

Privacy policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the use of our website and provision of our services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 In this policy, "we", "us" and "our" refer to MMPINFO DOO.[For more information about us, see Section 14.]

2. Credit

- 2.1 This document was created using a template from Docular (<https://seqlegal.com/free-legal-documents/privacy-policy>).

3. The personal data that we collect

- 3.1 In this Section 3 we have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.
- 3.2 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name and email address. The source of the contact data is you because you provide them when you register on mymedpharm.info. If you log into our website using a social media account, we will obtain elements of the contact data from the relevant social media account provider.
- 3.3 We may process your website user account data ("**account data**"). The account data may include your account identifier, name, email address, and other data that you enter in your profile on mymedpharm.info. The primary source of the account data is you, although some elements of the account, such as account identifier, data may be generated by our website. If you log into our website using a social media account, we will obtain elements of the account data from the relevant social media account provider.
- 3.4 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.
- 3.6 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the

timing, frequency and pattern of your service use. The source of the usage data is analytics tracking systems, such as Google Analytics and Yandex Metrika. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>. You can find out more about Yandex's use of information by visiting <https://metrika.yandex.com/about/info/data-policy/> and you can review Yandex's privacy policy at <https://yandex.com/legal/confidential/?lang=en>.

4. Purposes of processing and legal bases

- 4.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 4.2 **Operations** - We may process your personal data for the purposes of operating our website and providing our services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services and business.
- 4.3 **Relationships and communications** - We may process contact data, account data and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our website visitors, service users, individual customers and customer personnel, the maintenance of relationships, and the proper administration of our website, services and business.
- 4.4 **Direct marketing** - We may process contact data, account data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email. The legal basis for this processing is your consent for the use of your personal data that you give when you create an account on mymedpharm.info.
- 4.5 **Research and analysis** - We may process usage data for the purposes of researching and analysing the use of our website and services, as well as researching and analysing other interactions with our business. The legal basis for this processing is your consent for the use of your personal data that you give when you create an account on mymedpharm.info.
- 4.6 **Record keeping** - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.
- 4.7 **Security** - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.

- 4.8 **Insurance and risk management** - We may process your personal data where necessary for [the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 4.9 **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 4.10 **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

5. Providing your personal data to others

- 5.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.
- 5.2 Your personal data held in our website database will be stored on the servers of our hosting services providers AWS.
- 5.3 We may disclose usage data to our suppliers or subcontractors insofar as reasonably necessary for the purposes of placing advertisement on our website or advertising our website with the help of our suppliers or subcontractors.
- 5.4 Financial transactions relating to our website and services may be handled by our payment services providers, namely *[TBD]*. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at *[URLs]*.
- 5.5 In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6. International transfers of your personal data

- 6.1 In this Section 6, we provide information about the circumstances in which your personal data may be transferred to a third country under Montenegro data protection law.

- 6.2 The hosting facilities for our website are situated in the United States. The competent data protection authorities have made an adequacy determination with respect to the data protection laws of each of these countries.
- 6.4 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

7. Retaining and deleting personal data

- 7.1 This Section 7 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 7.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 We may store your personal information for an extended period of time, depending on how we need to use the information. For example, we'll keep your email address and name on file as long as you have an account with us. In addition, we may need to keep your transaction data on file for an extended period of time to maintain our internal transaction records.

8. Your rights

- 8.1 In this Section 8, we have listed the rights that you have under data protection law.
- 8.2 Your principal rights under data protection law are:
- (a) **the right to access** - you can ask for copies of your personal data;
 - (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
 - (c) **the right to erasure** - you can ask us to erase your personal data;
 - (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
 - (e) **the right to object to processing** - you can object to the processing of your personal data;
 - (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
 - (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
 - (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.
- 8.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting

https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelines-recommendations-best-practices_en.

- 8.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

9. About cookies

- 9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 9.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

11. Cookies used by our service providers

- 11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 11.2 We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>.
- 11.3 We use Yandex Metrica. Yandex Metrica gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Yandex's use of information by visiting <https://metrica.yandex.com/about/info/data-policy/> and you can review Yandex's privacy policy at <https://yandex.com/legal/confidential/?lang=en>.

12. Managing cookies

- 12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop> (Firefox);

- (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and
- (f) <https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you will not be able to use all the features on our website.

13. Amendments

13.1 We may update this policy from time to time by publishing a new version on our website.

13.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

13.3 We may notify you of significant changes to this policy by email.

14. Our details

14.1 This website is owned and operated by MMPINFO DOO.

14.2 We are registered in Montenegro under registration number 51117714, and our registered office is at Ilino BB, Bar, 85000 Montenegro.

14.3 Our principal place of business is Ilino BB, Bar, 85000 Montenegro.

14.4 You can contact us:

- (b) using our website contact form;
- (d) by email, using contact@mymepharm.info.