

## **Privacy Statement - BlueNovius B.V.**

BlueNovius B.V. protects personal data and handles personal data with care. In this Privacy Statement you can read which personal data BlueNovius B.V. processes, for which purposes and how long, how it safeguards your personal data and what your rights are with regard to the processing of your personal data.

### **Controller**

BlueNovius B.V., having its registered office in (3011 XA) Rotterdam, the Netherlands, at Bierstraat 123C is the controller for the processing of personal data. During the processing of personal data we comply with the requirements of the General Data Protection Regulation (**GDPR**). This means we:

- clearly specify our purposes before we process personal data, by using this Privacy Statement;
- limit our collection of personal data to only the personal data needed for legitimate purposes;
- first ask for explicit permission to process your personal data in cases where your permission is required;
- take appropriate security measures to protect your personal data and we demand the same from parties who process personal data on our behalf;
- respect your right to inspect, correct or delete your personal data held by us.

### **Personal Data**

We may process the following personal data in the context of providing our products and services: your first- and last name, title, gender, date of birth, address, e-mail address, phone number, username and password, IP address, function, title, specialization, hospital to which you are affiliated, BIG registration number, information on the e-learning programs you have taken and accreditation, information about your visit to websites and/or programs of participating companies and organizations in the pharmaceutical, medical and similar industries, answers to questions during use of one or more of our products and services, information on our products and services (including but not limited to applications) you have bought or showed interest in and information on tools and products from companies where we make use for our services and products, such as but not limited to whether you have visited a page, answered questions, downloaded an item or application, registered for a conference, made a poster, whether e-learning has started and/or completed, created a study group, looked at a webinar, opened an e-mail, clicked on an e-mail link or opened an application.

### **Location data**

If necessary, we may collect your location data (GPS). If that is the case, you will be asked to grant consent beforehand. This location data and other data can also be stored and processed by the provider of the navigation/mapping software, such as Google Maps, but the data could also be used by, for example, Google or Apple itself. We have no control over their actions. We recommend that you read the applicable privacy statement of the provider in question.

### **Purposes of data processing**

We may process your personal data as set out above for the following purposes in order to perform a contract or on the basis of a legitimate interest we have in the sense of the GDPR: - to comply with legislation and regulations, for communication and information on the products and/or services you have bought from us and/or showed interest in and new products and services (including but not limited to applications) we have developed, - to create and manage your account, including access to and linking of accounts, to register your accreditation points for e-learning programs, - to provide access to websites and/or applications of participating companies and organizations and reporting about your visit via our applications and websites to their websites and/or applications, - to improve the quality, safety and user-friendliness of our applications and websites and our products and services and from affiliated companies, such as but not limited to MedNovius B.V., and of participating companies and organizations in the pharmaceutical, medical and similar industries, - for communication and information on (new) products and services from us and/or affiliated companies, such as but not limited to MedNovius B.V., and of participating companies and organizations in the pharmaceutical, medical and similar industries, - to carry out market research, and - for analysis, insight and linking of data within the various accounts of our products and services processed to include information and offers from us and from affiliated companies, such as but not limited to MedNovius B.V., and of participating companies and organizations in the pharmaceutical, medical and similar industries, - for the registration of visitor data of (parts of) our applications and websites. To be clear, we don't make use of any automated processing of personal data, including profiling.

## **Contact Form and Newsletter**

You can use our email address [privacy@bluenovius.com](mailto:privacy@bluenovius.com) to ask questions or make any request. For this purpose, we use your IP address, email address, phone number and name and address details. We have a legitimate interest in doing this. We store this information until we are sure that you are satisfied with our response until six months thereafter. This way we can easily access the information in case you have any following questions and train our customer service to improve even more. Furthermore, we send e-mail newsletters to inform those interested of our products and/or services and from us and affiliated companies, such as but not limited to MedNovius B.V., and of participating companies and organizations in the pharmaceutical, medical and similar industries. Each newsletter contains a link via which you can unsubscribe. Your e-mail address is added to the list of subscribers, only with your consent. We store this information for three months after you cancelled your subscription.

## **Transfers of personal data**

We may provide, share and/or transfer your personal data to our affiliated companies, such as but not limited to MedNovius B.V. and to our partners, publishers, e-learning companies, media companies and other companies and organizations in the pharmaceutical, medical and similar industries (together "Partners"), in the context of the sale, merger & acquisitions and/or performance of its (or part of its) products and services, such as but not limited to Poh-educa, MedInsights, MedPoster, MedEduca, PubExplainer, MedExplainer and all other products and services that BlueNovius and its affiliated companies, such as but not limited to MedNovius B.V., may sell, merge, acquire and/or perform now and in the future. Partners may be based outside the EU, however they make use of the European model clauses. Please read the privacy statements of our affiliated companies and Partners on how they process your personal data. If you do not appreciate the transfer of your personal data to Partners as described above, you can let us know via our email address [privacy@bluenovius.com](mailto:privacy@bluenovius.com). Please note that in case you object against the transfer of personal data to any of the respective Partners, certain products and services (or part of products and services) might no longer work properly.

## **Social Media**

Our website features social media buttons. These buttons are used by the providers of these services to collect your personal data. Please read the privacy statement of the specific social media for more information on how they use your personal data. BlueNovius can never be held responsible for the processing of your personal by its affiliated companies, partners and social mediaplatforms.

## **Security**

We take adequate security measures to protect your personal data against any accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

## **Data Retention**

Your personal data will not be stored longer than necessary for the purposes of data processing as described above. Should you wish more information on how long we retain your personal data for each purpose, you can contact us via our email address [privacy@bluenovius.com](mailto:privacy@bluenovius.com)

## **Your rights**

You can always contact us via our email address [privacy@bluenovius.com](mailto:privacy@bluenovius.com) if you have any questions regarding our privacy statement or if you wish to exercise one of the following you rights you have based on the GDPR: - access to personal data, - rectification of personal data held where it is incorrect or incomplete, - erasure of personal data ("right to be forgotten") if certain grounds are met, - restrict/suspend processing of personal data, - data portability (if processing is based on consent and automated means), - withdraw consent at any time (if processing is based on consent), - object to processing (if processing is based on legitimate interests) and object to processing of personal data for direct marketing purposes. Please note that you always make clear who you are, so that we can assure we do not modify or remove the data from the wrong person.

## **Complaints**

If you think that we are not helping you in the right way, you have the right to lodge a complaint at the authority. For The Netherlands, this is the Autoriteit Persoonsgegevens.

## **Changes to this Privacy Statement**

We reserve the right to modify this statement. We recommend that you consult this statement on a regular basis, so that you remain informed of any changes. We will inform you on major changes.

*19 Augustus 2019*