

PRIVACY NOTICE

Welcome to FENDIGO's privacy notice.

This privacy notice provides information on how FENDIGO collects and processes your personal data when you visit our website, purchase a product or service from us or sell a product or service to us.

It is important that you read this privacy notice together with our privacy policy which contains more detailed information about our data processing. Our privacy policy can be accessed [here](#).

1 Important information and who we are

FENDIGO is made up of different legal entities, details of which can be found here <http://alivira.co> ("**Company Group**"). This privacy notice is issued on behalf of the FENDIGO Group so when we mention "**FENDIGO**", "**we**", "**us**" or "**our**" in this privacy notice, we are referring to the relevant company in the FENDIGO Group responsible for processing your data. FENDIGO is the controller and responsible for your personal data.

2 Our contact details

Our full details can be found [here](#).

3 The data we collect about you

We may collect, use, store and transfer different categories of personal data. We explain these categories of data [here](#).

We use different methods to collect data about you, which are explained [here](#).

4 How we use your personal data

We will only use your personal data for the purpose for which we collected it.

More information on how we use your personal data can be found [here](#).

More information on the purposes for which we use your personal data can be found [here](#).

5 How we share your personal data

We may share your personal data within the FENDIGO Group and with external third parties. More detail can be found [here](#).

6 International transfers

We may transfer, store and process your personal data outside the European Economic Area. More detail can be found [here](#).

7 Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including the right to receive a copy of your personal data and the right to make a complaint at any time to the competent Data Protection Authority.

More detail on your legal rights can be found [here](#).

PRIVACY POLICY

1 Introduction

Welcome to FENDIGO’s privacy policy.

FENDIGO respects your privacy and is committed to protecting your personal data. This privacy policy will:

- inform you as to how we look after your personal data; and
- tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below:

1	Introduction.....	1
2	Purpose of this privacy policy.....	1
3	We are the controller of your personal data.....	1
4	Our contact details.....	2
5	Complaints.....	2
6	Your duty to inform us of changes.....	2
7	The data we collect about you.....	2
8	If you fail to provide personal data.....	3
9	How is your personal data collected?.....	3
10	How we use your personal data.....	3
11	Marketing.....	4
12	Change of purpose.....	5
13	Disclosures of your personal data.....	5
14	International transfers.....	5
15	Data security.....	6
16	For how long will we use your personal data?.....	6
17	What are your legal rights?.....	6
18	Time limit to respond.....	8
19	Changes to this privacy policy.....	8

8 Purpose of this privacy policy

This privacy policy provides you with information on how FENDIGO collects and processes your personal data.

This privacy policy applies to our customers, suppliers, business partners and any other legal or physical person whose personal data we are using.

Our products and services are not intended for children. We do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

9 We are the controller of your personal data

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responsible for processing your data. FENDIGO is the controller and responsible for your personal data.

10 Our contact details

FENDIGO S.A.

Avenue Herrmann Debrouxlaan, 17 - 1160 Brussels

mail@fendigo.com

11 Complaints

You have the right to make a complaint for data protection issues at any time to:

- the Belgian Data Protection Authority (<https://www.dataprotectionauthority.be/>), or
- the Data Protection Authority of your habitual residence, place of work or of an alleged infringement of the [General Data Protection Regulation](#).

We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Authority. So please send us an email at mail@fendigo.com in the first instance.

12 Your duty to inform us of changes

It is important that your personal data is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

13 The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity data (Identity)	Contact Data (Contact)	Financial Data (Financial)	Transaction Data (Transaction)	Technical Usage Data (Technical)	Marketing & Communication Data (Marketing)
First name	Billing address	Bank account details	details about payments to you or from you	Internet protocol (IP) address	Preferences in receiving marketing from us and our third parties
Last name	Delivery address	Payment card details	Details of products or services you have purchased from us	Login data	Communication preferences (email, post, phone, etc)
Username or identifier	Email address		Details of products or services we have purchased from you		
Title	Telephone/Fax numbers				
Veterinary authorisations information					
Employer details					

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

14 If you fail to provide personal data

Where we need to collect personal data by law (or under the terms of a contract we have with you) and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

15 How is your personal data collected?

We use different methods to collect data from and about you including through:

15.1 Direct interactions.

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when:

- You apply for our products or services;
- You create an account on our website;

- You subscribe to our products, services or publications;
- We offer or deliver products or services to you;
- You request marketing to be sent to you;
- You give us some feedback; or
- You offer or deliver your products or services to us.

15.2 Automated technologies or interactions.

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. [Please see our cookie policy [LINK] for further details].

15.3 Third parties or publicly available sources.

We may receive Contact Data from search information providers (such as Google, Facebook, Yellow Pages based inside or outside the EU).

16 How we use your personal data

16.1 In general

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by sending us an email at mail@fendigo.com.

16.2 Purposes for which we will use your personal data

We have set out below, in a table format:

- a description of all the ways we plan to use your personal data,
- which of the legal bases we rely on to do so (and we have identified what our legitimate interests are where appropriate), and
- the time during which we will retain your data.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please send us an email at mail@fendigo.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/ Activity	Categories of data	Lawful basis for processing	Legitimate Interest (if applicable)	Retention period
Order Management - Selling and delivering products & services to customers	Identity; Contact; Financial; Transaction	Contract	NA	NA
Order	Identity; Contact;	Contract	NA	NA

Purpose/ Activity	Categories of data	Lawful basis for processing	Legitimate Interest (if applicable)	Retention period
Management - Buying and processing products & services from suppliers	Financial; Transaction			
(New & existing) Customer/Veterin aries Management. Direct Marketing.	Identity; Contact; Financial; Transaction	Legitimate Interest	Direct Marketing	For Vets: end of professional career. For other existing customers: 10 years post- contractual relationship.

17 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

17.1 Promotional offers from us

We may use your Identity, Contact and Marketing Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us:

- if you have consented to receiving such communications;
- if you have requested information from us or purchased goods or services from us or
- if you provided us with your details when you entered a competition or registered for a promotion

and, in each case, you have not opted out of receiving that marketing.

17.2 Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the FENDIGO Group for marketing purposes.

17.3 Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or send us and email at mail@fendigo.com at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

17.4 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [\[LINK TO YOUR COOKIE](#)

POLICY.]

18 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please send us an email at mail@fendigo.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

19 Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 16.2 above.

- Internal Third Parties. These are other companies in the FENDIGO Group who are based India. This disclosure of personal data is required for reporting and auditing purposes.
- External Third Parties. These are:
 - Service providers acting as processors based in the EU who provide IT and system administration services.
 - Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the EU who provide consultancy, banking, legal, insurance and accounting services.
 - The tax and social security administrations, regulators and other authorities acting as processors or joint controllers based in the EU who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

20 International transfers

We share your personal data within the FENDIGO Group. This will involve transferring your data outside the European Economic Area (**EEA**).

Also, some of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by using specific contracts approved by the European Commission. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

In the absence of specific contracts approved by the European Commission (see

above), we may transfer personal data to a third country or an international organization if one of the following conditions applies:

- You have explicitly consented to the proposed transfer;
- The transfer is necessary to enter into or perform a contract between us;
- The transfer is necessary for the performance of a contract that is concluded in your interest between us and a third party; or
- The transfer is necessary for the establishment, exercise or defense of legal claims.

Please send us an email at mail@fendigo.com if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

21 Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

22 For how long will we use your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider:

- the amount, nature, and sensitivity of the personal data,
- the potential risk of harm from unauthorized use or disclosure of your personal data,
- the purposes for which we process your personal data, and
- whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are set out in the table in paragraph 16.2 above.

In some circumstances you can ask us to delete your data (see paragraph 23.3 below for further information).

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

23 What are your legal rights?

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out above, please send us an email at mail@fendigo.com. You have the right to:

23.1 Request access to your personal data.

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

23.2 Request correction of your personal data.

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

23.3 Request erasure of your personal data.

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where:

- you have successfully exercised your right to object to processing (see below),
- we may have processed your information unlawfully or
- we are required to erase your personal data to comply with local law.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

23.4 Object to processing of your personal data

You have the right to object where:

- we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms, or
- we are processing your personal data for direct marketing purposes.

In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

23.5 Request restriction of processing of your personal data.

This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- you want us to establish the data's accuracy;
- our use of the data is unlawful, but you do not want us to erase it;
- you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

23.6 Request the transfer of your personal data to you or to a third party.

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies:

- to automated information which you initially provided consent for us to use; or
- where we used the information to perform a contract with you.

23.7 Withdraw consent at any time where we are relying on consent to process your personal data.

However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

23.8 No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly

unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

23.9 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

24 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

25 Changes to this privacy policy

We reserve the right to update this privacy policy at any time, and we will provide you with a new privacy policy when we make any substantial updates.