

GRÜNENTHAL Pharma Limited Data Privacy Statement

Grunenthal Limited is part of the Grunenthal GmbH group of companies. The group operates corporate entities registered individually in local markets, including Grunenthal Pharma Limited, in Ireland, and through the following 'Brands' each marketed separately in relevant local markets and territories, such as [Grunenthal LTD products](#)

Grunenthal Pharma Limited, is a separate company that deals with different products and related services which may vary from time to time as our product portfolio and services grow and change. A full list of Grunenthal GmbH operating companies can be found [\[here\]](#).

We take the privacy of your personal information seriously and know that you will wish to understand how we will use your personal information.

This Privacy Notice applies to:

- Individuals who visit our website,
- Individuals with whom we correspond such as those who have registered an interest in one of our products or services,
- Health care professionals, suppliers, and business partners.

This Privacy Policy:

- Will inform you about what personal information we collect and why, how we use it, who we share it with, as well as giving you other important information.
- Covers personal information collected via our website as well as information that you may provide when communicating directly with us and/or where your personal information may be provided by or obtained from a third party.

Personal information that you provide voluntarily for the purposes associated with you visiting our website may include:

- Contact information, such as your name, postal address, telephone number, mobile phone number, and email address;
- Copies of identification documents (such as a passport or driving licence) and copies of documents that provide a proof of address (such as a utility bill);
- Date of birth, nationality, gender, occupation;
- Where you have provided your feedback we will record your opinions and the text that you have written;
- Details of your marketing preferences and whether you are happy to receive marketing communications via Email, Telephone, Post or Text Message.

You will be able to visit our website and view products and services if you choose not to provide your personal information. However, without some of this information, we may not be able to communicate with you and/or take certain actions that you

request, for example because this personal information is required to respond to your enquiries.

General information that may be noted by members of staff in order to improve their customer service by providing a more personalised service.

For example, some members of staff may make a note of information that comes up in general conversation with you to personalise their conversations with, and services to, you.

Cookies and Personal Information that is collected automatically:

- A cookie is a small text file which is placed onto your computer (or other electronic device) when you use our website.
- When you visit our website, we may automatically collect standard internet and website log information and details of patterns about how website visitors behave. The information we collect includes information about your internet service provider, your operating system, browser type, domain name, the internet protocol (IP) address of your computer (or other electronic Internet-enabled device), your access times, the website that referred you to us, the web pages you request and the date and time of those requests. This may allow us to find out which parts of the website are popular or need changing. This is done in a way which does not identify any individual and we do not try to identify visitors to our website or to link this information with any personal information we collect.
- You can set your browser not to accept cookies and the website below tells you how to disable cookies from your browser. However, some of our website features may not function as a result.
- For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies: <https://www.allaboutcookies.org/manage-cookies/>.

Personal Information provided by you:

- The main way that we collect your personal information is when you provide it to us. This could be through our website, completing a questionnaire we have provided to you, attending a webinar, or when communicating with one of our staff members, either in person, via email or on the telephone.

Personal information provided by, or obtained from, third parties:

- Occasionally we may receive information about you from other sources (such as IQVIA ([IQVIA Ireland - IQVIA](#)), which we may add to the information we hold already about you in order to help us provide our products and services to you.
- We may receive personal information from an introducer or other person(s) acting as agent for you. We may also receive information about you from someone acting on our behalf.
- As part of our due diligence, we use reputable online screening service providers, such as ORO Labs, in addition to tools that search information from publicly available sources. We will sometimes supplement this information with our own enquiries of third parties – these can include: Internet searches;

Searches of Companies' Registers (such as Companies House); UK, EU and US financial sanctions lists; newspapers; law enforcement and regulatory watch lists; and other forms of publicly available information.

Uses of your information:

The most common purposes for which we will use your information are:

- **General communication:**

We will use your information to communicate with you and provide you with the details of products and services that you have requested, respond to any enquiries you may have because you have registered your interest in our company.

- **Direct Marketing:**

Where you have expressly given us consent or where we are otherwise legally permitted to do so, we may send you information about services or information which may be of interest to you.

We will endeavour only to send you information about news and services that could be suitable for you. To help with this we will ask for information about you – the more we know about the type of service you are interested in, the easier it will be for us to find the right information for you.

We ask for your consent to receive marketing materials on behalf of Grunenthal Pharma Limited and Grunenthal GmbH affiliated companies.

*Grünenthal Affiliates Grünenthal GmbH, Grünenthal Pharma GmbH & Co KG (HQ)

- Grünenthal Denmark ApS (Denmark)
- Grünenthal Finland Oy (Finland)
- Grünenthal Pharma Ltd. (Ireland)
- Grünenthal Norway AS (Norway)
- Grünenthal Sweden AB (Sweden)

You can unsubscribe/withdraw your consent and ask us to stop sending you marketing materials at any time by using the 'unsubscribe' link at the bottom of marketing emails, by informing one of our members of staff (with whom you have previously been dealing) or through our website.

We keep a record of when we receive consent from individuals and regularly review consent to check updates to preferences. We act on withdrawals of consent as soon as we can.

- **Other purposes:**

Additionally, and as required, we may use your information:

- To analyse and improve our products and services.
- For general business administration.
- To comply with our legal, contractual and regulatory obligations.
- For due diligence, and in order to verify your identity and home and/or business address, and to carry out a risk assessment to comply with our policies and processes for due diligence, and anti-money laundering checks.
- To comply with court or regulatory orders and to exercise or defend legal rights.
- If we are considering entering into a business relationship with you, where for example, you are a supplier, we may use your information to assess your suitability for inclusion in our database and for the administration of any contract entered into between you and your company/your organisation and Grunenthal Pharma Ltd and within Grunenthal GmbH, and/or its joint ventures.

Depending on which of the above purposes for which your information is used, it will be processed on one or more of the following legal grounds:

- The processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
- Where we have your consent (for example, where you have provided your consent to receive certain marketing from us).
- The processing is necessary to comply with a legal obligation to which Grunenthal Pharma Limited is subject.
- The processing is necessary for the purposes of Grunenthal's legitimate interests or those of any third party that receives your personal information, except where these are overridden by your interests or fundamental rights and freedoms.

As a result of our third party due diligence checks, we may obtain and store information about any criminal convictions that you have. This information would typically be obtained through our online due diligence searches that we conduct. The grounds for lawfully processing information on criminal convictions and offences related security measures is Article 10 GDPR and Section 55(1)-(3) of the Irish Data Protection Act 2018.

When we use data processors to process your data on our behalf, we will retain control over and we will remain fully responsible for your personal data and we will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers.

Your personal data may be shared with and used by Grunenthal GmbH affiliate companies that may have products or services that are suitable for you, or where Grunenthal GmbH operates Grunenthal Limited's IT systems, or is responsible for the collection and administration of finance payments, or where you are an agent and your information is stored in our centralised database so that it is accessible by other Grunenthal affiliates in connection with our due diligence processes.

We may also share your personal information with law enforcement, regulatory and government agencies; companies that are party to joint ventures with a Grunenthal GmbH affiliate; or other third parties.

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and that:

- They have given their consent for their details to be passed to the relevant Grunenthal GmbH affiliate.
- You will pass on a copy of this Privacy Policy to them.

We will use technical and organisational measures to safeguard your personal information, for example:

- Our IT systems are protected by firewalls; regular software updates; anti-virus protections and intrusion detection systems; and
- We store your personal information on secure servers located in Ireland and EEA.

While we will use all reasonable efforts to safeguard your personal information, you acknowledge that the use of the internet and email is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information that is transferred from you or to you via the internet or email. If you have any concerns about your information, please contact us (see '*How to contact us*' below).

We do not intend to transfer your personal information outside of Ireland or the EEA. If we believe a transfer of your personal information outside of Ireland or the EEA will arise, we will implement contractual or other measures to comply with legal requirements on the transfer of personal information, ensuring that there is an adequate level of protection in place.

Where you are located outside Ireland or the EEA then we will transfer your personal information to Ireland and Europe where our systems and servers are located. This will naturally entail your personal information being exported back out to the jurisdiction that it originated from or from where you are located (for example when we reply to your emails or we write to you).

Your personal information will be deleted when it is no longer reasonably required for the relevant purposes, and we are not legally required or otherwise permitted to continue storing such information. We will, in particular, retain your personal information where required for us to assert or defend legal claims until the end of the relevant retention period or until the claims in question have been settled.

The criteria that we use to assess how long to hold your personal information for in our sales and marketing database is a combination of whether or not you have previously purchased from us and when you last interacted with us.

Subject to certain legal conditions, you have the following rights in relation to the personal information that we hold about you. These are:

- The right to request a copy of the information we hold about you.
- The right to correct any mistakes in your information.
- The right to erase certain information.
- The right to request a restriction of the processing of your information.
- The right to object to certain information and automated decisions being processed.
- The right to withdraw your consent to direct marketing.
- The right to transferring your personal information in a structured file (data portability).

Should you wish to exercise any of your rights, please contact us directly (see '*How to contact us*' below) and we will be happy to assist.

Please note that we may ask for proof of your identity and address (such as a copy of your driving licence or passport – please do not send any original documents).

Additionally, you should be aware that not all of these rights are absolute and there may be circumstances in which we will not fully comply with your request because of a specified legal ground or exemption. For example, you will not be able to request that we delete all of your information if you have purchased a service or product from us because it will be necessary for the contract you have entered. We will always let you know the legal basis for this.

We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your information, and for any additional copies of the personal information you request from us.

We reserve the right to update and change this Privacy Policy from time to time in order to reflect any changes to the way in which we process your personal information or changing legal requirements. In case of any such changes, we will post the changed Privacy Policy on our website or publish it otherwise. The changes will take effect as soon as they are posted on this website.

This policy was last updated on 25th September 2025.

How to Contact Us

If you want to contact us to know more about the use of your information, ask us to correct it, or to exercise any of your rights, to contact us by post:

Postal Address: Legal Department, Grunenthal Pharma Limited, 4045 Kingswood Road, Citywest Business Park, Citywest Co Dublin.

If you wish to email us, please use UKINORdataprotectionofficer@grunenthal.com which operates to support the UK and Ireland and the Nordics. We will endeavour to send you a response as soon as possible. Your patience is much appreciated during busy periods.

You have the right to complain to the Office of the Information Commissioner (OIC) if you believe we have not handled your request in an appropriate manner. However, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have.

For information on contacting the OIC please see their website at www.oic.ie.

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