

PRIVACY POLICY

for Swine Academy

Thank you for your interest in our Swine Academy , a learning platform designed for knowledge sharing and skills development in the areas of swine health and production (the “Swine Academy” or “Platform”) provided by Boehringer Ingelheim Vetmedica GmbH, Binger Strasse 173, 55216 Ingelheim am Rhein, Germany, (hereinafter “Boehringer Ingelheim”, “we”, “our”, “us”, etc.) which are available in their current version under <https://swineacademy.lms.crossknowledge.com/interfaces/login.php>, and our services offered thereon (hereinafter “Service(s)”).

We respect your privacy and will collect and process your personal data in accordance with the applicable legal requirements, including the European General Data Protection Regulation (GDPR). This Privacy Policy (“Policy”) describes (a) what kind of personal data we collect from you through your interactions with us as registered user on our Swine Academy, and (b) how we process such personal data and for which purposes within the Platform and the Services.

The information in this Policy supplements the information contained in our terms and conditions of use for our Swine Academy (“Terms of Use”) available in their current version under <https://swineacademy.lms.crossknowledge.com/interfaces/login.php>. Capitalized terms used and not defined in this Privacy Policy have the meanings provided or referred to in our Terms of Use.

In this Privacy Policy, “Personal Data” means information relating to an identified or identifiable individual; an identifiable individual is one who can be identified, directly or indirectly, by use of any identifier or factor specific to that individual. For example, personal data includes your name, phone number and email address. By contrast, it does not include information of a general nature that does not identify you (for example, the number of users of the Platform).

1. PURPOSES OF DATA PROCESSING

Registration, communication

We process your data in order to provide you with the Services on our Swine Academy, for example when you submit your profile information to create and register your User Account, to administer and provide you with access to a specific Course, event or other Service, when you provide Feedback or send us messages, to communicate with you and to keep you updated on that Service and about other Services.

This data may include your first and last name, e-mail address, affiliation/ company, job title, language preferences, Courses in which participant is currently enrolled or enrolled in the past; evaluation, assessments and scores gathered as part of the training programs as well as the text of any enquiry or message that you provide on the Swine Academy and the relevant subject context (e.g. products).

The legal basis is Art. 6 (1) b) GDPR if you use our Services that require registration, otherwise our legitimate interest in providing you with our services and communicating with you, Art. 6 (1) f) GDPR.

Log data

When you visit the Platform, we receive log data sent by your browser (e.g. IP address, previous website visited, time and date, displayed contents, information regarding the browser and operating system). Collecting log data is technically required to enable you to use our website and to ensure the security and stability of the Platform.

When you use one of our mobile app version, we process the following data to provide the functions and to ensure the security and stability of the app: IP address, time and date, displayed contents, access status/HTTP status code, amount of data transferred, operating system

The log files and data are also processed to prevent and prosecute misuse of our websites and apps.

The log files and data will be stored for as long as necessary for the respective purpose, in principle for at least six months.

The legal basis for processing log data is Art. 6 (1) f) GDPR.

Use of cookies and related data processing (website optimization, analysis, advertising)

On our Swine Academy we use cookies (small text files placed on your browser) and similar technologies such as pixel tags (hereinafter referred to as "**Cookies**").

Essential Cookies

Essential Cookies are necessary for the Swine Academy to function properly by providing basic features such as page navigation, access to secure areas of the Platform or language settings as well as to track important, personally identified user events such as completed training, issued certificates or learning progress (materials, credit points) to reflect such user events in your learning record in the Swine Academy. Some of these cookies also collect IP addresses, login data and similar information that can be considered as personal data. The legal basis is our legitimate interest in operating our website, Art. 6 (1) f) GDPR. We store these essential Cookies the duration of a course session or for up to one year.

Website optimization and analysis

Based on your consent, we set Cookies and analyze how you're using our Platform. This way, we collect information about how well certain services are received and we can adjust and improve them as well our websites.

You may withdraw your consent at any time. To do so, please amend your settings in the "Cookie preferences" by clicking the respective term on the login page or in your User Account menu at the top right corner of each page of the Swine Academy.

With your consent, we use the following services:

- **Adobe Analytics (Omniture)**

Cookies from Adobe Analytics are used to analyze all traffic and usage patterns of individual users (without further identification) or groups (e.g. which services are used how often, how frequently do users return, how long do they stay, which websites and which region are users coming from).

Generally, these Cookies do not store any data that identifies the individual user. These non-essential Cookies are stored for the duration of a course session or for up to two years.

Adobe Analytics is a service of Adobe Systems Software Ireland Limited. To protect your identity, the IP address collected by the Cookies is shortened and replaced with a generic IP address.

Marketing Cookies

If you consent, we use Cookies that allow us and our partners to follow users to other websites in order to show ads that are more relevant to the individual user.

You may withdraw your consent at any time. To do so, please amend your settings in the "Cookie preferences" by clicking the respective term on the login page or in your User Account menu at the top right corner of each page of the Swine Academy.

Pharmacovigilance

As a pharmaceutical company Boehringer Ingelheim is required to carry out certain activities related to the detection, assessment, understanding and prevention of adverse effects or any other medicine related problem, also known as pharmacovigilance obligations. The pharmacovigilance obligations require us to process certain information, which may allow us to directly or indirectly identify a person, i.e. the animal owner and/or the reporter of the adverse event (personal data).

If you use one of the communication channels offered on our online presences (e.g. download form, online form, e-mail) for a report on our products, we may need to process following personal data:

- Full name, initials, and contact details (which may include your address, e-mail address and phone number), profession (e.g., veterinarian, pharmacist).
- Details related to the Boehringer Ingelheim product suspected to cause the reaction, such as administration information, batch number;
- Further details related to the adverse event: What did exactly happen?; course and outcome of the adverse event, start and end date, first-time user?, information on concomitant medications and/or diseases; seriousness of the event; view of reporter on possible causal relationship between Boehringer Ingelheim product and adverse event;

The contact information is requested to enable us to follow-up with the reporter to gain high quality and complete information on adverse events. If the reporter does not wish to provide his contact details to Boehringer Ingelheim or authorities, the reporter can enter "Privacy" in reporter's names field.

We may process your personal data to: (i) analyze the reported adverse event; (ii) contact the reporter for further information; (iii) collate and analyze the information about the adverse event with information about other adverse events received by Boehringer Ingelheim worldwide through our global pharmacovigilance database which is operated by Boehringer Ingelheim International GmbH; and (iv) report pharmacovigilance relevant information to health authorities worldwide.

We may also share pharmacovigilance related information which may include personal data with other pharmaceutical companies who are co-marketing, co-distribution, or other license partners of a Boehringer Ingelheim group of companies, where pharmacovigilance obligations for a Boehringer Ingelheim product require such exchange of safety information; these companies process the data only on our behalf, according to our instructions, under our control and in accordance with this Privacy Policy.

The legal basis for the processing is the fulfilment of our legal obligations (Art. 6 (1) c) GDPR) and our legitimate interest to monitor and improve the security of our products (Art. 6 (1) f) GDPR). Insofar as, in exceptional cases, human health data are also the subject of the processing, the legal basis for the processing is Art. 9 (2) i) GDPR, section 22 (1) (c) German Federal Data Protection Act.

We are legally obliged to archive pharmacovigilance related information which may include your personal data for the time period of the market authorization plus at least further five (5) years after the marketing authorization has expired in any country where the relevant Boehringer Ingelheim product was placed on the market.

Self-tests, self-evaluation and calculation features

Some of our Services may contain self-tests, self-evaluation or calculation features (e.g. quizzes, gamification badges), that allow users to obtain certain information or assessments instantly and online based on certain information. Unless users give us express consent for processing for further purposes, personally identifiable information provided by users is used solely to provide the functionalities of these tools. For statistical purposes and for the improvement of the tools, the information is processed exclusively in anonymized or aggregated form.

The legal basis is our legitimate interest in providing you with the above features, Art. 6 (1) f) GDPR and Art. 6 (1) b) GDPR in case the aforementioned features are only available to registered users.

Content from users

On some of our Services you have the possibility as a registered user to post your own content or comments and interact with other users within the Services. Comments or other information posted or contributed by you to any part of a Service designed to be visible in chat functions on the Swine Academy may be viewed and downloaded by other registered users who use or access the Service. Please bear this in mind when you post such comments or other information.

In these cases, in addition to the content you post, we also process your IP address and data at the time of posting in order to ensure the security of our system and to be able to react in the event of unlawful content (e.g. insults or copyright infringements). This data is usually deleted after 7 days.

Unless users give us express consent to process them for further purposes, personal data contained in the content or comments posted by users will be processed solely in the context of providing the posts or comments.

The legal basis for data processing is the contract on the use of our online offer (Art. 6 (1) b) GDPR).

Further purposes

If necessary, we process your personal data for additional purposes:

- satisfying our legitimate interests (Art. 6 (1) f) GDPR), including the following:
 - (i) to complete a corporate transaction (e.g., corporate restructuring, sale or assignment of assets, merger);
 - (ii) to protect, enforce and defend our rights, property and interests;
- ensuring compliance with legal obligations, court orders or other binding decisions of public authorities (Art. 6 (1) c) GDPR).
- as a contractual/statutory requirement according to Art. 13(2)(e) GDPR.

2. TRANSFER OF PERSONAL DATA

We may share and/or disclose personal data with third parties:

Reporting obligations to regulatory authorities and enforcement of rights

In order to comply with legal reporting obligations, to protect our rights and/or the rights of third parties, we may share and disclose personal data to rights holders, consultants, courts and competent authorities in accordance with legal provisions (e.g., mandatory reports in respect of a suspected adverse event).

Service provider (Processor)

We engage service providers to process your personal data for the purposes described in this privacy policy. These service providers process the data only on our behalf, according to our instructions, under our control, in accordance with this privacy policy and applicable legal requirements.

A corresponding overview of these external service providers, including a description of the respective services and the existence of an adequate level of data protection (Art. 44 et seq. GDPR), can be found in the table below:

Service provider	Description of the service	Country and adequate level of data protection
CrossKnowledge – E-Learning SAS 4 Rue Du Port Aux Vins 92150 Suresnes, France	Hosting, maintenance of and end user support of the Swine Academy Platform and the Services and data processor in the meaning of Art. 4 no. 8 GDPR.	France (EU)

Boehringer Ingelheim companies

As part of a global group of companies, we involve other Boehringer Ingelheim companies that support us with data processing (e.g., as part of our pharmacovigilance obligations to analyze and process a reported adverse event). These group companies process the data exclusively for the purposes stated in this privacy policy as Joint Controller according to Art. 26 GDPR.

Data transfer to recipients outside the EU

Service providers, business partners and Boehringer Ingelheim companies may process personal data outside the EU. In these cases, we ensure an adequate level of data protection to comply with European law (usually through EU standard contractual clauses published by the European Commission or, if necessary, other appropriate safeguards). If it is necessary to transfer personal data to authorities in third countries in order to comply with our legal obligations or to assert or defend legal claims, we ensure that the requirements of the GDPR for this data transfer are met.

Other data transfers

Except as stated in this Privacy Policy, Boehringer Ingelheim will not transfer your data to any third parties without your express consent, unless Boehringer Ingelheim is required or allowed to do so by law, regulatory directive, or court order.

3. RETENTION PERIODS

Boehringer Ingelheim will store your personal data as long as it is necessary for the respective purposes described in this Privacy Policy. In some cases, we are obliged to store your data for longer in order to comply with statutory retention periods. In such cases, we will ensure that your data will only be used to comply with the retention obligations and not for other purposes.

4. YOUR RIGHTS

You have the right to:

- request information about your personal data processed by Boehringer Ingelheim;
- in justified cases, request deletion, rectification or restriction of the processing of your personal data;
- in certain circumstances, request transfer of your Personal Data to you or another person in a commonly utilizable format;
- file a complaint with a data protection authority;
- request the deletion of your Personal Data if they are no longer necessary for the purposes of processing or there is no legal ground for their further processing.
- Not be subject to automated decision-making, including profiling, in certain circumstances. We may, for example, employ automated profiling techniques to recommend content that may interest you. If you wish to obtain human intervention into the recommendation process, you can contact us as set forth in the "Contact Us" section below.
- **object, on grounds relating to your particular situation, to processing of your personal data at any time as far as such processing is only based on Boehringer Ingelheim's legitimate interest (Art. 6 (1) f) GDPR). In this case, we will not process such personal data any longer, unless the Boehringer Ingelheim's compelling legitimate grounds for the processing prevail or the processing is necessary for the establishment, exercise or defense of legal claims. You can object to the use of data for direct marketing purposes at any time without a weighing of interests.**

Should you have given your consent to the processing of your personal data, you can withdraw it at any time with effect for the future; such withdrawal will not affect the lawfulness of the processing until such withdrawal.

5. CONTACT AND QUESTIONS

If you have any questions about this Privacy Policy or about how we use your personal data, please contact us at the following address:

Boehringer Ingelheim Vetmedica GmbH

- Data Protection Officer –

Binger Strasse 173, D-55216 Ingelheim am Rhein, Germany

E-Mail: datenschutz@boehringer-ingelheim.com

If you still have questions or concerns regarding data processing, you can also contact any supervisory authority.

6. CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Policy from time to time. Updates of our Privacy Policy will be published on this Swine Academy. Any amendments become effective upon publication on our Swine Academy.