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#### PRIVACY POLICY

#### **INTRODUCTION**

Protecting personal data and respecting the privacy of visitors and users of our online platforms and of (candidate) participants in our program is of great importance to Moeders voor Moeders, part of the pharmaceutical company Aspen Oss B.V.. Personal information is therefore carefully processed and secured by Moeders voor Moeders. In doing so, we comply with the laws and regulations in the field of personal data protection, such as the General Data Protection Regulation (AVG).

With this document we provide information about the data we process from (candidate) participants, from subscribers to e-mail newsletters and from visitors and users of our online platforms, the app 'Sara' and other services such as online promotions, fairs and actions, contests and loyalty programs. In general, when visiting the online platforms and viewing the content, you can remain anonymous by not providing any personal data. If you do not agree with this privacy policy, please do not provide any information and do not use the online platforms.

As used in this privacy policy, "we", "us", "our" and "our" mean Moeders voor Moeders, part of Aspen Oss B.V.

#### **MEANING OF PERSONAL DATA**

The term "personal data" is defined in the data protection legislation applicable in your country. It includes any information relating to an identified or identifiable natural person. This means any person who can be directly or indirectly identified by reference to an identifier such as a name, an identification number, location data, online identifiers (for example, IP addresses - if these can be used to identify you) or one or more factors specific to that natural person's physical, physiological, genetic, mental, economic, cultural or social identity.

In short, this refers to data that can be used on its own or with other data in our possession or at our disposal to identify you.

## PURPOSES OF COLLECTING AND PROCESSING PERSONAL DATA

We collect and process personal data for the following purposes:

- for the establishment and execution of an agreement concluded with you for participation in our collection program;
- to offer and provide you with the agreed services and/or information;
- to give you the opportunity to post and exchange questions and information on one of our online platforms, or if the platform offers the possibility to contact other users;
- To send you a newsletter, service message or other electronic message;
- to analyze, maintain, optimize and secure our online platforms and related technologies and to prevent fraud;
- to conduct market research and compile management information for product and service development and to determine the (general) strategy regarding the Moeders voor Moeders program.
- for recruitment purposes in case of a vacancy and the recruitment process including the creation of an (electronic) HR file for the applicant, managing applications and organizing job interviews.

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#### SHARING AND DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

Moeders voor Moeders uses data of participants for its own purposes and will only share it with external parties and organizations acting on behalf of Moeders voor Moeders. This is necessary, among other things, to make contact with the participants and to visit them at home. For this purpose, Moeders voor Moeders shares only that information with the informatricians, transportation companies and other service providers necessary for that contact and/or visit. Each external party working for Moeders voor Moeders signs a one-time confidentiality agreement prior to his/her work. Use of personal data by external parties and organizations is covered by agreements requiring that personal data can only be used for the purpose for which the data was made available and that the personal data is protected in an appropriate manner.

On the website <a href="www.moedersvoormoeders.nl">www.moedersvoormoeders.nl</a>, after registration there is the possibility to subscribe to Prénatal's e-mail newsletter. This is done only on your own initiative by placing a check mark at "Yes, I subscribe to the Prénatal newsletter". Then a screen appears in which the following data are already filled in automatically: name, due date, postal code and e-mail address. If "send" is clicked, the data is sent directly to Prénatal. Moeders voor Moeders will in no case provide personal data to Prénatal without consent.

In special cases we may, without consent, make personal data available to third parties. Special cases include, for example, lawful requests to do so from authorities, subpoenas or court orders, actions to detect or prevent damage or fraud, or actions to ensure the security of our network and services.

#### ANONYMIZATION OF DATA AND USE OF AGGREGATED INFORMATION

We may process your personal data into statistical or aggregate data so that you are not identified or identifiable from that data. We may use this collected data to conduct market research and analysis, including for statistical research and statistical reports.

In particular, we use this technology to collect anonymous information about the use of our online platforms. For example:

- 1. we use technology to track which pages visitors view on our platforms. We also use technology to determine which browsers our visitors use. This technology does not identify you personally, but allows us to track statistics about our visitors and their use of our platforms.
- 2. certain pages on our platforms may contain hyperlinks to other pages. We may use technology to track how often these links are used and which pages on our platforms our visitors choose to view. Again, this technology does not identify you personally, but allows us to track statistics about the use of these hyperlinks.

We use this anonymous data to improve the content and functionality of our platforms and to think about areas and topics of interest so that we can focus our email updates on them (for those who want to receive such messages). This allows us to gain a better understanding of what visitors to our platforms are generally interested in, and thus improve our platforms and the products and services we offer.

# **SECURITY OF PERSONAL DATA**

We strive to implement appropriate technical and physical security measures to protect personal data transmitted, stored or otherwise processed by us from accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, in connection with our platforms. These measures include computer security and secure files and facilities. Our service providers are also carefully selected and required to implement appropriate protective measures.

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In certain areas, Aspen Oss B.V./Moeders voor Moeders uses industry-standard SSL encryption to protect data transfers. Most current browsers support the necessary security level for using these areas.

In particular, we strive to take appropriate technical and organizational measures to ensure a level of security that is appropriate in light of the risks, including, where applicable: (a) pseudonymization (such as when data is separated from direct identification data so that linking to an identity is not possible without additional information kept separate) and encryption, (b) ensuring the continued confidentiality, integrity, availability and resilience of systems and services used to process your personal data, (c) ensuring the ability to restore availability and access to personal data in a timely manner in the event of a physical or technical incident; and (d) ensuring a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational security measures.

#### **COOKIES AND ANALYTICAL TOOLS**

We may from time to time use cookies on our online platforms. Cookies are small text files that your web browser leaves on your hard drive in order to recognize you as a returning user of our website(s), track your use of our website(s) and provide targeted advertising. This allows certain aspects of your visit to our website(s) to be tailored to you personally. Data collected from cookies in this way is used solely on a collection basis. Unless a visitor himself or herself provides us with his or her identity, e.g. by registering on our online platforms, providing information via an online form or sending us a message via the platforms, we will not learn the identity of individual visitors. We may use cookies to store preferences; record session information; build information about visitors' preferences and interests on the website(s); record previous activity on a website to better serve you when you return to our website(s); or customize content on a web page based on information you voluntarily provide.

The cookies our websites may set can be divided into four categories:

- 1. Strictly necessary cookies.
  - These cookies are essential because they enable you to browse our website(s) and use certain features, e.g. to access secure areas of the website or in connection with information searches. Without these cookies, certain services you may request could not be provided.
- 2. Performance cookies
  - These cookies can be used to collect information about how you use our website(s), e.g. which pages you visit most often. These cookies do not collect information that identifies you. These cookies are only used to provide information about the performance of our website(s) and to make relevant improvements.
- 3. Functionality and profile cookies
  - These cookies may be used so that our websites can store information about the choices you make and to provide you with more personalized functionality. In addition, we may use such cookies to ensure that the marketing and experience on the website(s) is relevant to you. The information these cookies collect is anonymous. Your browsing activity on other websites cannot be tracked.
- 4. Advertising Cookies
  - These cookies may be used to display advertising that is better suited to you and your interests. They are usually placed by advertising networks with our consent.

We use <u>Google Analytics</u>, a web analytics service provided by Google Inc. (Google) on our website(s) and app. Google Analytics uses cookies, which are text files placed on your computer, to help the website analyze how users use the site.

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Information generated by the cookie about your use of our website(s) is usually transmitted to and stored on a Google server in the United States. If IP anonymization is activated on this website, however, your IP address will first be truncated by Google and thus rendered anonymous within member states of the European Union or in other countries party to the Agreement on the European Economic Area. Only in exceptional cases will a full IP address be sent to a Google server in the United States and truncated there. Google will use this information on behalf of the operator of this website for the purpose of evaluating your use of the website, compiling reports on website activity and providing the website operator with additional services relating to website and internet usage. The IP address transmitted by your browser as part of Google Analytics is not combined with other data by Google. You can prevent the storage of cookies through the settings of your browser software. However, please note that in this case you may not be able to make full use of all functions of the website(s). Furthermore, you can prevent data generated by the cookie about your use of the website(s) (including your IP address) from being collected and processed by Google by downloading and installing a browser plug-in via the following link: http://tools.google.com/dlpage/gaoptout?hl=en

We use Google Analytics on our websites with the extension "anonymizeIP()". IP addresses are truncated before further processing to prevent data from being directly associated with individuals.

You can disable cookies via the settings of your Internet browser. Please consult the help function of your browser for information on how to disable cookies. If you disable cookies, certain features of our websites may not work properly.

#### LINKS TO OTHER WEBSITES

On our social media channels and websites <a href="www.moedersvoormoeders.nl">www.moedersvoormoeders.nl</a>, <a href="www.berichtjeuitjebuik.nl">www.vriendinnenonderelkaar.nl</a> you will find hyperlinks to websites that are not operated by us. Although these websites have been selected with care, we cannot be responsible for the use of your data by these organizations. Please read the privacy policies, if any, of the websites you visit.

# **SOCIAL MEDIA**

We like to engage, through the web and social media channels, with our participants and followers. The goal is to provide useful and relevant information and/or answer questions made known through social media. To this end, we monitor the Internet such as forums and social media channels, such as Facebook and blogs. In doing so, we make every effort to follow, participate in and/or proactively engage with feeds on these channels and answer individual, relevant questions and comments. We expressly reserve the right not to respond to every question or comment. No rights whatsoever can therefore be derived from whether or not we respond in a substantive manner. When participating in online initiatives and answering questions or responding to comments, Moeders voor Moeders may record (personal) data. These will of course be processed in accordance with what is stated in this document. We are not responsible for the handling of personal data by other participants through social media channels.

# PROCEDURE OF REGISTRATION FOR PARTICIPATION IN MOEDERS VOOR MOEDERS AND MANAGEMENT OF PERSONAL DATA

Registration for participation in Moeders voor Moeders is possible up to and including the 11th week of pregnancy and can be done via the registration form on the website, via the registration form in the app 'Sara', via QR code, by telephone via the information number or by contacting an informer directly.

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When registering, the following personal data are requested and recorded: first name, last name, address, zip code, place of residence, e-mail address, first day of last menstruation, telephone number and preferred accessibility. These data are stored in a database and forwarded to the informer in the corresponding area. She then contacts the candidate participant to make an appointment for an intake interview by telephone.

During the intake interview, the woman will be asked a question with reasons why she cannot participate in the program. This question must be answered truthfully. The answer to this question determines whether someone may participate. If this is the case, the additional data obtained will be further completed by the informer in the online database and then shared with the Moeders voor Moeders organization. After completing the intake interview, the candidate participant receives an e-mail containing a link to a digital participation agreement. This digital participation agreement opens in a secure environment where the candidate participant can confirm or reject her participation. If the participation agreement is confirmed, the necessary data is shared with the transportation company for delivery of the starter package. The participation agreement is stored digitally in the database in the participant's profile. In case the prospective participant rejects the participation agreement, her registration will be terminated immediately.

After confirming the participation agreement, the participant will receive an e-mail with personal login information with which she can log in to a protected environment on the Moeders voor Moeders website. In this protected environment the (personal) data and participation data can be viewed, the transport schedule can be consulted and a number of matters relating to participation can be arranged (for example, a move or vacation notification). In this protected environment the digital participation agreement can also be downloaded. With the personal login details, the participant also has direct access to the Sara app.

As part of our services, personal data are recorded. These personal data explicitly include not only the data a candidate participant shares with us through the online application form, but also the data added during the intake interview with the informant. By agreeing to the privacy policy you expressly consent to the recording, processing and use by Moeders voor Moeders of the information provided by you. The starting point is that providing personal data is not mandatory. You always have the choice whether to share personal data. However, in order to participate in Moeders voor Moeders, providing personal data is a prerequisite.

Active participants in Moeders voor Moeders receive a weekly digital newsletter at the start of participation with information about the organization, current news, tips and facts, and so on. Unsubscribing to this newsletter is possible at any time. When you unsubscribe from the digital newsletter, we reserve the right to inform you by e-mail of any changes regarding the participation process or other information that may be of interest to you. We also reserve the right to ask you, as a (former) participant, to participate in market research.

#### PARTICIPATION CONDITIONS

# **GEOGRAPHICAL AREA**

Participation in Moeders voor Moeders is only possible if you live in the Netherlands.

#### **REGISTRATION AND PARTICIPATION**

Registration for Moeders voor Moeders is possible from the moment you are late until the 11th week of pregnancy. This need not necessarily be determined by an obstetrician or gynecologist, your own assessment is sufficient.

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Participation in Moeders voor Moeders is possible from the 6th up to and including the 16th week of pregnancy (counting from the 1st day of the last menstruation) provided the participation conditions are met.

#### **SUBMITTING PERSONAL STORIES**

On the website <u>www.moedersvoormoeders.nl</u> there is an opportunity to submit a personal story. This story arrives at Moeders voor Moeders via an e-mail message. If Moeders voor Moeders decides to use the submitted story for publication on the website <u>www.moedersvoormoeders.nl</u>, the sender will always be contacted first for approval.

#### SENDING IN PHOTOS FOR PROMOTIONAL ACTIVITIES

On the website <u>www.moedersvoormoeders.nl</u> it is possible to send in personal photos that Moeders voor Moeders may use for promotional purposes, for example in printed matter, advertisements and on the website. When submitting, the submitter must agree to some conditions by placing a check mark at "I agree to the conditions".

## Conditions:

- participants give Moeders voor Moeders permission to use the submitted photos in various promotional activities, without Moeders voor Moeders having to provide any financial or other compensation;
- miscellaneous promotional activities include: print, website, social media and trade show activities:
- for other non-standard activities, the submitter will always be contacted first;
- participants agree to publication of photos in and on expressions of Moeders voor Moeders;
- Moeders voor Moeders may make changes to these terms and conditions at any time.

#### SIGN UP FOR NEWSLETTER BERICHTJE UIT JE BUIK

All residents in the Netherlands can subscribe to the newsletter of Berichtje uit je buik at <a href="www.berichtjeuitjebuik.nl">www.berichtjeuitjebuik.nl</a>. When subscribing, the following personal data are requested and recorded: pregnancy week (if expecting), e-mail address, first and last name. This data is stored in a database within a secure management system. Data can be changed by re-registering via the registration form on the website. Already existing data in the database will then be automatically overwritten. In every e-mail, Moeders voor Moeders includes an option to unsubscribe separately.

# **MOEDERS VOOR MOEDERS APP 'SARA'**

The Moeders voor Moeders app called 'Sara' can be downloaded from the Appstore and Google Playstore.

When using the app, one or more of the following data will be stored on a central server, in the online database and/or on your own mobile device:

- First and last name
- Expected delivery date
- Photos as taken and/or uploaded by user on behalf of the pregnancy diary and/or the flipbook
- Answers to diary questions and/or notes as added by user
- Whether the user is a participant of the Moeders voor Moeders program
- Technical information (operating system, device, app version, etc.)

To use the app optimally, an account must be created by entering an email address and password. Without an account, some features in the app are not available. In addition, by creating a personal account you are assured that in case of loss, theft, defect or replacement of the device used, the entered (personal) data, uploaded images and other content will not be lost.

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By using and installing the app you give Moeders voor Moeders unambiguous consent to process your personal data (Article 6 paragraph 1 sub a AVG).

When using the app, we collect and process personal data for the following purposes:

- To enable you to follow your pregnancy digitally and to record it in a personal pregnancy diary.
- To send you (if applicable) reminders and notifications regarding your participation in the Moeders voor Moeders program.
- To make participants more involved and to enthuse candidate participants to participate in the program.

#### RETENTION PERIOD OR CRITERIA USED TO DETERMINE RETENTION PERIOD

We retain personal data for as long as necessary for the purposes for which it was collected, as described above. The criteria we use to determine retention periods for personal data include:

## 1. Retention in case of queries

We retain personal data for a reasonable period of time after the relationship between Moeders voor Moeders and you has ceased to exist (up to 6 months) in case of inquiries on your part;

## 2. Retention in case of claims

We retain the personal data during the period in which you can file legal claims against us if and to the extent that we have entered into an agreement with you;

# 3. Retention in accordance with legal and regulatory requirements

We will retain personal data for the period required by law or regulations for this purpose; thereafter it will be destroyed.

Personal data of participants in the Moeders voor Moeders program will be digitally stored for 10 years. In this way we comply with legal (retention) obligations.

#### **APPLICATIONS**

When you start providing services for Moeders voor Moeders after a successful application, your personal data will be transferred to your personal file and will be processed for the purpose of the agreement. If your application is unsuccessful, we will retain your personal data for a period of time consistent with applicable law after we have notified you that your application was unsuccessful.

## YOUR RIGHTS UNDER DATA PROTECTION LEGISLATION

You have various rights under the privacy laws in your country. These may include (where applicable): the right to request access to the personal data we hold about you; the right to rectification, including having us correct inaccurate personal data; the right to request restriction of the processing concerning you or to object to the processing of your personal data; the right to request erasure of your personal data when it is no longer necessary for us to keep it; the right to data portability, including the right to obtain personal data in a commonly used machine-readable format under certain circumstances, for example where our processing of it is based on consent; the right to object to automated decision making, including profiling (where applicable), which has a legal effect on you as an individual or which significantly affects you; and the right to withdraw your consent to any processing for which you have previously given it. You can also file a complaint with the Personal Data Authority (Privacy Information and Reporting Point, telephone number: 088-1805250).

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# INSPECTION, MODIFICATION AND DELETION OF AND OBJECTION TO PERSONAL DATA

We believe it is important to be transparent about how we handle your personal data. With this document we want to contribute to that. However, if you have any questions about the way we handle your personal data, please send an e-mail to <a href="mailto:info@moedersvoormoeders.nl">info@moedersvoormoeders.nl</a> or a letter to Aspen Oss B.V., department Moeders voor Moeders, Postbus 98, 5340 AB in Oss.

Due to legal obligations, the data of participants who have donated their urine to Moeders voor Moeders must be kept for 10 years. This retention period starts after termination of the last participation. After this 10-year period, the data is automatically deleted. Access to the data is limited. If you want to know what personal data of yours has been recorded or if you want to change data in accordance with the applicable regulations, you can send an e-mail to <a href="mailto:info@moedersvoormoeders.nl">info@moedersvoormoeders.nl</a> or a letter to Aspen Oss B.V., department Moeders voor Moeders, Postbus 98, 5340 AB in Oss, stating 'inspection/change personal data'.

Your message should at least include your full name, address and place of residence. If we cannot or cannot fully determine to which personal data your request for inspection or amendment relates, we may ask you to specify your request. We will suspend the execution of your request until you have provided us with the (further) specification.

After execution of your request we will always send you a confirmation message. As soon as possible after receipt of your request to that effect, we will terminate the use of your data for the purposes against which your objection is directed and, in the event of a lawful request to change data, we will change the personal data in question, unless and insofar as the law obliges us to keep the personal data in question unaltered or there are (other) compelling reasons that oppose change.

### **CHANGES**

We reserve the right to make changes to this document. Therefore, please review this document regularly for updates to our privacy policy, cookie policy and terms of participation.

# **QUESTIONS**

If you have any questions about our privacy policy, cookie policy and/or terms of participation, please contact: Aspen Oss B.V., Moeders voor Moeders Department.

P.O. Box 98 5340 AB Oss

E-mail: info@moedersvoormoeders.nl

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