**Privacy Notice**

**for Persons engaged in labor / civil / commercial relationship with contractors / partners of Sopharma AD**

Sopharma AD, UIC 831902088 („Sopharma“, „We“, „the Company“) provides hereby information about your personal data that could be processed by us or transferred to us in relation with commercial or other relations between Sopharma and your employer/contract giver or customer. We usually receive your data directly from you or from your employer/contract giver/customer, when you contact us on behalf of your employer/contract giver/customer with regard to expected business relations with Sopharma or to the performance/modification/termination of existing business relations with Sopharma.

This Notice is intended to help you understand why and how we may use your information and with whom we may share it. The lists and examples below are illustrative, incomplete and not fully representative of each representative, proxy, contact person or subcontractor of contractor of the Company.

**What personal data of yours we process?**

„Personal data“ means any information about you, sufficient to identify you, including information subject to protection according to the applicable national and European legislation.

Personal data of persons from management bodies and persons authorized to sign contracts on behalf of the contractor or to be indicated by the contractor as contact persons, usually subject to processing by Sopharma are as follows:

|  |  |  |
| --- | --- | --- |
| **Personal data categories** | **Types** | **Reason for processing** |
| Information about you | Name, father’s name, surname | Contract or pre-contractual performance/ legitimate interest |
| Information about your professional position | Employer, position, professional qualification, certificates | Contract or pre-contractual performance/ legitimate interest |
| Contacts | E-mail, address and telephone | Contract or pre-contractual performance/ legitimate interest/ consent |
| Other  (where applicable) | PIN, ID / video recordings and photographic images | legal obligations, including good manufacturing practices / legitimate interest |

**For what purposes shall we use your personal data?**

Personal data submitted by you shall be used for the following purposes:

1. Performance of commercial or civil agreement and contracts to which Sopharma and your employer/contract giver/customer are parties, including but not limited to:
   1. your denomination as representative, proxy or contact person under commercial contract or agreement;
   2. preparation and assignment of orders for supply of goods/services
   3. activities on performance and coordination of processes, including processes related to medicinal product registration and manufacture
2. Performance of regulatory requirements, requests or inquiries by the European Medicines Agency or other regulatory authorities in Bulgaria or abroad
3. Processing of information for compliance with regulatory requirements of Bulgarian and European legislation, including avoidance of conflict of interests and corruption practices
4. The territory on which the Company carries out its activities is subject to video monitoring for the purposes specified on the relevant information panels fixed at the places for access to the territory

**Whom can we share your personal data with?**

Sopharma respects and protects the privacy of your personal data. In complying with legal requirements, it is possible that Sopharma discloses your personal data to the following persons:

* Goods/ service providers of Sopharma: When we use providers of goods/services related to the goods/ services provided by your employer/ contract giver/ customer to Sopharma (e.g., other contractors under contracts for supply of goods/ services or related to technical maintenance of in-house information systems and operative maintenance of their activities, it is possible for Sopharma to disclose some personal data. Such disclosure of data shall be made only in the presence of a good reason and on the basis of a written agreement with the recipients to provide an adequate level of protection.
* External consultants: auditors, lawyers and other consultants in relation with the performance of an independent financial audit, establishment and protection of rights of Sopharma etc.
* Governmental and municipal authorities: In performance of its legal obligations, Sopharma could be obliged to disclose personal data of employees or subcontractors of its suppliers, customers, partners and other contractors in case of explicit instruction by governmental or municipal authorities. In disclosing personal data to governmental authorities, we shall strive to cooperate with these authorities in their inquiries but we shall also strive at respecting the rights and privacy of the personal life of the employees or contractors of our suppliers, customers, partners and other contractors, as much as possible.
* Partners and governmental authorities for the purpose of business trip organization: your personal data could be disclosed to hotels, tourist agencies etc., as well as to governmental authorities (e.g. for visa issue), whenever this is required for your employee/ contract giver/ customer to be able to perform contractual, pre-contractual or other business relation negotiated or signed with Sopharma.

**Are your personal data shared with countries out of the European Union (ЕU) or the European Economic Area (EEA)?**

Products of Sopharma are distributed also in countries out of EU and EEA. In rare cases, it is possible your data to be disclosed to foreign authorities under the relevant jurisdictions, as well as to customers, partners and contractors out of EU.

It is important for you to know that Sopharma shall undertake every possible measure for protection of your Personal data in such transfer of data, for example by obliging its partners and companies that form part of the economic group of Sopharma out of (EU/EEA) to sign standard contract clauses for personal data protection approved by the European Commission.

Sopharma also strives to provide warranties by any possible legal methods regarding personal data protection out of EU/EEA.

**How long shall we keep your personal data?**

Sopharma shall keep your personal data in compliance with the Document Retention, Archiving and Destruction Policy of Sopharma AD and the applicable legislation. Your personal data shall be kept by the Company only for the period required for accomplishment of the purposes, for which personal data have been collected initially, unless the law requires by the Company to keep them for a longer period.

**Security and privacy of personal information**

Sopharma shall maintain adequate administrative, technical and organizational measures intended to assist in protecting employees’ personal data security and privacy and to prevent any accidental or illegal destruction, accidental loss, unauthorized correction, disclosure, access, abuse and any other illegal form of processing.

In performance of its obligations for personal data protection, Sopharma duly takes into account the achievements of the technical progress.

Sopharma carries out trainings of its employees with respect to policies and procedures of personal data protection.

**Your rights regarding your personal data**

In consideration of Bulgarian legislation, you have the following rights regarding your personal data processed by Sopharma AD:

1. to have access to your personal data processed by Sopharma and to receive a copy of them;
2. correction of your personal data processed by Sopharma in case of incompleteness or inaccuracy in such data;
3. to ask for deletion of your personal data whenever such conditions occur. Those are the cases of achieved purpose for which the data have been collected; you have withdrawn your consent, when the processing is based on consent and there are no other legal grounds for processing; your data have been processed illegally etc.;
4. to request restricted processing of your personal data in the cases specified by law;
5. to submit an objection against the processing of your personal data in the cases specified by law;
6. to exercise your right to data transfer and to request your data to be submitted to you in a structured, generally used and machine-readable format;
7. to withdraw your consent when the processing of your personal data is based on consent.

Detailed information on the terms and procedure for exercising your rights, you can find in Sopharma's Rules for exercising data subject rights on our website: [www.sopharmagroup.com](http://www.sopharmagroup.com) , section „Privacy Policy“, or the following link:

(<http://www.sopharmagroup.com/sites/sopharma2016corp/files/rules_for_exercise_of_rights_of_data_subjects.docx>)

You are also entitled to file a complaint with the Commission of Personal Data Protection (<https://www.cpdp.bg> ), whenever relevant prerequisites exist.

**How to contact us?**

If you have any questions or complaints on this Privacy Notice or about the methods and purposes for which we use your personal data, you can contact us at the following address: Sofia 1220, Nadezhda District, 16 Iliensko Shosse Str, e-mail: [personaldata@sopharma.bg](mailto:personaldata@sopharma.bg).

Our personal data protection agent is Ernst & Young Lawyers Office e-mail: [personaldata@sopharma.bg](mailto:personaldata@sopharma.bg).

**Update of privacy notice**

This notice may be updated from time to time to reflect the changes in Sopharma’s practices for protection of personal data. The Company shall inform you of any significant changes in this notice.