



Privacy and Cookie Statement

(version 2018-1)

1. Introduction

We, the International Federation of Pharmaceutical Wholesalers (hereafter: "IFPW") value your privacy. If you visit our website or we provide you with our services we may request you to provide information that includes your personal data. We may also receive your personal data from third parties (such as member associations and organizations) and that which is available in the public domain.

The purpose of this Privacy Statement is to be transparent on the processing activities that IFPW undertakes with regard to the personal data of individuals outside its own organization.

This Privacy Statement is subject to changes from time to time. We will always publish the most recent version of the Privacy Statement on our website so we advise you to consult it regularly.

2. Processing activities and purposes

The purposes of our processing activities are dedicated to our overall mission as a non-profit organization: "to help its members and stakeholders advance the safe, efficient and continuous access to pharmaceuticals worldwide through the promotion of good distribution practices and services."

In this paragraph we will set out the purposes of our processing activities under 2.1 up to and including 2.3, explaining which personal data we process for which purpose.

2.1 Providing membership benefits to IFPW members

Organizations (representing pharmaceutical wholesalers and distributors; pharmaceutical manufacturers; wholesaler associations; and service providers within the healthcare industry) may apply for membership in IFPW. Within the membership relationship, which establishes a contract between parties, IFPW keeps its members, and individuals from member-organizations, updated on developments in the pharmaceutical field.

The processing activities that IFPW undertakes to that effect include: sending newsletters and other publications (reports, presentations, press releases) on pharmaceutical topics by email; providing access to the content on the IFPW website; offering the opportunity to publish contact details within the IFPW network to connect with other professionals; offering invitations to educational and industry events by email; and collecting data, information and opinions by sending surveys and sharing the results.

The personal data that we (may) process in this regard are names, addresses (physical and email), country of residence, photos, phone numbers, gender, job titles, social media profiles, organizational affiliations, bank account and credit card information, and other voluntarily provided details.

2.2 Organizing conferences and meetings

We organize conferences and meetings to provide international networking opportunities and to provide content on developments and trends within the global pharmaceutical and healthcare industries.

The processing activities that IFPW undertakes for this purpose include collecting personal information of registrants and attendees; recording their registration (online and via facsimile); collecting payments from them; keeping them updated on event details by email and through mobile applications; including them on a

participants' list; offering them the opportunity to register as an IFPW member, indirect member or non-member; and providing them with IFPW newsletters and notifications of future events.

IFPW also assists in planning meetings between individuals from its membership and external stakeholders.

The personal data that we (may) process in this regard are names, addresses (physical and email), country of residence, photos, phone numbers, gender, job titles, social media profiles, organizational affiliations, bank account and credit card information, and other voluntarily provided details.

2.3 Informing website visitors of information on the pharmaceutical industry and the activities of IFPW

In accordance with its mission to advance the safe, efficient and continuous access to pharmaceuticals worldwide, IFPW aims to inform both pharmaceutical professionals as well as the general public. Information specific to members may be offered in restricted areas of the website.

The processing activities that IFPW undertakes to that effect include publishing information on developments, events, projects and research on its website, accessible by the URL: www.ifpw.com and www.ifpw.org. That information may contain personal data, such as names, job titles, business email addresses, photos and videos. On the IFPW website, hyperlinks are placed to the conference websites of IFPW, where personal data for the purpose, mentioned under 2.2. are collected

3. Cookies

Cookies are small files that are installed on your computer, mobile phone or tablet through your web browser.

The cookies we install when you visit our website <https://www.ifpw.com> may be divided into first party cookies (that we install) and third-party cookies (that are installed by third parties through our website).

If cookies are installed for commercial purposes (such as tracking online behaviour of an individual), they are considered to be used to collect personal data (such as IP-addresses, online behaviour). Other than social media plugin cookies (see below), IFPW installs non-commercial, "functional/technical" cookies only. Such cookies are necessary to run certain functionalities of our website, such as a login functionality, an online registration form or payment tools.

IFPW uses third parties for its registration and communications solutions. Please refer to the following for the privacy policies of these providers:

<https://www.cvent.com/en/privacy-policy>
<https://www.constantcontact.com/legal/privacy-statement>

We also use social media plugin cookies (Facebook, LinkedIn, Twitter). Such cookies enable you to share content on the IFPW website and from IFPW events within a social medium platform. Through the use of cookies, however, such platforms may also track your visit to our website, even if you have not clicked the button. For the sake of conciseness and to prevent the information on the use of social media plugin cookies published here from being outdated, we prefer to inform you on the specific cookies that the social media platforms use by referring to their respective cookie statements:

<https://www.facebook.com/policies/cookies/>
<https://www.linkedin.com/legal/cookie-policy>
<https://help.twitter.com/en/rules-and-policies/twitter-cookies>

Clicking on hyperlinks placed on our website may direct you to third party websites. For information on the use of cookies on those websites we refer to the cookie statements on those websites.

By adjusting your browser settings you can prevent cookies from being installed on your computer. This may, however, affect the proper functioning of (certain) features of a website.

4. Legal basis of the processing activities

Privacy laws permit the processing of personal data only if the party responsible for the processing can rely on a legal basis.

The legal basis for the processing activities, mentioned under 2.1 is: “the processing is necessary for the performance of a contract with the data subject” (if the data subject is an individual) or “necessary for the purposes of the legitimate interests pursued by the controller” (if the data subject is an elected officer and/or staff member of a member organization. The legitimate interest is that IFPW, on the basis of the agreement, is obliged to provide stakeholders and contact persons with relevant information.

The legal basis for the processing activities mentioned under 2.2 is: “the processing is necessary for the performance of a contract with the data subject” (the agreement on the basis of which an individual is entitled to attend a congress or event, organized by IFPW).

The legal basis for the processing activities mentioned under 2.3 is: necessary for the purposes of the legitimate interests pursued by the controller. The legitimate interest is that by publishing content on its website or other publications that are relevant for the pharmaceutical profession, IFPW is contributing to its overall mission, mentioned under 2.

5. Recipients of personal data

If you are an elected officer and/or staff member of a member organization or affiliate or other user of IFPW services, and if you use the networking features on the restricted parts of the IFPW website, mobile app, or other platform and opt in to be found by other members, the data that you provide will be shared with other members who opt in.

If you apply for membership or subscribe to a conference or other event or subscribe to newsletters or other communications, your data are shared with the companies that render services to IFPW in the field of payment handling or event management support. These companies qualify as our processors, along with the companies that provide us with IT services such as hosting of our databases and telecommunication services. These companies process your data on our instruction and for our purposes only. IFPW has entered into agreements with these processors on the basis of which they are bound to confidentiality obligations and the obligation to take appropriate technical and organizational security measures to protect your data against loss, or unauthorized access. The processors have no access to your personal data, unless access is necessary for the execution of their services to us.

6. Retention period

Your personal data are stored no longer than necessary for the purposes mentioned under 2. The aspects that are taken into account when retention periods are set by IFPW are: the duration of the agreement between IFPW and an individual, statutory retention periods, limitation periods for bringing legal actions, the necessity of storage for later reference (archiving purpose).

7. Your rights

Privacy laws grant you certain rights with regard to the processing of your personal data. These rights are: the right to access to and rectification or erasure of the data and restriction of or objection against the processing as well as the right to data portability. We will briefly explain these rights here.

The right to access means that IFPW must let you know, on your request, which of your personal data we process.

The right to rectification means that when the data we process are incorrect, we have to rectify them upon your request.

The right to erasure means that when we, given the necessity of the processing in relation to its purpose, process too many, too little or irrelevant personal data and you cannot erase the data yourself, you can request us to do this.

The right to restriction means that when you:

- hold the opinion that the data are incorrect or that the processing of the data is unlawful or unnecessary but the data cannot be erased in relation to your legal position; or
- have objected against the processing (see hereafter) you can request us to suspend the processing.

Suspension means we can only - apart from exceptions - store the data (without your consent) until it is clear whether your opinion is correct. The same applies to processors, who we must inform on the suspension.

The right to objection means that you can object to the processing activities based on "legitimate interest" (see under 4). We will then discontinue the processing.

The right to data portability means that you can request us, at the termination of your agreement with us, to provide you with the data that we received from you in a structured, commonly used and machine-readable format.

If you want to make one of the foregoing requests you can send it to us by email to: privacy@ifpw.com. We will respond to your request within a month. We will let you know what the possible consequences are of honoring your request (such as not being able to provide a service). If we hold the opinion that we have valid reasons to refuse your request we will inform you of those reasons in our response.

Finally we point out that if you hold the opinion that we, by processing your personal data, act in breach of the law, please let us know. We will then try to find a solution to meet your objections. If we are not able to solve the matter with you, you can file a complaint with the appropriate authorities.

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International Federation of Pharmaceutical Wholesalers, Inc. (IFPW)
10569 Crestwood Drive
Manassas, VA 20109
USA