

***Privacy Policy***  
*(Corporate Transparency Project)*



**INDEX**

**APPROVALS .....3**  
**CHANGE CONTROL.....3**  
**OBJECTIVE .....4**  
**SCOPE .....4**  
**WHO DOES IT PERTAIN TO .....4**  
**GENERAL CONCERNS.....4**  
**POLICY .....5**  
**GLOSSARY.....7**



**APPROVALS**

<b><i>DEPARTMENTS</i></b>	<b><i>Approval Date</i></b>
Finanzas Corporativas	18.10.21
Tecnología de la información	18.10.21

**CHANGE CONTROL**

<b><i>Person(s) Responsible</i></b>	<b><i>Changes</i></b>	<b><i>Version Change and Date</i></b>

## OBJECTIVE

This privacy policy establishes the necessary guidelines for carrying out the correct use, collection and circulation of personal information at GRUPO FARMA which may include the personal information of patients, suppliers, clients, health professionals, employees, employees' relatives, former employees and/or third parties.

GRUPO FARMA complies with all provisions of this policy and also complies with current privacy and data protection laws in the countries where it operates.

## SCOPE

This policy will be applied to all personal data regardless of where or how it is found.

## WHO DOES IT PERTAIN TO

This policy is directed to GRUPO FARMA employees whose responsibility involves the handling and the processing of personal data. In parallel this policy will also apply to third parties with whom GRUPO FARMA is associated because of business operations and to those within said operations who handle and process personal data belonging to GRUPO FARMA.

## GENERAL CONCERNS

The protection of personal information, of those who interact with the organization, is vital for GRUPO FARMA since it can be exposed to several operational risks.

All employees of GRUPO FARMA must guarantee the privacy of personal information by implementing and applying the correct procedures while collecting and managing it.

Any external request for personal information of GRUPO FARMA must be channeled and authorized by the units designated by GRUPO FARMA.

The personal information of employees and business allies are provided voluntarily.

## POLICY

In order for GRUPO FARMA to fulfill its objectives, personal information must be collected and processed in accordance with the guidelines of this policy and the regulations or laws of the country where it operates.

The GRUPO FARMA employee who manages personal information must:

- Always take into account the rules and regulations regarding privacy policy that are enforced in the countries where GRUPO FARMA operates.
- Disclose the use and purpose of any sort of personal information collected by someone. The right to authorize or not said information is always the choice of the one who is giving it out. Furthermore collected information must be authorized by signing contracts, privacy policies, and/or consent forms which, in any case, will include both the authorization and the purpose of personal information.
- Ensure that third parties with whom GRUPO FARMA is associated with through business, commit to the same personal information guidelines of GRUPO FARMA.
- Guarantee that the collection of the information required by the business is carried out transparently and legally and guarantee that strict security and confidentiality measures are used in its handling and processed.

These guidelines must be applied to the following processes:

- The calculation and processing of payroll, recruiting, selecting, training, performance evaluating, managing personnel files, and in general personnel administration. See Policy on Government Investigations and Routine Information Request (POL-TC502).
- While creating supplier and/or customer files which may include but not limited to banking information and customer credit limits. See Policy on Government Investigations and Routine Information Request (POL-TC502).
- Completing tax returns, tax withholdings, VAT, other withholdings and operations derived from the tax obligations of the company. See Policy on Government Investigations and Routine Information Request (POL-TC502).
- Obtaining and processing information from patients, health professionals, and/or scientists which is normally used for sales and marketing. In addition the information obtained from our competitors. See Policy on Interaction with Patients and Organizations (POL-TC203), and Social Media Policy (POL-TC305).

- Physical security and access control to all GRUPO FARMA facilities.
  - Security with all login and password information with GRUPO FARMA's computer systems.
  - Managing email security.
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- In general GRUPO FARMA handles and processes said information in order to:
    - Comply with the obligations contracted with the people who give their personal information.
    - Carry out activities of GRUPO FARMA corporation.
    - Carry out the data transfer and/or transmission in strict compliance with the Confidentiality Policy (POL-TC302), and ensure that it cannot be used for another purpose other than that established with provided authorization.
    - Disclose information when the authorities request it, only if it complies with current laws and/or regulations.
    - Safeguarding the databases with personal information must always be kept at GRUPO FARMA. These databases must have specific authorizations for their use and as mentioned before must be authorized by those who have given their information.

## GLOSSARY

**Employee:** Term used for someone who works at GRUPO FARMA.

**Personal information:** means information identifiable to any person, including, but not limited to, information that relates to a person's name, race, ethnicity, religion, sexual orientation, health, finances, education, business, use or receipt of governmental services or other activities, addresses, telephone numbers, identification numbers, other identifying numbers, and any financial identifiers.

**Medium:** It is the physical material where data that can be processed. A particular form of storage for digitized information, such as magnetic tape or discs. This term can also represent non digital forms of storage i.e. paper, stone, wood, canvas, photosensitive material, magnetic or other material for audio, video and similar storage.

**Current regulations:** refers to the current laws and regulations of each country where GRUPO FARMA has a presence.

**Data holder:** It is the person to whom the information belongs to.

**Data processing:** Data processing is, generally, the collection and manipulation of items of data to produce meaningful information about any of the business processes mentioned in this document and which are considered private.

**Third parties:** persons or entities that establish a relationship with GRUPO FARMA, for example: independent contractors, outsourcing services, suppliers, clients, business partners or advisers.