

PRIVACY NOTICE

Last updated: February 17, 2025

This privacy notice for iEthico Limited ('Company', 'we', or 'our'), describes how and why we might collect, store, use, and/or share ('process') your information when you use our services ('Services'), such as when you:

Visit our website at <https://iethico.com/> or any website of ours that links to this privacy notice

Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at support@iethico.com.

SUMMARY OF KEY POINTS

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with iEthico Limited and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law.

Do we receive any information from third parties? We do not receive any information from third parties.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

In what situations and with which parties do we share personal information?

We may share information in specific situations and with specific third parties.

How we keep your information safe? We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or

other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by filling out our data subject request form, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you voluntarily provide to use when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Our Website and Services are intended for use by healthcare professionals and businesses and only by those over the age of 18; we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other policy on data processing or other notices we may provide on specific occasions so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

iEthico Ltd (“iethico”, “we”, “us” or “our”) is the ‘data controller’ of the processing of your personal information as described in this policy. As the data controller, we decide why and how your personal information is processed and are responsible to you for that processing under data protection laws.

Correspondence address:

Email: support@iethico.com

Registered office address: Binley Business Park, Harry Weston Road, Binley, Coventry, England, CV3 2TX

Company number: **13124384**

We are regulated by the Information Commissioner’s Office (“ICO”) and you have the right to make a complaint at any time to them. We would, however, appreciate the

chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use.

The personal information we collect may include the following:

- Names
- Phone number
- Email addresses
- Mailing addresses
- Job titles
- Usernames
- Passwords
- Contact preferences
- Contact or authentication data
- Billing addresses

Sensitive Information. When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- financial data
- credit worthiness data

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

1.1 Data Minimization

- We only collect personal data we need for our specified purposes.
- We have sufficient personal data to properly fulfil those purposes.
- We periodically review the data we hold and delete anything we don't need. For further information, you may contact us about our data retention and data destruction policy by contacting support@iethico.com.

1.2 Information automatically collected

In Short: Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics – is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- ***Log and Usage Data.*** Log and usage data is a service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called ‘crash dumps’), and hardware settings).
- ***Device Data.*** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- ***Location Data.*** We collect location data such as information about your device’s location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Service.

2. CONSENT

We do not collect data without your consent which we request separately from our terms and conditions. The reasons we collect your data, and the way we process it are described in this policy. Any third party controllers who will be relying on your consent are named on this policy. You can withdraw your consent at any time and that is not a precondition for accessing our services.

We keep a record of when and how we got consent from users and we keep a record of exactly what they were told at the time.

We regularly review consents to check that the relationship, the processing and the purposes have not changed. We have processes in place to inform and request consent should the purpose of data collection change.

3. HOW DO WE PROCESS YOUR INFORMATION?

***In Short:** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in your account, as well as keep your account in working order.
- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To respond to user enquiries/offer support to users.** We may process your information to respond to your enquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfil and manage your orders.** We may process your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.
- **To enable user-to-user communications.** We may process your information if you choose to use any of our offerings that allow communication with another user.

- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- **To save and protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

4. WHAT LEGAL BASIS DO WE RELY ON TO PROCESS YOUR INFORMATION?

***In Short:** We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.*

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal basis we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information.

Consent. We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.

Performance of a Contract. We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.

Legitimate Interests. We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:

- Analyse how our services are used so we can improve to engage and retain users
- Diagnose problems and/or prevent fraudulent activities
- Understand how our users use our products and services so we can improve our experience
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a

law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

5. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

***In Short:** We may share information in specific situations described in this section and/or with the following third parties.*

We may need to share your personal information in the following situations:

Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sales of company assets, financing, or acquisition of all or a portion of our business to another company.

6. DO WE USE COOKIES AND OTHER TRACING TECHNOLOGIES?

***In Short:** We may use cookies and other tracing technologies to collect and store your information.*

Our Website may include links to third-party websites, plug-ins and applications.

Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy practices. When you leave our Website, we encourage you to read the privacy policy of every website you visit, connect with, or are referred to.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

7. HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:** We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than twelve (12) months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup

archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

For further information, you may contact us about our data retention and data destruction policy by contacting support@iethico.com.

8. HOW DO WE KEEP YOUR INFORMATION SAFE?

***In Short:** We aim to protect your personal information through a system of organisational and technical security measures.*

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process.

iEthico data uses AWS resources and registered and data is stored in the UK: AWS region eu-west-2). There are three types of storage involved with the medicine-shortage site:

Website: AWS EC2 Instance Server

Database: AWS RDS MySQL

Uploaded Documents: AWS S3

However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. DO WE COLLECT INFORMATION FROM MINORS?

***In Short:** We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services.

If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records.

If you become aware of any data we may have collected from children under age 18, please contact us at support@iethico.com

10. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: *In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws.

You can enforce your data protection rights by contacting us, or in most cases, by deleting your account and/or by ending your use of our Website, products or Services.

You have the following rights, some of which may only apply in certain circumstances:

o to be informed about the processing of your personal information (this is what this statement sets out to do);

- to object to processing of your personal information;
- to withdraw your consent to processing your personal information;
- to restrict processing of your personal information;
- to have your personal information erased;
- to request access to your personal information and information about how we process it;
- ask us to rectify information you think is inaccurate.
- ask us to complete information you think is incomplete.
- ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

to electronically move, copy or transfer your personal information in a standard, machine-readable form; and rights relating to automated decision making, including profiling.

To exercise these rights, please contact us using the contact details below – in the section.

You have the right to lodge a complaint with the UK data protection regulator. The contact details for the ICO, the data protection regulator in the UK, are available on the ICO website, where your personal information has or is being used in a way that you believe does not comply with data, however, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

Except in rare cases, we will respond to you within 1 month after we have received this information or, where no such information is required, after we have received full details of your request. You are not required to pay any charge for exercising your rights.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are in the EEA and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

https://ec.europa.eu/info/law/law-topic/data-protection_en

If you are in Switzerland, the contact details for the data protection authorities are available here:

<https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection---switzerland.html>

Withdrawing your consent: If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us using the contact details provided in the section (how you can contact us about this notice) below or updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Account information

If you would at any time like you review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.
- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information

in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

Cookies and similar technologies: Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

To opt out of interest-based advertising by advertisers on our Services visit <https://optout.aboutads.info/?c=2&lang=EN>

If you have questions or comments about your privacy rights, you may email us at support@iethico.com

11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected.

At this stage no uniform technology standard for recognising an implementing DNT signals has been finalised. As such we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

If a standard online tracking is adopted that we must follow in the future, we will inform you about that practise in a revised version of this privacy notice.

12. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time.

The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice you may e-mail us at support@iethico.com or by post to:

iEthico Limited

Binley Business Park

Harry Weston Road, Binley

Coventry

CV3 2TX

United Kingdom

14. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please email a request to our support team E: support@iethico.com.