

**ASPEN PHARMACARE HOLDINGS LIMITED  
AND ITS SUBSIDIARIES**  
("Aspen", "the Group" or "Aspen Group of Companies")

**PRIVACY STATEMENT**

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**1. IMPORTANT INFORMATION AND WHO WE ARE**

**1.1. Purpose of this privacy statement**

- 1.1.1. This privacy statement aims to give you information on how Aspen collects and processes your personal data through your interactions with Aspen or use of this website.
- 1.1.2. This website is not intended for children. We only collect data relating to children when it is provided to Aspen in the context of communicating feedback on, or to report an issue or adverse event related to one of Aspen's products, or when an employee provides the details of a child who is their beneficiary or dependent for purposes of their retirement fund or medical insurance coverage.

**1.2. Other privacy statements**

If you fall into any of the following categories, please refer to the appropriate Privacy Notice below so that you are fully aware of how and why we are using your personal data in these situations:

Who you are	Applicable Privacy Notice
I am applying for employment with Aspen	Aspen Candidate Privacy Notice
I am reporting an adverse event; or I am submitting a medical information inquiry; or I am submitting a product complaint	Aspen Privacy Notice for Pharmacovigilance, Medical Information Inquiries and Product Complaints.
I am an employee or individual contractor / independent consultant to Aspen	Please refer to the Aspen Employee Privacy Notice on the HR page of the Aspen intranet, or alternatively contact your HR representative for a copy.

### 1.3. Controller

Aspen is made up of different legal entities, details of which can be found [here](#). This privacy statement is issued on behalf of the Aspen Group so when we mention “Aspen”, “we”, “us” or “our” in this privacy statement, we are referring to the relevant company in the Aspen Group responsible for processing your personal data. Aspen Pharmacare Holdings Limited is the responsible party or controller accountable for any processing of personal data on this website.

### 1.4. Contact details

1.4.1. Please [contact](#) the Aspen Group Information Officer should you have any questions about this privacy statement, our privacy practices, or any requests to exercise your legal rights.

1.4.2. You have the right to submit a complaint to the applicable Regulator in your jurisdiction. We would, however, appreciate the chance to deal with your concerns before you approach the Regulator, so please [contact us](#) in the first instance.

### 1.5. Changes to the privacy statement and your duty to inform us of changes

1.5.1. We keep our privacy statement under regular review. This version was last updated on 25 June 2021. Historic versions can be obtained by [contacting us](#).

1.5.2. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 1.6. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy statement of every website you visit.

## 2. THE PERSONAL DATA WE COLLECT ABOUT YOU

2.1. Personal data, or personal information, means any information about an individual from which that person can be identified. It may also include personal information of juristic persons (for example companies or trusts) under certain laws. It does not include data where the identity has been removed (anonymous data).

2.2. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

2.2.1. **Identity Data** includes first name, maiden name, last name, identity number, username or similar identifier, marital status, title, date of birth and gender;

2.2.2. **Contact Data** includes billing address, delivery address, email address and telephone numbers;

2.2.3. **Financial Data** includes bank account and payment card details;

2.2.4. **Transaction Data** includes details about payments to and from you and other details of products you have purchased from us;

2.2.5. **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website;

- 2.2.6. **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;
  - 2.2.7. **Usage Data** includes information about how you use our website; and
  - 2.2.8. **Communications Data** includes your preferences in receiving communications from us and our third party service providers.
- 2.3. We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy statement.
- 2.4. We do not collect any **Special Categories of Personal Data** (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data), nor any information about **criminal convictions** and offences unless we are required or permitted to do so under applicable law for our legitimate business purposes. Our policies require that any such collection will be subject to the protocols prescribed under the applicable law.
- 2.5. If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products).

### 3. HOW YOUR PERSONAL DATA IS COLLECTED

- 3.1. We use different methods to collect personal data from and about you including through:
- 3.1.1. **Direct interactions.** You may give us your personal data by filling in forms, by corresponding with us or by entering into contracts with us. This includes personal data you provide when you:
    - 3.1.1.1. purchase our products;
    - 3.1.1.2. apply for a job;
    - 3.1.1.3. supply goods or services to us;
    - 3.1.1.4. request information or communications to be sent to you; or
    - 3.1.1.5. give us feedback or contact us.
  - 3.1.2. **Automated technologies or interactions.** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
  - 3.1.3. **Third parties or publicly available sources.** From time to time, we may collect personal data obtained from other sources, such as public databases, social media platforms and other third parties. For example, we may use such third party information to confirm contact or financial information, or to verify licensure or academic qualifications.

3.1.4. **Via employees:** We may also collect your personal information via an employee, where you are their partner, family member, dependent or beneficiary, and your information has been provided for purposes of administering matters related to their employment. For example, your personal information may be provided for purposes of registering the employee with and administering matters related to their retirement fund and medical insurance. Note that in such instances, Aspen and the relevant retirement fund or medical aid provider are joint controllers / responsible parties in respect of your personal information. Another example is where the employee identifies you as their next-of-kin for purposes of providing emergency contact details for their HR file.

**4. THE LAWFUL GROUNDS WE RELY ON TO USE YOUR PERSONAL DATA**

4.1. Most commonly, we will use your personal data in the following circumstances:

- 4.1.1. Where we need to perform the contract we are about to enter into or have entered into with you; or
- 4.1.2. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- 4.1.3. Where we need to comply with a legal obligation.

4.2. Generally, we do not rely on consent as a legal basis for processing your personal data under these lawful grounds, although our policies require that we obtain consent where we are required to do so under the applicable laws, including before sending communications to you. You have the right to withdraw consent to such use at any time by [contacting us](#).

**4.3. Purposes for which we will use your personal data**

4.3.1. We may process your personal data for different legitimate reasons and business purposes. Below you will find an overview of the types of purposes for which we may process your personal data:

Purposes	Examples
Assessment and (re) screening of (potential) customers, suppliers and/or business partners	Conducting due diligence on a potential new customer to establish possible international trade restrictions
Conclusion and execution of agreements	Procuring temporary staffing services for the office
Providing support (upon your request)	Providing support via communication channels, such as customer or contact center support
Information on our products	Provide you with adequate and updated information about our products and services
Security and protection of our interests/assets	Deploying and maintaining technical and organisational security measures, conducting internal audits and investigations, conducting assessments to verify conflict of interests

Purposes	Examples
Compliance with legal obligations	Disclosing data to government institutions or supervisory authorities as applicable in all countries in which we operate, such as tax and national insurance deductions, record-keeping and reporting obligations, conducting compliance audits, compliance with government inspections and other requests from government or other public authorities, responding to legal process such as subpoenas, pursuing legal rights and remedies, and managing any internal complaints or claims
Defense of legal claims	Establishment, exercise or defense of legal claims to which we are or may be subject

#### 4.4. Marketing

You will receive communications from us if you have requested information from us or purchased products from us and you have not opted out of receiving such communications.

#### 4.5. Opting out

You can ask us to stop sending you communications by [contacting us](#) at any time.

#### 4.6. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

#### 4.7. Change of purpose

- 4.7.1. Our policies require that we only use personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
- 4.7.2. If we need to use your personal data for an unrelated purpose, our policies require that we will notify you and explain the legal basis which allows us to do so.
- 4.7.3. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### 5. DISCLOSURES OF YOUR PERSONAL DATA

- 5.1. We may share your personal data with the parties set out below for the purposes set out above:
  - 5.1.1. **Internal third parties**, being other companies in the Aspen Group who provide, for example, payroll, HR, IT and system administration services or undertake leadership reporting;
  - 5.1.2. **External third parties** including service providers, professional advisers including lawyers, bankers, auditors and insurers, tax, customs or other authorities; and

5.1.3. **Third parties** to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy statement.

5.2. Our policies require that all third parties engaged by Aspen must respect the security of your personal data and to treat it in accordance with the law. Further, any third party service providers that are engaged by Aspen may not use your personal data for their own purposes and they may only process your personal data for specified purposes and in accordance with our instructions.

## 6. INTERNATIONAL TRANSFERS

We may share your personal data within the Aspen Group. This will involve transferring your data cross-border. We ensure your personal data is protected by requiring all our Group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules".

## 7. DATA SECURITY

7.1. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, our policies require that we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know, they will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

7.2. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable Regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

### How long will you use my personal data for?

8.1. Our policies require that your personal data is only retained for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

8.2. In some circumstances you can ask us to delete your personal data. See **paragraph 9** below for further information.

8.3. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- 9.1. Request access to your personal data;
- 9.2. Request correction of your personal data;
- 9.3. Request erasure of your personal data;
- 9.4. Object to processing of your personal data;
- 9.5. Request restriction of processing your personal data;
- 9.6. Request transfer of your personal data; or
- 9.7. Withdraw consent.

Please [contact us](#) if you wish to exercise any of the rights set out above.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests as soon as possible, depending on the complexity of your request or where you have made a number of requests.

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