

# Privacy Policy

Last modified on: 09/04/2023

This privacy notice is intended for healthcare professionals and other professionals working with Proxima Research International (hereinafter Proxima).

Proxima acts as a controller regarding certain categories of personal data collected within use open source, website and etc.

We developed this Privacy Policy to inform you how your personal data may be processed. We tried to write this Privacy Policy in clear and plain language for your better understanding. By doing so we hope you will get all details to be assured your personal data is safe with us.

The Privacy Policy defines:

- what personal data we process;
- what are the purposes of such processing;
- what rights the user has concerning such data;
- whether the data is transferred to third parties;
- what measures we take to protect personal data;
- other details of personal data processing.

If you have any questions about the Privacy Policy, the processing of your personal data by Proxima, or the exercise of your rights as a personal data subject or to withdraw your consent, send us a request to [dataprotection@proximaresearch.com](mailto:dataprotection@proximaresearch.com).

## 1. What is Personal Data?

**Personal data** (or **data**) is any information relating to you, and that alone or in combination with other pieces of information gives an opportunity to identify you as an individual. In general, these could be your name, email address etc. Personal data could also include such technical information as location data, MAC-addresses, IMEI, IP-address, both static and dynamic, browser, system information etc.

**Personal data processing** means any action with it, for example, collection, recording, organizing, structuring, storage, use, disclosure by any means, and so on.

Personal data may be collected automatically when you use the software through the use of cookies and similar technologies. **Cookies** are tiny pieces of code that may remain in your device after you have visited some website. Cookies and similar web technologies help us to automatically receive the information from your device and send the information back to improve your interaction with the Software and ensure its effective functioning, as described herein.

## 2. What data do we collect and for what purposes?

The personal data we collect and process may include:

**basic information** - your first name, last name; nickname, gender, age or date of birth, and language preference;

**contact information** - information that allows us to contact you, such as your personal or work e-mail address, postal address, telephone numbers and social media profile;

**professional and work experience information** - information related to your qualifications, your position, areas of specialization, , name of the company where you work, your position place of work, practiced practitioner number;

**technical and network activity information** - information about your device and how you use our websites, applications and systems, including your IP address, device ID, hardware model and version, mobile network information, operating system and other network identifiers, browser type, web page visit and search history, access times, referring pages, URLs you have accessed, forms you have submitted, and physical location;

## 3. Lawful basis and purposes of processing your data

### a. Lawful basis

**Your Consent:** your special authorization to our company in cases where such authorization is required. You may withdraw your consent at any time. We usually need to obtain your consent in such cases:

- to save cookies on your device to determine how you use our websites so that we can personalize the information that is displayed to you by tailoring content and notifications about things that interest you;
- in certain situations, when you provide sensitive information about yourself, such as health information.
- to send you certain electronic marketing communications; and
- in any other situation where the processing of personal data is based on your consent.

**Legitimate interest:** we may collect some of your data on the basis of our legitimate interests. For example, so that we can successfully carry out our activities. But this is only if our legitimate interest is not overridden by your rights for privacy. The legitimate interests we have with regard to the use of your data:

- data collected in relation with our anti-fraud practices is processed based on our legitimate interest.
- business development, namely aggregating a database of HCPs' data that forms one of Proxima's main products intended for further transfer to Proxima's clients – pharmaceutical manufacturers. A Database helps them to gather the HCPs contacts for the purposes of further communication about the newest developments in the field of production of medicines, promotion of their products, collecting feedback about their medicines, etc.
- providing information of a medical, scientific and educational nature;
- invitations to participate in conferences;
- subscription to specialized publications;
- involvement in marketing and scientific research;
- informing about medical products and services, including sending information and advertising materials;
- transfer of my personal data to pharmaceutical companies for the above purposes.
- sending you marketing materials directly (you will always have the right to opt out of receiving marketing and advertising messages);

In addition, the legitimate interest is the legal basis for the processing when we store your personal data. In such a case, the legitimate interest is to avoid risks of the loss of the data within our systems.

### b. Purposes of processing

We use personal data for the purposes described above in this privacy notice and for purposes that are reasonably compatible with the purposes described herein.

In particular, we collect and process data for the following purposes:

- providing information of a medical, scientific and educational nature;
- invitations to participate in conferences;
- subscription to specialized publications;
- involvement in marketing and scientific research;
- informing about medical products and services, including sending information and advertising materials;
- transfer your personal data to pharmaceutical companies for the above purposes.
- business development, namely aggregating a database of HCPs' data that forms one of Proxima's main products intended for further transfer to Proxima's clients – pharmaceutical manufacturers. A Database helps them to gather the HCPs contacts for the purposes of further communication about the newest developments in the field of production of medicines, promotion of their products, collecting feedback about their medicines, etc.
- sending you marketing materials directly (you will always have the right to opt out of receiving marketing and advertising messages);
- in order to create and technically maintain your account, identify the user and verify the identity of your person, give you the opportunity to use the website, communicate with you at your request, send you our newsletters and other communication.
- data collected in relation with our anti-fraud practices – to prevent violations and causing damages to the Proxima;

Additionally, we may process your data:

- for the compliance with our legal obligations and to respond to requests from competent authorities. This means we can store and disclose your information to law enforcement authorities, state, or government agencies if we establish that such disclosure is necessary to comply with the law. This includes responses to court orders or subpoenas, as well as other judicial or regulatory processes;
- to prevent or investigate possible wrongdoing or to protect ourselves, our subcontractors, partners and affiliates against legal liability;
- we may anonymize, pseudonymize, aggregate and de-identify the data that we collect and use this data for our own internal business purposes, including sharing it with our business partners, our affiliated businesses, agents and other third parties for commercial, statistical and market research purposes;
- for internal business/technical operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, and as part of our efforts to keep our network, and information systems secure.

If we decide to change the purposes of processing specified above, we will inform you on such changes prior to the use of your personal data within the newly set purposes. Where applicable, you will have to provide your consent for the amended purposes (unless additional purpose of processing is compatible with those listed above).

Please note that we do not sell your data or make any decision based solely on automated processing that may produce legal effects or similar significant effects.

## 4. How long do we store your data?

### a. Retention period

In some jurisdictions, we are required by law to retain your personal information for certain periods of time. The length of the period depends on the legal requirements of the jurisdiction in which you are located at the time you provide us with your information.

We will always retain your personal data for the period required by law in connection with legal proceedings or investigations relating to Proxima. In other cases, we will retain your personal data for as long as our relationship continues to enable us to answer your questions, process your requests or send you product samples. Generally, we will not store any data you provide for longer than the specific Software requires. To be more precise, we store your data for such periods:

## b. Other processing

Please note that sometimes we may process your data for statistical purposes and subject to the appropriate safeguards in accordance with applicable data protection laws.

**What are statistical purposes?** Statistical purposes mean any collection and processing of data necessary for statistical surveys or to produce statistical results. The statistical purpose implies that such statistical results do not include personal data, but only aggregate data. The statistical results may further be used for various purposes, for example, to assess our business development, understand the market demands, and improve our Software.

In most cases, we will anonymize your data before starting processing it for statistical purposes. As a result, such data will be no longer considered personal and its use will be not governed by data protection laws.

## 5. Granting access to third parties

We share your personal data as necessary and to the extent required to comply with laws and regulations and to manage our relationship with you.

We only share your personal data with those employees of our Proxima companies and their affiliates who need it to perform their job duties. A list of our affiliates and their locations can be found here.

In some countries, our interaction with you may involve specialized service providers. We provide your personal data to employees of these providers as part of their job duties.

We also share your personal data with other organizations, such as

- event management agencies;
- marketing agencies;
- technology service providers who work with us to develop and improve our websites, digital forums and applications;
- our clients – pharmaceutical companies;
- organizations in the event of an acquisition of our business or some of its brands, in whole or in part;
- service providers that manage adverse event reporting;
- local and foreign regulatory authorities, courts, governments and law enforcement agencies;
- professional advisors, including auditors, accountants and lawyers. The Enterprise under the Sublicense Agreement and similar agreements.

### A. Our employees and independent contractors

We may pass on your data to our employees or verified independent contractors (including private entrepreneurs). We always enter into non-disclosure and confidentiality agreements with those employees and independent contractors who have access to your data to ensure the data protection. In case of the independent contractors who are private entrepreneurs, we also sign the data processing agreements with them, where applicable.

Since some of your data may be transferred to third parties outside of the EEA, we could also transfer such data on the basis of the standard contractual clauses signed with the respective third parties, if the country of transfer (like Ukraine or the USA) is not subject to the adequacy decisions of the European Commission. You may request the copy of such instruments via contact details provided in Section 8.

We may also disclose your personal data to ensure compliance with the law. In other words, we may disclose information necessary for an investigation or trial at the official request of public authorities. If we are forced to disclose your information, we will notify you immediately and provide a copy of the request unless prohibited by law.

## 6. Your data processing rights

To exercise your rights listed below, you can send a request to the Proxima to [dataprotection@proximaresearch.com](mailto:dataprotection@proximaresearch.com) in order to properly protect your data, we may take additional measures to identify you when processing your request. We will provide you with a response to your request no later than 1 month from the date of its receipt, except as provided by law.

You have the right to:

- 1. Know about the sources of collection, the location of your personal data, the purpose of processing, the location of the controller of personal data.**

We respect the rights of personal data subjects and provide all necessary information in an accessible and understandable format. The Privacy Policy was created to ensure this right.

- 2. Receive information on the conditions for granting access to personal data, in particular information on third parties to whom your personal data is transferred.**
- 3. Obtain a copy of the personal data that you previously provided to us in a portable and, to the extent technically feasible, readily usable format that allows the consumer to transmit the data to another controller without hindrance where the processing is carried out by automated means.**

Under the GDPR, you may exercise this right in terms of your personal data that is processed on the basis of consent or the performance of the contract, if the data is collected directly from you and not created by Proxima.

- 4. Access to your personal data and the right to receive an answer as to whether your personal data is processed, as well as to receive the content of such personal data.**

You can at any time receive confirmation from us whether we are processing your personal data and receive a full copy of this data. In this case, you have the right to receive your personal data in a structured, commonly used and machine-readable format, as well as the right to transfer this data to another controller at your discretion.

- 5. Submit a reasoned request to us objecting to the processing of your personal data.**

If the review of such a request reveals that Proxima cannot demonstrate a valid legal basis for the processing of data that overrides your interests, rights, and freedoms, we will stop processing it and inform you about it.

If the request is not satisfied, we will provide you with a reasoned response to the refusal.

**6. Make a reasoned request to change or destroy your personal data if such data are processed illegally or are inaccurate, as well as in other cases provided by law.**

In particular, in the event of any inaccuracies in the data processed by Proxima, you have the right to contact us with a request to make appropriate changes to your personal data. You may also request that your data be destroyed if you believe that Proxima no longer needs it for the purposes for which it was collected.

**7. Complain about the processing of your personal data to the supervisory authorities or to the court and apply legal remedies in case of violation of the legislation on personal data protection.**

**8. Make reservations about the restriction of the right to process your personal data while giving consent (in case the legal basis for the processing was the consent).**

**9. Withdraw consent to the processing of personal data.**

You can withdraw your consent to the processing of your personal data at any time in case the legal basis for the processing was the consent. In this case, we must stop processing, i.e., destroy or delete your personal data and notify you on the results.

There may be exceptions to this right. For example, if the law requires Proxima to retain this data, or when it is necessary for protection in litigation, or when Proxima has other grounds for processing, etc.

**10. Know the mechanism of automatic processing of personal data and the right to protection against an automated decision that has legal consequences for you.**

This provision is intended to protect the data subject from decisions made by the algorithm without human involvement or control. For example, if a computer program decides on the basis of certain collected information who needs help and who does not. To protect you against such a decision, if we implement one, we will explain the subject of the rules and logic of decision-making by the algorithm, as well as the ability to require a review of the decision by a person.

However, as of now, the Software does not provide any solely automated solutions that would have legal consequences for you.

## **7. Personal Data Location**

Proxima does not physically store most of the personal data. All other data are stored in databases and file repositories hosted by Amazon Web Services. Databases are continuously backed up to enable restoring to any point in time within a retention period.

## **8. Security of Personal Data**

We take appropriate security measures to protect your personal data from accidental loss or destruction, from unlawful processing or access to it.

**Confidentiality.** All personnel are subject to full confidentiality and any contractors and subprocessors are required to sign a confidentiality agreement if the confidentiality is not a part of the main agreement between the parties. Also, any access by authorized personnel is logged.

We use verified contractors that might have access to the data as specified in this Privacy Policy and with whom relevant data processing agreements are concluded. Moreover, we guide and train our personnel to process your data securely.

**Isolation.** Access to personal data is restricted to individually authorised personnel. Authorised personnel are granted a minimum access on a need-to-have basis.

**Securing credentials and access tokens.** Firewall is installed on all servers, which prohibits access from all computers on the network except the corporate network. Tracking Data Transfer is ensured through a comprehensive solution based on the analysis of the system server logs and their current state.

**Logging.** To register and track all access to data and requests for receiving or changing data, a system for collecting and monitoring all system logs at different levels of the application is used.

**Internal Policies and Procedures.** All the employees and the contractors are obliged to obey the internal security policy with respect to the processing of personal data. Such policy provides for organization, physical, and technical security measures, and, for such purpose, takes into account the nature, scope, context and purposes of the processing, as well as the risks posed to the rights and freedoms of data subjects.

**Disclaimer.** While taking necessary steps to secure your data, we have no choice but to admit that no method of transmission over the Internet or method of electronic storage is 100% secure. If it happens that any of your personal data is under the breach and if there is a high risk of violation of your rights as a data subject, we would inform you and the respective data protection authorities as to the accidents without undue delay. We will also do our best to minimize any such risks.

## 9. Cookies, website and app data; use for analytics and marketing

Our websites may use cookies and similar technologies. You can choose to accept or refuse cookies. If you choose to decline cookies, you may not be able to use all elements of our websites, applications and services properly, which may affect your experience.

To the extent that your local law recognizes information collected through cookies and other technologies as personal data, we will treat it in accordance with the standards set forth in this privacy notice.

We collect information about the type of browser and operating system on your computer, the websites you visited before or after visiting our websites, standard server log information, IP addresses, geo-data, and information about your mobile service provider and mobile phone operating system. We use this information to analyze how visitors use our websites and mobile applications to improve them, as well as our services and advertising. We may also share this information with other Proxima companies and other third parties. Some of our websites use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to analyze usage patterns and may collect the information and may collect information about how you use the website, including your IP address.

We also use remarketing services provided by our advertising partners to personalize advertising to visitors to sites within their advertising networks (i.e. other than Proxima sites). On these pages, you may be shown ads related to your previous interactions with Proxima. To turn off personalization of ads served by Google, [click here](#). To turn off personalization of ads served by Facebook, [click here](#). Many of the companies that serve interest-based ads are members of the Network Advertising Initiative (NAI), Digital Advertising Alliance (DAA), or European Interactive Digital Advertising Alliance (EDAA). You can opt out of their interest-based advertising at

<https://optout.networkadvertising.org/>, <https://optout.aboutads.info/>, and <https://www.youronlinechoices.com/>.

## **10. Changes to this Privacy Policy**

We may amend or update this Privacy Policy from time to time. If we decide to do so, and the amendments will substantially affect your rights and legitimate interests, we will notify you of any changes via email. We will also indicate the "Last modified" date at the top of this Privacy Policy.

## **11. Contact information**

If you have any questions about the Privacy Policy or your data being processed by us, you are welcome to contact us:

**Proxima Research International LLS**  
**Principal place of business at 10a, Bazhana Ave., Kyiv, Ukraine, 02072,**  
**Email: [dataprotection@proximaresearch.com](mailto:dataprotection@proximaresearch.com)**