



Privacy Policy

This Privacy Policy (the "Policy") is issued by Lenis d.o.o. and all affiliated companies (Lenis Group). A list of all Lenis affiliated companies is available at www.lenis.si. References in this Notice to "we", "us", "our", and similar expressions refer to Lenis Group.

Collecting, handling and using of Personal Information

Lenis group ensures that we collect and process your personal data for specific purposes and to the smallest extent possible and store them only for the time required to fulfil the purpose, for which they were collected. Lenis will process your Personal Information fairly, meaning that we are transparent about how we process Personal Information and that we will process it in accordance with applicable law and the information we provide with this Policy or with any other or additional Notice you may have been provided with. Personal Information that we process is accurate, complete and, where necessary, kept up to date.

The information we collect will be used for the specific purposes, for our internal analytics purposes and to make our Services easier for you to use and navigate, to personalize the content of our Services to your preferences and to personalize and improve our interactions with you by making the information we provide more relevant to you. We also can use it to facilitate participation in surveys, research, promotions and other interactive features or to respond to your request and enquiries (e.g., for sending e-mails).

We may also be obliged to disclose your information to other recipients (for the provision of services such as sending e-mails and web site analytics) or to meet a legal obligation, for example when we need to report an adverse event.

We may also obtain your personal information from third parties or may combine the personal information we have about you with information that we may obtain from other sources, including publicly available sources such as public databases, registries, search engines, social media platforms and from databases operated by other third parties such as vendors, business partners, data brokers, healthcare professional and healthcare providers. In particular, we may perform analyses of pseudonymized health data we obtain from relevant healthcare, research or other relevant organizations, or use third parties such as social media platforms to conduct targeted advertising in which case such social media platforms may act as independent or joint controllers with us to provide such services.

We may also process personal information that you make manifestly publicly available on social media platforms such as e.g., Facebook, Twitter, LinkedIn, Google, etc. and other relevant public blogs, forums and communities.

We strongly recommend you get familiarized with the privacy settings of those social media platforms and exercise your rights with them accordingly because Lenis does not control the privacy practices of these third parties.

Legal basis for processing Personal Information

We will collect and process the Personal Information described above when one of the following applies to our Services:

- You have given to us your consent to process your Personal Information. We will normally need your consent in the following circumstances: (a) according to the relevant cookie banner that you may be presented with when we are using cookies and other tracking technologies for optional activities such as for analytics purposes (but not for essential and strictly necessary cookies that are collected automatically on the basis of our legitimate interest to operate and provide our Services); (b) if you use the Services to share sensitive Personal Information with us such as your health information; (c) if we use the Services to communicate with you proactively via electronic means such as emails or SMS; (d) if we store your information for future recruitment opportunities and contact you regarding relevant positions. You can withdraw your consent at any time.
- Where necessary for the performance of a contract concluded with you or where you request us to take steps prior to entering into a contract with you, for e.g. to fulfil all of our obligations towards you arising from such contract, including managing your orders, arranging the provision or receipt of goods and services, and making payments to you for services provided, reimbursement of expenses, or discounts; where necessary, to manage information related to your attendance at an event; to process inquiries or where you submitted questions.
- We need to meet a legal obligation, such as when we need to report an adverse event about any of our products.
- Where the processing is in our legitimate interests to provide the Services and not overridden by your data protection interests or fundamental rights and freedoms, for example, to contact you or otherwise provide you with information about Lenis's products or events (where your consent for receiving direct marketing communications is not required) or to tailor our communications to you based on your expertise and professional interests.
- We need to process your Personal Information to enable us to establish, exercise or defend legal claims or proceedings.

In cases where our processing of your Personal Information is not already covered by any of the above legal bases, we will either provide you with a separate privacy notice stating relevant legal basis or we will obtain your prior, explicit and specific consent to do so.

Recipients of your personal data

We disclose your Personal Information to the following categories of recipients (in all cases, only where necessary for the performance of their functions):

- our personnel (including employees and external consultants), professional advisers, and agents;
- other functions and companies within the Lenis group of companies worldwide which provide IT support, server hosting services, and other group services such as human resources, finance, compliance, legal, and other support services. A list of all Lenis affiliated companies is available at www.lenis.si;
- third-party service providers that process your personal data on our behalf and are contractually required to keep your personal data confidential and to protect it appropriately, such as:
 - providers of IT support services, website hosting, customer relationship management hosting, event management, and analytics services;
 - in the case of supplier personal data: providers of administrative, advisory, and logistical support services;
 - investment firms for benefits administration purposes, training providers, providers of support and hosting services for inquiry databases and other databases; and
 - providers of various human resources, travel, and administrative services;
- governmental authorities (including tax authorities), regulatory agencies, and law enforcement officials, where necessary for the purposes described above, where required by law, or where necessary for the establishment, exercise, or defence of our legitimate interests in accordance with applicable laws;
- if you are a healthcare professional, relevant regulators as necessary, such as the European Medicines Agency and pharmaceutical self-regulatory bodies such as the European Federation of Pharmaceutical Industries and Associations in Europe;
- in connection with the effective management of our relationships, the protection of our legitimate interests, or the fulfilment of our legal obligations, we may disclose your personal data to service providers such as banks, postal service providers, lawyers, auditors, and similar parties. When engaging such providers, we require them to strictly comply with all applicable data protection laws and regulations, as well as any specific rules applicable to their activities and to the protection of information processed in the course of such activities.

In particular, in the field of pharmacovigilance, Lenis and the local companies that act as the so-called marketing authorization holder may have to share information with regulatory authorities to the extent the data is potentially relevant to such authorities for reasons of drug safety and in an anonymous manner. To ensure the safety of our products and to advance the safety of medical procedures, the global accessibility of information is of utmost importance. Such reports contain details about the event but will only contain limited personal data.

- Patient identifiers: Information as provided, including age or year of birth, gender and initials (note that patient name will never be provided further).

- Reporter information: Information as provided (Including full name, profession, address, email address, and telephone number), will be collected to allow us to follow up with the reporter for additional information or for confirmation purposes.

International Transfers

Lenis operates internationally and will transfer your information to the recipients listed in the previous section. When transferring information outside your country, Lenis complies with local privacy protection laws.

When transferring personal information to third countries, Lenis generally relies on the European Commission's adequacy decision (or the corresponding local authority's decision) regarding the transfer of personal data to third countries. When transferring personal data to other countries outside the EEA that are not subject to an "adequacy decision" by the European Commission (or the relevant authority), Lenis generally relies on the standard contractual clauses approved by the European Commission.

Retention of personal data

We retain Personal Information we collect from you where we have an ongoing legitimate business need or legal obligation to do so and according to the Lenis Privacy Policy which defines exact time periods for the retention of Lenis records. The criteria used to determine Lenis retention periods include:

- whether there is a legal obligation to which we are subject (e.g. for pharmacovigilance or tax & accounting purposes);
- whether we have an ongoing relationship with you and for how long;
- whether retention is due to actual or threatened or anticipated litigation or internal and external investigations or legal hold orders);
- whether there are any industry codes or best practices in any particular case.

In principle, we will not keep your Personal Information for longer than is necessary for the purposes for which we collected it and as outlined in this Notice or as required by law or contract.

Once we no longer need your data, we will securely destroy or dispose of it. After the retention period expires, personal data will be deleted, destroyed, blocked, or anonymized, unless otherwise required by applicable law.

Security

We have implemented strict security measures to minimize the risk of breaches and misuse of your personal data, such as unauthorized disclosure and unauthorized access to your data.

The equipment/facilities where we store personal data are located in a secure environment with restricted physical access (i.e., locked rooms).

We use firewalls, strong passwords, antivirus software, and other measures to protect personal data (such as encryption and pseudonymization).

Only authorized persons have access to personal data, and the processing activities are regulated by our internal policies and bylaws.

We regularly organize personal data protection training for our employees in order to inform them of their obligations arising from the data protection legal framework and to raise awareness of personal data protection within our organization.

Processing of personal data of individuals who are (potential) business partners, or personal data of individuals employed by (potential) business partners (suppliers, customers, etc.)

In the event that you are our contractual party as an individual, Lenis (the controller) processes your data for the purpose of performing the concluded contract or for the purposes of concluding a contract with you (e.g. for telephone, written and electronic communication, sending notifications, making payments, etc.). In this case, we process your name and surname, address, e-mail address, telephone, tax number, EMŠO, account number. Personal data is stored only for as long as it is necessary to achieve the purpose for which it was collected or further processed, or until the fulfilment of contractual obligations or until the individual withdraws their personal consent. In cases where the processing of personal data is based on your consent, you may withdraw your consent at any time without affecting the lawfulness of the data processing carried out on the basis of your consent until its withdrawal.

In cases where we process your personal data in connection with your employment with our potential or existing business partners (e.g. because you are a contact person at our existing or potential business partner or are responsible for business development, product development, commercialization, quality assurance, or are involved in regulatory procedures), Lenis (the controller) processes data about your first and last name, the name (company) of the company where you are employed, the location of the company where you are employed, job title, email address, telephone number, date of contact and email correspondence. Lenis therefore maintains a database of the above personal data on persons employed by existing and potential business partners in order to contact these persons and present their activities to them and agree on potential cooperation or development thereof. The purpose of the processing is to ensure effective business development of Lenis and regular communication with key stakeholders in the process for the purposes of achieving Lenis' business goals, as well as to keep records and create anonymized reports regarding the number of contacted persons and/or companies, the number and forms of activities related to the processes of the business development department.

In both cases, if necessary (e.g. if necessary for the implementation of the contract or for the purposes of potential legal claims, etc.), we may forward your personal data to courts, insurance companies, state authorities, bodies with public authority, and

upon explicit request also to other users who have a basis for obtaining personal data in law, the personal consent of the individual or a contractual relationship.

In both cases, your personal data may also be transferred to the United Kingdom, as one of the companies of the group of which Lenis is a part is located there, and the United Kingdom is a country that ensures an adequate level of protection of personal data, as follows from the European Commission's adequacy decision.

Pharmacovigilance purposes

Any personal data provided to Lenis related to adverse events or other activities related to pharmacovigilance will be used for these purposes. This information is very important for public health and will be used for the detection, assessment, understanding and prevention of adverse effects or any other medicine-related problem.

For the processing of personal data for pharmacovigilance, Lenis relies on a legal obligation and for reasons of public interest, as the processing is necessary to comply with Lenis legal pharmacovigilance (GVP) obligations.

We collect the name, contact details, affiliations/profession and other personal data of the reporting individual. We may collect some additional personal data related to health and medical history of the individual experiencing an adverse event if required for processing of adverse event for pharmacovigilance purposes.

Medical Information enquiries purposes

We may collect name, surname, and contact details of the inquirer, organization where the inquirer works, information whether the inquirer is a Healthcare Professional et cetera. We may collect health data or data relating to the medical history of an individual submitting an enquiry to us. We collect this information to respond to your enquiry and follow up with you, if necessary, in order to comply with our legal obligations. We may be required by law to report your data to the regulatory authorities, to the extent your enquiry is associated with an adverse event.

If we ask you to provide any other personal information not described above, then the personal information we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect your personal information.

Healthcare Professionals

We collect information about healthcare professionals when you interact with us or our representatives. In addition to personal identifiers, including contact details, we collect information relating to your profession and employment, including your professional title, the institution with which you are affiliated, your qualifications, and

your areas of interest. We also maintain records of our communications and meetings with you.

We also collect personal data from a number of third-party data sources, in particular from publicly available sources such as public registers of healthcare professionals, published journals and event materials, as well as from websites of healthcare professionals or their employers. We collect and process such publicly available data only to the extent that the purposes of such collection and processing are compatible with and relevant to the original purposes for which the data was made publicly available. We may also use third-party data providers to enhance our knowledge of the healthcare sector. Such data may include information regarding your roles, qualifications, specialty, employer, experience, publications, and other profession-related information.

Recruitment

Lenis collects and processes job applicants' and prospective candidates' personal data for recruitment and hiring purposes. This may include contact information (such as name, surname, address, email address, and telephone number), identification information, professional and educational background, employment history, qualifications, skills, certifications, references, and information contained in CVs, cover letters, application forms, or interview notes.

Lenis processes this personal data in order to assess candidates' suitability for employment, verify qualifications and experience, communicate with candidates during the recruitment process, conduct interviews, prepare potential employment or contractual agreements, comply with legal obligations, and take steps at the request of the candidate prior to entering into an employment relationship or contract.

Where permitted by applicable law, Lenis may also retain candidate information for future recruitment opportunities and contact candidates regarding relevant positions. Personal data will be processed in accordance with applicable data protection laws and retained only for as long as necessary for recruitment purposes or as required by law.

Cookies

Cookies are small files that are loaded on your computer, in order to improve the customer experience.

Cookies are not harmful and are always limited in time.

We use the following cookies:

Strictly necessary cookies:

They are a key and without site will not work as it should. Adjust when you submit the form, sign make a purchase online or perform any interaction with the website,

which goes beyond clicking on simple links. These cookies we do not need to get your consent.

Additional cookies:

They analyze traffic to sites that can improve the user experience. By using the website, you agree to install on your computer.

How to manage and disable cookies on your PC:

Storage of cookies is under your full control, because the browser you are using, storing limits or disable cookies.

For information about the settings for cookies, select the web browser you are using.

[Chrome](#)

[Firefox](#)

[Microsoft Edge](#)

[Opera](#)

[Safari](#)

If you disable cookies, some opportunities website disabled.

List of cookies used by this site:

- COOKIE NAME: __utma
- DESCRIPTION: Page view statistics
- SERVICES: Google Analytics
- COOKIE EXPIRE TIME: 2 years
- COOKIE NAME: __utmb
- DESCRIPTION: Page view statistics
- SERVICES: Google Analytics
- COOKIE EXPIRE TIME: 1 day
- COOKIE NAME: __utmc
- DESCRIPTION: Page view statistics
- SERVICES: Google Analytics
- COOKIE EXPIRE TIME: End of this session
- COOKIE NAME: __utmz
- DESCRIPTION: Page view statistics
- SERVICES: Google Analytics
- COOKIE EXPIRE TIME: 6 months

We use optional cookies only if you give us your prior explicit consent in our cookie management solution. You can withdraw your consent at any time simply by visiting the preference center in our cookie management solution.

How can you control cookies?

You have the right to decide whether to accept or reject some or all of the cookies that are not strictly necessary. You can change your cookie preferences and withdraw your prior consent at any time by using our cookie management solution that you can access by clicking the relevant link (typically available at the footer of our website).

You can also set or amend your web browser controls to accept or refuse cookies. If you choose to reject strictly necessary cookies on our website using your browser settings, you may still be able to use our website though your access to some functionalities and areas of our website may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

Your data protection rights

You have the right to withdraw your consent at any time, if you give it. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on legal bases other than consent.

You also have the right to request access to, rectification, correction or deletion of your Personal Information or restriction of the processing or the right to object to the processing to some limited circumstances by contacting Lenis at GDPR@lenis.si.

Please note that your rights mentioned above are not absolute. They are limited by the applicable regulations and do not need to be complied with in certain cases. In addition, you have the right to file a complaint with the supervisory authority in relation to the processing of your personal data (Contact details for data protection authorities in the European Economic Area are available [here](#)). For more information, please contact your local data protection authority. The data protection officer of Lenis can be contacted by e-mail GDPR@lenis.si.

How often will we update this Privacy Policy?

We may update this Privacy Policy from time to time in order to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. Please therefore re-visit this Privacy Policy regularly to stay informed about our use of cookies and related technologies.

This Privacy Policy was last updated in May 2026.