

# INFORMATION NOTICE

## EU General Data Protection Regulation (2016/679), Articles 13 and 14

**Date of drafting: 14<sup>th</sup> July 2020**

**Version: 1**

We may update or revise this Information Notice at any time, with any notice to you as may be required under applicable law.

<b>1. Controller / Company</b>	Orion Corporation (Company Identification Number: 1999212-6) Orionintie 1 02200 Espoo Finland Tel. +358-10 4261
<b>2. The person in charge / contact person</b>	Ian Wariner Orion Pharma (UK) Ltd Oaklea Court 22 Park Street Newbury RG14 1EA United Kingdom Tel. +44 (0)1635 520 300 <a href="mailto:uk.privacy@orionpharma.com">uk.privacy@orionpharma.com</a>  Contact details of the Data Protection Officer: <a href="mailto:privacy@orion.fi">privacy@orion.fi</a>
<b>3. Name of the data file</b>	UK General Suppliers' Register
<b>4. The purpose for processing the personal data / recipients (or categories of recipients) of personal data / the legal basis for processing the personal data</b>	<p>The purpose for processing the personal data in this data file is to enable the controller to develop, maintain, administer and monitor supplier and service provider relationships and prospective supplier and service provider relationships, and the relationship with any external consultant with whom Orion Corporation or Orion Pharma (UK) Ltd are collaborating with.</p> <p>This data file concerns:</p> <ul style="list-style-type: none"><li>• our suppliers and service providers and prospective suppliers and service providers who are individual persons (such as self-employed persons);</li><li>• the representatives or contact persons of our suppliers and service providers or prospective suppliers and service providers who are legal entities; and</li><li>• external consultants.</li></ul> <p>The controller will not disclose the collected data for commercial purposes.</p> <p>We may share your information with third parties who assist us by performing technical operations such as data storage and hosting. The controller uses Microsoft Teams system for the management of its supplier relationships. The system is technically maintained by the service provider Microsoft for which purposes personal data is disclosed to Microsoft.</p> <p>If ownership or control of Orion Corporation or all or any part of our products, services or assets changes, we may disclose your personal data to any new owner, successor or assignee.</p>

	<p>The legal basis for processing of the personal data is that the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request or the legitimate interests of the controller / maintenance and administration of the supplier and service provider relationship, prospective supplier and service provider relationship, and external consultant relationship. We only process personal data based on our legitimate interests, in case we have deemed, based on the balancing of interest test, that the rights and interests of the data subject will not override our legitimate interest.</p>
<p><b>5. Content of the data file</b></p>	<p>The data file contains the following groups of data of suppliers' and service providers' representatives and potential suppliers' and service providers' representatives, as well as external consultants:</p> <ul style="list-style-type: none"> <li>• your general and identification information (e.g. name, email and/or postal address, fixed and/or mobile phone number)</li> <li>• your function (e.g. title, position and name of company);</li> <li>• for individuals acting as suppliers or service providers, financial information (e.g. bank account details) and</li> <li>• your electronic identification data where required for the purpose of delivering products or services to our company (e.g. login details)</li> </ul>
<p><b>6. Source of information</b></p>	<p>The information may either be directly provided by you or provided by our supplier or service provider (i.e. the company that you work for). The personal data to be processed can also be gathered by our sales, marketing, medical, finance and administrative personnel.</p>
<p><b>7. Retention period of the personal data</b></p>	<p>The data file is periodically updated to include only data which is relevant for the purpose of processing. Controller stores the information for as long as necessary in order for the controller to satisfy legal or contractual obligations, industry self-regulation, or in order to establish, exercise or defend legal claims. The data is then erased in accordance with the archiving obligation.</p>
<p><b>8. The principles how the data file is secured</b></p>	<p>The protection of the data file utilizes technical data protection such as personal username and password and electronically stored information is accessible only to the authorized persons.</p>
<p><b>9. Right of access</b></p>	<p>The data subject shall have the right of access, after having supplied sufficient search criteria, to the data on himself/herself in the personal data file, or to a notice that the file contains no such data. The controller shall at the same time provide the data subject with information of the sources of data in the file, on the uses for the data in the file and the destinations of disclosed data.</p> <p>The data subject shall have the right to data portability, i.e. the right to receive his or her personal data, which the data subject has provided to the controller and that is being processed by automated means, in a structured and machine readable format and the right to transmit those data to another controller, where the basis for processing is consent or the fulfilment of a contract between the controller and the data subject.</p> <p>The data subject who wishes to use its above mentioned rights shall make a request to this effect to the person in charge at controller by a personally signed or otherwise comparably verified document and by verifying his or her identity by attaching a copy of an official identification document.</p>

<p><b>10. Right to object to processing</b></p>	<p>In case the legal basis for processing the personal data is the legitimate interests of the controller, the data subject has the right to object to processing on grounds relating to his or her particular situation.</p> <p>In case the data subject wishes to use its above-mentioned right, he or she shall make a request to this effect to the person in charge at the data controller by a personally signed or otherwise comparably verified document in writing to the local representative of the data controller named under section 2. hereinabove.</p>
<p><b>11. Rectification, restriction of processing and erasure</b></p>	<p>The data controller shall, on its own initiative or at the request of the data subject, without undue delay rectify, erase or supplement personal data contained in its personal data file if it is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing.</p> <p>Under specific circumstances, the data subject has the right to obtain from the controller restriction of processing of his or her personal data.</p> <p>If the data controller refuses the request of the data subject of the rectification of an error, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal. In this event, the individual may bring the matter to the attention of the Data Protection Ombudsman.</p> <p>The data controller shall notify the rectification to the recipients to whom the data have been disclosed and to the source of the erroneous personal data. However, there is no duty of notification if this is impossible or unreasonably difficult.</p> <p>Requests for the above uses of data subject's rights shall be made by contacting the representative of the data controller named under section 2. hereof.</p> <p>You have the right to make a complaint to a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the General Data Protection Regulation.</p>