

SanoSwiss Privacy Statement

Effective date: May 30, 2026

This Privacy Statement explains how SanoSwiss collects, uses, stores, transfers, discloses, and otherwise processes personal data through the website <https://sanoswiss.com/>, e-commerce services, marketing communications, healthcare professional engagement, seminars, customer support, medical inquiries, pharmacovigilance reporting, and related business activities.

This Privacy Statement is prepared in accordance with Regulation (EU) 2016/679 (“GDPR”), the Law on Legal Protection of Personal Data of the Republic of Lithuania, pharmacovigilance legislation, consumer protection requirements, and other applicable legal acts.

1. Controller Identity and Contact Details

SanoSwiss UAB

Company code: 302332043

Registered address: Lvivo str. 25, LT-09320, Vilnius, Lithuania

Email: info@sanoswiss.com

Website: <https://sanoswiss.com/>

Where processing activities are performed jointly with SanoSwiss UAB or affiliated entities, such entities may act as joint controllers for specific processing activities.

Privacy contact:

info@sanoswiss.com

SanoSwiss has assessed that appointment of a mandatory Data Protection Officer under Article 37 GDPR is currently not legally required.

2. Supervisory Authority

You have the right to lodge a complaint with the Lithuanian State Data Protection Inspectorate (Valstybinė duomenų apsaugos inspekcija – VDAI) or another competent supervisory authority within the EU/EEA.

3. Categories of Personal Data

Depending on the interaction, SanoSwiss may process:

- Identification data
- Contact data
- E-commerce and order data
- Technical and device data
- Marketing and communication preference data
- Communication records
- Healthcare professional data
- Pharmacovigilance and health-related data
- Event participation data
- Social media and publicly available information

4. Sources of Personal Data

We may collect personal data:

- Directly from you;
- Automatically through cookies and similar technologies;
- From healthcare professionals, affiliates, distributors, event organizers, logistics partners, payment providers, and publicly available sources;
- From social media platforms and professional networks where legally permitted.

5. Processing Activities, Legal Bases and Retention

The table below summarizes the main processing activities performed by SanoSwiss.

Purpose	Data Categories	Legal Basis	Recipients	Retention
Order processing	Identity, contact, delivery, payment data	Contract performance	Payment and logistics providers	10 years
Marketing communications	Email, preferences	Consent / legitimate interest	Marketing platforms	Until withdrawal
Healthcare professional engagement	Professional data, contact details	Consent / legitimate interest	Event providers	5 years
Website analytics	IP, cookies, device data	Consent	Analytics providers	Cookie-specific

Pharmacovigilance	Health and safety data	Legal obligation + Art.9 GDPR	Authorities	Legally required periods
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6. Special Categories of Data

SanoSwiss may process special categories of personal data including health-related information in relation to:

- Pharmacovigilance;
- Product safety reporting;
- Medical inquiries;
- Adverse event reporting;
- Regulatory obligations.

Applicable legal bases may include:

- Article 9(2)(a) GDPR – explicit consent;
- Article 9(2)(i) GDPR – public health;
- Article 9(2)(f) GDPR – legal claims;
- Applicable pharmacovigilance legislation.

Due to legal pharmacovigilance obligations, certain health-related information may not be fully deleted where retention is required by law.

7. Mandatory and Optional Data

Certain personal data is mandatory to:

- Process orders and payments;
- Provide requested services;
- Handle medical and safety inquiries;
- Comply with legal obligations.

Mandatory fields are identified at the point of collection. Failure to provide mandatory data may prevent SanoSwiss from fulfilling services or legal obligations.

8. Cookies and Similar Technologies

SanoSwiss uses cookies, pixels, tags, SDKs, web beacons, scripts, and similar technologies.

Strictly necessary cookies are used for authentication, fraud prevention, and website functionality.

Analytics cookies are used to analyze website traffic and improve website performance.

Functional cookies store preferences and improve user experience.

Marketing cookies support advertising, remarketing, campaign measurement, and personalization.

Non-essential cookies are used only with valid consent where required by law. Consent may be withdrawn at any time as easily as it was granted.

Cookie Table (Examples)

Cookie	Provider	Purpose	Duration	Category
_ga	Google Analytics	Website analytics	14 months	Analytics
_gid	Google Analytics	Session analytics	24 hours	Analytics
_fbp	Meta	Advertising and remarketing	3 months	Marketing
PHPSESSID	Website	Session management	Session	Necessary

9. Automated Decision-Making and Profiling

SanoSwiss may perform limited profiling related to analytics, marketing preferences, and communication optimization.

SanoSwiss does not perform solely automated decision-making producing legal or similarly significant effects within the meaning of Article 22 GDPR.

10. Recipients of Personal Data

Personal data may be shared with:

- Affiliates and group companies;
- Hosting and IT providers;
- Payment processors;
- Delivery and logistics providers;
- CRM and marketing providers;
- Analytics and advertising providers including Google and Meta;
- Event organizers and training providers;
- Regulatory and public authorities where legally required.

Certain third-party providers, including social media and advertising platforms, may independently act as controllers of personal data.

11. International Transfers

Personal data may be transferred outside the EEA, including to providers such as Google LLC and Meta Platforms Inc.

Where such transfers occur, SanoSwiss applies safeguards in accordance with GDPR Chapter V, including:

- Standard Contractual Clauses;
- Adequacy decisions;
- Other lawful transfer mechanisms.

Information regarding safeguards may be requested by contacting SanoSwiss.

12. Rights of Data Subjects

You have the rights of:

- Access;
- Rectification;
- Erasure;
- Restriction;
- Portability;
- Objection;
- Withdrawal of consent;
- Complaint to supervisory authority.

Requests may be submitted to info@sanoswiss.com.

SanoSwiss may request identity verification before fulfilling requests and will respond within GDPR deadlines.

13. Security Measures

SanoSwiss applies organizational and technical safeguards including:

- Encryption;
- Access control;
- Logging and monitoring;
- Firewalls;
- Antivirus protection;
- Staff confidentiality obligations;
- Security awareness training;

- Incident response procedures;
- Backup and recovery measures.

14. Children's Privacy

SanoSwiss services are generally not directed toward children under 16 years of age and SanoSwiss does not knowingly collect children's personal data without appropriate legal basis.

15. Updates to this Privacy Statement

SanoSwiss may periodically update this Privacy Statement to reflect operational, legal, or technological changes. Updated versions will be published on the website with a revised effective date.