Privacy Policy

The protection of personal data is very important to us. For this reason, we continuously review all of our personal data processing activities and ensure that they comply with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "GDPR"), which is binding on all Member States of the European Union, as well as with national legislation on personal data protection.

Your personal data is processed by our company **Galenoderm s.r.o.,** with its registered office at Nobelova 28, 831 02 Bratislava – Nové Mesto, Slovak Republic, Company ID (IČO): 51 642 921, registered in the Commercial Register of the Bratislava III Municipal Court, Section: Sro, Insert No.: 127536/B, as the controller. You may contact us at any time by e-mail at info@galenoderm.com or by telephone at +421 2 4910 9010.

We hereby inform you about the manner and conditions of the processing of your personal data and about your related rights. We process personal data in the areas described below. Where a retention period is specified in years, it expires on the last day of the calendar year in which it would otherwise have expired for the given purpose.

1. Purpose, legal basis and retention period

PURPOSE

Contacts of healthcare professionals:

If you are a healthcare professional (e.g. a physician or pharmacist), we process your contact and professional data (name, title, specialty, workplace, work contact details) so that our medical representatives can visit you and provide you with professional information on the medicinal products and other products we represent, and so that we can plan and record these visits.

LEGAL BASIS

We may process your personal data without your consent on the basis of our legitimate interest in providing healthcare professionals with professional information on the products we represent. You have the right to object to this processing at any time (as described in Section 3).

RETENTION PERIOD

For the duration of your professional contact with us, but no longer than 2 years after the last contact.

PURPOSE

Newsletter and professional information:

We would like to inform you about news, professional information on the medicinal products and other products we represent, and professional events, primarily by means of an e-mail newsletter.

LEGAL BASIS

We may do so only if you give us your consent to the processing of your personal data. Consent is usually given in writing, for example through our medical representative.

RETENTION PERIOD

For the duration of your consent, i.e. until it is withdrawn (as described in Section 3).

PURPOSE

Pharmacovigilance and product safety:

If you report to us a suspected adverse reaction to a medicinal product or another safety issue concerning a product we represent, we process the personal data of the reporter and, to the extent necessary, data concerning the patient, including data concerning their health, in order to assess, record and report such a suspicion to the marketing authorisation holder and to the competent authorities.

LEGAL BASIS

We process your personal data without your consent, as this is necessary to comply with our legal obligations in the area of pharmacovigilance; data concerning health is processed for reasons of public interest in the area of public health.

RETENTION PERIOD

For the period required by pharmacovigilance legislation and by our agreements with marketing authorisation holders.

PURPOSE

Professional events:

If you register for a professional event that we organise or participate in, we process your personal data to the extent necessary for registration, organisation of the event and communication with you.

LEGAL BASIS

We may process your personal data without your consent, as this is necessary for the performance of a contract (registration for the event).

RETENTION PERIOD

For 1 year after the event.

PURPOSE

Suppliers and contractual partners:

If you are our supplier or contractual partner (e.g. a manufacturer or marketing authorisation holder of products we represent), we need to process your personal data that is necessary for the performance of the contract concluded with you, in particular to communicate with you about the terms of the contract, to conclude it, to perform it properly and, if necessary, to enforce performance.

LEGAL BASIS

We may process your personal data without your consent, as this is necessary for the proper performance of the contract.

RETENTION PERIOD

For the duration of the contract and 4 years after its termination.

PURPOSE

Contact persons:

If you are only a contact person of our contractual partner (e.g. its statutory representative, employee or external collaborator), we process your personal data that is necessary for the performance of the contract we have concluded.

LEGAL BASIS

In this case we do not need your consent, as your personal data must be processed for the proper performance of the contract in which you are named as a contact person; ensuring the proper and timely performance of such a contract is our legitimate interest and the legitimate interest of our contractual partner whose contact person you are.

RETENTION PERIOD

For the duration of the contract and 4 years after its termination.

PURPOSE

Accounting:

As an accounting entity, we keep accounts in accordance with applicable legislation and must therefore also process some of your personal data that appears in our accounting records (e.g. incoming and outgoing invoices, cash records).

LEGAL BASIS

We process your personal data for this purpose without your consent, as this is necessary to comply with our legal obligation to keep proper accounts and to fulfil the related obligations.

RETENTION PERIOD

For 10 years after the accounting document was issued.

PURPOSE

Taxes:

We also have obligations under tax legislation, in particular regarding income tax and value added tax, and must therefore process your personal data where tax legislation requires us to do so.

LEGAL BASIS

We process your personal data for this purpose without your consent, as this is necessary to comply with our legal obligations under tax legislation.

RETENTION PERIOD

In accordance with tax legislation, usually for 10 years after the tax document was issued.

PURPOSE

Legal claims:

In the course of our business, we monitor compliance with legislation, handle legal matters and, where necessary, assert and enforce our rights and claims or defend ourselves against rights and claims asserted by third parties.

LEGAL BASIS

We may process your personal data without your consent, as this is necessary to assert and enforce our rights and claims or to defend ourselves against rights and claims asserted by third parties in accordance with applicable legislation. This is our legitimate interest.

RETENTION PERIOD

For as long as the rights and claims exist and are enforceable (in particular until the claim becomes time-barred).

PURPOSE

Records management:

We also keep a register of incoming and outgoing mail and other records as required by law, which may contain your personal data, for example if you are the addressee or recipient of a consignment.

LEGAL BASIS

We process your personal data for this purpose without your consent, as this is necessary to comply with our legal obligation under the relevant legislation.

RETENTION PERIOD

In accordance with the periods we have set on the basis of legislation or a period we have determined in line with the principle of storage limitation, but usually 3 years for ordinary correspondence. If it is not clear to you how long we process your personal data, you may contact us at any time.

PURPOSE

Essential cookies:

To ensure the functionality and security of our website and that it loads correctly in your browser, we use essential cookies that enable the basic functions of the website (you can read more about cookies in the “Cookies” section).

LEGAL BASIS

We process your personal data because we have an interest in ensuring the proper functioning of the website and its basic functions. For this reason, we may process this data without your consent.

RETENTION PERIOD

For 7 days after your visit to the website, or no longer than the period set in your browser.

PURPOSE

Non-essential cookies:

To make the use of our website more convenient and efficient, we also use other cookies that are not strictly necessary for the website to function properly but are used, for example, to better tailor advertising to your interests and to compile statistics so that we can improve the website. We also use third-party cookies, e.g. Google Analytics (you can read more about these cookies in the “Cookies” section).

LEGAL BASIS

We may process this data only on the basis of your consent, which you give us when visiting the website, and you can choose whether or not to allow cookies. You may withdraw this consent at any time.

RETENTION PERIOD

For the duration of your consent, but no longer than 1 year after your visit to the website, unless otherwise stated for a specific cookie.

PURPOSE

Social networks:

As we wish to develop our activities and raise awareness of our work as widely as possible, we have set up our own pages, user accounts and channels on social networks (in particular Facebook and Instagram), through which you can obtain information about our activities and comment on, share or like our posts. We will process your personal data only for the purpose of managing and administering these pages, user accounts and channels and obtaining anonymised statistical data.

LEGAL BASIS

We may process this personal data for this purpose without your consent, as we believe you can reasonably expect us to manage and administer our pages, user accounts and channels, which inevitably involves processing the personal data of users who have become our followers, commented on or shared our posts or otherwise interacted with our page, user account or channel. Statistics are made available to us by the social network operators only in anonymised form, and we therefore consider that your specific consent is not required for their provision and processing; this does not affect the responsibility of the relevant social network operator for the processing of your personal data on which these statistics are based.

RETENTION PERIOD

For as long as the page, user account or channel exists, but no longer than 5 years after the processing began.

PURPOSE

IT security:

As we place great emphasis on data protection and information security within our organisation, we may also process personal data where this is necessary for IT security, handling security incidents and other IT administration matters.

LEGAL BASIS

We may do so without your consent, as it is in our interest to protect our information systems and thus also your personal data. In this case, we mainly process data about your IP address.

RETENTION PERIOD

For as long as necessary to trace a security incident, but no longer than 6 months.

PURPOSE

GDPR:

Our company is committed to properly fulfilling all of its obligations in the area of personal data protection, and we therefore also process your personal data where necessary to handle enquiries, requests and security incidents and to fulfil our obligations under the GDPR and other data protection legislation.

LEGAL BASIS

We may carry out this processing without your consent, as it is necessary for us to fulfil our obligations as a controller under the GDPR and other data protection legislation.

RETENTION PERIOD

For 5 years after the output was created.

2. Recipients or categories of recipients

We protect personal data and do not disclose or provide it to third parties, with the exception of our contractual partners who process personal data on our behalf and ensure its protection in accordance with our instructions. These are mainly providers of cloud services (web hosting), accounting, marketing, e-mail and IT services. In the area of pharmacovigilance and in cooperation on the products we represent, we may also provide personal data, to the extent necessary, to the marketing authorisation holders of these products and to the competent public authorities. Where we use the services of auditors, lawyers or other regulated professions, they are considered independent controllers and are therefore obliged to ensure the protection of your personal data under their own terms. Where required by law or by a decision of a public authority, your personal data will also be provided to public authorities or other entities.

3. Rights of the data subject

As a data subject, you have a number of rights under the GDPR, which we would like to draw to your attention:

Right of access to personal data

You have the right to obtain confirmation from us as to whether we process personal data concerning you and, if so, the right to access that personal data and to receive basic information about its processing. The first copy of the above personal data is provided to the data subject free of charge. Any further copies requested by the data subject will be subject to an administrative fee of EUR 5.

Right to rectification and/or completion of personal data

You have the right to ask us to rectify inaccurate personal data concerning you without undue delay and to have incomplete personal data completed.

Right to erasure of personal data

You have the right to request the erasure of your personal data without undue delay only where:

- the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- you withdraw the consent on which the processing is based and there is no other legal ground for the processing;
- you object to the processing and there are no overriding legitimate grounds for the processing;
- the personal data has been processed unlawfully;
- the personal data must be erased to comply with a legal obligation under European Union or Member State law to which we are subject;
- the personal data has been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

You may contact us for this purpose at any time, and we will then assess whether any exceptions apply in your case under which your data need not be erased even if one of the above conditions is met (e.g. where it is necessary for the establishment of legal claims).

Right to restriction of processing

You have the right to have us restrict the processing of your data (i.e. only store your data and not otherwise process it) where:

- you have contested the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead;
- we no longer need your personal data for the purposes of the processing, but you require it for the establishment, exercise or defence of legal claims;
- you have objected to the processing.

You may contact us for this purpose at any time, and we will then assess whether any exceptions apply in your case under which your personal data may be processed in ways other than storage.

Right to object to processing

You have the right to object to the processing of your personal data where the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. We may continue to process your personal data only if we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

Right to data portability

Where your personal data is processed by automated means on the basis of your consent or for the performance of a contract, you have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format and the right to transmit this data to another controller, provided that this is technically feasible.

Right to withdraw consent at any time

Last but not least, you have the right to withdraw your consent to the processing of personal data concerning you at any time, if you have given such consent, by sending the withdrawal to the controller's contact details given above. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Right to lodge a complaint with a supervisory authority

We also inform you that if you believe that your rights as a natural person have been infringed in the processing of your personal data or that the GDPR has been breached, you may lodge a complaint with the competent supervisory authority (pursuant to Article 77 of the GDPR, in the Member State of your habitual residence, place of work or place of the alleged infringement). The supervisory authority in the Slovak Republic, where the controller has its registered office, is the Office for Personal Data Protection of the Slovak Republic (Úrad na ochranu osobných údajov Slovenskej republiky). The contact details of all supervisory authorities can be found here: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en.

4. Requirement to provide personal data

The provision of your personal data that we process on the basis of your consent is voluntary and is not a statutory or contractual requirement; failure to provide it therefore has no negative consequences for you. Where personal data is processed on the legal basis of the performance of a contract or compliance with a legal obligation, failure to provide it may make it impossible to perform the contract or may result in a breach of a legal obligation. In the case of essential cookies, failure to provide personal data may result in the website not functioning. In all other cases, failure to provide personal data has no adverse consequences for you.

The controller is entitled to amend this Privacy Policy. The controller will publish the new version on its website and will also send it to the e-mail address you have provided to the controller.

This Privacy Policy is also available in Slovak and Czech. In the event of any discrepancy between the language versions, the Slovak version shall prevail.

This Privacy Policy takes effect on 12 November 2026.