



General Data Protection Regulation (GDPR)

CLIENT PRIVACY NOTICE

The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union and the European Economic Area. It also addresses the export of personal data outside the EU and EEA. The GDPR aims primarily to give control to citizens and residents over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU. In view of this legislation. The legal basis for processing your information at Poligas Ltd. is based either on:

- (a) Poligas Limited GDPR Consent - Medical Oxygen Patients.
- (b) Poligas Limited GDPR Consent – Commercial Clients.
- (c) When such processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into such a contract.
- (d) Processing which is necessary for Poligas Ltd. to comply with a legal obligation.
- (e) Processing which is necessary to protect your vital interests or of another natural person.
- (f) Processing which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- (g) Processing which is necessary for Poligas Ltd.'s legitimate interests or the legitimate interests of a third party in relation to the execution of a contract and the defence of Poligas Ltd.'s rights.

Poligas Ltd. takes privacy seriously, and according to GDPR would like to clarify how Poligas Ltd. collects, uses, discloses, transfers and stores your personal data. The Poligas Ltd. Privacy Notice provides an overview of the way in which your data is used.

What information do we collect?

For clients availing themselves of commercial services, Poligas Ltd. collects information you submit to Poligas Ltd. or other national authorities, including your name, identity card (or passport) number, company number, VAT number, address, phone number, fax number, email address, and any other communications and documentation that you send or deliver or that is in the public domain.

For patients availing themselves of medical gases, Poligas Ltd. collects information you submit to Poligas Ltd. or other authorized dispensaries, institutions and national authorities, including your name, identity card (or passport) number, address, phone number, email address, delivery address, carer details, and any other communications and documentation that you or a carer sends or delivers or that is in the public domain.

How do we use your information?

For both commercial and medical clients, Poligas Ltd. uses the information to provide you with our services and to perform any service or contract we have entered into with you (on your behalf, on behalf of your company or as a legal guardian of a child), to respond to any queries, suggestions and complaints you might have, and to gather feedback from you about our services. We may also use the information while seeking to collect debts that are owed, and keeping you updated with information regarding Poligas Ltd.'s products or services. For medical clients, medical details may be divulged to other healthcare professionals in the best interest of the patient, or if requested by a national authority or by Central Procurement Services Unit (CPSU).

Who do we share your information with?

For medical clients, Poligas Ltd. shares your information in accordance with legal data protection and privacy obligations. Poligas Ltd. may share your medical information with healthcare professionals and CPSU if this would be in your best interest. Poligas Ltd. may also share your medical information with authorities if required or requested by law. Medical information may need to be handled internally by the administration staff. Other personal details for medical clients may be divulged to a carer, institution, home, or delivery personnel.

For commercial clients, personal details may be shared internally at Poligas Ltd. to provide the service agreed, with credit reference agencies who provide anti-fraud and credit-insight, and central and government departments.

For medical and commercial clients, personal information may be shared with Poligas Ltd.'s professional advisors for example our lawyers, accountants, auditors, technology advisors, third party Cloud Service providers, and consultants when they need to provide a service to us.

Where possible, Poligas Ltd. take steps aimed at ensuring that all such persons process your personal information as disclosed by us as necessary for their service delivery and for no other

purpose. These may include the Police, local authorities, courts, and other central or local government bodies when they request it and we may lawfully disclose it, for example for the prevention and detection of crime.

Poligas Ltd. may disclose information in response to a court order or a request for cooperation from a regulatory, law enforcement or other government agency. Poligas Ltd., may disclose information to establish or exercise its legal rights, to defend its legal claims, or as otherwise required or permitted by applicable laws and/or regulations.

When Poligas Ltd., believes that disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspended illegal activity, fraud, or other wrongdoing; to protect and defend the rights, property or safety of Poligas Ltd., its clients, staff, suppliers or others.

How do we receive your information?

The information Poligas Ltd. receives may be provided by you to our pharmacists or other staff, by your healthcare professional, and by CPSU, either verbally, by hand, post, phone or electronically. Poligas Ltd. uses appropriate procedures, such as physical and technical security measures to safeguard your information across our offices and computer systems, networks against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. Your data will be mainly held and processed in Malta, except in cases of transfer of data to third-party cloud storage providers.

How long do we keep your information for?

In accordance with our legal data protection and privacy obligations, Poligas Ltd. will only retain your information for as long as we actually need it to achieve the purpose(s) for which we obtained it in the first place, or as required under any contract or by applicable law.

How do you manage your information?

You can contact us to discuss your information by emailing us on:

poligasorders@polidano-group.com

It is very important to us at Poligas Ltd. that all the information we hold about you remains accurate and up-to-date at all times. Please ensure that the information you provide to us remains accurate and up to date.

You have a number of rights which we respect and aim to uphold. These include

- Correcting inaccurate information.
- Asking us about your information.
You have the right to ask whether we have information about you, and for us to give you certain details about that information subject to any limitations imposed by law.
- Erasing your information.

You have the right to ask us to erase your personal data when your information is no longer necessary for the purpose it was collected for, or when you withdraw your consent (if consent was the lawful reason for processing), so long as it does not affect the lawfulness of processing based on consent before its withdrawal.

You have the right to object to having your personal data processed, so long as there are no legitimate grounds for such processing.

Your data could be erased if your information was unlawfully processed or it might have to be erased if it does not comply with a legal obligation.

Erasure requests will not apply if processing is necessary to exercise the right of freedom of expression and information, to comply with a legal obligation, and to exercise or defend legal claims with Poligas Ltd.

- The right to withdraw your consent at any time when the processing of your information is based on the giving of your consent.
- The right to restrict the processing of your information or to object to such processing.
- The right to obtain and reuse your information for different services.

This right applies only to the data you have provided to us, where processing is based on your consent or on a contract and when processing is carried out by automated means.

- The right to lodge a complaint with the commissioner of information and data protection if you consider that the processing of personal data related to you infringes the law.
- You may have other legal rights over the information we collect about you, and we will honor such rights. Please send your requests to the above email address.
- We reserve the right to charge an administrative fee in honoring your legal rights as permitted by law.

Will there be changes to this privacy policy?

Poligas Ltd. may need to update this policy from time to time to keep it accurate and up to date. If we change the policy, we will tell you about it by email, so it is of paramount importance that you check your information and correct it if necessary as indicated above.

Close Circuit Television (CCTV) information

Poligas Ltd. may have CCTV in operation throughout Poligas Ltd. premises. The footage is captured purely for security purposes. It is kept separate from your personal information and not accessed save from the request by national authorities such as the police force in the prevention and prosecution of crime.

Poligas Ltd. is a 'data controller' and a 'data processor' and has control over the data you provide us with. This term is a legal phrase to describe the entities who controls the way information is used and processed.