INFORMATION NOTICE
Record of Processing Activities

EU General Data Protection Regulation (2016/679),
Articles 13, 14 and 30

Date of drafting: 9th May 2018

We may update or revise this Information Notice at any time, with any notice to you as may be required under applicable law. Your right to data portability and/or restriction of processing, if applicable, will become applicable as of May 25th, 2018.

1. Controller / Company	Orion Corporation (Company Identification Number: 1999212-6) Orionintie 1 02200 Espoo Finland Tel. +358-10 4261
2. The person in charge / contact person	Julie Boothe Orion Pharma (UK) Ltd Oaklea Court 22 Park Street Newbury RG14 1EA United Kingdon Tel. +44 (0)1635 520 300 uk.privacy@orionpharma.com Contact details of the Data Protection Officer: Heidi Arala e-mail: privacy@orion.fi
3. Name of the data file	Register for Medical Information Enquires, Product Quality Complaints and Adverse Event Case reports
4. The purpose for processing the personal data / recipients (or categories of recipients) of personal data / the legal basis for processing the personal data	The purpose for processing the personal data in this data file is to enable the controller to locally maintain, administer and monitor medical information enquiries, product quality complaints and adverse event case reports in accordance with the requirements of The Human Medicines Regulations 2012 (SI 2012 No. 1916), the Good Pharmacovigilance Practices (GVP) and the ABPI Code of Practice for the Pharmaceutical Industry. The controller is, inter alia, allowed to provide information relating to adverse reactions to competent authorities. The obligations may vary country by country depending on national legislation. You can acquire further information on the obligations by contacting the representative of the controller named under section 2. hereof. The controller will not disclose the collected data for commercial purposes to third parties. The controller may transfer the data to service providers selected by the controller for fulfilling the purposes of the register. The controller uses an internet browser-based medical information management platform, technically maintained by a service provider called New Information Paradigms (NIP) Ltd. We may share your information with third parties, such as those who assist us by performing technical operations such as data storage and hosting. If ownership or control of Orion Corporation or all or any part of our products, services or assets changes, we may transfer your personal data to any new owner, successor or assignee.

	The legal basis for processing of the personal data is compliance with the controller's legal obligations based on binding law (EU General Data Protection Regulation Article 6.1.c) or legitimate interests of the controller / administration of the medical information requests (EU General Data Protection Regulation Article 6.1.f).
5. Content of the data file	The data file contains data of practising doctors, pharmacists, nurses and associated healthcare professionals and other relevant decision makers as well as students of these disciplines and consumers of medicines and their carers who contact the company and have questions about the company's products. Information collected and maintained by the controller: • Date of enquiry • Products details • Enquiry details, including details of product complaints and adverse events associated with the company's products • Contact information of the persons making the enquiry such as name, address, telephone numbers and e-mail addresses supplied by the enquirer • Profession or consumer status • Title • Role
6. Source of information	Data provided by the enquirer or the Medical Information service provider
7. Retention period of the personal data	The controller is obligated to store the information regarding drug safety for at least ten years after the end of the expiration of the marketing authorization and longer if European Union and/or local legislation so requires.
8. The principles how the data file is secured	The data file is located on a server in a private hosting environment. The application is used via a secure https connection and only with a personal username and password. The information is accessible only by such company employees who need the information based on their role. Only an authorized user of the data file can create new users and maintain user information. Technical maintenance of the data file is provided by New Information Paradigms Ltd (NIP).
9. Right of access and realization of the right of access	The data subject shall have the right of access, after having supplied sufficient search criteria, to the data on himself/herself in the personal data file, or to a notice that the file contains no such data. The controller shall at the same time provide the data subject with information of the sources of data in the file, on the uses for the data in the file and the destinations of disclosed data. The data subject who wishes to have access to the data on himself/herself, as referred to above, shall make a request to this effect to the person in charge at controller by a personally signed or otherwise comparably verified document.
10. Right to object to processing	In case the legal basis for processing the personal data is the legitimate interests of the controller, the data subject has the right to object to processing on grounds relating to his or her particular situation. In case the data subject wishes to use its above-mentioned right, he or she shall make a request to this effect to the person in charge at the data controller by a

	personally signed or otherwise comparably verified document in writing to the representative of the data controller named under section 2. hereinabove.
11. Rectification, restriction of processing and erasure	The data subject may notify Orion Pharma (UK) Ltd of changes in his/her data by contacting Orion Pharma at uk.medicalinformation@orionpharma.com The data controller shall, on its own initiative or at the request of the registered individual, without undue delay rectify, erase or supplement personal data contained in its personal data file if it is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing. The data controller shall also prevent the dissemination of such data, if this could compromise the protection of the privacy of the individual or his/her rights. The data subject shall have the right to obtain from the controller restriction of processing, in case the data subject has contested the accuracy of the processed personal data, if the data subject has claimed that the processing is unlawful and the data subject has opposed the erasure of the personal data and has requested the restriction of their use instead; if the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; or if the data subject has objected to processing pursuant to the EU General Data Protection Regulation pending the verification whether the legitimate grounds of the controller override those of the data subject. Where processing has been restricted based on the above grounds, the data subject who has obtained restriction of processing shall be informed by the controller before the restriction of processing is lifted. If the data controller refuses the request of the registered individual of the rectification of an error, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal. In this event, the individual may bring the matter to the attention of the Data Protection Ombudsman. The data controller shall notify the rectification to the recipients to whom the data have been disclosed and to the source of the erroneous personal data. However, there is no duty of notification if this is impossible or unreasonably difficult. Requests for rectification shall be made by contacting the representative of the data controller named under section 2. hereof.