

Privacy Statement Pharmacolog Dashboard™

1. General

1.1. About Pharmacolog

Pharmacolog provides solutions and products that enhance work efficiency and safety when preparing injectable medication. Our goal is to help prevent medication errors and ensure maximum medication efficacy when treating patients with powerful yet potentially harmful injectable drugs.

Pharmacolog's products help staff at pharmacies and hospital wards minimize the risk of errors in the compounding process. Furthermore, by verifying that drugs and narcotics used in surgery have not been tampered with, our solutions also make a vital contribution to preventing drug diversion.

1.2. About Pharmacolog Dashboard™

Pharmacolog has developed Pharmacolog Dashboard™ as a software tool for remote monitoring, analysis and supervision of measurements performed with Pharmacolog products such as DrugLog™, PrepLog™ and WasteLog™. This data is limited to operational metrics and configuration information.

If you use Pharmacolog Dashboard™, personal data, such as name and email address is processed.

Pharmacolog is committed to protecting these personal data and has drafted this Privacy Statement to provide transparency on how Pharmacolog treats personal data.

If you have any questions or concerns regarding this Privacy Statement or the protection of your personal data, please feel free to contact us via info@pharmacolog.com or via the contact details that you will find on the final page of this Privacy Statement.

2. Who is responsible for the processing of your personal data?

Pharmacolog processes personal data solely on behalf of the licensee of Pharmacolog Dashboard™ (e.g., a healthcare provider). The licensee acts as a controller responsible for the processing of the personal data and Pharmacolog acts as a processor.

A data processing agreement between the licensee and Pharmacolog controls how we process personal data on the licensee's behalf and the security measures that are taken.

Further details on the relevant processing activities can be found in paragraph 3 below.

3. Which personal data is used and for what purposes?

By providing Pharmacolog Dashboard™ as a product, Pharmacolog collects certain personal data. We can process these personal data in various ways. In paragraph 3.1 you will find information about our processing of personal data in general. In paragraphs 3.2 and further, you will find an overview of various topics with more detailed information about the processing of personal data in that context.

3.1. General processing purposes

In general, we may always process your personal data for the following purposes:

- For maintenance, administration, network and security purposes.
- For internal control and business operations.
- For determining, exercising, and defending our rights.
- For complying with legal obligations (incl. fraud prevention) and requests of authorized governmental institutions.

3.2. Using Pharmacolog Dashboard

Persons involved.

Users of Pharmacolog Dashboard™

The purpose of the processing.

To be able to use Pharmacolog Dashboard™, you need a user account. We will process your personal data to create your user account and to know your identity.

The personal data that is processed.

Name, e-mail address, licensee of Pharmacolog Dashboard™ the user is registered for.

Legal grounds for the processing.

The legal ground for personal data processing for this purpose is that it is necessary to provide our products and services. We process your personal data on behalf of the licensee. The licensee is the controller of the processing and Pharmacolog is the processor.

3.3. Providing support

Persons involved.

Users of Pharmacolog Dashboard™

The purpose of the processing.

We process your personal data to help you if you contact us in support matters, such as if you have questions about our products or services. We use your personal data to identify you, communicate with you, and investigate any complaints or support matters.

The personal data that is processed.

Name, e-mail address, licensee of Pharmacolog Dashboard™ the user is registered for.

Legal grounds for the processing.

The legal ground for personal data processing for this purpose is that it is necessary to fulfill our legitimate interest to provide you with support and answer any questions you have for us.

3.4. Preventing abuse

Persons involved.

Users of Pharmacolog Dashboard™

The purpose of the processing.

We process personal data to prevent abuse of our products or services and to investigate abuse. Abuse refers to fraud, junk mail, harassment, attempted illegal login to user accounts and other actions prohibited by our terms or by law.

The personal data that is processed.

Name, e-mail address, licensee of Pharmacolog Dashboard™ the user is registered for.

Legal grounds for the processing. The legal ground for personal data processing for this purpose is that it is necessary for our legitimate interest in preventing our products and services from being abused and our legitimate interest in investigating any abuse.

4. How do we obtain your personal data?

We obtain personal data in various ways:

- **Provided by you.**

Some personal data we receive straight from you, for example, personal data you enter in Pharmacolog Dashboard™.

- **Obtained via the licensee of Pharmacolog Dashboard™.**

Some personal data we obtain from the licensee of Pharmacolog Dashboard™, for example, the name and email of users of the licensee.

5. Who do we share your personal data with?

We will not share your personal data with any third party except as described below.

- **Our suppliers.**

We may use third parties to handle one or more aspects of the business, including processing or handling of personal data. We may share personal data with these third parties to provide services on our behalf, such as storing our data, and other IT services. When we use suppliers according to this paragraph, we enter into personal data processing agreements and take other appropriate steps to ensure that your personal data is processed in a manner that complies with applicable laws and regulations and this Privacy Statement.

- **Mergers or acquisitions.**

We may transfer or transmit your personal data to a buyer or potential buyer upon the merger or acquisition of all or part of our business or assets. Upon such transfer, we will take reasonable steps to ensure that the receiving party processes your information in a manner that complies with this Privacy Statement.

- **Government institutions.**

We can share your personal data with government institutions, such as the police, tax authorities or other authorities when we are required to do so by law.

6. To which countries will we transfer your personal data?

Parties involved in the processing of personal data originating from the EU may be located in a different country. In case these parties are situated outside the EEA, the transfer is legitimized in the manner described below. See this [link](#) for an overview of the EEA countries.

Transfers outside the EEA.

The transfer of your personal data to a third party outside the EEA can in the first place be legitimized based on an adequacy decision of the European Commission, in which it is decided that the (part within the) third country in question ensures an adequate level of data protection. See this [link](#) for a summary of the applicable adequacy decisions.

If your personal data is transferred to a country outside the EEA for which there is no adequacy decision, we agree on the applicability of the relevant version of the Standard Contractual Clauses with the relevant party. This is a standard contract to safeguard the protection of your personal data, which is approved by the European Commission, in which the parties fill out the appendices. See this [link](#) for the various framework Standard Contractual Clauses. Where appropriate, additional safeguards are taken.

In specific situations, we can also rely on the derogations from article 49 GDPR to legitimize the data transfer. This means that we may transfer your personal data: (i) with your explicit consent, (ii) if this is necessary for the performance of a contract that has been concluded with you or has been concluded in your interest, or (iii) if this is necessary for the establishment, exercise, or defense of legal claims. Lastly, in exceptional cases, we may also transfer personal data if the data transfer is necessary for our compelling legitimate interests and is not overridden by your interests or rights and freedoms.

You can contact us via info@pharmacolog.com if you want additional information about how we legitimize the transfer of your personal data to countries outside the EEA.

7. How do we secure your personal data?

Protecting your privacy and personal data is very important to us. Therefore, Pharmacolog has implemented appropriate technical and organizational measures to protect and secure personal data, to prevent violations of the confidentiality, integrity, and availability of data.

Pharmacolog has implemented an appropriate written security policy for the processing of personal data. We take appropriate safeguards and enforce security standards to protect your personal data from unauthorized access, unauthorized disclosure, and addiction. All data, including personal data, in transit is encrypted using TLS. Your personal data is available only to our employees, and our service providers who need the information for their service and are bound to confidentiality obligations. Within Pharmacolog we use technical tools, such as firewalls, passwords, encryption, two-factor authentication, etc. and we ensure that our employees are educated on the importance of maintaining security and confidentiality in



relation to the personal data we process. We have furthermore taken appropriate measures relating to onboarding of employees, access to personal data, incident reporting and continuity (back-up and restoring of data).

8. How long do we retain your personal data?

We do not keep your personal data for longer than what is necessary in relation to the purposes for which we process the personal data.

This means, for example, concerning users of Pharmacolog Dashboard™ that we will keep your personal data as long as you are a registered user of Pharmacolog Dashboard™ to enable you to use our products and to enable us to provide services to you.

In certain situations, we process your personal data for a longer period of time than what is necessary for the purpose of the processing. This may be the case in the following situations:

- **Retention obligation.**

To comply with a minimum retention period or other legal obligation to which we are subject based on applicable EU law or the law of an EU member state.

- **Procedure.**

Your personal data is necessary in relation to a legal procedure.

By exercising your privacy rights, you may request Pharmacolog to delete your personal data or restrict the processing. We refer to paragraph 9 below for further information on your rights.

9. Your privacy rights

9.1. What are your rights?

In relation to the processing of your personal data by Pharmacolog, you have the following privacy rights:

- **Right of access.**

You have the right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you (but not necessarily the documents themselves). We will then also provide you with further specifics of our processing of your personal data. For example, the purposes for which we process your personal data, where we got it from, and with whom we share it.

- **Right to rectification.**

You have the right to request rectification of the personal data that we hold about you. This

enables you to have any incomplete or inaccurate data we hold about you corrected. You have this right in case we process personal data about you that: (i) is factually incorrect; (ii) is incomplete or not related to the purpose it was collected for; or (iii) is in any other way used in a manner that conflicts with applicable law. The right of rectification is not intended for the correction of professional opinions, findings, or conclusions that you do not agree with. However, Pharmacolog could in such a case consider adding your opinion about this to the personal data.

- **Right to erasure.**

You have the right to request the erasure of your personal data. This enables you to ask us to delete or remove personal data where: (i) the personal data are no longer necessary, (ii) you have withdrawn your consent, (iii) you have objected to the processing activities, (iv) the personal data have been unlawfully processed, (v) the personal data have to be erased based on a legal requirement, or (vi) where the personal data have been collected in relation to the offer of information society services.

However, we do not have to honor your request to the extent that the processing is necessary: (i) for exercising the right of freedom of expression and information, (ii) for compliance with a legal obligation that requires processing, (iii) for reasons of public interest in the area of public health, (iv) for archiving purposes, or (v) for the establishment, exercise or defense of legal claims.

- **Right to restriction of processing.**

The right to restriction of processing means that Pharmacolog will continue to store personal data at your request but may in principle not do anything further with it. In short, you have this right when Pharmacolog does not have (or no longer has) any legal grounds for the processing of your personal data or if this is open for discussion. This right is specifically applicable in the following situations:

- **Unlawful processing.**

We may not (or no longer) process certain personal data, but you do not want us to erase the data. For example, because you still want to request the data at a later stage.

- **Personal data no longer required.**

Pharmacolog no longer needs your personal data for our processing purposes, but you still require the personal data for a legal claim. For example, in case of a dispute.

- **Pending an appeal.**

You objected to the processing of your personal data by Pharmacolog (see the right to object below). Pending the verification of your appeal, we shall no longer process this personal data at your request.

- **Contesting the accuracy of personal data.**

You contest the accuracy of certain personal data that we process about you (for example via your right to rectification; see above). During the period in which we assess your contest, we shall no longer process this personal data at your request.

- **Right to object.**

You have the right to object to the processing of your personal data where we are relying on legitimate interest as processing ground (see above). Insofar as the processing of your personal data takes place for direct marketing purposes, we will always honor your request. For processing for other purposes, we will also cease and desist processing, unless we have compelling legitimate grounds for the processing which override your interests, rights and freedoms or that are related to the institution, exercise or substantiation of a legal claim. If such is the case, we will inform you of our compelling interests and the balance of interests made.

- **Right to data portability.**

You have the right to request the transfer of your personal data to you or a third party of your choice (right to data portability). We will provide you, or such a third party, with your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies if it concerns processing that is carried out by us by automated means, and only if our processing ground for such processing is your consent or the performance of a contract to which you are a party (see above).

- **Right to lodge a complaint.**

You have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your habitual residence, place of work or where an alleged infringement took place. Please be referred to this [webpage](#) for an overview of the supervisory authorities and their contact details. However, we would appreciate the chance to deal with your concerns before you approach the supervisory authority, so we would be grateful if you contact us beforehand.

9.2. How to exercise your rights.

You can exercise your privacy rights free of charge, by phone or by e-mail via the contact details displayed at the end of this Privacy Statement. If requests are manifestly unfounded or excessive, in particular, because of the repetitive character, we will either charge you a reasonable fee or refuse to comply with the request. We may request specific information from you to help us confirm your identity before we further respond to your privacy request.

We will provide you with information about the follow-up to the request without undue delay and in principle within one month after receipt of the request. Depending on the complexity of the request and on the number of requests, this period can be extended by another two months. We will notify you of such an extension within one month of receipt of the request.



Applicable privacy laws and regulations may allow or require us to refuse your request. If we cannot comply with your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

10. How to contact us.

If you have any questions concerning this Privacy Statement or data collection in particular, please contact us at info@pharmacolog.com or via:

Pharmacolog AB

Ekeby bruk 2H

SE-75263, Uppsala

Sweden

11. Changes to this Privacy Statement

Occasionally, we may need to update or change this Privacy Statement. In case of important changes, we will appropriately inform you and ask you to take note of the changes made. The latest version of the Privacy Statement is always available on the Pharmacolog Dashboard™ webpage. This Privacy Statement was updated on November 15, 2022.

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