

PRIVACY NOTICE

Innovare R. & D., S.A. de C.V., commercially known as Innovare, with registered office in Calle 2 N. 13, San Pedro de los Pinos, Benito Juárez, Ciudad de México, México, Z.C. 03810, and website <http://www.innovare-rd.com.mx/>, is the responsible for the use and protection of your personal data. Regarding the aforementioned, we provide you the following information.

For what purposes will we use your Personal Data?

The Personal Data collected from you, will be used for the following, depending on the nature of the legal or commercial relationship between you and Innovare:

I. Possible Client:

Regarding Personal Data requested to establish a possible commercial relationship with you; we will use such Personal Data for the following purposes, which are necessary for the service you are requesting:

- Assessment to determine whether it will be possible to establish a commercial relationship,
- Acquisition of Innovare products,
- Provision of Innovare services,
- Investigation of commercial as well as supplier relations and references,
- Establishment of a credit term and limit, when applicable, and
- Definition of commercial terms.

Additionally, we will use your Personal Data for the following secondary purposes, that are not necessary for the service you are requesting, but that allow us and make it easier for us to provide you with a better service:

- Delivery of promotional material and,
- Service quality assessment.

If you do not want your Personal Data to be used for these secondary purposes, we place at your disposal the procedure to exercise your ARCO rights.

II. Supplier:

Regarding Personal Data requested to establish a commercial relationship with you, as a supplier or possible supplier for Innovare; we will use your Personal Data for the following purposes, which are necessary for the service you are requesting:

- Supplier registration;
- Execute the necessary legal instruments to document the relationship we have or want to have with you,
- Comply with obligations related to the legal relationship entered into with you;
- Comply or execute agreements;
- Quotation of products and services required by Innovare;
- Carrying out surveys and training programs;
- Attending questions and suggestions;
- Payments and invoices.

III. General Public:

Regarding Personal Data requested to the public; we will use your Personal Data for the following purposes, which are necessary for the service you are requesting:

- Invitation to and participation in events Innovare will be able to contact and invite you to attend some of our events, which might be professional and/or academic. We will create documents derived from your participation in our events containing your academic and/or professional information. Additionally, we will be able to photograph and/or interview you, which means we might publish those pictures or interviews either on conventional media or on social networks.
- Course Attendance. Innovare occasionally organizes courses delivered by universities or third parties in Mexico, for which we might use your Personal Data for registration purposes as well as in order to deliver diplomas or attendance certificates.
- Providing information. Innovare might send you information concerning subjects that are relevant to the company.

IV. Patients:

Regarding Personal Data requested to patients; we will use your Personal Data for the following purposes, which are necessary for the service you are requesting:

- Response to complaints. Innovare might contact you and follow up on any complaints you issue regarding any of our products or services.
- Response to suspected adverse drug reaction (SADR). In the case that an event that affects or could affect your health occurs, a pharmacovigilance report will be created, in accordance with applicable laws and regulations.
- Clinical investigation. In the case that Innovare undertakes an investigation for the development of new products, and that, because of your characteristics, your doctor suggests that you participate in any of our research projects, and that you decide to participate, we will use your Personal Data, including sensible personal data, for the sole purpose of creating or developing drugs related to your current health condition, as well as to follow up on your reaction and progress as a consequence of the product under development. The aforementioned with prior informed consent, which shall comply with applicable requirements.
- Market knowledge. Developing new products and services, knowing the market and the performance of the company within the former, as well as conducting market surveys.
- Sales follow-up. Follow up on sales with the purpose of achieving customer satisfaction, provide customer service, and others.

V. Healthcare Professionals:

Regarding Personal Data requested to healthcare professionals; we will use your Personal Data for the following purposes, which are necessary for the service you are requesting:

- Services provided to Healthcare Professionals. We may use your personal data for either or all of the following purposes:
 - Registration on our website in order to create your profile.
 - Telephone assistance regarding our products.
 - Cross-correlation of data in order to certificate the quality of our database.
 - Prescription statistics.
 - Market research studies.
 - Sending promotional material or invitations to events.

- Comply with obligations related to the legal relationship entered into with you;
- Comply or execute agreements;
- Exchange scientific information necessary to assist a specific condition or health emergency;
- Elaborate reports for sanitary authorities regarding to possible adverse events, in compliance with applicable legal regulation on pharmacovigilance;
- Inviting you to participate of continuing medical education events, as well as other events and training courses;
- Creating a database of healthcare professionals;
- Perform analysis in order to determine the efficiency of our programs, transportation and delivery of supporting material for patients, delivering promotions and awards;
- Register to receive information of interest of Innovare or about a particular subject;
- Comply with health obligations and other legal obligations;
- Allow you to participate in clinical studies as researcher.

VI. Candidates and Employees:

Regarding Personal Data requested to candidates for job vacancies and to company employees; we will use your Personal Data for the following purposes, which are necessary for the service you request:

- Review of professional and academic information;
- Contact, if your professional and academic information is of interest to Innovare and if you are applying for a vacancy;
- Assessment for employment;
- Exchange information with Innovare's global branches and subsidiaries;
- Recruitment and selection of staff, business consultancy, staff training and employment, payroll services, as well as socio-economic analyses and aptitude and proficiency tests;
- Human and Resources and labour procedures for current as well as possible employees, applicants, temporary employees and independent contractors;
- Any other compatible or analogous purpose.

VII. Visitors:

Regarding Personal Data requested to visitors, we might use your Personal Data for the following purposes, which are necessary for the service you are requesting: keep access control, as well as preserve the security of the facilities, employees, and the confidentiality of Innovare's proprietary information.

VIII. Web Visitors:

Regarding Personal Data requested to our website visitors, we might use your Personal Data for the following purposes, which are necessary for the service you request:

- Registration to the programs you have enrolled in voluntarily and distribution of requested information or information about Innovare that we deem of interest to you, as well as answering your questions and comments.
- Creation and administration of your account, when you decide to open one.
- Registration to receive relevant information about Innovare or about a specific subject.

Which Personal Data will we use for these purposes?

For the purposes of this Privacy Notice, personal data will be understood as any information regarding a identified or identifiable natural person, i.g. identification data, employment data and property data, among others and for sensitive personal data we will understand as personal data that affects the most private sphere of the data subject, particularly it is consider sensitive personal data the data that can reveal aspects such as racial or ethnic origin, health condition present or future, genetic information, religious, philosophical and moral beliefs, trade-union membership and political opinions.

In order to fulfil the purposes stated in this privacy notice, we will make use of the following personal data and sensitive personal data:

I. Possible Client:

- Identifying data
- Contact information
- Property and/or financial information

II. Supplier:

- Identifying data
- Contact information
- Employment information
- Academic information
- Migratory information
- Property and/or financial information

III. General Public:

- Identifying data
- Contact information
- Employment information
- Academic information
- Migratory information
- Property and/or financial information

In addition the aforementioned personal data and, for the purposes stated in this privacy notice, we will use of the following personal data considered as sensitive, which require special protection:

- Health condition data

IV. Patients:

- Identifying data
- Contact information
- Physical characteristics data
- Biometric data
- Employment information
- Academic information
- Migratory information
- Property and/or financial information

In addition the aforementioned personal data and, for the purposes stated in this privacy notice, we will use of the following personal sensitive information, which require special protection:

- Information on medical condition

V. Health Professionals:

- Identifying data
- Contact information
- Physical characteristics data
- Biometric data
- Employment information
- Academic information
- Migratory information
- Property and/or financial information

VI. Applicants and Employees:

- Identifying data
- Contact information
- Physical characteristics data
- Biometric data

- Employment information
- Academic information
- Migratory information
- Property and/or financial information

In addition the aforementioned personal data and, for the purposes stated in this privacy notice, we will use of the following personal data considered as sensitive, which require special protection:

- Information on medical condition

VII. Visitors:

- Identifying data
- Contact information

VIII. Web visitors:

- Contact information
- Physical characteristics data
- Biometric data
- Employment information
- Academic information
- Migratory information
- Property and/or financial information

With whom do we share your personal data and with what purposes?

Your personal data and sensitive personal data, whichever the case, is shared outside the country with the following people, companies, organizations, or authorities other than ourselves, protecting their private nature, and only for the following purposes, unless you explicitly request the opposite:

Recipient of Personal Data	Purpose	Requires consent
Innovare's Branches or Subsidiaries	Statistical purposes. Human Resources procedures. Follow-up and employee-training.	No
Ministers of Health in Mexico or other countries	Statistical purposes and compliance with applicable laws and regulations.	Variable, in some cases: Yes

Media	Invitation to and participation in events and courses. Participation in contests and similar processes.	Yes
Advertising Agencies	Invitation to and participation in events and courses. Participation in contests and similar processes.	Yes
Third Parties who provide training and/or deliver courses.	Training of Human Resources. Courses related to aspects of health.	Variable, in some cases: Yes
Health Professionals	Treatment of your health condition or participation in a study or research.	Yes
Companies devoted to providing integral health services	Treatment of your health condition.	Yes
Patient Associations	Participation in support programs for patients.	Yes

Concerning the transactions that require your consent, if, after reading this privacy notice, you do not express your disagreement with their completion, we will understand that you have given your consent. We make available the procedure, as described in the following section of this privacy notice, so that, when applicable, you can communicate your refusal to the completion of said transactions.

How can you access, rectify, or cancel your Personal Data, or oppose to their use?

You have the right to know what personal data we collect from you, the usage we give to it, and the terms of its usage (Access). Likewise, you have the right to request the rectification of your personal data, in case of being outdated, inaccurate, or incomplete (Rectification); to request that we remove it from our registers or databases, when you deem that your data is not being used appropriately (Cancellation); and to oppose the use of your personal data for specific purposes (Opposition). These rights are known as ARCO Rights.

In order to exercise either of your ARCO rights, you will need to deliver a written request, either at the aforementioned domicile or via email to lidia.hernandez@innovare-rd.com.mx, addressed to the person in charge of Innovare's Personal Information Department.

The request alluded to in the previous paragraph must contain: (i) the name of the data subject, address and email or any other form of to communicate the response; (ii) documents that certify your identity or that certifies you as legal representative; (iii) clear and accurate description of the personal data and/or sensitive personal data in which you are exercising the corresponding right; and (iv) any other element that could help us locate your personal data.

Concerning the process and requisites for the exercise of your ARCO rights, we inform you the following:

a) How can the holder and, if applicable, his representative, verify their identities and/or corresponding legal representation?

By means of a simple copy of your official identity document, your legal representative's power of attorney and identification document, as applicable.

b) What information must the request contain?

A clear description of the specific personal data and/or sensitive personal data upon which the right or rights are being exercised, as well as any background that allows the location of said information.

c) When will we answer your request?

30 (thirty) days.

d) By what media will we send an answer?

Via email or, should we not have an available email address, to your domicile.

e) In what means can the personal data requested be reproduced, in its case?

None.

f) For further information on the procedure, contact the person in charge of Innovare's Personal Information Department via email or by telephone as indicated below:

- a) Name: Personal Data Department.
- b) Responsible: Lidia Hernández
- c) Domicile: Calle 2 número 13, Col. San Pedro de los Pinos, Del. Benito Juárez, C.P.03810, Ciudad de México, México.
- d) Email address: lidia.hernandez@innovare-rd.com.mx
- e) Phone number: 50-15-95-18

You may revoke your consent to the use of your Personal Data

You may revoke the consent you have given us for the processing of your personal data. However, it is important that you have in mind that we might not always be able to handle your request or cease the usage immediately, since it is possible that we require, due to a legal obligation, to keep processing or using your personal data. As well, you should consider that, in some cases, revoking your consent will mean that we will not be able to continue providing you with the service you requested or that your relation with us will be terminated.

To revoke your consent you will need to deliver a written request following the procedure and through the means described in the previous section.

How can you limit the use or distribution of your Personal Data?

With the purpose of allowing you to limit our use and distribution of your Personal Data, you will need to deliver a written request following the procedure and through the means described in the previous sections.

Use of analysis technologies in our web portal.

We use web beacons and/or different bugs in our site, by means of which it is possible for us to analyze your user behavior inside our web portal. We do this with the purpose of providing you with a better service and user experience when browsing our website, as well as offering you new products and services based on your interests. The personal data we collect using these technologies will be used for the following purposes:

- Analysis and statistics of our portal.
- Improvement of our portal's service, quality and performance.

From these analysis technologies, we obtain the following Personal Data:

- Equipment specifications.
- Language preferences.
- User's region.
- User's internet browser.
- User's operating system.
- Time and date of a user's web session start and end.

You can disable these technologies if your browser offers a private browsing mode, as long as you activate private navigation.

How can you know if there are any changes made to this privacy notice?

This privacy notice may be subject to changes or updates any time, stemming from new legal requirements, from needs derived from the services and products we offer, from our privacy practices, from changes in our business model, or other causes.

We undertake to inform you about any changes made to this privacy notice, by uploading any updates to it directly on Innovare's web portal.

Innovare processes your Personal Data on the basis of the principles of legality, consent, information, quality, purpose, loyalty, proportionality, and responsibility in the terms established by the Federal Law on Protection of Personal Data held by Individuals (*Ley Federal de Protección de Datos Personales en Posesión de los Particulares*) and other applicable regulations.

Last updated: 05/02/2019.