

**INCEPTUA CTS PORTAL
PRIVACY NOTICE**

1 INTRODUCTION

- 1.1 Inceptua Group is providing access to its partners through the CTS Portal (the "Portal") improving communication and overview of the distribution management of client's products.
- 1.2 We are a data controller in respect of the users personal data that you pass to us via the Portal. This means we decide how your personal data is processed and for what purposes.
- 1.3 We use your personal data for the following purposes:
- (a) To operate the Portal and fulfil the order(s) that you request as authorized by Inceptua's clients through the Portal;
 - (b) To communicate with you regarding the ongoing product distribution and potential updates / reminders in relation to the distribution or the Portal set-up.
- 1.4 We are Inceptua Group with the headquarter Inceptua S.A., a company incorporated in Luxembourg with registered office at 2, Place de Paris, 2314 Luxembourg.
- 1.5 If you wish to contact us in relation to this notice, or data protection generally, please contact us by:
- (a) [email](mailto:privacy@inceptua.com) on privacy@inceptua.com;
 - (b) postal mail directed to:
DPO Inceptua
c/o activeMind AG Management- und Technologieberatung,
Büro Berlin
Kurfürstendamm 56
10707 Berlin, Germany
- 1.6 This privacy notice applies to the personal data which you provide to us for enabling you as user in the Portal and through the Portal. It sets out how and why we use your personal data, and the rights you have in respect of your personal data.
- 1.7 We may change this privacy notice from time to time. Where we make significant changes to this privacy notice or the way in which we use personal data within the scope of this privacy notice, we will communicate this to you via our Portal and/or email.

2 CATEGORIES OF COLLECTED PERSONAL DATA AND PURPOSE OF USE

- 2.1 The table below sets out the personal data that we will collect, why we collect it and the legal basis on which we rely. All Data will be provided by you upon registering in the Portal.

Type of data	Purpose	Our legal basis for using it
name, job title; email address, phone number, the address you work or operate out of,	Contact and identification date; providing access to the Portal; to contact you regarding ongoing product distribution or updates to program information;	<u>Performance of a contract</u> - carrying out the services / fulfilling order(s)

name; email address	to ask you to participate in surveys;	<u>Legitimate Interest</u> - assessing client satisfaction and improving our services;
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3 HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR

We keep your personal data for no longer than reasonably necessary and in any event, we will not retain your personal data ten years beyond the date of your last order.

4 WHERE DO WE OBTAIN YOUR PERSONAL DATA FROM

We obtain your personal data directly from you via the Portal, and occasionally via email and via phone.

5 PARTIES WE MAY SHARE YOUR PERSONAL DATA WITH

5.1 In general, internal access to your personal data will be restricted to those who have a need to access it in order to carry out their duties (for example our customer services team or administrators of the Portal).

5.2 However, we may also share your personal data with the following external third parties in some circumstances:

- (a) regulators such as data protection authorities, and government authorities such as tax authorities or others, if we are required to do so by law or if the regulator or authority requests it and we regard that request as reasonable or are required to comply by law;
- (b) our insurers, legal or financial advisers or other third parties who need access to it in the context of managing, investigating or defending claims or complaints;
- (c) in connection with re-organisations, mergers and acquisitions of all or part of our business;
- (d) To other third parties acting on behalf of Inceptua to fulfil the order request, e.g. logistic vendors, or support Inceptua in maintaining and developing this Portal.
- (e) other companies within our group, for instance where they provide us services; and
- (f) where you have consented to do us doing so.

5.3 Where we share your personal data with our service providers, we have contracts with those service providers setting out how they must handle your personal data, including not to use your personal data other than in accordance with our instructions.

6 TRANSFERS OUTSIDE OF THE EEA

6.1 In certain circumstances, we may export personal data outside of the European Economic Area, and we may use third party service providers who do the same.

6.2 We only do that if there is a good reason to do it and where either:

- (a) are adequate safeguards in place (such as the appropriate contractual arrangements with suppliers, or adequacy decisions, depending on the destination country); or
- (b) we are otherwise permitted by data protection law (for instance, where you have given consent or such transfer is necessary to provide our service to you).

7 OBJECTING TO OUR LEGITIMATE INTERESTS PROCESSING

- 7.1 You have the right to object to processing of your personal data on the basis of our legitimate interests, but we might not have to cease processing where you do so if either:
- (a) we are able to demonstrate compelling legitimate grounds for the processing which override your interests; or
 - (b) where that legitimate interest is the establishment, exercise or defence of legal claims.

To object to legitimate interests processing, please contact us using the details at the top of this notice. Please note that we may retain certain data required for legal or compliance reason as permitted by law.

8 YOUR RIGHTS

The law gives you certain rights in respect of the personal data that we hold, which you should be aware of:

- 8.1 You have the right to obtain your personal data from us except in limited circumstances. Where we provide it, the first copy will be free of charge, but we reserve the right to charge a small fee for additional requests or in respect of manifestly unfounded or excessive requests;
- 8.2 You have the right to require us to rectify any inaccurate personal data we hold concerning you;
- 8.3 Taking into account the purposes of the processing, you may also have the right to have incomplete personal data completed, by means of providing a supplementary statement or otherwise;
- 8.4 You have the right to require us to erase your personal data on certain limited grounds (including where they are no longer necessary for the purpose for which they were collected or where we rely on consent, which you withdraw, and there is no other legal ground for the processing);
- 8.5 Where we process personal data either on the basis of consent or contractual necessity, you provided the personal data to us, and we process that personal data by automated means, you have the right to require us to give you your data in a commonly used electronic format;
- 8.6 You have the right to object to our processing of personal data which we process on the grounds of our legitimate interests, as detailed in the paragraph titled “objecting to our legitimate interest processing” above;
- 8.7 You have the right to require us to restrict the processing of your personal data on certain grounds, including where:
- (a) you contest the accuracy of the personal data and want us to restrict processing of your personal data while we verify its accuracy;
 - (b) the processing is unlawful, but you request a restriction of the processing rather than erasure;
 - (c) we (as controller) no longer need the data for the purposes of the processing, but you have told us you require us to retain that personal data for you to establish, exercise or defend legal claims; or
 - (d) you have objected to us processing your personal data on grounds of legitimate interests and want us to restrict processing of your personal data while we consider your objection.

8.8 If you would like to exercise any of these rights, please contact us using the details set out at the top of this notice.

9 IF WE CAN'T REMEDY AN ISSUE

Should you have any complaints or issue with our treatment of your personal data, you may lodge a complaint with the applicable data protection authority.