

If you have any questions about our Privacy Policy, you are very welcome to get in touch with us.

Last updated: January 2021.

## **PRIVACY POLICY**

Our Privacy Policy explains how information is collected, used and disclosed by DrugStars ApS with respect to all features and functionalities as well as all content and applications, associated with [www.DrugsDisclosed.com](http://www.DrugsDisclosed.com) ("Services").

This Privacy Policy applies only to the Services governed by our General Terms and Conditions of Service ("*Terms*") which you and your company (the "Customer") must read and accept in order to access and use our Services. For more information, [see our Terms](#).

This Privacy Policy is subject to applicable data protection laws, and DrugStars undertakes to ensure that the collection, use and other processing of personal information about you complies with such laws applicable from time to time.

## **DATA CONTROLLER AND CONTACT INFORMATION**

The data controller of your personal data is:

### **DrugStars ApS**

CVR: 36 89 39 74

**Contact:** [info@drugstars.com](mailto:info@drugstars.com) or +45 2628 5636

### **Address**

Emdrupvej 28 A, 4., 2100 København Ø

DrugStars' Data Protection Officer (DPO) is:

Bech-Bruun Advokatpartnerselskab

CVR nr.: 38 53 80 71

Langelinie Allé 35 2100 København Ø

Tel: 72 27 30 02.

Mail: [dpo.drugstars@bechbruun.com](mailto:dpo.drugstars@bechbruun.com)

Safe messaging via <https://dpo.bechbruun.com/drugstars>

## **PROTECTION OF YOUR PERSONAL INFORMATION**

We are very concerned with safeguarding your information and we will implement appropriate technical and organizational security measures to protect your Personal Information against accidental or unlawful destruction, loss or alteration and against unauthorized disclosure or abuse. We will also ensure that the same applies to any and all third parties to whom we might disclose your personal information in accordance with this Privacy Policy.

## **WHAT INFORMATION WE OBTAIN AND THE PURPOSE FOR WHICH IT IS OBTAINED**

We may collect personal information (*such as your name, email address, payment details, firm address, name of employer, password and VAT number of your company*) from you;

- If the Customer buys access to [www.DrugsDisclosed.com](http://www.DrugsDisclosed.com).

We may collect and store the above-mentioned information related to you, since you are the intended beneficiary who is registered by e-mail address and permitted by DrugStars to use the Services (the “Authorized User”).

## **COOKIES**

We may also use “cookies”. These are small text files which are sent to your browser and placed on your computer. We may use both session cookies and persistent cookies to better understand how you interact with our services, to aggregate usage and web traffic routing on our services, and to improve our services. Internet browsers usually accept cookies by default. You must accept our cookie policy in a pop-up window before cookies can be stored.

## **PURPOSES AND LEGAL BASIS OF PROCESSING PERSONAL DATA**

We may use the information collected (*including personal information*) for the following purposes and with the following legal bases:

- to provide our services, carry through the payment and providing a safe user account (GDPR Article 6 (1) (b));
- to invoice the Customer and to forward a receipt (GDPR Article 6 (1) (b));
- legitimate interest in being able to phone you with the purpose of upselling (GDPR Article 6(1)(f));
- to automatically renew the Customer subscription in accordance with the Terms (GDPR Article 6 (1) (b));
- legitimate interest in forwarding new possible Terms (GDPR Article 6(1)(f));
- legitimate interest in providing customer service (legitimate interest GDPR Article 6 (1) (f));
- legitimate interest in being able to establish, exercise or defend legal claims (Article 6(1)(f) of the GDPR);
- legitimate interest in providing service messages (legitimate interest GDPR Article 6 (1) (f));
- legitimate interest in processing personal data for marketing purposes (GDPR article 6 (1) (f) and marketing consent in order to provide marketing material through e-mail pursuant to Section 10 (1) of the Danish Marketing Act.

## **PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED**

We will only store Personal Information about you until we have finished processing such information for the stated purposes and up to 24 months after the suspension, disablement or termination of your access, use and/or account. Hereafter, we will erase any personal information about you to ensure your privacy. However, the personal data may be processed and stored for a longer period in anonymized form.

Personal data stored for bookkeeping purposes will be stored in 5 years from the closing of the current financial year.

## **DISCLOSURE OF PERSONAL INFORMATION**

To fulfil the above purposes we may provide access to your personal data for third parties who, on the basis of a contractual relationship with DrugStars, provide relevant services, e.g. IT-providers, payment providers and email providers. Such service providers will only process personal data in accordance with our instructions pursuant to the data processor agreements entered into.

Aside from above, it is a general rule that your personal data is not disclosed to a third party without your permission. However, under certain circumstances and in accordance with applicable law, we may need to disclose your personal data to Police, Lawyers, Auditors and Courts.

Your personal data in connection with the payment will be transferred to USA on the basis of the Standard Contractual Clauses.

## **LINKS TO OTHER SITES OR APPLICATIONS**

The Service may contain links to other websites, services or applications that are operated by other parties. Any information you provide on those sites or applications is provided directly to the owner of that site or application and is subject to that party's privacy policy. Our privacy policy does not apply to such sites, and we are not responsible for the content or privacy and security practices and policies of those sites.

## **YOUR RIGHTS**

You may request access to the personal information we have obtained about you. We are obligated to inform you whether or not we are processing personal information about you, the purpose of the processing, the categories of the personal information and any other available information as to the source of such data.

If we cannot comply with the request within 4 weeks from receipt of your request, we will inform you of the reasons for this and when we expect to be able to comply with your request.

You may at any time object our processing of personal information concerning you.

If your objection is justified, we will no longer process such information.

You may request us to rectify, erase or block personal information which is inaccurate or misleading or in any other way processed in violation of law or regulations.

We will make great efforts to notify any third party to whom personal information may have been disclosed of any rectification, erasure or blocking carried out in compliance with your request.

You are free to contact us at any time if you feel that we are processing of personal information about you in violation of applicable law. However, you may also file a complaint to the appropriate supervisory authority concerning the processing of Personal Information about you.

### **COMPLAINTS**

How to contact the appropriate authority: Should you wish to report an issue or if you feel that we have not addressed your concerns in a satisfactory manner, you may contact the Danish Data Protection

Agency: <https://www.datatilsynet.dk/> Email: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk) Address: Carl Jacobsens Vej 35, 2500 Valby Telephone: +45 33 19 32 00

### **PRIVACY POLICY CHANGES**

Any Personal Information that is collected is subject to the privacy policy in effect at the time such information is collected.

We may, however, modify and revise our privacy policy from time-to-time. If we make any material changes to this policy, we will notify you of such changes by posting them on [www.DrugsDisclosed.com](http://www.DrugsDisclosed.com) or by sending you an email, and we will indicate when such changes will become effective.

By continuing to access or use the Services after those changes become effective, you are agreeing to be bound by the revised policy.

### **QUESTIONS?**

Please contact us if you have any questions about our privacy policy.