

# DATA PROTECTION PRIVACY POLICY

Drogo-Pharma Limited (hereinafter the “COMPANY”) in the exercise of their professional activities shall adhere to the laws and The Personal Data Processing Act (Protection of the Individual) Law of 2001 (138 (I) / 2001) as well as The General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016).

The present Data Protection Policy outlines how Drogo-Pharma Limited collects, uses, protects and transfers personal data of the clients. This Data Protection Privacy Policy was prepared in order to ensure that the rights and freedoms of the customers (hereinafter “the data subject”) of Drogo-Pharma Limited (hereinafter “the Company”) are successfully protected.

## **A. PROCESSING OF PERSONAL DATA**

### WHAT PERSONAL DATA DO WE COLLECT?

The personal data that we collect is:

- Name
- Home Address
- Email Address
- Date of Birth
- Contact Number

### WHAT ARE THE PURPOSES OF COLLECTING YOUR PERSONAL DATA?

The personal data we collect will be used for the following purposes:

- ✓ To introduce our new products;
- ✓ To inform the data subject about withdrawal of products;
- ✓ Offers/sales of our products;
- ✓ Personal invitations to events organised by our Company;
- ✓ Any information regarding the usage of our products;
- ✓ Any promotional activities of our Company; and
- ✓ Any information relating to services and products of our company.

- ✓ Engage in communication with the clients including confirmations and reminders of appointments, and requests to cancel or change bookings.
- ✓ Collect health information to perform the agreed services appropriately, and potentially highlight areas that products and services may cause issues to clients because of their health;
- ✓ Ensure a safe service and provide industry standard advice;
- ✓ Store customer records.

We will never transfer and/or process your personal data to any third party. The sharing of your personal data is only carried out with your express consent, which you are able to withdraw at any time. We will never collect any personal information from you that do not need or retain any data that is no longer necessary for the purposes specified herein.

Personal data is kept in a form which permits identification of you no longer than is necessary for the purposes for which the personal data is processed. The period for which the personal data will be retained is four (4) years.

Personal data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage by using appropriate organisational measures.

If the purposes for which the personal data are processed do not or do no longer require your identification by us, we shall not be obliged to maintain, acquire or process additional information in order to identify you for the sole purpose of complying with this Privacy.

If we are not in a position to identify you, the DPO shall inform you accordingly, if possible.

#### LEGAL BASIS OF PROCESSING OF PERSONAL DATA:

- You have given consent to the processing of your personal data for one or more specific purposes;
- Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract;
- Processing is necessary for compliance with a legal obligation to which we are subject;
- Processing is necessary in order to protect your vital interests or of another natural person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the interests or

fundamental rights and freedoms of you which require protection personal data, in particular where the data subject is a child.

- Where the processing for a purpose other than that for which the personal have been collected is not based on your consent, we shall, in order to ascertain whether processing for another purpose is compatible with the purpose for which the personal data are initially collected, take into account:
  - i. Any link between the purposes for which the personal data have been collected and the purposes of the intended further processing;
  - ii. The context in which the personal data have been collected, in particular regarding the relationship between you and us;
  - iii. The nature of the personal data that is processed;
  - iv. The possible consequences of the intended further processing; and
  - v. The existence of appropriate safeguards, which may include encryption or pseudonymisation.

### CONDITIONS FOR CONSENT

Your consent is given in the context of a written declaration as per the Appendices A and B.

You shall have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, you shall be informed thereof. You can at any time you think fit to submit your request in writing to the DPO of the Company at [info@drogopharma.com](mailto:info@drogopharma.com).

### CONDITIONS APPLICABLE TO CHILD'S CONSENT

The processing of personal data of a child is permitted where the child is at least 16 years old. Where the child is below the age of 16 years, such processing shall be permitted only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child by completing and signing the relevant form.

## **B. YOUR RIGHTS**

### TRANSPARENT INFORMATION, COMMUNICATION AND MODALITIES FOR THE EXERCISE YOUR RIGHTS

We shall take appropriate measures to provide you with any information and any communication relating to processing in a concise, transparent, intelligible and easily accessible form, using clear and plain language, in particular for any information addressed specifically to a child. The information shall be provided in writing, or by other means,

including, where appropriate, by electronic means. When requested by you, the information may be provided orally, provided that your identity is proven by other means.

We shall facilitate the exercise of your rights. We shall not refuse to act on your request for exercising your rights, unless we demonstrate that we are not in a position to identify you.

We shall provide information on action taken on your request regarding your rights without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We shall inform you of any such extension within one month of receipt of request, together with the reasons for the delay. Where you make the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by you.

If we do not take action on your request, we shall inform you without delay and at least within one month of receipt of the request of the reasons of not taking action and on the possibility of lodging a complaint with the supervisory authority and seeking a judicial remedy.

Any information provided as well as any communication and any actions taken in relation to your request shall be provided free of charge. Where requests from you are manifestly unfounded or excessive, in particular because of the repetitive character, we may either:

- a. Charge a 'reasonable fee' taking into account the administrative costs of providing the information or communication or taking the action requested; or
- b. Refuse to act on the request.

We shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.

Where we have reasonable doubts concerning the identity of the natural person making the request, we may request the provision of additional information necessary to confirm the identity of that natural person.

#### INFORMATION TO BE PROVIDED WHERE PERSONAL DATA IS COLLECTED FROM YOU

Where personal data are collected from you, we shall, at the time when personal data are obtained, provide you with all of the following information:

- a. Our identity and contact details;
- b. The contact details of the data protection officer;
- c. The purposes of the processing for which the personal data are intended as well as the legal basis for the processing.

We shall, at the time when personal data are obtained, provide you with the following further information necessary to ensure fair and transparent processing:

- a. The period for which the personal data will be restored and/or the criteria used to determine that period;
- b. The legitimate interests pursued by us or by a third party, if any;
- c. The existence of the right to request from us access to and rectification or erasure of your personal data or restriction of processing or to object to processing as well as the right to data portability;
- d. The existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on the consent before its withdrawal;
- e. The right to lodge a complaint with the supervisory authority of Cyprus; namely the Commissioner for Personal Data Protection;
- f. whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide personal data and of the possible consequences of failure to provide such data;
- g. the existence of automated decision-making, including profiling, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;

Where we intend to further process the personal data for a purpose other than that for which the personal data were collected, we shall provide you prior to that further processing, with information on that other purpose and with any relevant further information.

### RIGHT TO ACCESS

You shall have the right to obtain from us confirmation as to whether or not your personal data are being processed, and, where that is the case, access to the personal data and the following information:

- a. The purposes of the processing;
- b. The categories of personal data concerned;
- c. The recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d. Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

- e. The existence of the right to request from us rectification or erasure of personal data or restriction of processing your personal data concerning or to object to such processing;
- f. The right to lodge a complaint with the supervisory authority of Cyprus; namely the Commissioner for Personal Data Protection;
- g. Where the personal data are not collected from you, any available information as to their source;
- h. The existence of automated decision-making, including profiling, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where personal data are transferred to a third country or to an international organisation, you shall have the right to be informed of the appropriate safeguards relating to the transfer.

Upon request, we shall provide a copy of the personal data undergoing processing. For any further copies requested, we may charge a 'reasonable fee' based on administrative costs. Where you make the request by electronic means, and unless otherwise requested by you, the information shall be provided in a commonly used electronic form.

### RIGHT TO RECTIFICATION

You shall have the right to obtain from us without undue delay the rectification of inaccurate personal data that relates to you. Taking into account the purposes of the processing, you shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### RIGHT TO ERASURE (“right to be forgotten”)

You shall have the right to obtain from us the erasure of your personal data without undue delay and we shall have the obligation to erase the personal data without undue delay where one of the following grounds applies:

- a. The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b. You withdraw consent and where there is no other legal ground for the processing;
- c. You object to the processing and there are no overriding legitimate grounds for the processing;
- d. The personal data have been unlawfully processed;

- e. The personal data have to be erased for compliance with a legal obligation in relation to Cyprus Law to which we are subject;

### RIGHT TO RESTRICTION OF PROCESSING

You shall have the right to obtain from us restriction of processing where one of the following applies:

- a. The accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;
- b. The processing is unlawful and you oppose the erasure of the personal data and requests the restriction of their use instead;
- c. We no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- d. You have objected to processing pending the verification whether the legitimate grounds override yours.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person;

Any natural person who has obtained restriction of processing pursuant to the provisions above, shall be informed by us before the restriction of processing is filed.

### NOTIFICATION OBLIGATION REGARDING RECTIFICATION OF ERASURE OF PERSONAL DATA OR RESTRICTION OF PROCESSING

We shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We shall inform you about those recipients if you request it.

Where we have made the personal data public and/or in the case your personal data have been, by default, transferred to other third parties, we shall take reasonable steps (including technical measures) to communicate with that third party in order to erase the data received; communicate with the supervisory authority, if the circumstances allow such special action; as well as we shall immediately inform you for the default and provide you with all necessary information regarding the measures taken to solve the issue.

### RIGHT TO DATA PORTABILITY

You shall have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another party without hindrance from us to which the personal data have been provided, where:

- a. The processing is based on consent or on a contract; and
- b. The processing is carried out by automated means.

In exercising your right to data portability pursuant to the above, you shall have the right to have the personal data transmitted directly from us to another party, where technically feasible.

### RIGHT TO OBJECT

You shall have the right to object, on grounds relating to your particular situation, at any time to processing your personal data, including profiling. We shall no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

At the time of the first communication with you, the right of objection shall be explicitly brought to your attention and shall be presented in a clear and plain language.

### AUTOMATED INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING

You shall have the right not to be subject to a decision based solely on an automated processing, including profiling, which produces legal effects concerning your personal data or similarly significantly affects you.

We shall implement suitable measures to safeguard your rights and freedoms and legitimate interests, at least the right to obtain human intervention on our part, to express your point of view and to contest the decision.

## **C. OBLIGATIONS AND RESPONSIBILITIES**

### OUR RESPONSIBILITY

Taking into account the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons, we shall implement appropriate technical and organisational measures to ensure and to be able to demonstrate that processing is performed in accordance with the laws and regulations.

We shall implement appropriate measures for ensuring that, by default, only personal data which are necessary for each specific purpose of processing are processed. That obligation



applies to the amount of personal data collected, the extent of their processing, the period of their storage and their accessibility. In particular, such measures shall ensure that by default personal data are not made accessible without the individual's intervention to an indefinite number of natural persons.

### DATA PROTECTION OFFICER (“DPO”)

A Data Protection Officer (“DPO”) is appointed to act for and on behalf of the Company and to act for the purposes of the laws and regulations regarding GDPR. The contact details of the DPO are the following:

Email: [info@drogopharma.com](mailto:info@drogopharma.com)

Tel: +357 25 570 315

Address: 5, Paphos Avenue, 3052 Limassol, Cyprus

We shall ensure that the DPO is involved, properly and in a timely manner, in all issues which relate to the protection of personal data.

You may contact the DPO with regard to all issues related to processing of your personal data and to the exercise of your rights as stated in the present ‘Data Protection Privacy Policy’.

The DPO shall be bound by secrecy or confidentiality concerning the performance of his or her tasks, in accordance with Union or Cyprus law.

The DPO may fulfil other tasks and duties. We shall ensure that any such tasks and duties do not result in a conflict of interests.

The DPO shall have the following tasks:

- (a) To inform and advise us and the employees who carry out processing of their obligations pursuant to this Policy and to other Union or Cyprus law data protection provisions;
- (b) To monitor compliance with the Union or Cyprus law data protection provisions and with the policies of the Company in relation to the protection of personal data, including the assignment of responsibilities, awareness-raising and training of staff involved in processing operations, and the related audits;
- (c) Advice on data protection impact assessment (DPIA) – If a type of processing is likely to result in a high risk to the rights of the data subject, the DPO shall carry out a DPIA in order to assess the origin, nature, likelihood and severity of the risk and identify best practises to mitigate it;
- (d) To cooperate with the supervisory authority of Cyprus; and
- (e) Be the main contact for the supervisory authority.

The DPO shall not engage another person without prior specific or general written authorisation from us.

Processing by the DPO shall be governed by a contract or other legal act under Union or Cyprus law, that is binding on the DPO and that sets out the subject-matter and duration of the processing, the nature and purpose of the processing, the type of the personal data and categories of that data subjects and our obligations and rights.

Where the DPO engages another individual of carrying out specific processing activities on our behalf, the same data protection obligations as set out in the contract or other legal act between us and the DPO shall be imposed on that other individual by way of a contract or other legal act under Union or Cyprus law. Where that other individual fails to fulfil its data protection obligations, the DPO shall remain fully liable to us for the performance of that other individual's obligations.

The DPO and any other individual (if any) acting under our authority or of the DPO, who has access to personal data, shall not process those data except on instructions from us, unless required to do so by Union or Cyprus law.

### TRAINING POLICY

The DPO assigns data protection responsibilities to Employees/Staff in relation to our policies and procedures on personal data management.

The DPO shall ensure that all Employees/Staff with day-to-day responsibilities involving personal data and processing operations, and those with permanent/regular access to personal data, demonstrate compliance with the GDPR regulations.

The DPO ensures that these members of Employees/Staff are kept up to date and informed of any issues related to personal data.

The DPO ensures that all security requirements related to data protection are demonstrated and communicated to Employees/Staff to the same affect.

Employees/Staff are provided with specific training on processing personal data relevant to their individual day-to-day roles and responsibilities, and in accordance with our policies and procedures.

Employees/Staff are provided with specific training on any information security requirements and procedures applicable to data protection and the data processing within their individual day-to-day roles and responsibilities, including reporting personal data breaches.

Employees/Staff are provided with training on dealing with complaints relating to data protection and processing personal data.

### RECORDS PROCESSING OF ACTIVITIES

The DPO shall maintain a record of processing activities under his responsibility. That record shall contain the following information:

- (a) the name and contact details of us and the DPO's;
- (b) the purposes of the processing;
- (c) a description of the categories of data subjects and of the categories of personal data;
- (d) the categories of recipient to whom the personal data have been or will be disclosed including recipients in third countries or international organisations (if applicable);
- (e) where possible, the envisaged time limits for erasure of the different categories of data;
- (f) Where possible, a general description of the technical and organisational security measures.

The DPO shall make the record available to the supervisory authority on request.

### COOPERATION WITH THE SUPERVISORY AUTHORITY

The DPO shall cooperate on request, with the supervisory authority in the performance of his tasks.

### SECURITY OF PROCESSING

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, we shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- (a) The pseudonymisation and encryption of personal data;
- (b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- (c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- (d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

All of the personal data and all other information relating to you, which is in a hard copy form, shall be kept in a locker in the office of the DPO. The DPO shall be the only person who will have access to the office and who shall hold the key of the locker.

All personal data and all other information relating to you, which is in an electronic form, shall also be kept in a special file in the computer of the DPO which will be locked with a password. The DPO shall be the only person who will be aware of the password.

In assessing the appropriate level of security account shall be taken in particular of the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

The measures referred above, shall be review and updated every two (2) years.

### NOTIFICATION OF A PERSONAL DATA BREACH TO THE SUPERVISORY AUTHORITY

In the case of a personal data breach, the DPO shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority of Cyprus; namely, the Commissioner for Personal Data Protection, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

The DPO shall notify us without undue delay after becoming aware of a personal data breach.

The DPO shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken.

### COMMUNICATION OF A PERSONAL DATA BREACH

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the DPO shall communicate the personal data breach to you without undue delay.

The communication to you referred in the above paragraph shall describe in clear and plain language the nature of the personal data breach.

The communication to you referred to above shall not be required if any of the following conditions are met:

- (a) The DPO has implemented appropriate technical and organisational measures, and those measures were applied to the personal data affected by the personal data

breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;

- (b) The DPO has taken subsequent measures which ensure that the high risk to your rights and freedoms is no longer likely to materialise;
- (c) It would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby you are informed in an equally effective manner.

If the DPO has not already communicated the personal data breach to the data subject, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so or may decide that any of the conditions referred above are met.

### RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY

Without prejudice to any other administrative or judicial remedy, you shall have the right to lodge a complaint with the supervisory authority of Cyprus, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes this Privacy Policy.

The supervisory authority of Cyprus is the Commissioner for Personal Data Protection.

The details of the supervisory authority of Cyprus for the purposes of lodging a complaint are the following:

Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

Address: 1 Iasonos Street, 1082, Nicosia

P.O. Box 23378, CY-1682 Nicosia

Tel: +357 22 818 456

Fax: +357 22 304 565

Further to the above, any proceedings against the Company and/or the DPO shall be brought before the courts of Cyprus where we and the DPO have an establishment.

### RIGHT TO COMPENSATION AND LIABILITY

Any person who has suffered material or non-material damage as a result of an infringement of this Privacy Policy shall have the right to receive compensation from us for the damage suffered.

We shall be liable for the damage caused by processing which infringes this Privacy Policy. The DPO shall be liable for the damage caused by processing only where it has not complied with obligations of this Privacy Policy, specifically directed to him or where it has acted outside or contrary to lawful instructions of us.

We and the DPO shall be exempt from such liability if it proves that it is not in any way responsible for the event giving rise to the damage.