

## PRIVACY AND COOKIE POLICY

### Purpose

This Privacy and Cookie Policy – Proqurable (“Policy”) sets out how Proqurable B.V (hereinafter referred to as “**Proqurable**”), manages personal data of Stakeholders, in compliance with the General Data Protection Regulation (“GDPR”) and other applicable personal data privacy laws.

### Scope

This Policy applies to personal data processed by Proqurable, collected via our website and/or during professional interactions with investors, suppliers, clients, service providers and other relevant stakeholders (collectively referred to as “**Stakeholders**”, “you”, “your”).

### Introduction

This Policy explains how Proqurable collects, processes, retains, and discloses personal data of Stakeholders in alignment with GDPR and other applicable personal data privacy laws.

This Policy applies to Proqurable’s Stakeholders, in order to maintain transparency about how personal data is managed within our organization and by third parties that process personal data of Stakeholders on behalf of Proqurable (see POL 400 – Personal Data Privacy Policy and Code of Conduct – Business Partners). It is available to inform relevant data subjects of their rights and our practices regarding personal data processing.

All terms not expressly defined herein shall have the meanings assigned to them under the GDPR.

### References

#### Internal:

FRM 210-012 Terms, acronyms, and definitions  
POL 400 Personal Data Privacy Policy  
Code of Conduct – Business Partners (on i+ solutions website)

#### External:

General Data Protection Regulation ( <https://eur-lex.europa.eu/eli/reg/2016/679>)  
Dutch GDPR Implementation Act (Uitvoeringswet AVG or UAVG)  
(<https://wetten.overheid.nl/BWBR0040940/2021-07-01>)

### Policy

**Types of Personal Data Processed:** Depending on the relevant Stakeholder and our interactions with you, Proqurable may collect personal data including but not limited to name, personal identification details, professional contacts, business bank account details, account status, license information and other related financial information.

#### Collecting Personal Data with Cookies:

Upon obtaining your consent via its website, Proqurable collects cookie data, including browser type, IP address and searched products.

We collect this data to administer customer relationships, improve our website and user experience, prevent unauthorized use or fraud, and deliver products or services.

You can manage or disable cookies via your browser settings; however, certain website features may be inaccessible without cookies.

**Legal Basis and Purposes of Processing Personal Data:** Proqurable processes Stakeholders personal data for following legitimate legal basis and purposes:

Legal Basis	Purposes
<b>Contractual Requirement</b> (Article 6(1)(b))	We process your personal data when it is necessary for the performance of a contract with you, or where you have requested us to take steps prior to us entering into a contract together, in particular: to fulfil any of our obligations owed to you under such contract such as to manage your orders, arrange the provision or receipt of goods and services, and to make payments to you for services provided, the reimbursement of expenses or rebates; and managing orders, questions, and complaints regarding products where you have placed orders, posed questions in relation to orders, or submitted complaints.
<b>Legal Obligation</b> (Article 6(1)(c))	We process your personal data to meet legal (including tax and accounting), regulatory, pharmacovigilance, quality, medical inquiry, and compliance requirements.
<b>Legitimate Interest</b> (Article 6(1)(d))	We also process your personal data when it is necessary for the purposes of our legitimate interests including but not limited to, enhancing website and product offerings, preventing fraud and unauthorized IT use, providing service updates, support, and response to inquiries, educating Proqurable staff, managing and monitoring our business relationship with you and carrying out due diligence and conflict of interest analysis.
<b>Consent</b> (Article 6(1)(a))	Generally, we do not rely on consent as a legal basis for processing your personal data, except for certain circumstances such as sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

**Disclosure of Personal Data:** Proqurable discloses your personal data to the following categories of recipients (in all cases, only when necessary to fulfil their functions):

i+solutions employees, consultants, and external advisors

Investors

Suppliers

Third party service providers such as banks, auditors, and IT administrative service providers

Governmental organisations such as tax authorities and customs offices

**Transfer of Personal Data:** Proqurable may transfer your personal data to countries outside the EU/EEA, specifically in Africa, based on EU standard for data protection.

**Retention of Personal Data:** If we have a contract with you, your personal data will be retained for the duration of your contract and for an appropriate duration after its termination to protect us from any legal claim.

Otherwise, your information will be retained for two years, or as reasonably necessary for the purposes set out above, in accordance with applicable laws. For more information on your particular circumstance, contact us using the contact information listed at [5.9](#).

**Data Subject Rights:** As a GDPR data subject, you have rights including:

- Right to be Informed
- Right of Access
- Right to Rectification
- Right to Erasure
- Right to Restriction of Processing
- Right to Data Portability
- Right to Object
- Rights in Relation to Automated Decision-Making and Profiling

Rights may be subject to conditions based on processing circumstances. For questions about your rights, contact us.

**Changes to This Policy:** This Policy is subject to updates. Proqurable will maintain the latest Policy on its website.

**Contact Information:** For queries regarding this Policy, or to exercise your data subject rights, contact us at [dataprotection@iplussolutions.org](mailto:dataprotection@iplussolutions.org)

**Disclaimer:** While i+solutions will manage personal data in its official capacity, we are not responsible for any personal data shared independently by Stakeholders or external parties.

## Attachments

N/A

## Revision History

Version	Change	Justification
00	New document	DMS-702
01	Renamed the document title to indicate it pertains solely to XS2MEDS.	DMS-693
02	Rebranded XS2MEDS to Proqurable.	DMS-722

