

# ELPEN PHARMACEUTICAL CO INC

## Privacy Policy

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- 1. Purpose and scope of this Privacy Policy - Privacy Policy**

ELPEN fully respects the privacy of your personal data and makes every effort to protect them in full compliance with the existing legislation and Regulation (EU)

2016/679 of the European Parliament and of the Council of 27.4.2016 on the Protection of Individuals with regard to processing of personal data (General Data Protection Regulation, hereafter referred to as GDPR). This Privacy Policy aims to inform users of this site about the manner and purpose of collecting and processing their personal data from ELPEN, the controller and owner of [www.elpen.gr](http://www.elpen.gr), as well as to explain their rights and choices about these data.

This Privacy Policy only applies to personal data that may be collected and (may) be processed on this site and does not concern any other collection and processing of personal data that ELPEN may make.

ELPEN may provide additional informational notices about the confidentiality of information to site users in individual sections of the site when collecting their personal data on a case-by-case basis. These notices are in any case supplemented by this Privacy Policy.

Providing personal data to ELPEN or by using the site, you consent to the collection and processing thereof on behalf of our company for the purposes and subject to the terms described in this Privacy Policy. The privacy statement contained herein complements the Terms of Use of our company website.

## **2. Definitions**

For the purposes of this Privacy Policy:

"Personal data": means any information relating to an identified or identifiable natural person (the "data subject"); an identifiable natural person is one whose identity can be directly or indirectly identified; indirectly, in particular by reference to an identifier such as a name, an identity number, location data, an online identity identifier, or one or more factors specific to physical, natural, genetic, psychological, economic, cultural or social identity of that individual.

"Special categories of personal data": means personal data revealing racial or ethnic origin, political qualifications, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the

unambiguous identification of a person, data relating to health or data relating to sexual life of a natural person or sexual orientation.

“Health data”: means personal data relating to the physical or mental health of a natural person, including the provision of healthcare services, which reveal information about his / her state of health.

"Processing" : means any act or set of acts carried out with or without the use of automated means in personal data or in sets of personal data such as the collection, registration, organization, structuring, storage, adaptation or change, retrieval, retrieval of information, use, disclosure by transmission, dissemination or any other form of disposal, association or combination, restriction, erasure or destruction.

“Controller”: means a natural or legal person, a public authority, a service or another body which, alone or jointly with others, defines the purposes and the manner in which personal data are processed; where the purpose and method of processing are determined by Union law or the law of a Member State, the controller or the specific criteria for his appointment may be provided for by Union law or the law of a Member State.

"Processing": means a natural or legal person, a public authority, a service or another entity that processes personal data on behalf of the controller.

“Data protection officer”: means the natural person designated by the controller and the processor for the reasons provided for by law, on the basis of his professional qualifications and his expertise in the field of data protection law and practices, with a primary duty to participate in all issues related to the protection of personal data.

"Consent" of the data subject: any indication of will, free, specific, explicit and in full knowledge, by which the data subject expresses agreement with a declaration or with a clear positive action to process the personal data they concern it.

"Existing legislation": The provisions of Greek, Union or other legislation to which ELPEN and define issues of personal data protection, such as:

- Law 2472/1997 on the protection of individuals from the processing of personal data,
- Law 3471/2006 on the protection of personal data and privacy in the electronic communications sector, and amending Directive 2472/1997,
- Directive 95/46 / EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of data
- Directive 2002/58 / EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications) as amended,
- Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repealing of Directive 95/46 / EC (General Regulation for Privacy) hereinafter and GDPR and any implementing laws.

### **3. Responsible for Processing - Data Protection Officer**

#### **Responsible for Processing**

ELPEN PHARMACEUTICAL CO INC, 95 Marathonos Ave., 190 09, Pikermi, Greece  
Telephone: +30 211 1865 000, Email: [info@elpen.gr](mailto:info@elpen.gr) Website: [www.elpen.gr](http://www.elpen.gr)

#### **Data Protection Officer (DPO)**

Georgia S. Chatzitheodorou

ELPEN PHARMACEUTICAL CO INC, 95 Marathonos Ave., 190 09, Pikermi, Greece  
Telephone: +30 211 1865 000, Email: [dpo@elpen.gr](mailto:dpo@elpen.gr)

#### **4. Personal Data to be processed**

Your personal data that may be processed by ELPEN is in principle the normal personal data you may provide when using the features available on this Web site, including browser data, requests for use of the services offered on the site and data collected from cookies, in accordance with the terms of use of these as described below.

With your simple visit to ELPEN 's website, your data processing is limited to the browsing data, that is, the data that needs to be sent to the site for the operation of the computers on which it operates and the Internet communication protocols.

For the rest, we may collect and process data that will be provided directly by you, especially in the following cases: when you provide us with your personal data, e.g. with your future subscription to our newsletters, sending an email to our company's email address, eventually signing up for you and receiving your details anywhere on this site. In addition, you may provide our company with special categories of personal data, such as health data, in particular under the Pharmacovigilance system.

#### **5. Collection and processing of personal data**

During your simple visit to the ELPEN website, the internet provider may automatically collect information (e.g., the IP address, the operating system used to link to the site, the date and type of the browser, the language and settings, the external links you follow on the site of ELPEN and your activities on it) to enable the technical operation of the website itself and the best performance of information depending on your device. This information is recorded as statistical files or log files. Browsing data is usually deleted after being processed in an anonymous form but it may be stored and used by our company to trace and identify the perpetrators of any computer offenses committed against or through this site. Subject to this and the provisions of the Cookie Policy, the browsing data described above is stored only temporarily, in accordance with the law.

Otherwise, your personal data will be used for communication with you or for the purposes communicated to you each time prior to collection. ELPEN has taken the appropriate technical and organizational measures to keep your data safe and protected against unauthorized access.

With your consent, our company can process your normal personal data to ensure that you can take advantage of the services and features available on its site, collect statistics on how to use it, manage your information, queries and reports it receives through the site from you as well as your registration in any of its regions.

Especially for your specific categories of personal data, such as health data, in particular under the Pharmacovigilance system, their processing takes place only in accordance with the specific conditions and terms of existing legislation.

The Company may also process your personal data for the fulfilment of its legal obligations under the existing legislation.

Any collection and processing of personal data by ELPEN is done in accordance with existing legislation, in full compliance with the General Data Protection Regulation and with full respect for the principles under the law governing processing, with a view to ensuring security and confidentiality.

#### **6. Children's personal data**

This site is not intended for children under the age of 16. In any case, our policy is to not knowingly make any kind of personal data processing under the age of 16 years. By using the site you are assured that you are over sixteen (16) years old. If you are under 16 (16) years of age, you are required to abstain from any use of the Website and from any transfer of your personal data without the consent of the person in charge of your parental responsibility. If you fail to comply with the above obligations, you must immediately become familiar with our business. In any case, using the Site, you acknowledge that ELPEN is not responsible for violating the above obligations on your part to the extent that it cannot, even if it makes reasonable efforts to verify your age or consent your parent's care.

## **7. Storage of Personal Data**

Your personal data is stored by ELPEN only for as long as it is required to fulfil the purpose for which they were collected, as described in this Privacy Policy, based on their nature, any contractual relationship that governs their storage and the related legal obligations of the company. These data are deleted (or anonymized) when the purpose of their processing ceases to exist, in accordance with existing legislation.

## **8. Cookies Policy**

### **8.1 What are cookies?**

Cookies are small text files that a site saves on your computer or mobile device when you visit this site. In this way, the site remembers your actions and preferences for a period of time, so you do not have to enter these preferences whenever you visit the site or browse its pages. Cookies do not collect information individually, but when they are read by a server through an internet browser they can provide information to provide a more user-friendly service.

### **8.2 What types of cookies are used at [www.elpen.gr](http://www.elpen.gr)?**

The types of cookies the site uses are persistent cookies (cookies) and temporary cookies (session cookies).

The session cookies used by the web site are deleted after the end of your browser and / or after the browser is closed.

Persistent cookies remain on your computer or device until you delete them, or for a pre-set cookie time. Also, when you visit our website, Google Analytics places on our behalf cookies (third-party cookies). With these cookies, they collect data on the performance of your ads and your interaction with our website.

These data may be used by our partners to extract statistical conclusions and improve your advertising experience as a visitor. Most browsers can be configured to reject cookies. If you reject our Cookies, certain features and features of the Site may not work properly. However, you do not have to accept Cookies before you can read our

content. We do not link Non-Personal Data from Cookies to Personal Data without your consent and we do not use Cookies to collect or store your Personal Data.

### **8.3 Which cookies are used on our site and what information is collected?**

The website [www.elpen.gr](http://www.elpen.gr) uses cookies for various purposes depending on their function:

**Absolutely Necessary / Basic Cookies.** The absolutely necessary cookies are essential to the proper functioning of the site, allow you to browse and use its functions such as access to secure areas or use of the shopping cart. These cookies do not recognize your individual identity. Without these cookies, we cannot provide our site with effective functionality.

**Cookies Functionality.** The functionality cookies help the site remember your choices, such as your username, language, and region. So, we provide you with improved and personalized features. In addition, they help provide the services you have requested, such as video viewing or social media use. They do not allow us to monitor your activity on other sites.

**Traffic Management Cookies.** On our website we use traffic management cookies to identify technical problems that may occur during your tour. Based on the information collected by these cookies, we correct technical mistakes and problems, and we continuously improve the services we offer through our website. So, we better meet your personal needs. Cookies are not used for purposes other than those described herein.

**Performance Cookies.** Performance cookies collect information about how you use the website, such as which pages you visit more often and whether you receive error messages. The information they collect is aggregated. We only use them to improve the performance of our website.

Name: Google Analytics Performance Cookies

Who places them? Google Analytics



Description: <https://policies.google.com/technologies/cookies>

Lifecycle: <https://policies.google.com/technologies/cookies>

**Targeting / advertising cookies and usage statistics.** They are used to provide content that suits you best and your interests. They can be used to send targeted ads / bids, limit ad impressions, or measure an ad campaign's effectiveness. They can be used to remember the websites you've visited to determine which online marketing channels are more effective, and allow us to reward external websites and partners who promoted you to us. Also, to improve our website, we use cookies to collect information about the time and the way visitors interact with our website, the ads and the services offered by the website. For example, how many times a visitor saw a particular product or service and whether he chose to share it on a social networking platform.

Name: Targeting / advertising cookies and Google Analytics usage statistics

Who places them? Google Analytics

Description: <https://policies.google.com/technologies/cookies>

Lifecycle: <https://policies.google.com/technologies/cookies>

**Social Cookies.** These cookies are necessary to link your social networking account to our site. For example, to allow you to republish and share with your friends on social networks information on our site or to indicate that you want to follow our page in social media. Social cookies are not required for your navigation on our site.

Name: Social Cookies

Who places them? Addthis.com

Description: <https://www.addthis.com/privacy/privacy-policy/>

Lifecycle: <https://www.addthis.com/privacy/privacy-policy/>

#### **8.4 How to check cookies?**

Cookies are stored on your computer or device after you learn about privacy settings. If you do not accept cookies or some of them, some of our site's features may not be fully available.

It is at your discretion to withdraw your consent or oppose the use of cookies on your computer or device whenever you like, to check and / or delete cookies.

You can delete cookies from your computer or device at any time by following each browser's settings (e.g., Google Chrome: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en> Microsoft Edge: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> ). By doing so, you withdraw your consent to the use of cookies on your computer or device.

You can also set up the browser you use in such a way that it either alerts you to the use of cookies on specific web site services, or does not allow the acceptance of cookies in any way.

#### **9. Your rights**

Under the existing privacy protection legislation, you have the following rights, for which you can always contact the company using the contact details found below:

1. Ask to know if through its website ELPEN your personal data is collected and what is it.
2. Access them or request a copy of them.
3. Ask for the correction or completion of this data if you believe it is incorrect or incomplete.
4. Request the removal of your personal data. In this case, ELPEN they will delete them unless there is one of the legitimate reasons under which they are entitled to maintain them.

5. Make objections to some or all of the purposes for processing your personal data, or request that their processing be limited under the legal requirements.

6. Revoke your consent to the collection and processing of your personal data by ELPEN.

7. Submit a complaint to the competent supervisory authority, in this case the Personal Data Protection Authority.

If the request is complex or there are a large number of requests, ELPEN A.E. will inform the individual applicant whether another two (2) months extension will be required. If the claims are manifestly unfounded or excessive, in particular because of their recurrence, ELPEN may refuse to respond to the request, justifying its reply.

#### **11. Links to third-party sites**

The website of ELPEN may contain links to other third-party websites. If you follow these links, you will leave the ELPEN and hence the scope of this Privacy Policy. ELPEN is in no way responsible for privacy practices or privacy policies on third-party sites as it cannot guarantee the security of your browsing to them. In this context, we encourage you to read the privacy statements of each and all sites that collect personally identifiable information. This privacy statement applies only to the information collected from our site.

#### **12. Amendments and updates to this Privacy Policy**

ELPEN reserves the right to modify and / or update this Privacy Policy at any time. Please check regularly our published Privacy Policy. In the event of an update and / or substantial change to this Privacy Policy, a relevant publication will be made on the company's website and the "update date" of the present will be amended accordingly. You may also be informed by other means, via email or other communications provided by you through this site.

### **13. How to contact us**

You may contact us for any questions, comments, complaints about this Privacy Policy in order to exercise any of your above rights to request or ask for t access to and / or correction of your personal information.

Contact Information: ELPEN PHARMACEUTICAL CO INC, Avenue Marathonos 95, 190 09, Pikermi, Greece Telephone: +30 211 1865000 (ISOT 200)

Email for privacy issues: [dpo@elpen.gr](mailto:dpo@elpen.gr)