

GENERAL DATA CONTROL AND PROTECTION STATEMENT OF GALENA PHARMA

Data controller

Galena Pharma Oy, Sammonkatu 10, 70500 Kuopio, Finland
Business ID: 1057172-0

Contact information

Galena Pharma Customer Service
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Sources of personal data

We process personal data from the following sources:

- Contact form on our website
- Adverse reaction notification form on our website
- Customer and consumer feedback
- Post Market Surveillance
- MIQ (Medical Information Questions)
- Customer records
- Payroll and Human Resources records (employees and job applicants)
- Stakeholder records

A description of how personal data is processed is available for all sources where content and classification of data, method of receipt, further processing, method and duration of retention and mode of destruction are specified.

Purpose of the processing of personal data

Galena Pharma may process or collect personal information based on customer relationship, the contract between the customer and the company, use of the website, personal consent, the legitimate interest of the data controller or legal obligations.

Galena Pharma uses personal information for the following purposes:

- to process the adverse event notification
- to process the post market surveillance information
- to process the Medical Information Question
- to process information from customer service, customer relationships and customer feedback
- to process contact information forms
- to process personal information given in recruiting and employment situations
- to process personal information given by stakeholders

What data do we process?

-Information collected from the adverse event notification form on our website (please see the separate data protection statement on the adverse event reporting page of the website)

-information collected from the contact form on our website:

- the name of the person or contact person of the company, company/organization, phone number, e-mail, the content of the message.

-information collected with cookies:

- visit statistics of the website visitors using Google Analytics as per its terms of service. Google Analytics does not provide us with information about the visitor's IP address: we only receive anonymous data through which we cannot identify the user directly.

Galena Pharma processes personal data received from other sources than its website. These records may contain the following personal data:

- freely given information from the data subject through e-mails, telephone calls, social media services, contracts, customer meetings, employment applications, employment contracts and other situations where personal data is openly available.
- regular sources of information and individuals whose data gets processed in payroll.
- the contact person information of companies and other organizations collected from public sources such as websites, directory services and other companies.

Use of cookies

Our website uses cookies. A cookie is a small text file sent to and stored on a user's computer that enables the webmaster to identify the visitors who frequently visit the site. We aim to improve the quality and contents of our website in a user-oriented manner. We use cookies to collect visitor statistics for the site and analyse the data. You can block Google Analytics cookies by downloading and activating the Google Analytics Opt-out Browser Add-on.

Transfer of personal data

Data is not regularly transferred or disclosed outside the EU or the EEA unless there is a legal obligation to do it. Whenever we need to transfer your personal data to a third-party business partner located in a Third Country, we apply standard data protection clauses adopted by the European Commission as appropriate safeguards.

An external supplier is used in the technical implementation of the customer register service, to whom data gets transferred for this purpose and who has provided process descriptions under data protection law.

As part of post market surveillance requirements, Galena Pharma may share or disclose anonymized personal data with, e.g., competent authorities.

Concerning the company payroll, data can get disclosed to regular receivers who are entitled to the information related to the payroll.

Protection of personal data

Galena Pharma has appropriate technical and organizational measures for protecting personal data. Access to personal data is limited only to persons with obligatory duties to process the data. Data processors are obliged with the obligation of confidentiality.

Galena Pharma has appropriate systems to protect personal data against possible loss, destruction, or damage.

Retention

Personal data is retained in our protected database and used only to handle the case or report according to regulatory requirements.

Galena Pharma retains personal data from adverse event notifications under the requirements specified in the legislation.

Other personal data is retained for as long as it is required for the purposes described in this statement.

Legal grounds for the processing of personal data

According to the EU General Data Protection Regulation (GDPR), the legal grounds for personal data processing of Galena Pharma are:

- the consent of the data subject
- a contract where the data subject is party
- the legitimate interest of the controller (e.g., customer relationship, customer feedback/contact processing)
- the legal obligation of the controller (post market surveillance, customer feedback/contact regarding the quality of the product)

Right to information

You have the right to ask

- for information about your personal data processed by Galena Pharma
- for correction of your personal data if there are errors or omissions
- for the transfer of your personal data to yourself
- to complain to the Data Protection Authority
- to object to the processing of your personal data, if it is based solely on Galena Pharma's legitimate interests
- for the deletion of your personal data

It is to note that the rights mentioned above may be restricted if it is a prerequisite for obligations related to post market surveillance. The rights may get restricted if there is a legal basis for processing them. Galena Pharma will verify the identity of the requester before processing any possible request. The request for information must be sent in writing to the data controller. The data controller will reply to the customer within the set time frame under the EU Data Protection Regulation (typically within one month). The right to request information is free of cost when performed once per year maximum.

Changes to this statement

We reserve the right to update this statement as necessary as a part of legislation requirements or the development of our services or website.

Complied 15.12.2021