

## Website Privacy Policy

*The below policy addressed the following articles of GDPR:*

<i>Article number</i>	<i>Article name</i>
12	Transparent information, communication and modalities for the exercise of the rights of the data subject
13	Information to be provided where personal data are collected from the data subject
14	Information to be provided where personal data have not been obtained from the data subject

### PLEDGE ON PRIVACY

The Nanomi BV (hereinafter "Nanomi"), is pleased that you are visiting our website. Data protection and data security are very important to us. Therefore, we would like to inform you about the personal data we collect during your visit to our website and about the intended purposes.

As changes to the law or changes to our corporate processes may require an adaptation of this privacy statement, we ask you to read this privacy policy regularly. The privacy policy can be accessed any time under "Privacy Policy", saved and printed out.

### § 1 Data Controller and Scope

The controller according to the EU General Data Protection Regulation (hereinafter: GDPR) and other national data protection acts of the Member States, as well as other data protection regulations, is:

Nanomi BV  
Zutphenstraat 51  
NL-7575 EJ Oldenzaal  
The Netherlands  
Email: [info@nanomi.com](mailto:info@nanomi.com)  
Phone: +31 8 800 40 800

### § 2 Data Protection Officer

The external Data Protection Officer can be contacted at:

Herr Rechtsanwalt Dr. Karsten Kinast, LL.M.

KINAST Rechtsanwaltsgesellschaft mbH

Hohenzollernring 54

D-50672 Köln

Tel.: +49 (0)221 – 222 183 – 0

E-Mail: mail@kinast.eu

Website: www.kinast.eu

### **§ 3 Principles of Processing Personal Data**

Personal data are all information relating to an identified or identifiable natural person. This includes information such as your name, age, address, telephone number, date of birth, e-mail address, IP address or user behavior. Information that cannot (or only with a disproportionate effort) be referred to your person, e.g. by anonymizing the information, is not personal data. The processing of personal data (e.g. the collection, retrieval, use, storage or transmission) always requires a legal basis or your consent.

We may collect and use personal data to provide information to you about us, to market products and services, to process orders or applications submitted by you, to create products or services to meet your needs, to seek your feedback or to contact you in relation to those services offered on our websites, to provide you educative information to help resolve your problem and/or to help build your knowledge as also to allow you to subscribe to our newsletters.

Processed personal data will be deleted as soon as the purpose of the processing has been fulfilled and no legally prescribed retention obligations are to be observed.

In case we process your personal data for the provision of certain offers, please find below information about the specific processes, the scope and purpose of data processing, the legal basis for processing and the respective storage period.

This website is not intended nor aimed for the use or access by children below 18 years of age.

### **§ 4 Data Processing**

1. Website

a. Scope and Purpose of the Processing

When you access and use our website, we only collect the personal data that your browser automatically transmits to our server. This information is temporarily stored in a so-called log file.

The following personal data is recorded to the extent necessary for the provision of a functional website and our contents and services:

- IP address of the requesting computer
- Date and time of access
- Name and URL of the retrieved file
- The website from which access is made (referrer URL)
- The used browser and, if applicable, the operating system of your computer as well as the name of your access provider

b. Legal Basis

Art. 6 (1) lit. f GDPR serves as the legal basis for the data processing. The processing of the mentioned data is necessary for the provision of our services and thus serves the protection of a legitimate interest of our company.

c. Data Deletion and Storage Time

The data subject's personal data are deleted or blocked as soon as the purpose of the storage is fulfilled. The collection of data for the provision of the website and the storage of data in log files is absolutely necessary for the operation of the website. Consequently, there is no possibility of objection for the user. Further storage may take place in individual cases if this is required by law.

2. Registration / Creation of account

a. Scope and Purpose of the Processing

Most of the sections of our website do not require any form of registration and/or creation of account. However, if some sections of our website require registration, such registration shall be at your discretion and you may choose to not to register with us, however in such event you will not be able to access such section. In the event you choose to register, you may need to fill in certain fields to gain full access to such section of the site by choosing a user name and password and/or for us to respond to your query.

You have the possibility to register on our website by entering your personal data. We process the following personal data for the registration/customer account setup:

- Name
- E-mail address

b. Legal basis

The processing of the personal data is based on article 6 (1) lit. a GDPR on the declaration of consent that you have voluntarily given as follows:

Declaration of consent

I agree that when registering for the user account my personal data will be saved. This will allow me to log in on future visits with username and password without having to enter my data again. I have read and accepted the current privacy policy and terms and conditions. I can withdraw this consent at any time with effect for the future by deleting my user account in the member area under Account settings, delete account there.

c. Data Deletion and Storage Time

As soon as the registration on our website is cancelled or modified, the data processed during the registration process will be deleted. Further storage can be carried out in individual cases if this is required by law.

3. Contact form

a. Scope and Purpose of Processing

You have the opportunity to contact us using a form provided on our website. In the course of sending your inquiry via the contact form, reference is made to this data protection declaration in order to obtain your consent. If you use the contact form, the following personal data will be processed:

- Name
- E-mail address

The purpose of entering your e-mail address is to assign your request and to be able to reply to you. When using the contact form, your personal data will not be forwarded to third parties.

b. Legal Basis

The data processing described above for the purpose of establishing contact is carried out voluntarily in accordance with Art. 6 (1) lit. a GDPR on the declaration of consent submitted by you as below:

Declaration of consent:

By entering my data and clicking the "send" button I declare my consent to the use of my name and my e-mail address for answering my contact request.

I can withdraw my consent to the processing of personal data collected during the registration process at any time.

c. Data Deletion and Storage Time

As soon as the request you have made has been dealt with and the relevant facts have been finally clarified, your personal data processed by the contact form will be deleted. Further storage may take place in individual cases if this is required by law.

## § 5 Transfer of personal data

### 1. Third Party transfer

We only share your personal information with third parties if:

- you have given your express consent pursuant to Art. 6 (1) lit. a GDPR,
- it is legally permissible and necessary for the fulfilment of a contractual relationship with you pursuant to Art. 6 (1) lit. b GDPR,
- there is a legal obligation to pass on the data in accordance with Art. 6 (1) lit. c GDPR,
- the disclosure pursuant to Art. 6 (1) 1 lit. f GDPR is necessary to assert, exercise or defend legal claims and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data.

### 2. Transfer within the Lupin group

We are a global enterprise and, we transfer personal data concerning you to countries outside the EU. Please click here to see list of our companies within our corporate group.

We transfer personal data between our entities and <any other entities/processors/third parties> for the purposes explained above.

Your personal data is stored in databases, and on the servers of the cloud-based database management services that Lupin engages, located within and outside EU.

### 3. Data transfer abroad

We may have databases in different jurisdictions. If required, we may transfer your data to one of its databases outside your country of domicile. Where we transfer personal data outside of the EU, we either transfer personal data to countries that provide an adequate level of protection (as determined by the European Commission) or we have appropriate safeguards in place. Appropriate safeguards to cover these transfers are in the form of standard contractual/data protection clauses adopted by the European Commission.

In such event if the level of privacy protection in such country of database does not comply with recognized international standards, we will ensure that data transfers to such databases in that country are adequately protected and that the transfer of data to third parties in such countries will not occur unless Lupin implements the standards it generally follows to maintain the personal data.

## **§ 6 Cookies**

### a. Scope and Purpose of Processing

We use cookies on our website. Cookies are small files which are sent by us to the browser of your terminal device and stored there as part of your visit to our internet pages. Some functions of our website cannot be offered without the use of technically necessary cookies. Other cookies allow us to perform various analyses. Cookies are, for example, able to recognize the browser you are using when you visit our website again and to transmit various information to us. We can use cookies to make our internet offer more user-friendly and effective, for example, by tracking your use of our website and by determining your preferred settings (e.g. country and language settings). In case third parties use cookies to process information, they will collect the information directly from your browser. Cookies do not cause any damage to your device. They cannot run programs or contain viruses.

To know more about our use of cookies, please see our Cookie Policy.

### b. Legal Basis

Due to the described purposes of use, the legal basis for the processing of personal data using cookies lies in Art. 6 (1) lit. f GDPR. If you have given us your consent to the use of cookies on the basis of a

reference ("cookie banner") given by us on the website, the lawfulness of the use is additionally governed by Art. 6 (1) a GDPR.

c. Storage Time

As soon as the data transmitted by the cookies is no longer necessary for the purposes described above, this information will be deleted. Further storage may take place in individual cases if this is required by law.

d. Browser Settings

Most browsers are already set to accept cookies by default. However, you can change your browser settings so that it only accepts certain cookies or no cookies at all. However, we would like to point out that you may no longer be able to use all the functions of our website if cookies are disabled by your browser settings on our website.

You can also use your browser settings to delete cookies already stored in your browser. Furthermore, it is possible to set your browser so that it informs you before cookies are stored. Since the different browsers may differ in their respective functions, we ask you to use the respective help menu of your browser for the setting options.

If you would like a comprehensive overview of all third-party access to your Internet browser, we recommend that you install specially developed plug-ins.

## **§ 7 Tools for Tracking and Analysis**

We use tracking and analysis tools to ensure continuous optimization and user-oriented design of our website. With the help of tracking measures it is also possible for us to statistically record the use of our website by visitors and to further develop our online offer for you with the help of the knowledge gained. On the basis of these interests, the use of the tracking and analysis tools described below is justified in accordance with Art. 6 (1) lit. f GDPR. The following description of the tracking and analysis tools also shows the respective processing purposes and the processed data.

1. Google Analytics

Our website uses Google Analytics, a web analysis service of Google Inc, 1600 Amphitheatre Parkway, Mountainview, CA 94043 USA ("Google"). Google Analytics uses cookies, which are text files placed on your computer, to help the website analyse how users use the site.

The information generated by these cookies, for example about the time, place and frequency of your use of this website, is usually transferred to a Google server in the USA and stored there. When using

Google Analytics, it is not excluded that cookies set by Google Analytics may collect other personal data in addition to the IP address. We would like to point out that Google may transfer this information to third parties if this is required by law or if third parties process this data on behalf of Google.

Google will use the information generated by cookies on behalf of the operator of this website to evaluate your use of the website, to compile reports on website activities and to provide the website operator with further services associated with website and internet use. The IP address transmitted by your browser within the framework of Google Analytics is not merged by Google with other data according to its own statements.

You can generally prevent cookies from being saved by adjusting your browser settings accordingly. However, we would like to point out that in this case you may not be able to use all functions of this website to their full extent.

To prevent information about your use of the website from being collected by Google Analytics and transmitted to Google Analytics, you can download and install a plug-in for your browser under the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

This plug-in prevents information about your visit to the website from being transmitted to Google Analytics. This plug-in does not prevent any other analysis.

Please note that you cannot use the browser plug-in described above when visiting our website via the browser of a mobile device (smartphone or tablet). When using a mobile device, you can prevent Google Analytics from collecting your usage data by clicking the following link: `<a href="javascript:gaOptout()">Disable Google Analytics</a >`.

By clicking on this link, an opt-out cookie is placed in your browser. This prevents information about your visit to the website from being transmitted to Google Analytics. Please note that the opt-out cookie is only valid for this browser and only for this domain. If you delete the cookies in the browser, the opt-out cookie will also be deleted. To further prevent the collection by Google Analytics, you have to click the link again. The use of the opt-out cookie is also possible as an alternative to the above plug-in when using the browser on your computer.

To ensure the best possible protection of your personal data, Google Analytics has been extended on this website by the code "anonymizeIp". This code has the effect that the last 8 bits of the IP addresses are deleted and your IP address is thus recorded anonymously (so-called IP masking). As a matter of principle, Google shortens your IP address even before the transmission within member states of the European Union or in other Member States to the Agreement on the European Economic Area and thus makes it anonymous. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there.

## **§ 8 External website links**



This site contains links that may lead you to other sites. This Privacy Policy applies only to our websites. We may provide links to other websites, which we believe, may be of interest to our visitors. We try to ensure that such websites are of the highest standard. However, Nanomi does not guarantee the standards of every website link it provides or be responsible for the contents of non Nanomi sites. The risk of accessing such websites is solely yours. Be careful when accessing these links, as Nanomi is not responsible for the privacy practices or the content of such other Websites.

## **§ 9 Spamming**

Nanomi does not condone "spamming". Spamming is defined as sending unsolicited e-mails, usually of a commercial nature, in large numbers and repeatedly to individuals with whom the sender has had no previous contact or who have declined to receive such communications. In contrast, Nanomi may inform all its visitors of its products, health, or other related information by e-mail, whilst giving you the choice of opting out of such service.

## **§ 10 Your rights as Data Subject**

If your personal data are processed, you are a data subject within the meaning of the GDPR and the following rights apply to you:

- Pursuant to Art. 15 GDPR you can request information about your personal data processed by us. In particular, you may obtain information about the purposes of processing, the categories of personal data, the categories of recipients to whom your data have been or will be disclosed, the planned storage period, the existence of a right to correction, deletion, restriction of processing or objection, the right to lodge a complaint with a supervisory authority, the origin of your data, if not collected from us, about transfer to third countries or international organizations, and the existence of automated decision-making, including profiling and, where applicable, meaningful information about the logic involved.
- Pursuant to Art. 16 GDPR you can immediately demand the correction of incorrect data or the completion of your personal data stored with us.
- Pursuant to Art. 17 GDPR, you may request the deletion of your personal data stored by us, provided that the processing is not necessary to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims.
- Pursuant to Art. 18 GDPR, you can request the restriction of the processing of your personal data if you contest the accuracy of the data, if the processing is unlawful, if we no longer need the data and if you refuse their deletion because you need to establish, exercise or defend legal claims. You are

also entitled to the right under Art. 18 GDPR if you have objected to the processing in accordance with Art. 21 GDPR.

- Pursuant to Art. 20 GDPR, you may request that the personal data you have provided us with be received in a structured, current and machine-readable format or you may request that it be transmitted to another person responsible.
- Pursuant to Art. 7 para. 3 GDPR you can withdraw your consent at any time. As a consequence, we are no longer allowed to continue the data processing based on this consent for the future.
- Pursuant to Art. 77 GDPR, you have the right to complain to a supervisory authority. You can contact the supervisory authority of your habitual residence, place of work or our company headquarters.

## **§ 11 Security and Confidentiality**

Nanomi has implemented adequate technical and organizational safeguards, in line with industry standards to ensure the security of personal data, including the prevention of their alteration, loss, damage, unauthorized processing or access, having regard to the state of the art, the nature of the data, and the risks to which they are exposed by virtue of human action or the physical or natural environment. To ensure the security and confidentiality of personal data that Nanomi collects online, Nanomi uses data networks protected, inter alia, by industry standard firewall and password protection.

The key security measures to keep your personal data secure and confidential, including and not limited to:

- Limiting access to your personal data to our employees strictly on a need to know basis, such as to respond to your inquiry or request. This is for the sole purpose of preserving your data and who are otherwise authorized and trained to handle such data properly.
- Our employees who misuse personal data are subject to strict disciplinary action. Staff compliance with our policies and procedures is regularly reviewed. Staff compliance with our policies and procedures is regularly reviewed. While we cannot guarantee against any loss, misuse or alteration to data, we strive to prevent any such unfortunate occurrences.
- It is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign off when you are done using a shared computer.