

## PRIVACY POLICY - INFORMATION OBLIGATION

regarding the data of the Medical Staff collected

in the "Winpoint-Ipocrates" database

### §1. General provisions

Sagra Technology Sp. z o.o. offers its clients services supporting the management of files their contractors. Sagra Technology records the data of medical personnel (doctors, dentists, pharmacists, nurses, midwives, hygienists) in the "Winpoint-Ipocrates" database on the basis of the collected consents for the provision of the said services.

The protection of these data is carried out in accordance with the requirements of generally applicable laws

rights.

From May 25, 2018, the provisions of the Regulation of the European Parliament i

Of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repeal of Directive 95/46 / EC (GDPR). The most important goal of the GDPR is strengthening protection of personal data of natural persons that are collected and processed by companies and institutions operating in the European Union.

For the purposes of better reception of the Privacy Policy, the term "Personal Data Subject" has been replaced by the terms "You", "Administrator" - "We". The term "GDPR" means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and in the matter on the free movement of such data and repealing Directive 95/46 / EC.

We respect the right to privacy and we care about data security and we act in accordance with the following rules of the Privacy Policy

### §2. Data Administrator

Sagra Technology a limited liability company based in Szczecin, entered into

Register of Entrepreneurs under the KRS number: 0000122856, for which the registration files are kept

District Court Szczecin Centrum in Szczecin, XIII Commercial Division of the National Register Sądowy, NIP: 8520604961, REGON: 008080085 is the Administrator of Personal Data, which means an entity that alone or jointly with others sets goals and methods processing of personal data.

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Personal data is processed:

- 1.in accordance with the provisions on the protection of personal data,
- 2.in accordance with the implemented Privacy Policy,
- 3.to the extent and for the purpose necessary to provide our services,
- 4.based on the consent granted.

The recipients of personal data are entities using Sagra IT systems

Technology - in particular manufacturers or sellers from the pharmaceutical and medical industries and cosmetology with which Sagra Technology cooperates.

The list of our clients can be found at: <http://sagra.pl> in the "Our clients" section.

Sagra Technology Sp. z o.o. may collect and use some or all of the following categories of personal data:

- Name and surname, number of the license to practice the profession (PWZ),
- Grade (if any),
- Specialization (s),
- Workplaces or medical activities.

We process this information in order to:

- providing the services of Sagra Technology Spółka z o.o. and,
- making them available to entities using Sagra IT systems

Technology and,

- managing any existing relationship that may have us with you and to exercise our contractual rights and obligations if we are contracted with

the entity with which you work or cooperate.

The legal basis for the processing of this data is your consent referred to in art. 6 paragraph 1 lit. a) GDPR.

### §3. Rights of data subjects

Each data subject has the right to access, rectify, delete or processing restrictions, the right to object, the right to lodge a complaint with the authority supervisory board. In order to exercise the indicated rights, you can visit our office or send the application to our address by letter or by e-mail.

Contact with the person supervising the processing of personal data in our organization is possible electronically at the following e-mail address: daneosobowe@sagra.pl

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The purpose of the GDPR is to ensure that every person can protect their rights and freedoms and ensuring control over the processing of data belonging to it. For this purpose you can exercise your rights:

- the right to access data - the data subject has the right to receive information

incl. what data we process, for what purposes they are processed, and obtain a copy.

You can ask us to receive information as to whether we process your data personal.

- the right to delete data (the right to be forgotten) - the data subject

may indicate the scope and circumstances justifying the requested data deletion, e.g. data

they are no longer necessary to achieve the purposes for which they were collected, and there are no grounds

legal for further data processing, the data is processed unlawfully.

The right to delete data may be exercised in cases where we do not have as

Personal Data Administrator the legal basis for data processing.

- the right to transfer data - the data subject has the right to receive in

a structured, commonly used, readable format

machine personal data concerning it.

The data transfer request may be submitted by the data subject.

- the right to limit data processing - the data subject indicates that the conditions specified in Art. 18 GDPR to limit the processing of its data e.g. we do not need certain data, there are no reasons for further data processing and the data subject requests to suspend the operation on data or not deleting data.

Each request for restriction of data processing will require individual considering the existing grounds for data processing, purpose and scope processing.

- the right to rectify data - at any time when the need arises, the data subject informs us about the change of their personal data.

You can contact us with a request to rectify any incorrect or supplement incomplete data.

the right to object - you can object to the processing at any time data in an automated manner, as well as opposition to data processing for purposes marketing.

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You can object to data processing, for example, at our headquarters, by post to ours address, or to the email address: daneosobowe@sagra.pl

- the right to lodge a complaint regarding the processing of personal data to the authority supervisory board.

We will provide information on the exercise of your rights in writing, by e-mail or it can be picked up at our headquarters after prior appointment.

If we receive a request to exercise the right regarding your data, without undue delay -

and in any case within one month from the date of receipt of the application - we will provide each person,

to whom the data relate, information about the actions taken in connection with the implementation of the above-mentioned rights. IN

if necessary, this period may be extended by a further two months due to

the complexity of the request or the number of requests. Within one month of receipt

requests, we will inform the data subject of such an extension, stating

reasons for the delay.

#### §4. Personal data protection

Both while the current generally applicable regulations are in force

personal data protection law (Personal Data Protection Act i

executive regulation to the act) and in the light of new European regulations,

we process your data using all technical and organizational measures

necessary to ensure the security of this data. Your personal data is

the most valuable resources for our organization. Sagra Technology has implemented and implements the appropriate

technical and organizational measures ensuring data processing protection, in particular

securing data against disclosure to unauthorized persons, and removal by

an unauthorized person, loss and alteration, damage or destruction. Moreover, all

employees and persons cooperating with us are obliged to keep secret,

which includes all information relating to your Data.

Our employees carry out training in the field of protected information security, including

the scope of data protection. We have implemented data encryption and we have introduced control

access, thanks to which we minimize the effects of a possible security breach

data. We do not share data with entities other than those authorized on the basis of

applicable law.

#### §5. Data Protection Officer

At present, to coordinate activities and supervise data security

The Information Security Administrator was also appointed, and was

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appointed Data Protection Officer - Marcin Włodarz. With the Data Protection Officer, Mr. Marcin Włodarz, you can contact by letter directing correspondence to our registered office address or to the e-mail address: [iodo@sagra.pl](mailto:iodo@sagra.pl)

#### §6. Sharing your data

Sagra Technology Sp. z o.o. may sometimes share your data with other entities in connection with the purpose for which your Data is collected. In particular, we can share yours data:

- entities that cooperate with us under trade agreements concluded with Sagra Technology,
- IT service providers that we use, for example to store these data (with which we have concluded contracts for entrusting the processing of personal data),
- third parties pursuant to a court decision to protect the interests of Sagra Technology or in other situations as required by law or for the purposes of proceedings forensic.

The processing of your data in the manner described above does not involve transferring it to other countries, including countries outside the European Union (EU) / European Area Economic (EEA).

#### §7. Storage of your data

Where data processing is based on your consent, Sagra Technology stores your personal data in the "Winpoint-Ipocrates" database only until withdrawn by you consent or your objection to the processing of data.

In the event that the above legal grounds no longer apply, we may continue processing your data for the purpose of establishing and exercising legal claims or protection against them - for an additional period of up to 10 years or for the period required by law.

#### §8. Sensitive personal data

The general rule is that Sagra Technology does not collect "sensitive personal data" nor does it profiles the collected data. "Sensitive Personal Information" refers to information about racial or ethnic origin, political opinions, religious beliefs or philosophical, trade union or health or sexual life.

#### §9. Changes to the privacy policy

Sagra Technology reserves the right to change the privacy policy. About the change, the user will be informed by posting the new content of this document on the website [www.sagra.pl](http://www.sagra.pl)