



Privacy Notice for Photography, Audio, and Video Recordings

Philippines

This Privacy Notice sets out how the various entities within the Zuellig Pharma group (a non-exhaustive list of our entities is found at Part XIV (Contact Us) of our Privacy Policy (hereinafter collectively referred to as “**Zuellig Pharma**”, “**our**”, “**us**” or “**we**”) collects, uses, discloses, and processes (“**Process**”) photography, audio, and video recordings we take in accordance with Republic Act (R.A.) No. 10173 otherwise known as the “Data Privacy Act of 2012” and its Implementing Rules and Regulations (together **the “Act”**).

Please take the time to familiarize yourself with the contents of this Privacy Notice before providing your consent to the processing of your personal data.

I. GENERAL

All terms used in this Privacy Notice shall have the meaning given to them in our [Privacy Policy](https://www.zuelligpharma.com/privacy-policy) located at <https://www.zuelligpharma.com/privacy-policy> unless otherwise indicated. This Privacy Notice constitutes an addendum to the main Privacy Policy and shall be read in conjunction with our Privacy Policy. Save as stated herein, our personal data handling practices remain as stated in our Privacy Policy.

II. PROCESSING OF PERSONAL DATA (WHAT PERSONAL DATA WE PROCESS)

We Process photographs, audios, and visual recordings of you taken or recorded at our premises when activities are taking place and/or during any organized or sponsored Zuellig Pharma events, conferences, seminars, initiative, or promotion (collectively “**events**”) whether you attend as a speaker or attendee.

In addition to this Privacy Notice, we will make sure that you are aware when photography or videography is taking place through any of the following ways:

- Prior advance notice will be given via email, printed and/or electronic documents, event booking forms and invitations.
- Signages will be placed in prominent locations before you enter the area where photography and videography will take place as well as the entry and exit points of the event.
- Our photographer/videographer will be clearly identifiable throughout the event.

If you participate in any of our events as a patient or model, we may collect your age, and/or month and year of birth, gender, identification number, and sensitive personal data such as your health condition, racial or ethnic origin, and such information provided by you or your treating physician or inferred from the photograph, audio recordings, or video recordings in any format or any other methods of capturing any of the foregoing (the “Recording”) including your sustainability for the treatment, identifying, and executing relevant aesthetics treatment or procedure.

III. LAWFUL BASIS AND PURPOSE OF PROCESSING PERSONAL DATA (WHY WE PROCESS YOUR PERSONAL DATA)

We Process your personal data only if we have a lawful basis to do so. Unless prohibited by applicable laws, we typically rely on at least one of these lawful bases to do so:

- The provision of your consent through acceptance of this Privacy Notice in cases where you are prominently featured within the photos and videos; and/or
- Where it is in our legitimate interests to develop new product or service offerings to meet the needs of our customers. If we are relying on legitimate interest, we will use depth of field, distance, and/framing so as not to directly identify you and minimize the privacy impact;
- We may also use your personal data for the purposes of marketing and promotions. You may view further information about our marketing and promotions in Part XI (Marketing and Promotions) of our main Privacy Policy.
- We may also Process your personal data defined above for compliance and legal purposes.

Where you attend any Zuellig Pharma organized or sponsored event as a speaker or attendee, our affiliates, related and/or associated companies, clients, business partners or other third parties, we may use your photographs, audio, and videos recordings for the following purposes:

- On our websites, applications, platforms, forms, products, services, or social media pages or otherwise (hereinafter collectively referred to as the “**Platform**”), for internal documentation and monitoring purposes and to share the same, upon your consent, with our clients, principals, customers and third parties; and/or
- To use actual photographs, audios, video recordings and/or written testimonials for internal, external reports, documentation, and presentation to internal functions for monitoring purposes or upon your consent, to clients during any governance meetings, internal campaigns, external slide decks to be presented to healthcare professionals during events.

Please take note that some audio or video recordings may be edited for brevity, but such edits will not alter the context of the message.

IV. DISCLOSURE OF PERSONAL DATA (WHO DO WE SHARE YOUR PERSONAL DATA WITH)

Zuellig Pharma may share your personal data with third parties, including the Zuellig Pharma group; service providers and vendors that process your personal data on Zuellig Pharma’s behalf, including third parties that deliver marketing and promotional materials, such as network advertising partners, advertising providers and partners, social media companies; consumers and members of the public that receive Zuellig Pharma promotional material, such as patients and health care professionals; and other third parties participating in the events, such as other event participants. Your personal data may also be submitted to the local health authorities, if required by such authorities, for the purposes of reporting and/or pre-approvals required for the event.

You may view further information about the disclosure of personal data in Part V of our main [Privacy Policy](#).

V. PROTECTION OF PERSONAL DATA (HOW DO WE KEEP YOUR PERSONAL DATA SECURE)

Rest assured that we are committed to protecting your personal data. You may view further information about how we keep your personal data secure in Part VI of our main [Privacy Policy](#).

VI. YOUR RIGHTS (WHAT RIGHTS DO YOU HAVE IN RELATION TO YOUR PERSONAL DATA)

You may have certain rights in relation to your personal data in accordance with the Act. In respect of the personal data which you have submitted to us, you may have the right at any time to:

- request for access to your personal data in our records;
- request to make correction of your personal data in our records in the event the information is inaccurate, misleading, out-of-date or incomplete upon validation and verification of the new information provided;
- request to cease processing your personal data for the purposes of marketing;
- object to the processing of your personal data, request to restrict or limit processing of your personal data, or request portability of your personal data;
- withdraw your consent for us to continue processing your personal data; and
- lodge an inquiry or complaint to the relevant data protection authority about our collection and use of your personal data.

If you want to exercise these rights, particularly, your right to withdraw your consent, the details on how to contact us are discussed below.

VII. RIGHT TO WITHDRAW YOUR CONSENT

Once the Recording has taken place, you may withdraw your consent by sending us a [data subject request](#) with the subject heading: "Withdrawal of consent for photography" and state your name, the date and name of the event that you attended. Further details on how to contact us are discussed in XIV (Contact Us) of our main [Privacy Policy](#). If we are unable to identify you, we may have to ask you to provide us with additional information solely for identification purposes to aid us in fulfilling your withdrawal of consent. In this case, please be assured that we will dispose of such additional information as well once the purpose has been achieved.

To this end, please take note that we will immediately stop using your Recording in current and future publications. However, we cannot remove any Recording which has already been published in the public domain prior to your withdrawal of consent. Please be aware that your

withdrawal of consent will not affect the lawfulness of any processing that we made before you informed us of your withdrawal.

VIII. RIGHT TO COMPLAIN

If you have any concerns or complaints about the way we handle your personal data, we request that you contact us and give us the opportunity to address your complaints. For details on how to contact us, you may view Part XII of this Privacy Notice.

If you are not satisfied with our response, you have the right to file a complaint with the National Privacy Commission (NPC) as the supervising authority in respect of the Processing of your personal data. For further information on filing a complaint with the NPC at <https://privacy.gov.ph/filing-a-complaint/>.

IX. RETENTION OF PERSONAL DATA (HOW LONG WILL WE KEEP YOUR DATA)

We will retain your personal data only for as long as reasonably required for the purpose for which such personal data was collected or as permitted by applicable laws after which, we will delete or dispose of your photos, audio, and video recordings. Please take note that some information may still appear in materials that are already in circulation prior to the deletion or disposal of your personal data.

You may view further information about our data retention in Part VIII of our main [Privacy Policy](#).

X. INTERNATIONAL TRANSFERS OF PERSONAL DATA (WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE OF THE COUNTRY WHERE SUCH DATA WAS COLLECTED)

Your personal data may be transferred across international borders within the Zuellig Pharma group or with its vendors or third parties, which may include countries with data protection laws that are not as strict as the Act.

Zuellig Pharma transfers personal data across international borders in accordance with the Act, including but not limited to entering into applicable model data transfer agreements. To obtain a copy of an applicable Zuellig Pharma inter-company data transfer agreements, please, contact <http://www.zuelligpharma.com/contact-us>.

You may view further information about our international transfers of personal data in our main [Privacy Policy](#).

XI. LANGUAGE (WHAT HAPPENS IF THIS POLICY IS TRANSLATED TO MULTIPLE LANGUAGES)

You may find further information about this in our main [Privacy Policy](#).

XII. CONTACT US (HOW YOU MAY EXERCISE YOUR RIGHTS)

If you have any questions or concerns about this Privacy Notice and the way we handle your personal data, or if you wish to exercise any of your rights mentioned above, you may send us a [data subject request](#) or you may contact our Data Protection Officer through the following:

ZUELLIG PHARMA CORPORATION

Address	Km. 14 West Service Road South Superhighway corner Edison Ave. Brgy. Sun Valley, Paranaque City, Philippines
Email Address	phzpdataprivacy@zuelligpharma.com
Tel. No.	+63 (998) 961-8246 / +63 (917) 846-1007

INTERPHARMA SOLUTIONS PHILIPPINES, INC.

Address	Km. 14 West Service Road South Superhighway cor Edison Ave. Brgy. Sun Valley, Paranaque City, Philippines
Email Address	ISPI-DPO@interpharmasolutions.com
Tel. No.	+63 (998) 961-8246 / +63 (917) 846-1007

METRO DRUG INC.

Address	Sta. Rosa Estate, Brgy. Macabling, Sta. Rosa, Laguna, Philippines
Email Address	mdi-dpo@metrodrug.com.ph
Tel. No.	+63 (998) 961-8246 / +63 (917) 846-1007

ZUELLIG PHARMA ASIA PACIFIC LIMITED PHILS. ROHQ

Address	8F Armstrong Corporate Center 134 H.V. Dela Costa St.
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	Salcedo Village, Bel-Air 1209 Makati City
Email Address	zpap-dpo@zuelligpharma.com
Tel. No.	+632 8231 2205 local 510

You may also visit the "[Contact Us](https://www.zuelligpharma.com/privacy-policy)" page of our website which you can find in this link: <https://www.zuelligpharma.com/privacy-policy>.

XX. AMENDMENTS TO THIS PRIVACY NOTICE (HOW WE COMMUNICATE CHANGES TO THIS PRIVACY NOTICE)

Zuellig Pharma reserves the right to modify, update, and/or amend this Privacy Notice at any time. We will take reasonable steps to ensure amendments to this Privacy Notice are communicated by posting all amendments prominently on the Platform and other places we deem appropriate for a reasonable period. Amendments to this Privacy Notice will be effective immediately once published on any of the Platforms unless otherwise noted.

XXI. REGULAR EVALUATION, AUDIT, AND POLICY REVIEW

This Privacy Notice shall be evaluated, audited, and reviewed every three (3) years or sooner if required by the Act or whenever necessary to improve based on best practices.

-END OF DOCUMENT-

