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# Privacy and Cookie Policy - Iplussolutions

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#### 1. Purpose

This Privacy and Cookie Policy – Iplussolutions ("Policy") sets out how Stichting Iplussolutions and its affiliates, except XS2Meds B.V (hereinafter referred to as "i+solutions"), manages personal data of Stakeholders, in compliance with the General Data Protection Regulation ("GDPR") and other applicable personal data privacy laws.

# 2. Scope

This Policy applies to personal data processed by i+solutions, collected via our website and/or during professional interactions with donors, suppliers, clients, service providers and other relevant stakeholders (collectively referred to as "Stakeholders," "you," "your").

# 3. Introduction

- 3.1 This Policy explains how i+solutions collects, processes, retains, and discloses personal data of Stakeholders in alignment with GDPR and other applicable personal data privacy laws.
- 3.2 This Policy applies to i+solutions' Stakeholders, in order to maintain transparency about how personal data is managed within our organization and by third parties that process personal data of Stakeholders on behalf of i+solutions (see POL 400 Personal Data Privacy Policy and Code of Conduct Business Partners). It is available to inform relevant data subjects of their rights and our practices regarding personal data processing.
- 3.3 All terms not expressly defined herein shall have the meanings assigned to them under the GDPR.

# 4. References

#### Internal:

- FRM 210-012 Terms, acronyms, and definitions
- POL 400 Personal Data Privacy Policy
- Code of Conduct Business Partners (on i+ solutions website)

#### External:

- General Data Protection Regulation (<a href="https://eur-lex.europa.eu/eli/reg/2016/679">https://eur-lex.europa.eu/eli/reg/2016/679</a>)
- Dutch GDPR Implementation Act (Uitvoeringswet AVG or UAVG) (<a href="https://wetten.overheid.nl/BWBR0040940/2021-07-01">https://wetten.overheid.nl/BWBR0040940/2021-07-01</a>)

# 5. Policy

- 5.1 **Types of Personal Data Processed**: Depending on the relevant Stakeholder and our interactions with you, i+solutions may collect personal data including but not limited to name, personal identification number, professional contacts, business bank account details and other related financial information.
- 5.2 **Collecting Personal Data with Cookies:** i+solutions does not collect any cookie data from its website.
- 5.3 **Legal Basis and Purposes of Processing Personal Data**: i+solutions processes Stakeholders personal data for following legitimate legal basis and purposes:

Legal Basis	Purposes
Contractual	We process your personal data when it is necessary for the performance
Requirement	of a contract with you, or where you have requested us to take steps
(Article 6(1)(b))	prior to us entering into a contract together, in particular:
	<ul> <li>to fulfil any of our obligations owed to you under such contract such as to manage your orders, arrange the provision or receipt of goods and services, and to make payments to you for services provided, the reimbursement of expenses or rebates;</li> </ul>
	<ul> <li>managing orders, questions, and complaints regarding products where you have placed orders, posed questions in relation to orders, or submitted complaints.</li> </ul>
	<ul> <li>where applicable, to manage information related to your attendance at an event, for example, your travel and dietary requirements</li> </ul>
Legal Obligation	We process your personal data to meet legal (including tax and
(Article 6(1)(c))	accounting), regulatory, pharmacovigilance, quality, medical inquiry, and compliance requirements.
Legitimate	We also process your personal data when it is necessary for the
Interest	purposes of our legitimate interests including but not limited to,
(Article 6(1)(d))	educating i+solutions staff, managing, and monitoring our business
	relationship with you and carrying out due diligence and conflict of interest analysis.
Consent (Article 6(1)(a))	Generally, we do not rely on consent as a legal basis for processing your personal data, except for certain circumstances such as sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

- 5.4 **Disclosure of Personal Data**: i+solutions discloses your personal data to the following categories of recipients (in all cases, only when necessary to fulfil their functions):
  - i+solutions employees, consultants, and external advisors
  - Donor organisations
  - Third party service providers such as banks, auditors, and IT administrative service providers
  - Governmental organisations such as tax authorities and customs offices
- 5.5 **Transfer of Personal Data**: i+solutions may transfer your personal data to countries outside the EU/EEA, specifically in Africa and Asia, based on EU standards for data protection.
- 5.6 **Retention of Personal Data**: If we have a contract with you, your personal data will be retained for the duration of your contract and for an appropriate duration after its termination to protect us from any legal claim.
  - Otherwise, your information will be retained for two years, or as reasonably necessary for the purposes set out above, in accordance with applicable laws. For more information on your particular circumstance, contact us using the contact information listed below in <u>5.9</u>.
- 5.7 **Data Subject Rights**: As a GDPR data subject, you have rights including:
  - Right to be Informed
  - Right of Access
  - Right to Rectification
  - Right to Erasure
  - Right to Restriction of Processing
  - Right to Data Portability

- Right to Object
- Rights in Relation to Automated Decision-Making and Profiling

Rights may be subject to conditions based on processing circumstances. For questions about your rights, contact us.

- 5.8 **Changes to This Policy**: This Policy is subject to updates. i+solutions will maintain the latest Policy on its website.
- 5.9 **Contact Information**: For queries regarding this Policy, or to exercise your data subject rights, contact us at <u>dataprotection@iplussolutions.org</u>.
- 5.10 **Disclaimer:** While i+solutions will manage personal data in its official capacity, we are not responsible for any personal data shared independently by Stakeholders or external parties.

# 6. Attachments

N/A