

## Introduction

We are delighted about the visit of our website. Luye Pharma AG (hereinafter 'Luye Pharma', 'we' or 'us') attaches great importance to the security of users' data and compliance with data protection provisions. Hereinafter, we would like to inform about how personal data is processed on our website.

## Controller and data protection officer

### Controller:

#### **Luye Pharma AG**

Am Windfeld 35

83714 Miesbach/Germany

Tel.: +49 8025 2867 0

E-Mail: [info@luyepharma.eu](mailto:info@luyepharma.eu)

### External data protection officer:

DDSK GmbH

Tel.: 07542 949 21 -0

E-Mail: [datenschutz@luyepharma.eu](mailto:datenschutz@luyepharma.eu)

## Terms

The specialist terms used in this Privacy Policy are to be understood as legally defined in article 4 GDPR.

## Information on data processing

### Automated data processing (log files etc.)

Our website can be visited without actively providing personal information about the user. However, every time our website is accessed, we automatically store access data (server log files), such as the name of the internet service provider, the operating system used, the website the user visited us from, the date and duration of the visit and the name of the file accessed, as well the IP address of the device used (for security reasons, such as to recognise attacks on our website) for a duration of 7 days. This data is solely evaluated for the purpose of improving our offering and does not enable conclusions to be drawn about the person of the user. This data is not merged with other data sources. We process and use the data for the following purposes: to provide the website, to improve our websites and to prevent and identify errors/malfunctions and the abuse of the website.

**Legal base:** legitimate interests (Art. 6 (1) (f) GDPR)

**Legitimate interests:** ensuring the functionality of the website and its error-free, secure operation, as well as in adapting this website to suit users' needs

### Use of cookies (general, functionality, opt-out links etc.)

We use 'cookies' on our website to make visiting our website more attractive and to enable certain functions to be used. The use of cookies serves our legitimate interest in making a visit to our website

as pleasant as possible and is based on article 6 (1) (f) GDPR. Cookies are standard internet technology used to store and retrieve login details and other usage information for all the users of a website. Cookies are small text files that are deposited on your end device. They enable us to store user settings, inter alia, to ensure that our website can be shown in a format tailored to your device. Some of the cookies we use are deleted after the end of a browser session, i.e. when closing the browser (known as 'session cookies'). Other cookies remain on the user's end device and enable us or our partner companies to recognise the browser on the next visit (known as 'persistent cookies').

The browser can be set so that the user is informed when cookies are to be stored and can decide whether to accept them in each individual situation, to accept them under certain circumstances, or to exclude them in general. In addition, cookies can be retrospectively deleted to remove data that the website stored on your computer. Deactivating cookies (known as 'opting out') can limit our website's functionality in some respects.

**Categories of data subjects:** Website visitors, users of online services

**Opt-out:**

Internet Explorer:

<https://support.microsoft.com/de-de/help/17442>

Firefox:

<https://support.mozilla.org/de/kb/wie-verhindere-ich-dass-websites-mich-verfolgen>

Google Chrome:

<https://support.google.com/chrome/answer/95647?hl=de>

Safari

<https://support.apple.com/de-de/HT201265>

**Legal bases:**

Consent (article 6 (1) (a) GDPR), legitimate interest (article 6 (1) (f) GDPR)

The pertinent legal basis is specifically stated for each tool in question.

**Legitimate interests:**

Storing of opt-in preferences, presentation of the website, assurance of the website's functionality, provision of user status across the entire website, recognition for the next website visitors, user-friendly online offering, assurance of the chat function

## Contacting us

On our online offering, we offer the option of contacting us directly or requesting information via various contact options.

In the event of contact being made, we process the data of the person making the enquiry to the extent necessary for answering or handling their enquiry. The data processed can vary depending on the method via which contact is made with us.

**Categories of data subjects:** Individuals submitting an enquiry

**Data categories:**

Master data (e.g. name, address), contact data (e.g. email address, telephone number), content data (e.g. text inputs, photographs, videos), metadata and communication data (e.g. device information, IP

addresses), usage data (e.g. websites visited, interest in content, access times)

**Purposes of processing:** Processing requests

**Legal bases:** Consent (article 6 (1) (a) GDPR), performance of contract (article 6 (1) (b) GDPR)

## Information on data processing for medical enquiries

We process personal data which we receive in connection with medical enquiries. Which data we process depends on the specific enquiry and the chosen communication medium. Our contact details, which we provide on our online presences and package inserts, enable electronic, telephone and postal communication

**Categories of data subjects:** Individuals submitting an enquiry

**Data categories:** name, contact data (e.g. email address, telephone number, fax number), profession (if necessary)

**Purposes of processing:** Processing the medical enquiry, contacting to obtain further information about the medical enquiry for its response

**Legal bases:** legitimate interest in responding to medical enquiries in order to optimise the use of our products (article 6 (1) (f) GDPR), public interest in the sphere of public health (ensuring quality and safety standards for medical products and medical devices) (article 9 (2) (i) GDPR)

## Presence on social media

We maintain online presences on social networks and career platforms so we can exchange information with users registered there and easily contact them.

Sometimes, data belonging to social network users is used for market research and, by extension, for advertising purposes. Users' usage behaviour, such as their stated interests, can lead to user profiles being created and used in order to adapt adverts to suit the interests of the target group. To this end, cookies are normally stored on users' end devices, which sometimes occurs regardless of whether you are a registered user of the social network.

In conjunction with the use of social media, we also make use of the associated messenger services to communicate easily with users. We would like to point out that the security of some services can depend on the user's account settings. Even in cases of end-to-end encryption, the service provider can draw conclusions about the fact that the user is communicating with us, when they do so, and, on occasion, capture location data.

Depending on where the social network is operated, the user data can be processed outside the European Union or outside the European Economic Area. This can lead to risks for users because it is more difficult for them to assert their rights, for example.

**Categories of data subjects:** Registered users and non-registered users of the social network

**Data categories:** Master data (e.g. name, address), contact data (e.g. email address, telephone number), content data (e.g. text inputs, photographs, videos), usage data (e.g. websites visited, interest in content, access times), metadata and communication data (e.g. device information, IP addresses)

<b>Purposes of processing:</b>	Increase in the reach, networking of users
<b>Legal bases:</b>	Consent (article 6 (1) (a) GDPR), legitimate interest (article 6 (1) (f) GDPR)
<b>Legitimate interests:</b>	Interaction and communication on social media pages, increase in profits, findings regarding target groups

## Instagram

Tool:	Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland
Privacy:	<a href="https://help.instagram.com/519522125107875">https://help.instagram.com/519522125107875</a> and <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a>
Third-country transfer:	<a href="https://help.instagram.com/519522125107875">https://help.instagram.com/519522125107875</a>
Opt-out-link:	<a href="https://www.instagram.com/accounts/login/?next=/accounts/privacy_and_security/">https://www.instagram.com/accounts/login/?next=/accounts/privacy_and_security/</a>

## Facebook

Tool:	Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland
Privacy:	<a href="https://www.facebook.com/privacy/explanation">https://www.facebook.com/privacy/explanation</a> und <a href="https://www.facebook.com/legal/terms/page_controller_addendum">https://www.facebook.com/legal/terms/page_controller_addendum</a>
Third-country transfer:	<a href="https://www.facebook.com/help/566994660333381?ref=dp">https://www.facebook.com/help/566994660333381?ref=dp</a>
Opt-out-link:	<a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>

## Data transfer

The personal data of visitors to our online offering is not transferred. We do not transfer any personal data to a third country that we have received in connection with a visit to our online offering. Visiting our social media site involves the transfer of personal data to a country outside the EEA. We implement measures to ensure that the processing is legally permissible in the manner we intend. In this case, standard data protection clauses including a separate regulation of appropriate technical and organisational measures are in place to protect the data subjects in the best possible way.

## Storage period

In principle, we store the data of visitors to our online offering for as long as needed to render our service or to the extent that the European body issuing directives and regulations or another legislator stipulates in laws and regulations to which we are subject. In all other cases, we delete personal data once the purpose has been fulfilled, with the exception of data that we need to continue to store to comply with legal obligations (e.g. if retention periods under tax law and trade law require us to keep documents such as contracts and invoices for a certain period of time).

## Automated decision-making

We do not use automated decision-making or profiling.

## Legal bases

The decisive legal bases primarily arise from the GDPR. They are supplemented by national laws from member states and can, if applicable, be applied alongside or in addition to the GDPR.

<b>Consent:</b>	Article 6 (1) (a) GDPR serves as the legal basis for processing procedures regarding which we have sought consent for a particular purpose of processing.
<b>Performance of a contract:</b>	Article 6 (1) (b) serves as the legal basis for processing required to perform a contract to which the data subject is a contractual party or for taking steps prior to entering into a contract, at the request of the data subject.
<b>Legal obligation:</b>	Article 6 (1) (c) GDPR is the legal basis for processing that is required to comply with a legal obligation.
<b>Vital interests:</b>	Article 6 (1) (d) GDPR serves as the legal basis if the processing is necessary to protect the vital interests of the data subject or another natural person.
<b>Public interest:</b>	Article 6 (1) (e) GDPR serves as the legal basis for processing that is necessary to perform a task in the public interest or to exercise public force that is transferred to the controller.
<b>Legitimate interest:</b>	Article 6 (1) (f) GDPR serves as the legal basis for processing that is necessary to protect the legitimate interests of the controller or a third party, provided this is not outweighed by the interests or fundamental rights and fundamental freedoms of the data subject that require personal data to be protected, particularly if the data subject is a child.

## Rights of the data subject

<b>Right of access:</b>	Pursuant to article 15 GDPR, data subjects have the right to request confirmation as to whether we process data relating to them. They can request access to their data, along with the additional information listed in article 15 (1) GDPR and a copy of their data.
<b>Right to rectification:</b>	Pursuant to article 16 GDPR, data subjects have the right to request that data relating to them, and that we process, be rectified or completed.
<b>Right to erasure:</b>	Pursuant to article 17 GDPR, data subjects have the right to request that data relating to them be erased without delay. Alternatively, they can request that we restrict the processing of their data, pursuant to article 18 GDPR.
<b>Right to data portability:</b>	Pursuant to article 20 GDPR, data subjects have the right to request that data made available to us by them be provided and transferred to another controller.

**Right to lodge a complaint:**

In addition, data subjects have the right to lodge a complaint with the supervisory authority responsible for them, under article 77 GDPR.

**Right to object:**

If personal data is processed on the basis of legitimate interests pursuant to article 6 (1) (1) (f) GDPR, under article 21 GDPR data subjects have the right to object to the processing of their personal data, provided there are reasons for this that arise from their particular situation or the objection relates to direct advertising. In the latter case, data subjects have a general right to object that is to be put into effect by us without a particular situation being stated.

**Withdrawal of consent**

Some data processing procedures can only be carried out with the express consent of the data subject. Once granted, you are able to withdraw consent at any time. To do so, sending an informal note or email to [datenschutz@luyepharma.eu](mailto:datenschutz@luyepharma.eu) is sufficient. The legality of the data processing carried out up to the point of withdrawal shall remain unaffected by the withdrawal.

**External links**

Our website includes links to online offerings from other providers. We note that we have no influence over the content of the online offerings linked to and over whether their providers comply with data protection provisions.

**Amendments**

We reserve the right to amend this information on data protection, in compliance with the applicable data protection provisions, if changes are made to our online offering so that it complies with the legal requirements.

**This Privacy Policy was drawn up by the DDSK GmbH**