

PRIVACY POLICY

1. Who we are

Huvepharma EOOD, a limited liability company duly incorporated and existing under the laws of the Republic of Bulgaria, with Unified Identity Code (UIC) 203631745, having its seat and registered address at 3a, Nikolay Haytov Str., 5th floor, 1113 Sofia, Bulgaria, registered with the Bulgarian Commission for Personal Data Protection as a personal data controller (administrator) under number 417386 (“**Huvepharma**”).

Huvepharma is a company distributing and selling veterinary medicinal products, aiming to support and facilitate its customers by providing additional services allowing them to monitor the efficacy of Huvepharma products application and use. One of those services is Aviapp® software program and mobile application for iOS and Android.

For more information about the application of Aviapp®, please check our Terms of Use.

2. What does processing of personal data mean (legal definition)

“Processing” means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by means of transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction of personal data.

3. Why Huvepharma will be processing your personal data. Purpose

Huvepharma will be processing your personal data in order to provide you with an access to and the opportunity to use Aviapp®.

The primary purpose of requesting your personal data is to open your account and to allow you to use Aviapp®. In addition, Huvepharma will be processing your personal data for analytical, statistical and advertising purposes, including but not limited to the purpose of direct marketing.

The Avian Performance Platform Aviapp® has been developed by Huvepharma to offer its customers a user-friendly objective data management system to monitor and evaluate health and performance parameters at your company over time.

4. The categories of data being processed

We require only minimum personal information and data in order to allow you to become a user of Aviapp®. This information and data, together with your prior, explicit, written, informed, freely given and unambiguous consent, are necessary for Huvepharma to meet the regulatory requirements.

Huvepharma will be processing (itself or through third parties acting in the capacity of data processors) the following categories of personal data:

- your first and last name (as per your valid ID card or passport);

- your address;
- your email;
- telephone number;
- the name of the company you are working for (place of employment); and
- function.

Huvepharma is obliged to keep your personal data as up-to-date as possible, and to update details promptly upon being informed about the respective changes. Therefore, please notify us about any changes in the personal data as provided by you as soon as practicable.

5. Unambiguous consent

By creating his/her account, each user of Aviapp® has to declare that he/she has read and accepted the Terms of Use and the Privacy Policy of Huvepharma and to express his/hers prior, explicit, written, informed, freely given and unambiguous consent Huvepharma to processing (itself or through third parties acting in the capacity of data processors) all his/hers personal data as provided under the terms and conditions of the abovementioned documents.

Prior to start using Aviapp®, you have to create your own account. Therefore, upon receiving an invitation to log in, you have to fill in your personal data as per the form provided and to proceed by clicking on the button “Create account”. This means that you automatically agree to the Terms of Use and the Privacy Policy of Huvepharma and at the same time you give your consent so that your personal data could be lawfully kept and processed by Huvepharma.

You are not allowed to use Aviapp® without agreeing to the above documents and without providing Huvepharma with your prior, explicit, written, informed, freely given and unambiguous consent for the procession of your personal data.

You may revoke your consent and block the processing of your personal data and the use of your email by Huvepharma for advertising purposes or direct marketing at any time, without any justification or costs, by submitting an objection to the following email: aviapp@huvepharma.com.

You have the right to be notified before your personal data is disclosed for the first time to third parties or used on their behalf for the purposes of direct marketing, and to be expressly offered the right to object to such disclosure or use.

Please note that in any case of objection against disclosure to third parties, Huvepharma may, at its own discretion, terminate your agreement for Aviapp® and block your access to the application.

6. Recipients to whom the data shall be disclosed

Please note that in certain cases Huvepharma shall be obliged to disclose your personal data to the public authorities: if this is required by the law; pursuant to a court, regulatory or other official act, ruling or decision; based on the agreements between Huvepharma and other personal data controllers/ processors; following your personal instructions or the instructions of your authorized representative(s).

Huvepharma shall disclose your personal data to Nucleus BVBA, Belgium, (for more information please check <https://www.nucleus.be/nl>) which shall act as a data processor of all the personal data collected by Huvepharma in connection with Aviapp®. The selection of Nucleus BVBA is based on an assessment of the sufficiency in respect of all the technical and organizational measures for protection of personal data applied by Nucleus BVBA. An

agreement has been concluded between the two companies in order to set forth the standard processor`s obligations as well as the allocation of both parties liabilities.

7. The period of time after which the data must no longer be stored, used or disseminated

Your personal data shall be processed by Huvepharma (itself or through third parties acting in the capacity of data processors) as long as you are an Aviapp® user.

Your registration could be cancelled by you, by the company you are working for, and by Huvepharma in case you break the terms and conditions as provided herein and in the Terms of Use. In any of those cases Huvepharma shall erase your personal data.

The law provides an opportunity for Huvepharma to further processing your personal data in certain cases for historical, statistical or scientific purposes only.

8. User`s right of access and right of rectification

You have the right to access your personal data processed by Huvepharma (itself or through third parties acting in the capacity of data processors) and to obtain an extract of it at no cost.

When exercising of your right of access you may require:

1. Confirmation if the data referring to him/her are processed, information about the purpose of this processing, about the category of the data and the recipients or the categories of recipients to whom the data shall be disclosed;
2. Notification to you in a comprehensible form, containing your personal data, that are processed, as well as any available information of their source;
3. Information about the logic of each automated processing of personal data referring to you, if applicable.

You are also entitled to require, at any time, from Huvepharma to erase, rectify or block your personal data whose processing does not comply with the provisions of the applicable law and to notify any third parties to whom your personal data have been disclosed of any erasure, rectification, or blocking carried out in compliance with this law requirement. You may have also incorrect data rectified, and incomplete or irrelevant data erased or prohibited free of charge.

To exercise any of the abovementioned rights you have to submit a written application to Huvepharma`s registered address accompanied with a proof of your identity (certified copy of your valid ID card or passport). This application may also be submitted in electronic form to the following email: aviapp@huvepharma.com, provided it is signed by electronic signature. The application could be filed only by you personally or by your explicitly authorized representative (holding a power of attorney certified by a notary public). It has to contain: your name, address and other data necessary for identifying the respective individual; description of the request; preferred form of provision of the information; signature, date of submission of the application and mailing address.

Huvepharma shall keep a register of all applications received and shall respond within fourteen (14) days from its submission. This term may be extended up to thirty (30) days in the cases when the collection of all requested data objectively requires a longer period and this would impede seriously the activities of Huvepharma or its data controller(s).

9. Security of the processing

Huvepharma (itself or through third parties acting in the capacity of data processors) takes appropriate technical and organizational measures to process the provided personal data lawfully (in full conformity with the applicable legislation in force) and in good faith, as well as to protect your data against accidental or unlawful destruction, or against accidental loss, unauthorized access, alteration or dissemination, as well as against other unlawful forms of processing.

The types of data protection are physical, personnel, documentary protection, protection of automated information systems and/or networks and cryptographic protection. Some of the measures are as follows:

- restriction of the number of individuals having access to the data on a need-to-know base;
- use of access codes, locking offices with computers and data files, other appropriate measures of physical protection;
- training of the respective personnel about their obligations under the law, Huvepharma policies and guidelines on the personal data protection, and requesting each employee`s explicit consent to assume an obligation of non-disclosure of personal data;
- regular checks for ascertaining that no unlawful use is made of the software program and mobile application used for the automatic personal data processing.

As the processing of your personal data involves the transmission of data by electronic means, the protective measures secured by Huvepharma and/or its data processor(s) take into account the modern technological achievements and ensure a level of security adequate to the potential risks that the data is exposed and the nature of the data to be protected.

10. Cookies

A cookie is a small piece of data that a website asks your browser to store on your computer or mobile device. The cookie allows the website to “remember” your actions or preferences over time.

Cookies do not give Huvepharma access to your computer/mobile device or any other information about you. They only improve your interaction with the website and the mobile application. Cookies do not contain any information that personally identifies you, but the personal information that we store about you may be linked to the information stored in and obtained from cookies.

By installing Aviapp®, you agree to use the cookies that are strictly necessary to run Aviapp® software program and mobile application. Aviapp® uses Google Analytics.

If you block cookies, you will not be able to use all the features on our software program and mobile application. You can also delete cookies already stored on your computer. By doing this, you may impact negatively on the usability of Aviapp®.

11. Complaints

If you believe that Huvepharma has breached its obligation under the Bulgarian Law on Personal Data Protection (last amended on 15 Feb 2013) and the Directive 95/46/ECC on the protection of individuals with regard to the processing of personal data and on the free

movement of such data or this Privacy Policy, or that Huvepharma has otherwise failed to respect your confidentiality, you may file a complaint on the following email: aviapp@huvepharma.com.

In case you are not satisfied with our response to a complaint, you may notify the Bulgarian Commission for Personal Data Protection (<https://www.cdpd.bg/en/index.php>), whose address is: 2, Prof. Tsvetan Lazarov Blvd., 1592 Sofia, Bulgaria.

Huvepharma reserves the right to modify this Privacy Policy at any time, so please review it on a regular bases. In case of amendments, the same shall be promptly announced in this document, on the website <https://aviapp.huvepharma.com/>, and wherever else we deem appropriate, in order to keep you updated on our approach to data processing.

I hereby acknowledge that I am duly informed and fully aware of all the rights provided by the Bulgarian Law on Personal Data Protection (last amended on 15 Feb 2013), including but not limited to: (i) the objectives, methods and means of processing of my personal data, as well as the voluntary nature of their provision, the volume and the persons to whom they can be provided; (ii) the right of access; (iii) the right of rectification; (iv) the right of objection against the processing of my personal data for the purposes of the direct marketing, (v) the right to be notified before my personal data to be disclosed for the first time to third parties or used on their behalf for the purposes of the direct marketing; and (vi) the right of objection against such disclosure or use.

I hereby give my prior, explicit, written, informed, freely given and unambiguous consent Huvepharma to collect, store, processing (itself or via third parties) and use all my personal data as provided for the purposes and under the terms and conditions of this Privacy Policy and Aviapp® Terms of Use, and in compliance with the requirements of the Bulgarian legislation.