

## **PHOENIX - Data Protection Declaration**

In the following statement we would like to inform you about the processing of your information when using Speakap. We prepare this notice in compliance with local data protection laws and the EU General Data Protection Regulation (GDPR).

### **1. Controller & Data Protection Officer**

Speakap is provided by PHOENIX Pharmahandel GmbH & Co KG, Mannheim, Germany (PHOENIX) in cooperation with its Affiliate(s), i.e. with your employer who decided to take part in this social media/communication platform. In this statement "We" means PHOENIX and your employer together. PHOENIX group means all PHOENIX's Affiliates.

Please note your employer is always your contact point for all issues related to the personal data processing:

You can reach your local data protection officer via e-mail ([data.protection@united-drug.com](mailto:data.protection@united-drug.com)) or via our postal address to: PHX Ireland Limited, United Drug House, Magna Business Park, Magna Drive, Citywest, Dublin 24, Ireland with the addition "the data protection officer".

Your employer processes your personal data within Speakap as the Data Controller and is therefore responsible for most of the data processing within Speakap. Certain personal data may be shared with PHOENIX group on a controller-to-controller basis, but always respecting the obligations under the GDPR regarding such data sharing.

### **2. Processing of personal data in relation to the user account**

Every employee (user) has her/his own user account within Speakap. This user account is based on the e-mail address (private or business) your employer is using already for work related topics or HR communication or which you have given voluntarily when you opted in to use Speakap. We create your user account in order to establish social/communication media for employees within PHOENIX group, so we can all communicate and share the work information and knowledge. This data using is based on either our legitimate interest or your opt in consent.

If you do not want to have a user account, please contact us before you register. Any non-active accounts can be deleted upon request (see the contact details above).

You can activate your account via the registration process during which you will accept the Terms of Use. Once the account is activated it can be deactivated only according to the Terms of Use.

When an employee leaves us, the user profile is deactivated. This means that we delete the private or business e-mail address (used for the account) and the employee's name is no longer visible in Speakap. Posts and comments created so far remain visible and are made anonymous after a period of one year. We need to keep the history related to the user account so we can protect our assets and rights as the Employer and Provider of a social platform (incl. exercise or defence of legal claims).

### **3. Processing of personal data related to the registration and using of Speakap**

During the registration process and when using the Speakap application, the following personal data is collected as entered by you.

- E-Mail address
- Name
- Surname
- Mobile Number (optional)
- Avatar / user image
- Posts
- News
- Shared Pictures
- Likes
- Comments
- Polls
- Events

If you are posting content, you are using the service of Speakap. We process your data to provide you with the social media services, for which you have registered to (performance of contract). Be aware that your post shall be related to the business or business culture (see the Terms of Use). Speakap posts can be seen by all of your company members, department and team members or the members of a certain group, private or public, you are a member of . You are responsible for the content you are sharing via posts, comments or chats.

We base the data processing also on our legitimate interest; Speakap is the employment social/communication media within the organisation. We keep the user history to protect our assets and rights as Employer/Provider of a social platform; e.g. exercise or defence of legal claims.

#### **4. Push notifications**

When you download the Service on your mobile phone, you are asked if you want to receive push notifications. You can always change your choice at any time using the settings on your mobile phone respectively in the settings of the app itself. In order to receive push notifications we make use of third parties that are located outside the European Economic Area, including Apple and Google.

You have the right to withdraw your consent for push notifications at any time. Your withdrawal, however, does not affect the lawfulness of processing based on your consent before withdrawal.

#### **5. Cookies & Technical data processing during the visit of Speakap**

The technical provider of Speakap and main Data Processor is:

Workforce IT GmbH  
 Kaiser-Wilhelm-Ring 27-29  
 50672 Köln, Germany  
 (Technical provider)

When you use Speakap, data (detailed below) will be collected which your browser automatically transmits to the Speakap server.

Data Automatically collected:

- IP address

- date and time of the request
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/HTTP status code
- amount of transferred data
- Referrer URL
- Browser Type
- Operating system and its interface
- Language and version of the browser software

Please note each use of Speakap is documented and archived with IP address, MAC address, the type of browser, the operating system, account number, pages visited within Speakap, date and duration in order to indemnify us if necessary and to prove which user used Speakap and when. This user access data is erased after 30 days. Specifically, IP addresses are stored in session tables but are purged after the session expires or the user logs off. We process your data to provide you with the social media services, for which you have registered. We base this processing also on our legitimate interest, i.e:

(a) Protection of IT systems, assets and rights of the Data Controller; e.g. exercise or defence of legal claims.

(b) Improvement of systems, tools and platform's functions as a benefit for the Data Controller and Users.

## **6. Your Data Privacy Rights**

Here you can find your rights related to your personal data:

### **Right of Access**

You have the right to request confirmation that your personal data is processed and also have the right to request copies of that data according to Art. 15 GDPR.

### **Right to rectification**

In accordance with Article 16 of the GDPR, you have the right to request the completion or correction of inaccurate data concerning you.

### **Right to erasure**

In accordance with Art. 17 GDPR, you have the right to request that relevant data be deleted providing there are no legal obligations preventing the deletion.

You are also able to delete self-created content such as posts or comments on the platform by yourself. If you need assistance with the erasure of comments or posts, please contact your local country admin. Contact information can be found in the local version of this statement

### **Right to restriction of processing**

You may request a restriction of the processing in accordance with Art. 18 GDPR

### **Right of data portability**

You have the right to request to receive the data provided to us in accordance with Art. 20 GDPR and additionally to request its transmission to other processors.

### **Right to object**

You may object to the future processing of your data according to Art. 21 GDPR at any time.

The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

**Right to notify the supervisory authority**

Please contact us at [data.protection@united-drug.com](mailto:data.protection@united-drug.com) with any questions or complaints in relation to how we process your personal data. In accordance with Art. 77 GDPR you have the right to file a complaint with the relevant competent supervisory authority:

**Office of the Data Protection Commissioner.**

Canal House, Station Road,  
Portarlinton,

Co. Laois, R32 AP23,

Ireland

Phone +353 (0761) 104 800

Fax +353 57 868 4757

Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

Date of last review and update: September 2023