posted on the company website.

## 3 DEFINITIONS

**Personal Data:** 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

**Data subject:** An identified or identifiable natural person

**Processing:** Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**Consent of the data subject:** Any freely given, specific, informed and 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

**Data concerning health:** Personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status

**Healthcare professional:** A medically-qualified person such as a physician, dentist, pharmacist, nurse, coroner or as otherwise specified by local regulations

**Consumer:** For the purpose of reporting safety information, a person who is not a healthcare professional such as a patient, lawyer, friend, relative of a patient or carer

## 4 ABBREVIATIONS & ACRONYMS

**EU:** European Union

**GDPR:** EU General Data Protection Regulation

## 5 REFERENCES

- *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 (General Data Protection Regulation)*