

PRIVACY POLICY

Index 2.2.

Approved by: Adelina Andreeva

Version 01 / 01.06.2018

PRIVACY POLICY

“DMG Bulgaria” Ltd., respects the privacy of anyone who visits our website, sends us an e-mail, or is our client, partner or team member. Therefore, we strictly adhere to the applicable legislation regarding the processing of personal data. This policy describes how and why uses “DMG Bulgaria” Ltd., your personal information, how we protect your privacy, as well as your rights and possible choices regarding this information. This policy constitutes the complete agreement between you and “DMG Bulgaria” Ltd., regarding the publicly accessible parts of our website. By using our website, you agree to be bound by this Privacy Policy.

This policy enters into force on May 25, 2018.

WHO WE ARE

In this Privacy Policy “DMG Bulgaria” Ltd., “we” or “us” means

“DMG BULGARIA” LTD, registered at Commercial Registry with UIC 200209105, seat and registered address in Bulgaria, Sofia City – 1113, region of Slatina, Geo Milev RQ, Academic Georgi Bonchev Str., building 104, entrance A, represented by Adelina Andreeva – Manager.

We perform the following activities: production, design, testing, certification, distribution and sale of pharmaceuticals, medical devices, medical equipment, biocides, medical and surgical tools, food and dietary supplements, phytotherapeutic, homeopathic, herbal and cosmetic products, veterinary products; research activities in the field of pharmaceutical products; organizing, conducting and coordinating seminars, conferences, courses, meetings (for medical research purposes), refresher courses for sales representatives of pharmaceutical companies, so we use personal data on a daily basis in our work. For many years, we have been processing this data with care, discretion and a high level of security.

WHAT PERSONAL DATA WE COLLECT

The type and amount of information we collect and the way we use it depends on the reason why you provide it to us.

When you contact us by phone, mail, in person or online, we may collect information about you (referred to in this Privacy Policy as "personal information"). It may include your name, ID / Passport number, personal identification number, email address, telephone number, date of birth, position, photos (when applying for work or attending events organized by us) and other personal information, which you may decide to provide us with.

Sensitive data

According to the legislation in the field of data protection, certain types of personal information are more sensitive. These are the so-called "sensitive" or "special categories" of personal data that include information revealing racial or ethnic origin, religious or philosophical beliefs and political opinions, trade union membership, genetic or biometric data, health or sexual health information, or sexual orientation of a person. Sensitive information shall only be collected when needed. In the event that we collect and process such information, we will provide you with clear notices, indicating what information is required and why.

Children

We strongly believe in protecting the privacy of children's personal data. In line with this belief, we deliberately do not collect or process personal information for individuals under the age of 14 years old, and no part of the website is targeted to individuals under the age of 14 years. If you are under the age of 14 years, please do not use the website in any way. We will take appropriate steps to erase any personal information of persons under the age of 14 years.

HOW WE COLLECT INFORMATION FOR YOU

We collect information in the following ways:

When you provide it to us DIRECTLY

It is possible to provide us with your personal data for the purpose of signing a service contract or to communicate with us.

- When you authorize OTHER ORGANIZATIONS to share it with us or it is publicly available;
- When we collecting it in your use of our WEBSITE or APPLICATIONS

“Cookies”

Like most websites, we use “cookies” that help us to make our site - and the way you use it - better. “Cookies” are small text files that are downloaded and stored on your device when you visit a website. “Cookies” are widely used by website owners to provide you with a good internet experience and also to provide information that can help them to improve the websites.

Our website uses “cookies” with the following purpose:

- In order our website to function
- To collect anonymous data on how our users use our site, which is helping us to improve it
- To allow you to share the content on social networks
- To help us to provide appropriate advertising to those who may be interested in it.

We do not use “cookies” to:

- Collect personal information to identify a person
- Provide personal information to third parties

Most internet browsers automatically accept “cookies” unless you change your browser settings. If you want to restrict, block, or erase cookies set by websites, you can usually do so through your browser settings. These settings are usually found in the "options" or "favorites" menu of your internet browser. Please note that if you set your Internet browser preferences to block all

PRIVACY POLICY

Index 2.2.

Approved by: Adelina Andreeva

Version 01 / 01.06.2018

“cookies”, you may not have access to all or part of our website. Unless you have not adjusted your internet browser settings to block “cookies”, our site will use “cookies”.

HOW WE SHALL USE YOUR INFORMATION

We will use your personal information for the following purpose:

- To provide you with the services or information you have requested;
- To administer and maintain a register of your contractual relationship with us;
- To answer or fulfil requests, complaints, or inquiries that you have make to us
- For in-house training, quality control or evaluation of the services that we provide and for conducting analyzes and marketing researches to improve our services;
- To send you a correspondence and to communicate with you;
- To present information (and photos) of our events on our site;
- To administer our website and troubleshoot, analyze data, studies, generate statistics and researches related to our technical systems;
- To test our technical systems in order to be sure that they function as expected;
- To prepare reports on our work, services and events;
- Performing due diligence and ethical screening;
- For auditing and administering our accounts;
- To fulfill our legal obligations, for example, to execute a contract concluded between us or obligations to regulatory bodies, to the government and/or law enforcement authorities;
- For lodging, maintaining or enforcing legal claims.

We will not do anything with your information beyond the scope of your legitimate expectations.

LEGAL BASIS FOR PROCESSING

According to the legislation in the field of personal data protection, it should be a “legal basis” for the use of personal information. The legal grounds are set out in the General Regulation on the Personal Data Protection (Regulation 2016/679) and the relevant national data protection legislation.

Specific consent

There is consent when we ask you whether we can use your information for a specific purpose and you agree with it.

Legal obligation

We have a legal basis to use your information when processing is necessary to comply with a statutory or regulatory obligation.

Performing a contract / taking steps under your pre-contractual relationship request

We have reasons to use your personal information when we are in the process of entering into a contract with you or performing a contractual obligation. For example, when you use any of our services or apply to work with us

Vital interests

We may use your personal information where the processing is necessary to protect the interests of life and health. For example, if there is a case where we need to contact someone unexpectedly or share his or her information with Emergency Service.

Legitimate interests

We have reason to use your personal information when it is reasonably necessary for us (or a third party) to do so in our (or a third party) "legitimate interest" (provided that the purpose for which the information is used is fair and does not have an unjustified impact on your rights). We believe that our legitimate interests include all the day-to-day activities that "DMG Bulgaria" Ltd performs with personal information

We rely on legitimate interests only when we believe that any potential impact on you (positive and negative), its degree of privacy impact, and your rights under personal data protection laws have no precedence over our (third party) interest in using your information in this way.

When we use sensitive personal information, we require an additional legal basis in accordance with the legislation on the personal data protection, so we will do on the grounds of your explicit consent or other means at our disposal for the use of this type of information (for example, if you have made it publicly available, if we have to process it for employment, social security or social protection purposes, for your vital interests or, in some cases, if it is of public interest in doing so).

HOW WE PROTECT THE SECURITY OF YOUR INFORMATION

We apply technical and organizational measures to ensure that your personal information is protected. For example, our online contact forms are always encrypted and our network is protected and routinely monitored. We limit access to information on a "need-to-know" basis and undertake appropriate measures to ensure that our team members are aware that such information is used only in accordance with this Privacy Policy. We regularly review who has access to the information that we have, in order to guarantee that your information is only available to suitably trained staff and contractors.

HOW LONG YOUR INFORMATION IS STORED

"DMG Bulgaria" Ltd. applies specific criteria to determine how long your information will be stored, specified on the basis of legal and operational considerations, taking into account the guidelines of the Commission for Personal Data Protection. The principle is that we store it for a period no longer than is necessary for the purposes for which it was collected.

We store your collected personal information, when we have an ongoing legitimate business need for that (for example, to provide you with a service you have requested or to comply with the applicable legal, tax or accounting requirements). When we do not have a legitimate business

PRIVACY POLICY

Index 2.2.

Approved by: Adelina Andreeva

Version 01 / 01.06.2018

need to process your personal information, we will erase or anonymize it, and if this is not possible (for example, because your personal information has been stored in backups), then we will securely store your personal information and will isolate it from any other processing until erasure become possible.

SHARING YOUR INFORMATION WITH OTHER ORGANIZATIONS

We will only use your information for the purposes for which we have collected it. Under no circumstances will we sell or share your personal information with any third party for its purposes, and you will not receive marketing communications from any other organization as a result of sharing your data with us.

We will only share your data for the following purposes:

1. Third-party suppliers and subcontractors who may process personal data on our behalf: We may need to share your information with hosting providers and other services that help us to provide our services. These providers will only act upon our instructions, be subject to prior verification and will assume contractual obligations containing strict data protection clauses. We strive to ensure that these third parties will only use personal data for legitimate purposes in accordance with this Privacy Policy.
2. Where we are legally bound: We will perform such requests when the disclosure of information is mandatory by law. In addition, we will ensure the sharing of such information by signing, as far as possible, specific agreements with the organization concerned or through case-by-case check aiming to ascertain that the request and the disclosure of the information are lawful.

When we use external data processing companies on our behalf, we perform a complete comprehensive verification of these companies and conclude a contract that sets out our expectations and requirements, especially with regards to the way they manage the personal data collected or to which they have access.

In some cases, we may decide to use the services of a supplier outside of the European Economic Area (EEA), which means that your personal information is transferred, processed and stored outside the EEA. You should be aware that in general the legal protection of personal information in non-EEA countries may not be equivalent to the level of protection granted in the EEA. However, we undertake steps to introduce appropriate precautionary measures to protect your personal information when processed by the provider, such as using the standard

contractual clauses approved by the European Commission. By providing us your personal data, you agree to this transfer, storage or processing outside EEA.

KEEPING YOUR DATA UP-TO-DATE

Wherever possible, we use publicly available sources to keep your personal data up-to-date. We would be grateful if you inform us in the case of change of your contact details.

YOUR RIGHTS

The legislation in the field of Personal Data Protection entitles you to request access to the personal information that “DMG Bulgaria” Ltd. has for you as well as to request rectification of possible inaccuracies.

If we collect and process your personal information on the basis of your consent, you have the right at any time to withdraw your consent. The withdrawal of your consent does not affect the lawfulness of the consent-based processing prior to its withdrawal or the processing of your personal information on any other legal basis.

You have the right to request the erasure of personal data relating to you, restriction of the processing or to object to the processing of your personal data.

If you wish to exercise any of your rights, please to fill out a special form (provided on request) and send it together with copies of two different ID documents that provide photo identification and confirm your address, such as passport, driver's license and more. In addition, please to provide additional information about the nature of your relationship with us as this will help us to determine the location of your personal data. You can send us the documents by post to: Bulgaria, Sofia City – 1113, region of Slatina, Geo Milev RQ, Academic Georgi Bonchev Str., building 104, entrance A, Adelina Andreeva. As an alternative way of contacting us, you can send a copy of the completed form, along with the scanned copies of the two IDs described above, to the following email: info@dmgbg.com We will respond to you within 30 days of receipt of your written request and copies of the identity documents.

COMPLAINTS

If you want more information or have questions about this Privacy Policy, and to file a formal complaint about our approach on your personal data protection or you want to ask a privacy question, you may contact us at: info@dmgbg.com

You may also lodge a complaint regarding the processing of your personal data to the Commission of Personal Data Protection (www.cpdp.bg) - the Bulgarian Supervisory body on the compliance with the legislation on personal data protection.

CHANGES IN CURRENT POLICY

We reserve the right, in our sole discretion, to alter, amend, supplement or remove parts of this Privacy Policy at any time. Any such change that substantially affects your rights to your personal information will take effect 30 days after the notice of such change has been posted on this website during which time you may let us know that you are not agree to this change.

Further use of this website after the 30-day period will ultimately be considered as acceptance of the changes to this Privacy Policy. In addition, you agree that such notice posted on this website constitutes a reasonable and sufficient notice.

PRIVACY POLICY

Index 2.2.

Approved by: Adelina Andreeva

Version 01 / 01.06.2018

At any time, you are bound by the relevant current version of the Privacy Policy and the applicable legislation. We strongly recommend that you periodically review this Privacy Policy to make sure you are familiar with the latest version.

(last update: June 1st, 2018)

CONTACT US

If you have questions, comments or suggestions, you can inform us about them on:

info@dmgbg.com

Date:

June 1st, 2018

Adelina Andreeva

Manager