

Privacy Statement

Introduction

Protecting your personal information is important to us. We have, therefore, created this statement in accordance with the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679 the "GDPR"). GDPR strengthens and unifies data protection across the European Union. It also applies to all organisations that hold or process the personal information of EU-based individuals.

The legislation is intended to ensure that all personal information held by organisations (including, for example, a work email address) which might allow you, as an individual, to be identified, is accurate and secure and there is no mis-use of personal information by that organisation.

This document sets out how Nogra Pharma Limited ("Nogra") collects, uses and safeguards the personal information that you, as an individual, provide to us.

This statement covers all communication with Nogra, including users of our website.

In this privacy statement:

"you" or "your" refers to you as an individual and not to any legal entity (such as your employer) which you may be representing by viewing our websites or communicating with us

"our", "ours", "we" or "us" refers to Nogra.

Please note, if you provide personal information relating to other individuals (for example contact details in a work context), you must either advise those individuals of the details of this statement or provide them with a link to this statement.

By providing your information to Nogra you consent to the collection and use of your personal information in the manner set out below.

The privacy statement covers only Nogra. It does not cover the privacy policies of other entities which may be accessible through, or linked to, any Nogra website or communication.

We will not notify you separately of any changes or updates to this privacy statement, but instead will post them to this page. Any change or update will be effective immediately upon posting.

Should you have any questions on this statement, please email them to: info@nographarma.com

Collection of personal data

When you visit a Nogra website or contact us, Nogra may collect personally identifiable information about you from information provided by you.

This can include the following information relating to you: name, address (residential or corporate), geographical location, email address, contact details, corporate contact information, correspondence records.

We may also obtain personal information on you from other public sources.

Purposes of Processing and Legal basis for processing

Generally, Nogra will use the personal information provided by you to:

Respond to your queries or engage in other correspondence with you

Maintain or update contact data about you or a third party (for example your employer) within Nogra's systems

Enable us to act on any agreement with you, your employer or any other relevant third party

Provide information to any third parties that may host, maintain or manage services for Nogra, solely to the extent necessary to fulfil their hosting, maintenance or service management functions.

We will never share your personal information with others for marketing purposes, unless you have given us your explicit permission to do so.

Accordingly, you understand that we may use your personal information for the purposes as described above, provided that we are acting in a fair, transparent and accountable manner and that we have taken appropriate steps to prevent the activity having any unwarranted impact on you and also noting your right to object to such use, as discussed below.

Should we wish to use your personal information for other purposes (including, if applicable, any purpose that requires your additional consent), we will contact you.

Recipients of Data and Transfer of Data

Nogra may disclose personal information to:

Entities within the Nogra group, its service providers and their respective affiliates engaged by Nogra to process data for the above-mentioned purposes;

To regulatory authorities, courts and bodies as required by law or to service providers for internal investigations and reporting.

The disclosure of personal information to the third parties set out above may involve the transfer of data other jurisdictions outside the European Economic Area ("EEA") which may include Switzerland and the United States. Any transmission of personal information by Nogra or its service providers outside the EEA shall be in accordance with the conditions of the GDPR. These countries may not have the same data protection laws that apply in the EEA, but Nogra will authorise its group entities or other service providers to transfer personal information to other countries only where standard contractual clauses or other safeguards permitted under the GDPR have been put in place with parties to whom personal information will be transferred.

Nogra and its service providers apply appropriate information security measures designed to protect personal information in its or its service providers' possession from unauthorised access by third parties or from any form of computer corruption.

Third party sites

Our communications may contain links to third party websites. As we do not control the information on these websites, you should review their privacy policies and cookies to learn about how that website may collect and use your personal information.

When accessing any third party sites that may be linked you will leave this website. These third party sites are not controlled or endorsed by Nogra. Nogra is not responsible for the contents, operation or security of such sites.

Retention period

Nogra will retain personal information only for as long as required for the purposes set out above. Once the personal information is no longer required, we will take appropriate steps to dispose of any records containing your personal information, to the extent this is operationally feasible and proportionate.

Data subject rights

Where Nogra holds personal information, the owner of that information has the following rights, in certain circumstances, in relation to their personal information:

Right to access any personal data held

Right to have any inaccurate personal data rectified

Right to restrict the use of personal data

Right to request that personal data is erased

Right to object to the processing of personal data

Right to obtain a copy of any personal data held in electronic form (data portability)

Nogra will notify you of any personal data breach affecting you that is likely to result in a high risk to your rights and freedoms.

You also have the right to lodge a complaint with the Office of the Data Protection Commissioner, or your local supervisory authority, if you consider that the processing of your personal information by us infringes the data protection legislation.

If your personal information has changed or requires correcting, please let us know by emailing info@nographarma.com so that we can update our records.

Opting out of receiving communications

Nogra and its service providers may from time to time send communications to you. All such communications from us include an "unsubscribe" link which can be clicked should you no longer wish to receive these types of communication from us.

Alternatively, you can send an email to info@nographarma.com requesting to be removed from some of or all our mailing lists.

Personal data requests

Any questions about our use of your personal information should be directed to Nogra at <u>info@nographarma.com</u>