

PRIVACY POLICY

OUR COMMITMENT

PT Darya-Varia Laboratoria Tbk (“**DVL**”) is committed to protect Your Personal Data and implements all necessary measures to ensure such protection. This Privacy Policy Notice (“**Notice**”) will explain to you the purposes and modalities which DVL processes your Personal Data through this Site (hereinafter referred to as the “**Site**”). Please read this entire Notice before entering the Site or submitting any information to DVL through the Site, as this Notice may be changed at any time and without prior notice. Therefore, You are advised to read it periodically.

What processing activities are covered by this Policy?

This notice outlines DVL’s policies and responsibilities in the collection, use, storage, correction, disclosure, processing, transfer, and deletion of Your Personal Data (as defined below) on the Site, in accordance with applicable laws and regulations regarding Personal Data Protection (“**Law**”).

Validity and updates of this Policy

By visiting this Site and providing your Personal Data to access the Site and/or interact with DVL, You acknowledge that You have read and agree to the collection and processing by DVL of Your Personal Data in the way described in this Notice.

This Notice may be modified by DVL, from time to time, to conform its requirements to developments or changes in applicable Laws and/or to DVL's practices. Therefore, DVL invites You to examine this Policy periodically. By continuing to communicate with DVL or by continuing to use the Site and/or providing Your Personal Data to DVL following modifications to this Notice, this indicates Your acceptance of such modifications.

WHAT PERSONAL DATA DOES THIS SITE COLLECT?

This Site may collect the following categories of Personal Data:

- For the purposes of Your other interactions with DVL, may include, but are not limited to, name, age, and contact details (e.g., address, email address, telephone number).
- Messages: any information You send to us in Your requests, questions, and/or correspondence with DVL by using this Site via email, telephone, fax, post, or through your face-to-face interactions with DVL or in any other way.
- Connection data: any information about Your connection and access to this Site (e.g., type of device and browser used, timestamp of your connection, Internet protocol (IP) address, pages visited, browsing history, etc.). DVL generally shall not link your IP address with anything that would allow DVL to identify You.

- Location data: information that Your machine and browser may provide about Your location if You allow such information to be shared with DVL.
- Recordings and images: Your name, audio recordings, video recordings, and images, which may be captured during Your participation in the broadcasting and recording of the Event (if any).
- Data from publicly available sources: including but not limited to, public hospital data, medical association websites, and from data supplier DVL which provides a global reference database for healthcare and related professionals (if any).
- Information from surveys or polls: information You may provide through Your participation in surveys or polls through the Site, in connection with the services provided on the Site, including but not limited to Events.
- Data relating to and data that can be collected by cookies: DVL may use cookies on this Site to store some information on your computer to improve the quality of Your visit to our Site. In some cases, this information will help us to accommodate content to Your interests, or help us avoid asking for the same information on repeat visits to the Site. No personally identifiable information is provided in this process.

PURPOSE: DVL WILL ALWAYS COLLECT YOUR PERSONAL DATA FOR EXPLICIT AND LEGITIMATE PURPOSES

DVL collects your Personal Data that you voluntarily provide to DVL, or vice versa, and only for the following purposes:

- to facilitate and/or process Your inquiries and/or requests, as necessary.
- to comply with legal obligations or Laws applicable to DVL.
- to provide You with access to services, applications, and online platforms; manage Your online account.
- to enable us to identify or authenticate You; provide or verify Your credentials, including through passwords, password hints, security information and questions, and through other forms of identification.
- to improve and develop our products and marketing activities; identify usage trends and develop new products; understand how You and Your devices interact with our services; tracking and responding to security issues; determine the effectiveness of our product promotional campaigns; and conduct surveys.
- to enable us to communicate with You; respond to Your requests or questions; providing support for products and services; provide You with important information, administrative information, required notices, and promotional materials; send You news and information about our products, our services, our brands, and our operations; organizing and managing professional events and congresses, including Your participation in such events.

DVL will not collect, disclose, use, or process such Personal Data unless You voluntarily choose to provide, or provide your consent, or unless such disclosure is permitted or required by applicable laws and regulations.

You voluntarily provide your Personal Data to us for the above purposes, however, if You refuse or withdraw your consent, DVL may not be able to (1) communicate with You; (2) provide You with access to the Site; and/or (3) invite, register, enable you to access and/or engage You in any of the Events. If you delete or choose not to allow the use of cookies, some areas of our Site may not function properly or be accessible.

By providing Your Personal Data to register for an Event, You acknowledge that You have read and consent to the collection and processing by DVL of your Personal Data in the manner described in this Notice.

FUNDAMENTALS: DLV WILL ALWAYS PROCESS YOUR PERSONAL DATA IN ACCORDANCE WITH THE LAW

Depending on the data processing undertaken, DVL will generally process Your Personal Data based on one of the following legal bases:

- **Your prior consent:** where You have clearly stated Your consent to the processing of your Personal Data by DVL. In practice, this will generally mean that the DVL will ask You to sign a document, or complete an online “opt-in” form, or follow a relevant procedure to enable you to be fully informed and then clearly accept or refuse the data processing under consideration.
- **Contractual relationship based on the agreement between You and DVL:** in such cases, the processing of Your Personal Data is generally necessary for the execution or performance of the agreement; this means that if You do not want DVL to process Your Personal Data in that context, DVL may or will be obliged to refuse to enter into an agreement with You or will not be able to provide the products or services covered by the agreement.
- **Legal obligations applicable to DVL activities:** for example, DVL is required to implement Pharmacovigilance procedures to monitor unpleasant effects of marketed products, which generally involve the collection and storage of Personal Data.
- **“Legitimate interests”** DVL within the meaning of applicable data protection laws. In such cases, DVL will consider Your fundamental rights and interests in determining whether the processing is lawful.

DVL may rely on other legal reasons, such as (i) protection of your vital interests and (ii) performance of duties in the public interest, public service, or exercise of authority under applicable data protection regulations.

Consent from third parties

In some circumstances, You may have provided Personal Data relating to another person (such as Your partner, family member or friend) and in such circumstances, You state and warrant that You are authorized to provide their Personal Data to us and that You have obtained consent for their Personal Data to be processed and used in the manner set out in this Notice.

Links to Third Party Websites

This site may contain links to third party websites. Please note that DVL is not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties. If You provide information directly to such sites, the privacy policies and terms of service on those sites apply and DVL shall not be responsible for the information processing practices or privacy policies of those sites.

WHO HAS ACCESS TO PERSONAL DATA: DVL WILL SHARE YOUR PERSONAL DATA ONLY WITH AUTHORIZED PARTIES

For the purposes described above, DVL may share your Personal Data with third parties solely for the purposes described above.

However, DVL will request that the third party to:

- undertake to comply with data protection laws and the principles of this Policy;
- will only process Personal Data for the purposes described in this Policy; and
- implement appropriate technical and organizational security measures designed to protect the integrity and confidentiality of your Personal Data.

DVL WILL ENSURE THAT (I) PROCESSING & ANALYSIS, (II) REPAIRS AND UPDATES, (III) DISPLAY, ANNOUNCEMENT, TRANSFER, DISSEMINATION, DISCLOSURE AND (III) DELETION OR DESTRUCTION WILL BE CARRIED OUT IN ACCORDANCE WITH THE PROVISIONS OF THE LAW

DVL shall take steps to ensure that (i) processing & analysis, (ii) correction and updating, (iii) display, announcement, transfer, dissemination, disclosure, and (iii) deletion or destruction will be carried out in accordance with the provisions of the Law.

For example, DVL will stop processing Personal Data if You withdraw your consent in accordance with the provisions of the Law. DVL will also update, correct errors and inaccuracies in Personal Data after DVL obtained information to do so from You as the subject of Personal Data.

DVL WILL TAKE SECURITY MEASURES TO PROTECT YOUR PERSONAL DATA

DVL has implemented various technological and organizational procedures and measures to ensure the integrity and confidentiality of your Personal Data from unauthorized access, use and disclosure. These measures should take into account the state of the art, costs of implementation and the nature, scope, context and purposes of processing as well as risks of varying likelihood and severity to the rights and freedoms of natural persons.

For example, DVL store Your Personal Data on servers that have various types of technical and physical access controls, which may include, for example, where necessary, encryption. DVL may also aggregate or anonymize Personal Data to ensure that no personally identifiable information is passed on to third parties.

DVL WILL KEEP YOUR PERSONAL DATA AS LONG AS NEEDED

DVL will retain Your Personal Data only for the period necessary to fulfill the purposes for which it was collected, as outlined in this Notice. As an exception, DVL is required to retain Your Personal Data for longer periods as required by law.

DVL WILL ENSURE THAT YOU HAVE RIGHTS TO YOUR PERSONAL DATA

You can exercise your rights as provided by data protection laws. To that end, the DVL informs you that You have the right to:

- obtain information about clarity of identity, basis of legal interest, purpose of request and use of Personal Data, and accountability of the party requesting Personal Data.
- complete, update, and/or correct errors and/or inaccuracies in Personal Data in accordance with the purposes for which the Personal Data is processed.
- gain access to and obtain a copy of Personal Data about him/herself in accordance with the provisions of laws and regulations.
- end processing, delete, and/or destroy Personal Data about him/her in accordance with statutory provisions.
- withdraw consent to the processing of Personal Data about him/ her that has been given to Us.
- raise objections to decision-making actions based solely on automated processing.
- delay or limit the processing of Personal Data in proportion to the purposes of the Personal Data processing.

You also have the right to other things, as stated in the applicable laws and regulations. If You wish to exercise any of these rights, please contact us as described in the "How to Contact Us" section below, and DVL will take the necessary steps to respond as soon as possible.

HOW TO CONTACT US

DVL welcomes any questions or comments You may have regarding this Policy or its implementation. Any such questions or comments, including any requests relating to the use of Your Personal Data should be submitted to the following email address:

Email: info@darya-varia.com

Address: South Quarter Tower C Floors 18-19

Working Hours: 09.00 – 17.00 from Monday – Friday (except national holidays)