

# PRIVACY POLICY FOR LOBSOR PHARMACEUTICALS AB

## 1. GENERAL INFORMATION

- 1.1 This document describes how Lobsor Pharmaceuticals AB, company registration number 556930-4768 having its registered address at Kålsängsgränd 10D, 753 19 Uppsala, Sweden (“**Lobsor**” “**we**” or “**us**”) collects, uses and processes personal data (“**Privacy Policy**”). This Privacy Policy is applicable when you visit our website [www.lobsor.com](http://www.lobsor.com) (“**Website**”) and when you interact with us in regard of our services (together the “**Services**”) as a customer or a supplier.
- 1.2 All definitions in this Privacy Policy shall be interpreted in accordance with applicable data protection laws which refers to the General Data Protection Regulation (Regulation no. 2016/679) and the Directive on Privacy and Electronic Communications (Directive 2002/58/EC), as well as the national implementations and related national legislation.

## 2. DATA PROCESSED

- 2.1 We will process the following personal data when you interact with us:
- (a) name;
  - (b) e-mail address;
  - (c) telephone number;
  - (d) job title and company;
  - (e) technical data, which may include the URL you are accessing the Website from, your IP address, unique device ID, network and computer performance, browser type, language and identifying information and operating system;
  - (f) location data; and
  - (g) other personal data that you may provide to us in free text when you are communicating with us.
- 2.2 We are unable to respond to your inquiries or fulfil our agreement with our customers if the personal data above is not provided.

## 3. PURPOSES OF PROCESSING

- 3.1 We will process the personal data set out above for the following purposes:
- (a) to administer your orders, to enable and provide the Services, and to provide, personalize and improve your experience with the Services, and to otherwise provide the Services according to the agreement you have with us;

- (b) to send you newsletters via e-mail, including to provide you with marketing of our and our related parties' products and services;
- (c) to enforce the agreement you have with us, including to protect our rights, property and safety and also the rights, property and safety of third parties if necessary; and
- (d) to fulfil requirements by law.

#### **4. LEGAL GROUND**

- 4.1 Consent. By subscribing to our newsletter, you consent to the processing of the personal data such as your name and email address as set out in this Privacy Policy. The processing of your personal data for the purposes of responding to your inquiry when you contact us is also your consent. The personal data which was collected for that purpose will be deleted once the saving of the data is no longer necessary, or we limit the processing if legal storage periods exist.
- 4.2 Fulfilment of contract. Lobsor processes a limited amount of personal data, such as names and contact details of customer and supplier representatives in order to be able to enter into and fulfil agreements with our customers and suppliers.
- 4.3 Legal obligation. We are processing personal data to fulfil our obligations pursuant to law, e.g. to keep book-keeping records in accordance with applicable law.
- 4.4 Legitimate interest. Moreover, we also base the processing of your personal data on our legitimate interest of needing to log data when you visit our Website to be able to maintain sufficient IT security, to evade fraud and to protect the Website from cyber threats. We also log data for the maintaining and improvement of our Website.

#### **5. DISCLOSURE OF PERSONAL DATA**

- 5.1 We may share and disclose your personal data to our affiliates and subcontractors, e.g. payment service providers, service providers hosting the Website to be able to provide the Services.
- 5.2 When using the Services, you may be directed to other websites where the personal data collected is not in our control. The privacy policy of the other website will govern the personal data obtained from you on that website.

#### **6. RESPONDING TO LEGAL REQUESTS AND PREVENTING HARM**

We may access, preserve and share your personal data in response to a legal request (like a search warrant, court order or a subpoena or the like), or when necessary to detect, prevent and address fraud and other illegal activity, to protect ourselves, you and other users, including as part of investigations.

#### **7. COOKIES, PIXELS AND OTHER SYSTEM TECHNOLOGIES**

- a) This website uses the following types of cookies, the scope and function of which are described below:
  - Transient cookies (please see bb)
  - Persistent cookies (please see cc).

bb) Transient cookies are deleted automatically as soon as you close the browser. These include session-cookies in particular. These save a so-called session-ID, by which different requests of the browser can be allocated to the joint session. This allows your computer to be recognized if you return to our website. The session-cookies are deleted as soon as you log out or close the browser.

cc) Persistent cookies are deleted automatically after a specific period of time, which may differ depending on the cookie. You can delete the cookies in the security settings of your browser at any time.

dd) You can configure your browser settings according to your wishes and e.g. decline the acceptance of third-party-cookies or all cookies. We point out, however, that you may not be able to use all features of this website.

ee) We use cookies in order to identify you for subsequent visits, if you have an account with us. Otherwise, you would have to log-in for each visit separately.

#### b) Cookies of third parties on our websites

We allow third parties to place cookies for this website on your computer.

This website uses Google Analytics, a web analysis service of Google Inc. ("Google"). We have concluded a corresponding contract with the provider for order data processing.

Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site is being used. The information generated by the cookie about your use of this website is usually transferred to a Google server in the USA and stored there. You can prevent this by setting your browser so that no cookies are stored.

Data processing is carried out on the basis of the legal requirements of Art 6 Paragraph 1 lit a (consent) and/or f (legitimate interest) of the GDPR.

Our concern in accordance with GDPR (legitimate interest) is the improvement of our offer and our website. Since the privacy of our users is important to us, the user data is pseudonymised.

However, by activating IP anonymisation on this website, Google will abbreviate your IP address in advance within Member States of the European Union or in other countries party to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and abbreviated there.

On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide the website operator with other services relating to website and Internet use. The pseudonymised IP address transmitted by your browser within the framework of Google Analytics will not be combined with other Google data.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this

data by Google by downloading and installing the browser plug-in available under the following link: [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

Users can also prevent Google Analytics from collecting data by clicking on the following link. An opt-out cookie is set to prevent future collection of your data when you visit this website: Disable Google Analytics

We use cookies from The Trade Desk on our website to track your visit. The purpose of the tracking technology is to identify the retargeting/targeting of visitors within the framework of the media campaign and to address them later with an advertising medium. You can object to tracking at any time here and deactivate interest-based advertising here: <http://thetradedesk.com/general/privacy-policy#optout>

## **8. RETENTION**

We store your personal data for as long as it is relevant and necessary for us to perform the Services, or for as long as we have a legal obligation to store such data, but in no case longer than what we have a legal ground for.

## **9. CHILDREN**

The Services are not directed to persons under the age of thirteen (13). If you are a parent or guardian of a person under the age of 13 and you become aware of that the child has provided personal data to us without your consent, please contact [info@lobsor.com](mailto:info@lobsor.com) to exercise your access, rectification, erasure, limiting of processing and objection rights.

## **10. YOUR RIGHTS**

- 10.1 You have an absolute right to object to the processing of your personal data for direct marketing as described in point 3.1(b) above. You also have the right to withdraw your prior given consent. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal, and we may continue processing your personal data based on other legal grounds, except for direct marketing.
- 10.2 You have the right to request access and further information concerning the processing of your personal data, or request that we correct, rectify, complete, erase or restrict the processing of your personal data. You have the right to obtain a copy of the personal data that we process relating to you free of charge once (1) every calendar year. For any additional copies requested by you, we may charge a reasonable fee based on administrative costs.
- 10.3 If the processing is based on the legal grounds consent or fulfilment of contract you have the right to data portability. Data portability means that you can receive the personal data that you have provided to us, in a structured, commonly used and machine-readable format, and have the right to transfer such data to another data controllers.

## **11. CONTACT INFORMATION**

- 11.1 To exercise your rights, or if you have any questions regarding our processing of your personal data, please contact us at the following address: [info@lobsor.com](mailto:info@lobsor.com) or Lobsor Pharmaceuticals AB, Kålsängsgränd 10D, 753 19 Uppsala, Sweden. In your letter/email please state your full name. Note that you should sign the request to receive information of the processing of your personal data yourself.

11.2 If you have any complaints regarding our processing of your personal data, you may file a complaint to the competent data protection authority. You can find out more about the local data protection authorities under the following link [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

## **12. CHANGE OF CONTROL**

If there is a change of control in our business, we may transfer your information to the new owners for them to continue to provide the Services. The new owners shall continue to comply with the commitments we have made in this Privacy Policy.

## **13. NOTICE OF CHANGES TO THE PRIVACY POLICY**

If we make changes to this Privacy Policy, we will update this webpage. If your consent is required due to the changes, we will provide you additional prominent notice as appropriate under the circumstances and, ask for your consent in accordance with applicable law.

---

Last updated: 2020-12-03