

**INFORMATION NOTICE/
Record of Processing Activities**

**EU General Data Protection Regulation
(2016/679), Articles 13, 14 and 30**

Date of drafting: 16th April 2018

We may update or revise this Information Notice/ Record of Processing Activities at any time, with any notice to you as may be required under applicable law. Your right to data portability and/or restriction of processing, if applicable, will become applicable as of May 25th, 2018.

1. Controller / Company	Orion Corporation (Company Identification Number: 1999212-6) Orionintie 1 02200 Espoo Finland Tel. 010 4261
2. The person in charge / contact person	Contact person: Saara Heikari (Associate Global Brand Manager)/ Satu Weber (Digital Marketing Specialist) latter from May 2018 onwards. Orion Corporation Orionintie 1A 02200 Espoo Finland Tel. 010 426 3944 / 010 4261 Email: saara.heikari@orionpharma.com / satu.weber@orionpharma.com Data Protection Officer: Heidi Arala e-mail: privacy@orion.fi
3. Name of the data file	Orion ESC-HF webcast streaming site information data file

<p>4. The purpose for processing the personal data / recipients (or categories of recipients) of personal data / the legal basis for processing the personal data</p>	<p>The purpose for processing the personal data in this data file is to enable the controller:</p> <ul style="list-style-type: none"> • To identify individuals as healthcare professionals • To contact the attendees of webcasts for commercial purposes, such as, to provide them with further information about the product/service in question, or to organize a visit of sales representatives of the company • To contact data subjects about upcoming webcasts/educational events and send reminders about them via email • To send links to the live streaming of the webcast and video recordings of the webcast. • To direct market controller’s products and services, including electronic direct marketing (such as, sending electronic newsletters or other information regarding products/services), performing direct advertising regarding prescription medicines solely to individuals allowed to prescribe and supply medicines. • To develop, maintain, administer and monitor client relationships and to otherwise create and develop its business, including creating a customer profile and profiling <p>Company will not disclose or transfer the collected data for commercial purposes to third parties. We may share your information with third parties, such as those who assist us by performing technical operations such as data storage and hosting. The controller may disclose the data to service providers selected by the controller for fulfilling the purposes of the register. Company uses an internet browser-based customer relationship management platform, technically maintained by a service provider called Interactive Medica for which purposes personal data is disclosed to Interactive Medica.</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 consent of the data subject. (EU General Data Protection Regulation Article 6.1.a).</p>
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5. Content of the data file The data file contains the following groups of personal data of website visitors, webcast attendees, registered individuals :

- Full Name
- Occupational e-mail address
- Occupation and specialty area
- Employer and employer’s address including country
- Information about from where the data subject heard about the webcast/ educational training
- Direct marketing objection

6. Sources of information Information is only collected from the data subject.

7. Retention period of the personal data

The data file is periodically updated to include only data which is relevant for the purpose of processing. Upon legitimate request of the data subject the processing is restricted in accordance with the request.

The personal data shall be retained only for the period necessary to fulfil the purposes outlined in this data file unless a longer retention period is required or permitted by law, or until the data subject requests it to be removed.

8. The principles how the data file is secured

The data file is located on a web server in a private hosting environment protected with personal username and password. The application is used via a secure https connection. The server is protected technically and physically in a way that third party individuals cannot gain access to it. Access to the data file shall be granted only to those Orion employees and Orion's subcontractors involved in the management of the data file. Access can be gained only through special request. Technical maintenance of the data file is provided by Advertising agency SST.

Only SST authorized employees can access the server via a VPN connection for maintenance of the system.

9. Right of access and realization of the right of access, and right to data portability

The data subject shall have the right of access, after having supplied sufficient search criteria, to the data on himself/herself in the 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.

The data subject has the right to data portability (EU General Data Protection Regulation Art 20), 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.

The data subject who wishes to have access to the data on himself/herself, or use his/her right to data portability as referred to above, shall make a request to this effect to the person in charge at the controller by a personally signed or otherwise comparably verified document.

10. Right to withdraw consent

The data subject has the right to withdraw the consent he/she has given for the processing of his/her personal data. Data subject shall make a request to this effect to the contact person in charge at Orion Corporation named under section 2. above by a personally signed or otherwise comparably verified document in writing.

Withdrawal of consent does not render the processing of personal data performed prior to such withdrawal unlawful.

11. Rectification, restriction of processing and erasure

A 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. The data controller shall also prevent the dissemination of such data, if this could compromise the protection of the privacy of the individual or his/her rights.

The data subject shall have the right to obtain from the controller restriction of processing, in case the data subject has contested the accuracy of the processed personal data, if the data subject has claimed that the processing is unlawful and the data subject has opposed the erasure of the personal data and has requested the restriction of their use instead; if the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; or if the data subject has objected to processing pursuant to the EU General Data Protection Regulation pending the verification whether the legitimate grounds of the controller override those of the data subject. Where processing has been restricted based on the above grounds, the data subject who has obtained restriction of processing shall be informed by the controller before the restriction of processing is lifted.

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 data subject may bring the matter to the attention of the Data Protection Ombudsman.

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.

Requests for rectification shall be made by contacting the representative of the data controller named under section 2. above.