



Fostering Healthcare Innovation

PRIVACY POLICY

This Privacy Policy applies to personal data collected through the website www.cemagcare.com ("Website").

CEMAG Care, with registered office at 55 rue de Turbigo, 75003 Paris, France and registered with the register of legal entities under the SIRET number 817 912 850 00010 ("CEMAG Care") is the Controller for the processing of your personal data for the purposes described below. CEMAG Care will collect your Personal data in accordance with this Privacy Policy and applicable laws, notably with the General Data Protection Regulation (Regulation (EU) 2016/679).

The definitions given by article 4 for the following terms are:

« Personal 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;

The term « data » for « personal data » will be used in the following document.

« Processing » means 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;

« Recipient » means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.

01 > Which personal data are collected?

CEMAG Care collects data through the Website and the forms available on it, which include:

INFORMATION COLLECTED ABOUT YOU WHEN YOU ACCESS THIS WEBSITE

These data correspond to the following categories:

- > Domain and server (host) from which you access this website on the Internet;
- > Address of the website from which you access our website;
- > Date, time, length of visits of this website and pages most frequently accessed;
- > Your internet protocol (IP) address;
- > Operating system of your computer and details of your web browser.

INFORMATION COLLECTED ABOUT YOU WHEN YOU CHOOSE TO COMPLETE A FORM AVAILABLE ONLINE

- > Data on your personal identity: surname, first name and email address;
- > Content of your message and the answer provided.

This form is at your disposal in case you want to contact us. We would like to remind you that the completion is not mandatory.

02 > What are the purposes for processing and the legal basis?

Your data is processed for the following purposes and in accordance with the legal basis set out in the table below which also lists the recipients of your data.

	Purposes	Legal basis	Categories of recipients
General	Managing and providing the Website. Performing statistics on the use of the Website (please see our cookie policy) to improve the quality of our website.	Our legitimate interest to provide a Website. Your consent.	IT Services Marketing department
Patients and consumers	Managing and responding to general information requests	Comply with our legal obligations.	Pharmaceutical and medical Affairs department
	Managing and responding to requests concerning medical information	Our legitimate interest to answer your questions.	
Health professionals	Managing and responding to general information requests	Comply with our legal obligations	Pharmaceutical and medical Affairs department
	Managing and responding to requests concerning medical information	Comply with our legal obligations	
	Carrying-out and follow-up information and communication actions for example, to invite you to congress, seminars, debates and carry out market research, scientific cooperation or research	Our legitimate interest to develop and maintain our relationship with you	Coordinateur DMOS et Transparence des liens Marketing department
Job applicants	Processing your online job application and evaluating your suitability for a position at CEMAG Care	Our legitimate interest to evaluate your application for a position at CEMAG Care and to take the necessary measures prior to concluding a contract with you	HR services and potentially recruitment agencies working for CEMAG Care
Business Partners	Analysis of potential partnership and signature of partnerships	Our legitimate interest to develop and maintain our relationship with you	Direction, Marketing and Quality departments
Press	Managing and responding to requests concerning CEMAG Care's business or products	Our legitimate interest to develop and maintain our relationship with you	Direction and Marketing department

In addition to the categories of recipients mentioned above, CEMAG Care will transmit your data to our authorized processors which will process your data on behalf of CEMAG Care.

CEMAG Care may also communicate your data to relevant authorities if required by applicable laws.

03 > How long will your personal data be retained?

In accordance with applicable data protection legislations, the information collected about you when you access the website will not be retained for more than 3 years.

Regarding your personal information, the retention period is the following:

- > Managing and providing the Website: until 3 years
- > Performing statistics on the use of the Website: until 3 years
- > Managing and response to medical information requests: until 10 years after the expiration of the last marketing authorization of the relevant pharmaceutical product in case the question relates to pharmacovigilance.
- > Carrying-out and follow-up information and communication actions for example to invite you to congress, seminars, debates and carry out market research, scientific cooperation or research: until 5 years
- > Processing your online job application and evaluating your suitability for a position at CEMAG Care: until 2 years
- > Analysis of potential partnership and signature of partnerships: until 5 years
- > Managing and responding to requests concerning CEMAG Care's business or products: until 2 years except for a question on adverse effect or on pharmacovigilance and materiovigilance incident
- > Data concerning opposition list for receiving information: until 3 years

04 > Transfers outside of the European Economic Area

CEMAG Care will not transfer your data outside of the European Economic Area.

Otherwise, processes will comply with Regulation (EU) 2016/679 requirements.

05 > Opportunities to reduce the collected data

You can reduce the amount of personal data we collect about you as follows:

- Through the contact form disabling the use of tracking technologies. Indeed, CEMAG Care uses tracking technologies, such as cookies, which can collect personal information about you. For more information, please refer to our cookie policy.
- Contacting us as mentioned in section **07>What are your rights? How can you exercise them?**

06 > Security

CEMAG Care will implement appropriate technical and organizational measures to ensure an appropriate level of security regarding the risk incurred and protect your data against unauthorized access, disclosure, alteration or destruction.

07 > What are your rights? How can you exercise them?

Under applicable Data Protection Law, notably the General Data Protection Regulation ("GDPR") you have a number of rights with regard to your data. These rights are as follows:

- > Right to Access - You can ask to see the data CEMAG Care holds about you. In connection with a request, CEMAG Care may request specific information about you to enable us to confirm your identity and right access, as well as search for and provide you with the data CEMAG Care holds about you. In the event we cannot provide you with access to your data (for instance, personal information may have been destroyed, erased or made anonymous), we will inform you of the reasons why.
- > Correction or Deletion of Personal Information – CEMAG Care works to ensure that data in its possession is accurate, current and complete. If you believe that the data CEMAG Care holds on you is incorrect, inaccurate, incomplete or outdated, you may request the revision or correction of that information. If it is determined that data is inaccurate, incomplete or outdated, we will revise it.
- > Withdrawal of Consent - If you have provided consent for the processing of your data, you have the right to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.
- > Objection to processing - you have the possibility to object to the processing of your data including profiling, on grounds relating to your particular situation.
- > Limitation to processing - you have the right to obtain from us restriction of processing in certain instances (see section **5>Opportunities to reduce the collected personal data**)
- > Right to data portability - you have the right to receive the data, which you have provided to us, in a structured, commonly used and machine-readable format when the processing is based on your consent or on a contract. You also have the right to ask us to transmit it to another data controller of your choice.
- > Complaints - You have the right to lodge a complaint to the Data Protection Authority of the country¹ where you live or work, or place the alleged infringement, if you believe that CEMAG Care has not complied with the requirements of the GDPR with regard to your data or does not provide a satisfying answer to your request.
- > Data after death: it is possible to provide guidance for post mortem data in writing at the directions mentioned below.

If you wish to exercise one of these rights, please send a request in this regard via email to dataprivacy@cemagcare.com or by post to CEMAG Care, 55 rue de Turbigo 75003, France, stating both your name and surname, together with a copy of your identity card.

Last Update February 14thApril, 2021

¹ in France : CNIL – 3 Place de Fontenoy, 75007 Paris (Tel : 01 53 73 22 22).