

# WEBSITE PRIVACY POLICY

## Introduction

This website (the "Site") is owned and operated by Aspen Healthcare FZ LLC ("Aspen"). Aspen is providing this Site privacy policy ("Privacy Policy") to explain how Aspen collects, uses, discloses and protects the Personal Data (as defined below) which you may submit to us when accessing and using the Site. Aspen is the controller within the meaning of applicable data protection laws. This Site is an Aspen-controlled web programme where Aspen owns, approves and/or engages audiences on behalf of Aspen.

In general, you may visit the Site and view its content while remaining anonymous by not providing any Personal Data. However, if you use this Site, it may be necessary to process your Personal Data. Data that is automatically collected when visiting the Site or the Personal Data you enter when using our services will be processed in accordance with data protection laws applicable in your country. If you do not agree with how Aspen processes your Personal Data, please do not provide any information and do not use the Site.

We process Personal Data that we receive directly from you. If, in exceptional cases, we process Personal Data that we have not received directly from you, this will be Personal Data that we have legitimately obtained from publicly accessible sources (e.g. the internet, the press, commercial and association registers) or that has been legitimately provided to us by third parties.

As used in this Privacy Policy, "we," "our" and "us" means Aspen and its affiliates.

## The meaning of Personal Data

"Personal Data" is defined in data protection laws applicable in your country. It includes any information relating to an identified or identifiable natural person. This means any individual who can be identified directly or indirectly by reference to an identifier such as name, identification number, location data, online identifiers (for example, IP addresses – if they can be used to identify you) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Put simply, this includes data which either by itself or with other data held by us or available to us, can be used to identify you.

## Important notice about international transfers

We are part of the Aspen Group which has databases in different jurisdictions. We may transfer your data to one of the Group's databases outside your country of domicile. These other countries will either have different data protection laws than your country of residence or they will not have data protection laws. They may not be deemed by the European Commission as providing adequate protection for Personal Data. Even if the country to which the data is to be transferred does not require us to provide adequate protection for your data, we will nonetheless seek to ensure that data transfers to Aspen Group databases in that country are adequately protected. In general, we take the following protective measures:

- adequacy decision of the EU Commission for recipients in Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Republic of Korea, Switzerland, the United Kingdom, the United States (commercial organisations participating in the EU-US Data Privacy Framework) and Uruguay (further information is available at [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en))
- standard contractual clauses pursuant to Art. 46 II General Data Protection Regulation ("GDPR") for other recipients (for further information, please refer to [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en))
- exceptions under Art. 49 GDPR for other recipients.

## The categories of Personal Data we may collect, the purpose and the lawful basis

Personal Data collected from you may include the following:

<b>Categories of Personal Data</b>	<b>Purpose</b>	<b>Lawful basis</b>
Application data (e.g. name, CV)	Processing of this personal data is required to enable Aspen to administer the recruiting process, including the set-up of an electronic job applicant HR file, managing your application, organizing interviews.	Processing is necessary for us to enter into a contract with you.
Contact information (e.g. full name, postal address, e-mail address, employer/business and professional information, job titles, telephone and fax numbers)	Managing and responding to your queries. This may include forwarding your message to one of our Aspen Group companies if necessary to follow up your query.	Performance of contract and legitimate interests – it is important that we can respond to your enquiries.
E-mail address, name, company	We use this data to send you newsletters and marketing information and to analyse your use of our newsletter and interaction with the Site.	Your consent.
Browsing information (IP address, browser information)	Monitoring and producing statistical information regarding the use of our platforms, and analysing and improving their functionality.	Legitimate interests - we need to perform this limited routine monitoring to make sure the Site works properly, to diagnose any problems with our server and administer the Site.
Browsing information (IP address, browser information, usage-based information)	Operating social media pages on various platforms (such as Facebook, Instagram) in order to present Aspen and measuring the success of our activities in connection with the use of our social media pages.	Legitimate interests (see column on left) and consent where mandatory.
All information	Establishing and enforcing our legal rights and obligations and monitoring to identify and record fraudulent activity. Complying with instructions from law enforcement agencies, any court or otherwise as required by law. For our general record-keeping and customer relationship management. Managing the proposed sale, restructuring or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organisation. Resolving any complaints from or disputes with you.	Legitimate interests (see column on left).

In summary, we need certain categories of Personal Data because it is necessary in order to administer any contract with you (where relevant). Certain other Personal Data is processed for our legitimate interests in cases where this does not result in prejudice to you.

## **Data anonymisation and use of aggregated information**

We may convert your Personal Data into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from that data. We may use this aggregated data to conduct market research and analysis, including to produce statistical research and reports.

In particular, we use technology to collect anonymous information about the use of this Site. For example:

- we use technology to track which pages of our Site visitors' view. We also use technology to determine which web browsers our visitors use. This technology does not identify you personally, it simply enables us to compile statistics about our visitors and their use of our Site.
- certain pages of this Site may contain hyperlinks to other pages of it. We may use technology to track how often these links are used and which pages on our Site our visitors choose to view. Again, this technology does not identify you personally, it simply enables us to compile statistics about the use of these hyperlinks.

We use this anonymous data to improve the content and functionality of this Site and consider areas and subjects which are attracting interest so that we can focus our e-mail updates (for those that wish to receive such communications). This allows us to better understand our Site visitors' interest areas generally and therefore to improve our Site and products and services we offer.

## **Cookies and analytic tools**

We and third parties may from time to time use cookies and similar technologies (e.g. pixels, local storage, or session storage objects) on our Site to store information of your device (e.g. computer, notebook, mobile phone) or to enable access to information that is already stored on your device.

Cookies and similar technologies are used to provide this Site and the functions that are essential for this Site (e.g. certain user input, authentication, security, multimedia player, load balancing, UI customisation cookies); analyze the use of this Site (e.g. which pages are visited most frequently) so that this Site can be improved in a user-oriented manner and; to be able to play personalized advertising and content and to measure the success of our activities in connection with the use of this Site. The details in the Cookie Settings are decisive. There you can also find additional information about the cookies we use.

The cookies that the Site may deploy can be divided into four categories:

1. **Strictly Necessary Cookies**  
These cookies are essential, because they enable you to move around the Site and use certain features, e.g., to access secure areas of the Site or in connection with information searches. Without these cookies, certain services you may ask for could not be provided.
2. **Performance Cookies**  
These cookies may be used to collect information about how you use the Site, for example which pages you visit most often. These cookies do not collect information that identifies you. These cookies are only used to learn how our Site is performing and make relevant improvements.
3. **Functionality & Profile Cookies**  
These cookies may be used to allow the Site to store information about choices that you make and provide you with more personal features. We may also use such cookies to ensure that onsite marketing and experience is relevant to you. The information these cookies collect may be anonymous and they cannot track your browsing activity on other Web sites.
4. **Advertising Cookies**  
These cookies may be used to deliver advertisements that are more relevant to you and your interests. They are usually placed by advertising networks with our permission.

You can disable cookies using your Internet browser settings. Please consult your browser's help function for information on how to disable cookies. Note that if you disable cookies, certain features of our Site may not function properly.

## **Disclosure of your Personal Data to third parties**

We may disclose your Personal Data to third parties, including but not limited to the following:

- within our Group of companies for the purposes of use described in this Privacy Policy;

- to third parties who supply services to us and who help us and our Group of companies to operate our business. For example, sometimes a third party may have access to your Personal Data in order to support our information technology;
- to our legal and other professional advisers;
- as necessary in order to comply with a legal requirement, to protect vital interests, to protect the security or integrity of our databases or this Site, to take precautions against legal liability; or
- to regulatory authorities, courts and governmental agencies to comply with legal orders, legal or regulatory requirements and government requests.

### **Security of Personal Data**

We endeavour to use appropriate technical and physical security measures to protect Personal Data which is transmitted, stored or otherwise processed by us, from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access, in connection with our Site. These measures include computer safeguards and secured files and facilities. Our service providers are also selected carefully and required to use appropriate protective measures. In certain areas, Aspen uses industry-standard SSL-encryption to protect data transmissions. Most current browsers support the level of security needed to use these areas.

In particular, we endeavour to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including as appropriate: (a) pseudonymisation (such as where data is separated from direct identifiers so that linkage to an identity is not possible without additional information that is held separately) and encryption, (b) ensuring the ongoing confidentiality, integrity, availability and resilience of systems and services used to process your Personal Data, (c) ensuring the ability to restore the availability and access to Personal Data in a timely manner in the event of a physical or technical incident; and (d) ensuring a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational security measures.

### **Retention period or criteria used to determine the retention period**

We keep your Personal Data for as long as it is necessary to do so to fulfil the purposes for which it was collected as described above.

The criteria we use to determine data retention periods for Personal Data includes the following:

- Retention in case of queries: we will retain it for a reasonable period after the relationship between us has ceased (up to 6 months) in case of queries from you.
- Retention in case of claims: we will retain it for the period in which you might legally bring claims against us (in practice this means we might retain it for up to 10 years) if and to the extent we have entered into any contract with you.
- Retention in accordance with legal and regulatory requirements: we will consider whether we need to retain it after the period described above because of a legal or regulatory requirement.

If your application for employment is successful and you commence employment with Aspen, your Personal Data will be transferred to your personnel file and will be processed for employment purposes. If your application for employment is not successful, we will keep your Personal Data for a period compliant with applicable laws, after notification that your application was not successful.

### **Your rights under data privacy laws**

Depending on where you live, you may have various with regard to the processing of your Personal Data. These may include (as relevant):

- the right to request access to the Personal Data we hold about you;
- the right to rectification, including to require us to correct inaccurate Personal Data;
- the right to request restriction of processing concerning you or to object to processing of your Personal Data;
- the right to request the erasure of your Personal Data where it is no longer necessary for us to retain it;
- the right to data portability including to obtain Personal Data in a commonly used machine readable format in certain circumstances such as where our processing of it is based on a consent;

- the right to object to automated decision making including profiling (if any) that has a legal or significant effect on you as an individual;
- the right to withdraw your consent to any processing for which you have previously given consent.

In cases where we send newsletters, you can tell us at any time not to send you marketing communications by e-mail, by clicking on the unsubscribe link within the marketing e-mails you receive from us, or by sending an "opt out" request to the address indicated on such email. You may request not to be contacted by us in connection with any new services, updates, news, or events by contacting us as described below.

If you believe that we have not complied with data protection regulations when processing your Personal Data, you also have the right to lodge a complaint with the applicable supervisory authority in your country or state of residence.

For more information for European Union Residents, please visit [https://commission.europa.eu/law/law-topic/data-protection/reform/rights-citizens/my-rights\\_en](https://commission.europa.eu/law/law-topic/data-protection/reform/rights-citizens/my-rights_en)

Please see "**Contact Details**" if you wish to exercise any of these rights (as relevant).

### **Links to Other Websites**

This Site may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of these third-party websites or any association with their operators. We do not control these websites and are not responsible for their data or privacy practices. We urge you to review any privacy policy posted on any site you visit before using the site or providing any Personal Data.

### **Contact Details**

If you would like to contact us about this Privacy Policy, please e-mail us at [informationrequests@aspenpharma.com](mailto:informationrequests@aspenpharma.com)

Please refer to the Terms and Conditions on the Site, associated with your usage and viewing of the Site.

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