

PRIVACY NOTICE

Last Updated: [DD] October 2022

SCOPE OF THIS PRIVACY NOTICE

Please read this privacy notice ("**Privacy Notice**") carefully to understand Our policies and practices regarding Your Personal Data and how We will treat it. This Privacy Notice applies to individuals ("**You**", "**Your**") who buy Galderma's products through the website <https://www.medfx.co.uk/> (the "**Website**") that is operated by Med-fx Limited, 3 Perry Way, Witham, Essex, CM8 3SX, an affiliate of the non-exclusive distributor of Galderma's products in the UK ("**Med-fx**").

This Privacy Notice explains how Your Personal Data are collected, used, and disclosed by Galderma (U.K.) Limited ("**Galderma**", "**We**", "**Us**", "**Our**"). It also tells You how You can access and update Your Personal Data and make certain choices about how Your Personal Data are used.

This Privacy Notice provides important information in the following areas:

1. PERSONAL DATA THAT WE COLLECT ABOUT YOU, WHY WE COLLECT IT, AND HOW WE USE IT
2. PERSONAL DATA OF CHILDREN USING INFORMATION SOCIETY SERVICES (INCLUDING THE WEBSITE)
3. USES MADE OF YOUR PERSONAL DATA
4. DISCLOSURE OF YOUR PERSONAL DATA
5. RETENTION OF YOUR PERSONAL DATA
6. DISCLOSURE, STORAGE AND/OR TRANSFER OF YOUR PERSONAL DATA
7. YOUR RIGHTS
8. CHANGES TO THIS PRIVACY NOTICE
9. DATA CONTROLLERS & CONTACT

1. PERSONAL DATA THAT WE COLLECT ABOUT YOU, WHY WE COLLECT IT, AND HOW WE USE IT

We collect various types of information about You from Med-fx upon the purchase of Our products through the Website and use it for the purposes described below:

| Types of Personal Data Collected | What We use Your Personal Data for | Legal basis | Our legitimate interests |
|---|--|--|--|
| <p>Personal contact information.</p> <p>This includes any information you provide to Med-fx that would allow Us to contact You, such as Your name, postal address, e-mail address and/or phone number.</p> <p>Personal profile information.</p> <p>This includes any information You provide to Med-fx with respect to the purchases or orders made by You, Your interests, preferences, feedback and survey responses.</p> | <p>We use Your Personal Data for consumer service and support purposes, including responding to Your enquiries.</p> <p>We collect information about how Our micro-site on the Website is used to be able to provide You with certain content and improve it based on the feedback We receive.</p> <p>We also use Your profile Personal Data to better understand Your preferences and provide You with commercial discounts and with information about related offers, products and/or services (including training) We offer.</p> | <p>Our legitimate interests.</p> <p>Your Consent.</p> | <p>Improving and developing new products and services.</p> <p>Being more efficient and growing Our business.</p> |
| | <p>Providing Medical Information / Reporting Adverse Events / Handling Product Complaints</p> <p>We use Your Personal Data to respond to Your inquiries (e.g., responding to any questions or concerns You may have concerning Your use of Our products, order status, technical issue, product question/complaint, general question, investigating an adverse event etc.).</p> | <p>Legal obligations.</p> <p>Our legitimate interests.</p> | <p>Reporting adverse events.</p> <p>Providing You with further information or training in the properties and/or use of Our products.</p> |

Galderma does not process any information collected through any cookies placed on the Website. Please see the Website's Cookie Policy to learn how You can manage Your cookie settings and for detailed information on the cookies Med-fx uses and the purposes for which Med-fx uses them.

2. PERSONAL DATA OF CHILDREN USING INFORMATION SOCIETY SERVICES (INCLUDING THE WEBSITE)

We do not knowingly solicit or collect Personal Data from children below the age of 13. If We discover that We have unintentionally collected Personal Data from a child below 13, We will remove that child's Personal Data from our records promptly. However, Galderma may collect Personal Data about children below the age of 13 years of age from the parent or guardian directly, and with that person's explicit consent as required by law.

3. USES MADE OF YOUR PERSONAL DATA

The following paragraphs describe the various purposes for which We collect and use Your Personal Data, and the different types of Personal Data that are collected for each purpose. Please note that not all of the uses below will be relevant to every individual.

| What We use your Personal Data for | Our reasons | Our legitimate interests |
|---|--|--|
| <p>Patient/consumer service and support.</p> <p>We use Your Personal Data for consumer service and support purposes, including responding to Your enquiries. We collect information about how Our micro-site on the Website is used to be able to provide You with certain content and improve it based on the feedback We receive.</p> <p>We also use Your Profile Personal Data to better understand your preferences and provide you with commercial discounts and with information about related offers, products and/or services (including training) We offer.</p> | <p>Legal obligations.</p> <p>Our legitimate interests.</p> | <p>Improving and developing new products and services.</p> <p>Being more efficient and growing Our business.</p> |
| <p>Providing Medical Information / Reporting Adverse Events / Handling Product Complaints</p> <p>We use Your Personal Data to respond to Your inquiries (e.g., responding to any questions or concerns You may have concerning Your use of Our products, order status, technical issue, product question/complaint, general question, investigating an adverse event etc.).</p> | <p>Legal obligations.</p> <p>Our legitimate interests.</p> | <p>Reporting adverse events.</p> <p>Providing You with further information or training in the properties and/or use of Our products.</p> |

In case We want to use your Personal Data for purposes unrelated to those described in this Privacy Notice, We will first notify You and, where required, offer You a choice as to whether or not We may use Your Personal Data in this manner.

4. DISCLOSURE OF YOUR PERSONAL DATA

In addition to the Galderma entity mentioned in the data controllers & contact section (see Section 9 below), We share your Personal Data with the following types of third-party organisations:

Other Galderma subsidiaries and affiliates worldwide. Galderma and its subsidiary and affiliate companies may share Your Personal Data amongst and between each other for the purposes set forth in this Privacy Notice.

Service providers. These are external companies that We use to help Us run Our business (e.g., cosumer support services, data analysis, CRC, etc.). Service providers, and their selected staff, are only allowed to access and use Your Personal Data on Our behalf for the specific tasks that they have been requested to carry out, based on Our instructions, and are required to keep Your Personal Data confidential and secure. Where required by applicable law, You can obtain a list of the service providers processing your Personal Data on Our behalf (see Section 9 below to contact Us).

5. RETENTION OF YOUR PERSONAL DATA

Galderma takes every reasonable step to ensure that Your Personal Data are only processed for the minimum period necessary for the purposes set out in this Privacy Notice and for the period We maintain an ongoing relationship with You. When we no longer need to use Your information or at Your request, Your Personal data will be securely and permanently disposed or rendered completely anonymous. More specifically, We will delete/anonymize Your data two (2) years after your last purchase or interaction with Us, unless applicable laws or sectoral regulations impose longer retention periods.

6. DISCLOSURE, STORAGE AND/OR TRANSFER OF YOUR PERSONAL DATA

Galderma uses appropriate measures (described below) to keep Your Personal Data confidential and secure. Please note, however, that these protections do not apply to information You choose to share in public areas such as third-party social networks.

People who can access your Personal Data. Your Personal Data will be processed by Our authorised staff or agents, on a need-to-know basis, depending on the specific purposes for which Your Personal Data have been collected.

Measures taken in operating environments. We store Your Personal Data in operating environments that use reasonable security measures to prevent unauthorised access. We follow reasonable standards to protect Your Personal Data. The transmission of information via the Internet is, unfortunately, not completely secure and although We will do our best to protect your Personal Data, We cannot guarantee the security of the data during transmission through the Website.

Transfer of your Personal Data. The storage as well as the processing of Your Personal Data as described above may require that Your Personal Data are ultimately transferred/transmitted to, and/or stored at, a destination outside of Your country of residence, notably Switzerland and United States of America (US). When We share Your Personal Data with an entity located outside of the UK, including to countries which have different data protection standards to those which apply in the EEA, We will put in place, in line with applicable legal requirements, appropriate safeguards to ensure that Your Personal Data gets the same protection as it does here in the UK. In the absence of an adequacy decision and/or any other data protection related certifications these measures may include (i) entering into European Commission approved standard contractual clauses, as adopted or amended or replaced at any time for use in the UK, to protect Your Personal Data, as well as any supplementary measures required by law or deemed necessary, to provide an adequate level of data protection to protect Your Personal Data (and You have a right to ask Us for a copy of these clauses by contacting Us (see Section 9 below) and/or (ii) will rely on Your consent (where permitted by law).

7. YOUR RIGHTS

Access to Personal Data. You have the right to access and request a physical or electronic copy of information held about You. Where the data was not obtained directly from You, you also have the right to request information on the source of Your Personal Data.

Additional rights (e.g., modification, deletion of Personal Data). Where provided by law, You can request deletion, objection, the portability, rectification of Your Personal Data and restrict Our processing of Your Personal Data. You also have the right to know if You are the subject of automated decision-making, including profiling, and to object to such processing. Finally, You have the right to provide Us with your instructions on how Your data should be processed after Your death.

You can withdraw Your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before You withdrew Your consent.

Please note that, in certain circumstances, We will not be able to delete Your Personal Data without also deleting Your user account. We may be required to retain some of Your Personal Data after You have requested deletion, to satisfy Our legal or contractual obligations. We may also be permitted by applicable laws to retain some of Your Personal Data to satisfy Our business needs.

These rights can be exercised by sending Us an e-mail dataprotection.uk@galderma.com or writing to Us at Galderma (U.K.) Limited, Evergreen House North, Grafton Place, London, England, NW1 2DX, attaching a copy of Your ID or equivalent details (where requested by Us and permitted by law). If the request is submitted by a person other than You, without providing evidence that the request is legitimately made on Your behalf, the request will be rejected. Please note that any identification information provided to Us will only be processed in accordance with, and to the extent permitted by applicable laws.

We hope that We can satisfy queries You may have about the way We process your Personal Data. However, You have the right at any time to complain to competent data protection authorities. In case We do not handle your request timely or if You are not satisfied with Our response to any exercise of these rights, You are entitled to lodge a complaint with the Information Commissioner's Office (ICO); You can contact ICO here: The Information Commissioner's Office | Wycliff House, Water Lane, Wilmslow, Cheshire, SK9 5AF | Website: <https://ico.org.uk> | Tel. +44 1625 545 700 | Helpline number: 0303 123 1113.

8. CHANGES TO THIS PRIVACY NOTICE

If We change the way We handle your Personal Data, We will update this Privacy Notice. We reserve the right to make changes to Our practices and this Privacy Notice at any time. Please check back frequently to see any updates or changes to this Privacy Notice.

9. DATA CONTROLLER & CONTACT

To ask questions or make comments on this Privacy Notice and Our privacy practices or to make a complaint about Our compliance with applicable privacy laws, please contact Us by:

- sending an e-mail to: dataprotection.uk@galderma.com (You can always put in copy our Global Data Privacy Office at: privacy.office@galderma.com);
- sending a letter to: Galderma (U.K.) Limited, Evergreen House North, Grafton Place, London, England, NW1 2DX for the attention of our Data Privacy Officer; or
- calling Us on +44 (0)300 3035674.

We will acknowledge and investigate any complaint about the way We manage Your Personal Data (including a complaint that We have breached your rights under applicable privacy laws).

Data controller: Galderma (U.K.) Limited, Evergreen House North, Grafton Place, London, NW1 2DX England.