

## Privacy Policy

### I. Basic Information

This Privacy Policy declaration is intended to inform the users of this website about the type, scope and purpose of the collection and use of personal data by the website operator DRAPALIN Pharmaceuticals GmbH ("DRAPALIN"). DRAPALIN takes the protection of your personal data very seriously and treats these data confidentially and in accordance with the statutory provisions. Since changes can be made to this Privacy Policy declaration due to new technologies and the constant further development of this website, we recommend that you read this Privacy Policy declaration again at regular intervals.

According to Art. 4 (1) GDPR, personal data is all information relating to an identified or identifiable natural person, such as name, address, e-mail address, telephone number or user behavior.

Furthermore, the definitions of the terms used in this data protection declaration (e.g. "processing") are contained in Art. 4 GDPR.

Responsible for processing in accordance with Art. 4 (7) GDPR is

Drapalin Pharmaceuticals GmbH

represented by the managing directors Ms. Lana Korneva and Mr. Konstantin Lubsky

Address: Hofmannstraße 52

81379 Munich

e-mail: [datenschutz@drapalin.de](mailto:datenschutz@drapalin.de)

Phone: +49 (0)89 245 807 89

Fax: +49 (0)89 999 502 44

### II. Purpose of this Website

This website is primarily intended for purely informative purposes about the DRAPALIN company. In addition, information for professional circles is provided in the secure login area.

In addition, after registration, customers can place online orders for DRAPALIN products via the order form in the secure area for professional circles (see Chapter VI. "Data collection and transmission for orders via the order form for professional circles").

Various DRAPALIN e-mail addresses are displayed on this website which serve to establish contact. The handling of messages sent to these e-mail addresses is explained in more detail in the section "Handling of contact data and enquiries via e-mail and the contact form" and in the following chapters.

### **III. Access Data**

#### Type of data collected during website use and Storage Period

DRAPALIN collects data on access to the website on the basis of a legitimate interest (in accordance with Art. 6 para. 1 sentence 1 letter f) GDPR) and stores these data as "server log files" on the website server. The following data are logged in this way:

- Visited website
- Time at the time of access
- Quantity of data sent in bytes
- Source/reference from which you accessed the website
- Used Browser
- Internet provider used
- Operating system used
- IP address used

DRAPALIN cannot draw any conclusions about your person or your personal data from the data collected.

The server log files are stored for a maximum of 7 days and then deleted. The data is stored for security reasons, e.g. to clarify cases of abuse. If the storage of data is necessary for reasons of evidence, they are excluded from deletion until the facts have been finally clarified.

#### Cookies

Cookies are used on this website on the basis of a legitimate interest in accordance with Art. 6 Para. 1 Sentence 1 letter f) GDPR in order to increase the user-friendliness and security of this website. Cookies are small text-based files which are stored on your terminal device. Your browser accesses these files. The use of cookies increases the user-friendliness and security of this website.

The cookies used on this website do not store any personal data of website visitors. However, to improve our online offer, we do store (without personal reference) your access data to this website. By making the data anonymous, it is not possible to draw conclusions about your person.

The following cookies are used on this website:

Name	Provider	Purpose	Content of the cookie (example)	Expiry Time
PHPSESSID	WordPress	Saves the user's session in the form of a session ID, without reference to the identity of the user (see example content of the cookie). This is only used to associate several requests from a user on a page with that user's session.	g17mn4nelu4kaqqnqcof0fjk15	After closing the browser

If you do not want cookies to be stored on your terminal device, you can select the appropriate option in your browser settings. Common browsers contain the setting option not to allow cookies. Instructions for this can be found on the website of your browser provider.

Note: It is not guaranteed that you can access all functions of this website without restrictions if you make the appropriate settings.

#### **IV. Collection and Processing of Personal Data**

DRAPALIN only collects, uses and passes on your personal data if this is permitted by law or if you have consented to the collection and passing on of data.

Handling of contact data and enquiries via e-mail and the contact form

If you contact DRAPALIN via the contact options offered (e-mail address or contact form), your message and the contact data contained in the e-mail or contact form (such as e-mail address, name, details in the e-mail signature) are stored in the DRAPALIN e-mail service programme. This is necessary so that these data can be accessed for the efficient processing of your request. The stored data will be deleted after completion of the process.

By clicking on the "Send" button on the contact form, you declare your consent to the use of your data to contact you and to the storage and processing of the data for this purpose. A processing or use for other purposes does not take place.

You can revoke your consent at any time and without giving reasons by using the contact options provided in the section "Right of Objection".

Data processing in the context of contacting us is carried out in accordance with Art. 6 Para. 1 Sentence 1 lit. a) GDPR on the basis of your voluntarily given consent.

#### Use of Google Analytics, Social Media Plug-Ins or other tracking or analysis tools

None of these services are currently used by DRAPALIN.

#### Newsletter Subscription

You can subscribe to the online newsletter ("Newsletter") of DRAPALIN via this website. In our Newsletter we regularly inform you about current developments in the field of medical cannabis, about our company and about our webinars and events. The newsletter is sent by e-mail approximately every four to eight weeks.

You can subscribe to the Newsletter via our website using a double opt-in procedure. This means that you must first enter your e-mail address and confirm that you accept the terms of this privacy policy. Then click on the "Subscribe" button and you will receive a registration e-mail to your e-mail address. In this mail you must click on the registration link to complete the registration process.

Only your e-mail address is collected and processed for the newsletter subscription. This will be used for sending the newsletter and for documenting your consent to this. It will not be used for other purposes. Your e-mail address will not be stored under a pseudonym. It will not be used for statistical surveys.

Within the scope of the newsletter dispatch your e-mail address will be sent to the dispatch service provider

Sendinblue GmbH

Köpenicker Straße 126

10179 Berlin

Internet: <https://de.sendinblue.com>

In order to protect your rights, DRAPALIN has concluded a contract with the dispatch service provider for order processing within the meaning of Art. 28 GDPR.

The Privacy Policy guidelines of the dispatch service provider can be found here: <https://de.sendinblue.com/legal/privacypolicy/>

The collection, processing and forwarding of your e-mail address is based on the consent you have given us in accordance with Art. 6 para. 1 lit. a) GDPR.

Your e-mail address remains stored in our Newsletter distribution list until you cancel your newsletter subscription or revoke your consent for its use. Each Newsletter e-mail contains a link via which the newsletter subscription can be cancelled. In addition, you can revoke your consent at any time by sending us a message using the contact details provided in the section "Right of objection". For further details, see also chapter VII "User Rights".

#### Login to the protected area for Professional Circles

On this website DRAPALIN provides a password-protected area for medical professional circles. Here, information material on DRAPALIN products can be called up and orders placed.

Access to the area for professional circles is only possible with an existing account with the DocCheck specialist portal: <https://www.doccheck.com>

You can view the DocCheck privacy policy declaration here: [info.doccheck.com/en/privacy](https://www.doccheck.com/en/privacy)

To log in, you must enter the access data for your DocCheck account (e-mail address and password). An automated check will then be carried out to verify the existence of an account registered with DocCheck. If the result of this check is positive, access will be granted to the area for professional circles.

DRAPALIN has at no time access to or insight into the data required for login or otherwise stored in the DocCheck portal. In this respect, no data collection by DRAPALIN takes place.

DRAPALIN assumes no liability for the misuse of your login data, unless this was caused by DRAPALIN itself.

### **V. Passing on of Personal Data to Third Parties and Third-Party Providers**

DRAPALIN stores your recorded data in principle only for its own purposes and only passes them on to third parties for the processing of orders via the order form (see section VI. "Data Collection and Transmission for Orders via the Order Form for

Professional Circles" and for the dispatch of Newsletters (see section "Newsletter subscription"). Otherwise, data will only be passed on to third parties if

- you have given your express consent in accordance with Art. 6 Para. 1 Sentence 1 lit. a) GDPR,
- the disclosure pursuant to Art. 6 para. 1 sentence 1 lit. f) GDPR is necessary for the assertion, exercise or defence of legal claims and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data,
- there is a legal obligation for the transfer under Art. 6 para. 1 sentence 1 lit. c) GDPR, as well as
- this is legally permissible and is required under Art. 6 para. 1 sentence 1 lit. b) GDPR for the processing of contractual relationships with you. For further details, please refer to Chapter VI "Data Collection and Transfer for Orders via the Order Form for Professional Circles". In addition, you will be informed in advance which data will be passed on, for what purpose and to whom.

No data is transferred to third countries. Should DRAPALIN be induced to make such a data transfer by the applicable law in each case, DRAPALIN will inform you of this legal obligation immediately before processing, unless the applicable law prohibits such information for reasons of public interest.

## **VI. Data Collection and Transfer for Orders via the Order Form for Professionals**

For orders placed via the order form in the secure area for specialist circles, the provisions of this data protection declaration apply in accordance with the following provisions.

Registration is required for the qualification of the Customer and for the processing of the order process. For this purpose, the following data of the Customer will be collected and stored:

- Name and first name of the contact person
- Trade name of the pharmacy
- Delivery address
- e-mail address
- Phone number
- Narcotics license and narcotics number

The presentation of the narcotics subscriber number is required to verify the customer's entitlement to purchase narcotics.

With the initial order via the order form, the customer is permanently created in DRAPALIN's internal customer portal with the above-mentioned data after appropriate verification. This is done with the purpose of facilitating the ordering process for future orders.

The business name of the pharmacy and the delivery address are transmitted to the logistics service provider of DRAPALIN, Med-X-Press GmbH (with its registered office at Pracherstieg 1 in 38644 Goslar).

The legal basis for data processing and transmission in accordance with this chapter is Art. 6 para. 1 sentence 1 lit. b) GDPR.

## **VII. User Rights**

As a user, you have the right to receive, upon request, free information about what personal data about you has been stored. In particular, you can request information on the processing purposes, the category of personal data, the categories of recipients to whom your data has been or will be disclosed and the planned storage period.

You also have the right to obtain completion, correction of incorrect data, opposition to processing, restriction of processing and deletion of your personal data. If applicable, you may also exercise your right to data portability.

### Right of appeal

If you believe that your data have been processed unlawfully, you can lodge a complaint with the relevant supervisory authority.

The competent supervisory authority is the

### **Bayerisches Landesamt für Datenschutzaufsicht**

Promenade 18  
91522 Ansbach  
Germany

postal address:  
PO Box 1349  
91504 Ansbach

Phone: +49 (0) 981 180093-0  
Fax: +49 (0) 981 180093-800  
e-mail: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)

### Deletion of Data

You have the right to have your data deleted, unless processing is necessary to fulfil a legal obligation (e.g. data retention), to exercise the right to freedom of expression and information, for reasons of public interest or to assert, exercise or defend legal claims.

The data stored by DRAPALIN will be deleted if they are no longer required for their intended purpose and no statutory retention periods prevent this. If deletion of the data cannot be carried out because their storage is necessary for the fulfilment of a legal obligation, data processing will be restricted to the corresponding purpose. In this case no data processing for other purposes will take place.

### Right of Objection

If your personal data are processed on the basis of legitimate interests in accordance with Art. 6 (1) Sentence 1 lit. f) GDPR, users of this website have the right to object to the processing of their personal data at any time with effect for the future.

If you wish to correct, block, delete or obtain information about the personal data stored about you, or if you have questions regarding the collection, processing or use of your personal data, object to the processing of your data or, if applicable, wish to revoke any consents you may have given, please use one of the following contact options

post address:       Drapalin Pharmaceuticals GmbH  
                          Abteilung Datenschutz  
                          Hofmannstraße 52D - 81379 München  
                          Germany

e-mail:               datenschutz@drapalin.de

fax:                   +49 (0) 89 999 502 44