

## Personal data protection

The General Data Protection Regulation (EU / 2016/679), in force since 25 May 2018, prescribes a set of rules - obligations for business entities that collect and process personal data and the rights of physical entities whose data are collected and processed. On this page you can read about your rights and specifics of collecting and processing your personal data in Clinres farmacija.

Technology and our business are constantly evolving and Clinres farmacija strives to follow standards and maintain a tradition of preserving high ethical principles in all our business practices. Clinres farmacija treats the personal data of its partners, employees, customers, and the data collected for the purpose of processing side effects, medical inquiries and reports of quality defects with due care, in accordance with all applicable Croatian and European legal regulations and good practices.. In order to keep up with changes in a complex business environment, the company has established a policy of managing and protecting personal data and has implemented documented procedures by which it has woven this policy into all its business processes in which personal data may occur. In accordance with the spirit and letter of the General Regulation on Personal Data Protection (EU 2016/679), Clinres farmacija takes into account the fact that personal data is inalienable personal, private property. The company offers simple, secure and accessible tools to data owners by which they can view, verify, modify or request the deletion (to the extent permitted by law) of their personal data that the company stores or otherwise processes.

Great attention is paid to the data received from our business partners - health care institutions, competent authorities, contracted research organizations and pharmaceutical companies involved in clinical trials.

We process your personal data for several reasons, including:

- collection and monitoring of side effects, ie implementation of pharmacovigilance activities
- answering medical inquiries or other inquiries regarding products under our responsibility
- collecting reports of quality defects or suspected defects in the quality of products under our responsibility
- collecting personal data for the purpose of conducting a clinical trial
  - o the term “personal data” refers to:
    - first and last name
    - contact details (address, e-mail, phone number, address of the Institution in which you work

## **CONFIDENCE IN THE PRIVACY AND PROTECTION**

We have recognized the ease of electronic data exchange over the Internet and digital communication as widely present and easily accessible services that are potentially highly exposed to the possibility of unintentional or malicious loss, alteration or theft of personal data. Since Clinres farmacija may collect personal information through its website and exchange data electronically and through other data transmission channels, every reasonable effort is made to:

- prevent sending personal data to a larger number of recipients than necessary
- use only the encrypted channels when sending personal data
- avoid keeping more copies than necessary to maintain the business and protect its partners from the consequences of possible temporary loss, breach of integrity and / or unavailability of data
- check the ability of their business partners and service providers to adhere to the same rules and policies before using their services to store or process personal data
- apply the latest verified technologies to protect personal data collections from loss, inconsistencies, uncontrolled changes, unauthorized copying or transmission
- constantly maintain and improve the awareness of all its employees about good practices and legal requirements regarding the protection of personal data
- periodically check and improve the effectiveness of its personal data protection system

## **YOUR RIGHTS WITH REGARD TO THE PROTECTION OF PERSONAL DATA**

### **Right to be informed**

At any time you have the right to request information on whether your personal data is processed and for what purpose, who is the controller, what are the contact details of the data protection officer, which categories of personal data are processed, for what period they are processed or stored, what is the source for obtaining your personal data, who are the recipients of your personal data.

You have also the right to be informed of your other rights listed here (right of access, right of correction, right of deletion, right of restriction of processing and others).

### **Right of access**

At any time you may request and receive confirmation from Clinres farmacija whether your personal data are being processed and you may gain access to this data and information about:

- the purpose of processing,
- the categories of personal data being processed;
- recipients or categories of recipients to whom the data have been or will be disclosed
- the time period for which the data are stored, ie the criteria by which it is possible to determine that time period

- the possibility of correcting or deleting personal data or restricting the processing of your personal data or the right to object to such processing
- the right to lodge a complaint with a supervisory authority
- the source of your personal data, if you did not provide them yourself
- possible existence of automated profiling and decision making

#### Right to rectification

You can request from Clinres farmacija to obtain, without undue delay, a rectification of inaccurate personal data related to you. You have the right to supplement incomplete personal data, including making an additional statement.

#### Right to erasure/to be forgotten

It is your right to request Clinres farmacija to delete personal data related to you without delay, if personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; if you withdraw the consent on which the processing is based and there is no other legal basis for processing; if you object to the processing; if personal data is unintentionally unlawfully processed; if personal data must be deleted in order to comply with a legal obligation under Union law or the law of the Member State to which Clinres farmacija is subject.

This does not apply if processing is necessary (and to the extent necessary) to exercise the right to freedom of expression and information; in order to comply with a legal obligation requiring processing in Union law or the law of the Member State to which Clinres farmacija is subject or to perform a task of public interest or to exercise the official authority of Clinres farmacija, for reasons of public interest in the field of public health, for archiving purposes in the public interest, for scientific or historical research purposes, for the purpose of making, exercising or defending legal claims.

#### Right to file a complaint with a supervisory authority

Based on your particular situation, you have the right at any time to object to the processing of personal data related to you, including profiling, where processing is necessary for the performance of a public interest task or in the exercise of the official authority of Clinres farmacija or if the processing is necessary for the legitimate interests of Clinres farmacija or a third party, Clinres farmacija may no longer process personal data unless it proves that there are compelling legitimate grounds for processing that go beyond your interests, rights and freedoms or to make, exercise or defend legal claims.

If personal data are processing for direct marketing purposes, you have the right to object at any time to the processing of personal data related to you, for the purposes of such marketing, which includes profiling to the extent that it is related to such direct marketing.

### Right to data portability

You have the right to request and receive the personal data related to you, which you have provided to Clinres farmacija in a structured, commonly used digital form, and you have the right, without interference of Clinres farmacija, to transfer those data to other controller if processing is based on your consent and if processing is carried out by automated means.

You are entitled to a direct transfer from Clinres farmacija to another controller if technically feasible and this right must not adversely affect the rights and freedoms of others.

### Rights related to automatic decision-making and profiling

Clinres farmacija does not conduct automatic profiling and decision-making based on collected personal data. Due to your more complete information, we state this right of yours. You have the right not to be the subject to a decision based solely on automated processing, including automatic profiling, which produces legal effects that would affect you, or similarly significantly affect you, unless that decision is necessary for the conclusion or performance of a contract between you and the data controller, if it is permitted by Union or Member State law to which the data controller is subject or based on your explicit consent.

### Right to withdraw your consent

Your consent is one of the legal grounds for the processing of data related to you. It is your right at any time to withdraw your consent. The withdrawal of consent does not affect the lawfulness of the processing of data made prior to the withdrawal of the consent.

### Right to restrict processing

You have the right to request a restriction on the processing of your personal data, if:

- You dispute the accuracy of your personal data, for the period necessary for Clinres farmacija to verify that accuracy; the processing of your personal data is illegal, and you don't ask for deletion but only the limit of processing
- Clinres farmacija no longer needs your personal data, but it needs the existence of it to obtain its legal requirements;

If you object to the processing of your personal data, you have the right to request a restriction of processing for the period until the determination of whether the legitimate reasons for Clinres farmacija for processing exceed your reasons from the objection.

## Do you have questions about privacy?

Request additional information about the protection of your personal data or submit any of the requests in accordance with your above listed rights.

Contact us in writing or by phone at:

Address Clinres farmacija d.o.o. , Srebrnjak 61, 10 000 Zagreb, Hrvatska.

E-mail: [zastitapodataka@clinres-farmacija.hr](mailto:zastitapodataka@clinres-farmacija.hr)

Phone number: +385 1 23 96 900

In addition, you can inform yourself extensively, accurately and in detail about the protection of personal data with the Croatian Agenciji za zaštitu osobnih podataka (AZOP) which is the national authority responsible for the protection of personal data (<http://azop.hr>), and on the website of the European supervisory authority for the protection of personal data (<https://edps.europa.eu/>).

### Additions

- Any changes to our privacy policy will be published on this website;
- By using this website, the user accepts and completely agrees with the privacy policies.