

Ljubljana, 24. Maj, 2018

**ZA VSE ZDRAVSTVENE DELAVCE
TO ALL HEALTHCARE PROFESSIONALS**

Zadeva / RE: **Obvestilo o varstvu podatkov in privolitev za neposredno komunikacijo**
/ Privacy notice and consent for direct communication

Spoštovani,

V tem obvestilu je opisano ravnanje družbe **Abbott Laboratories** (Abbott Park, 100 Abbott Park Road, Illinois, ZDA) in njenih povezanih družb, vključno s slovensko povezano družbo, **Abbott Laboratories d.o.o.** iz Ljubljane, Dolenjska cesta 242c (v nadaljevanju so družba Abbott Laboratories iz ZDA ter njene povezane družbe skupaj imenovane družba »**Abbott**«) v zvezi z zbiranjem, uporabo in razkrivanjem vaših osebnih podatkov v okviru vašega sodelovanja z družbo Abbott.

Načeloma so osnovne informacije glede naše obdelave vaših osebnih podatkov zajete v tem obvestilu, za več informacij pa lahko preberete naše politike o varovanju podatkov po posameznih državah, ki so na voljo na globalni ali na lokalni spletni strani, ki jo boste uporabljali.

Kdo smo?

Abbott je globalna družba s področja zdravstva, ki dosega napredek pri vrhunski znanosti in tehnologijah, ki imajo potencial za znatno izboljšanje zdravja in zdravstvene dejavnosti. Naši izdelki zajemajo celoten življenjski cikel od novorojenčkov do starostnikov, od prehrane in diagnostike do zdravstvene oskrbe in farmacevtske terapije.

Vsaka povezana družba družbe Abbott ima vlogo upravljavca osebnih podatkov zdravstvenih delavcev v državah, kjer tako povezana družba kot zdravstveni delavec opravlja poslovno/poklicno dejavnost. Tako je slovenska povezana družba Abbott (kot je navedena v uvodu) upravljač osebnih podatkov slovenskih zdravstvenih delavcev. V primeru vprašanj ali pripombe glede obdelave se obrnite na:
Pooblaščena oseba za varstvo podatkov družbe

Dear Madam/Sir,

this notice provides an overview of the practices of **Abbott Laboratories** (Abbott Park, 100 Abbott Park Road, Illinois, USA) and its affiliates, including Slovenian affiliate, **Abbott Laboratories LLC** of Ljubljana, Dolenjska cesta 242c (jointly, Abbott Laboratories of USA and its affiliates, "Abbott"), with respect to collection, use and disclosure of personal information about you in the course of Abbott's interactions with you.

Whilst the principle points on our processing of your personal information are set out in this notice, for further information please see our country specific privacy policies available via the Abbott global or local websites you will be using.

Who are we?

Abbott is a global healthcare company, advancing leading-edge science and technologies that hold the potential for significant improvements to health and to the practice of healthcare. Our products encircle life, from newborns to ageing adults, from nutrition and diagnostics through medical care and pharmaceutical therapy.

Each Abbott affiliate is deemed to be the controller of personal information of health care professionals ("HCP") in the countries where both, an affiliate and HCP performs its business/ practice. Accordingly, Abbott's Slovenian affiliate (as identified in the introduction) is the controller of personal information of Slovenian HCPs. Should you have any queries or concerns regarding its processing please contact: **Data Protection Officer at Abbott**

**Abbott Laboratories d.o.o., Dolenjska cesta 242c,
1000 Ljubljana.**

**Laboratories d.o.o., Dolenjska cesta 242c, 1000
Ljubljana.**

Katere vaše osebne podatke zbira družba Abbott?

Vrste osebnih podatkov, ki jih zbiramo in obdelujemo v okviru vašega sodelovanja z družbo Abbott, so odvisne od narave razmerja med vami in našo družbo ter zahtev veljavne zakonodaje. Ti podatki lahko med drugim vključujejo:

- kontaktne podatke (npr. ime, telefon, mobilni telefon, naslov elektronske pošte),
- poklicne reference (npr. naziv delovnega mesta, področje specializacije, izobrazba, znanstveni naziv),
- ime in naziv zdravstvene ustanove, kjer ste zaposleni (npr. kot samozaposleni zdravstveni delavec ali zaposleni v bolnišnici ali v drugi zdravstveni ali državni ustanovi),
- programi in dejavnosti družbe Abbott, v katerih ste sodelovali ali za katere se zanime,
- poslovni podatki na podlagi dejavnosti družbe Abbott (npr. pogostost klicev, vaš želeni način komunikacije),
- identifikacijski podatki, pridobljeni med uporabo digitalnih in spletnih vsebin družbe Abbott (npr. IP naslovi, gesla, uporabniška imena in podobno).

Vrste osebnih podatkov, ki jih dodatno zbiramo in obdelujemo o posameznikih s katerimi ima družba Abbott sklenjeno pogodbo, vključujejo:

- podatki o pogodbi, sklenjeni med vami in družbo Abbott,
- kakršni koli podatki v zvezi s plačili (npr. davčna številka, naslov osebnega bivališča, vrednost (neto in bruto), narava, pravna podlaga in datum plačila),

Lahko se odločite, da ne boste posredovali ali omejite količino in vrsto vaših osebnih podatkov, ki jo prejme družba Abbott, vendar lahko nekatere vzajemne postopke (npr. sklepanje in izvajanje pogodb, zagotavljanje vaše udeležbe na dogodkih, odgovarjanje na vaša povpraševanja glede naših izdelkov) izpeljemo le, če nam zagotovite ustrezne osebne podatke.

What personal information does Abbott collect about you?

In the course of your dealings with Abbott, the types of personal information we collect and process depend on the nature of the relationship you have with our company and the requirements of applicable laws. This information may include, among other things:

- contact information (e.g. name, phone, mobile, e-mail address),
- professional credentials (e.g. your job title, speciality area, education, scientific title),
- name and address of the healthcare practice where you work (e.g. as self-employed HCP or working in the hospital or in other health or governmental organization),
- Abbott programs and activities in which you participated or are interested in,
- business information based on Abbott's activities (e.g. frequency of calls, your communication preferences),
- identification data generated in the course of use of Abbott digital and on-line content (e.g. IP addresses, passwords, user names and similar).

The types of personal data that we additionally collect from individuals that have entered into an agreement with Abbott, include:

- contracts you have executed with Abbott,
- any payment-related information (e.g. tax identification number, your personal address, value (nett and gross), nature, legal basis and date of payment),

You may choose not to provide or to limit the amount and type of personal information that Abbott receives about you, although some of our interactions (e.g. entering and performing the contracts, ensuring your participation at events, replying to your queries regarding our products) can only be fulfilled if you provide us with appropriate personal information.

Kako bomo uporabljali vaše osebne podatke?**How will we use your personal information?**

Vaše osebne podatke bomo uporabljali v skladu s tem obvestilom in za naslednje namene:

A. vzdrževanje medsebojnega stika,

B. uresničevanje zakonitega poslovnega interesa družbe Abbott pri izvajanju registriranih poslovnih dejavnosti, kot je:

- (i) zagotavljanje informacij o naših izdelkih in storitvah (npr. za namene seznanjanja z izdelki in njihovo ustrezno uporabo, sodelovanja v naših poslovnih in tržnih raziskavah in na splošno neposredne komunikacije z vami preko naših poklicnih predstavnikov, naših spletnih strani, preko elektronske pošte, klicnih centrov, pošte, sporočil (SMS in MMS), družbenih medijev in drugih kanalov).

Če pridobimo vašo privolitev za prejemanje naših sporočil, ki je podana na koncu tega obvestila, bomo vaše kontaktne podatke – ime, poštni naslov, naslov elektronske pošte, številka telefona in mobilnega telefona (»kontaktni podatki«) – uporabili za neposredno komunikacijo z vami prek vseh ali izbranih komunikacijskih kanalov (pošta, elektronska pošta, mobilni telefon (SMS in MMS sporočila ter klici), telefonski klici – avtomatski in v živo). Vedno boste imeli možnost na preprost način ugovarjati prejemanju informacij ali kadar koli uveljaviti svojo pravico do preklica privolitve za prejemanje informacij o izdelkih in storitvah ali dogodkih družbe Abbott, zlasti s klikom na povezavo »odjavi se« ali podobno možnost v katerem koli našem sporočilu.

- (ii) beleženje medsebojnega sodelovanja z zdravstvenimi delavci, tako na spletu kot izven spletu (za naše postopke na spletu velja naša politika o varstvu podatkov na spletu);

We will use your personal information in line with this notice and for following purposes:

A. performing contacts between us,

B. pursuing Abbott's legitimate business interest in performance of registered business activities, such as:

- (i) rendering information on our products and services (e.g. for the purpose of products familiarization and education on their proper use, participation in our business and market researches and surveys and, generally, direct communication with you through our professional representatives, our web sites, via e-mail, call centres, post, messages (SMS and MMS), social media and other channels, as the case may be).

Where we have your consent for receiving messages from us given at the end of this notice, we will use your contact information – name, post address, e-mail, telephone and mobile phone number(s) („**Contact Information**“) – for direct communication with you by all or selected communication channels (post, e-mail, mobile phone (SMS and MMS and calls), telephone calls – automated and live). You will always be given an opportunity to object in an easy manner receiving information or use your right to withdraw your consent for receiving information about Abbott's products and services or events at any time, in particular by clicking on the “unsubscribe” link or similar option in any of our communications.

- (ii) keeping track of our interactions with HCPs, both offline and online (our online practices will be governed by our Internet privacy policy);

- | | |
|---|---|
| <p>(iii) poročanje o plačilih, opravljenih zdravstvenim delavcem (npr. v skladu spanožnim/gospodarskim etičnim kodeksom in pogodbami, ki jih je sklenila družba Abbott, zlasti z javnimi organi za namene izpolnjevanja zakonskih obveznosti) za konsolidirano finančno poročanje;</p> | <p>(iii) reporting payments made to HCPs (e.g. in accordance with industry/trade association code of ethics and contracts to which Abbott is or may be a party, especially where concluded with official authorities in exercise of laws) for consolidated financial reporting;</p> |
| <p>(iv) zagotavljanje nepromocijskih (npr. medicinskih ali znanstvenih) informacij, npr. z odgovarjanjem na vaša povpraševanja, na izobraževalnih dogodkih in na druge načine, vključno z uporabo komunikacijskih kanalov, opisanih pod točko (i) tega poglavja, in drugih medijev, ki se razvijejo po datumu tega obvestila;</p> | <p>(iv) providing non-promotional e.g. medical and scientific information e.g. by replying to your queries, on educational events and in other manners, including use of communication channels described in the item (i) of this section and in other media developed after the date of this notice;</p> |
| <p>(v) revidiranje dejavnosti in sredstev družbe Abbott za zagotavljanje skladnosti in varnosti na nacionalni (Slovenija) in globalni ravni (s strani družbe Abbott);</p> | <p>(v) auditing Abbott activities and resources for compliance and security purposes at national (Slovenia) and global level (by Abbott);</p> |
| <p>(vi) poslovna analitika (npr. oblikovanje profilov, segmentiranje, ciljno usmerjanje, prediktivna analitika) na podlagi dejanskih poslovnih dejavnosti družbe Abbott;</p> | <p>(vi) business analytics (e.g. profiling, segmentation, targeting, propensity modelling) based on Abbott's actual business activities;</p> |
| <p>(vii) odločanje, ali je glede na zahteve zakonodaje, ki nas zavezuje, primerno poslovno sodelovati z zdravstvenimi delavci za določene tukaj opisane poslovne namene.</p> | <p>(vii) determining the appropriateness, given the requirements of laws applicable to our business, of engaging HCPs for certain of the business purposes described here,</p> |

C. v skladu z zahtevami zakonov, ki veljajo za poslovanje družbe Abbott, zlasti na naslednjih področjih:

- (i) plačilo davkov in obveznih socialnih prispevkov in javnih dajatev na plačila, opravljena v zvezi s sodelovanjem z zdravstvenimi delavci;
- (ii) poročanje z razkrivanjem finančnih podatkov v skladu z veljavno zakonodajo) ;
- (iii) poročanje glede kakovosti in varnosti, vključno z ustreznim poročanjem glede vzdrževanja in popravila izdelkov, negativnih izkušenj, pritožb čez izdelke.

C. as required by laws applicable to Abbott business especially in the field of:

- (i) taxation and payment of mandatory social and public contributions on payments made in interactions with HCPs;
- (ii) financial disclosure reporting, in accordance with applicable laws;
- (iii) quality and safety reporting, including, where applicable, product maintenance & repairs, adverse experience, product complaint reporting.

D. **izvajanje pogodbe** (npr. pogodbe o storitvah svetovanja), ki je sklenjena med vami in družbo Abbott ali za izvajanje ukrepov na zahtevo takega posameznika pred sklenitvijo pogodbe.

D. **performance of a contract** (e.g. consultant agreement), which is concluded between you and Abbott or in order to take steps at your request prior to entering into a contract.

Ali vaše osebne podatke posredujemo tretjim osebam?

Družba Abbott lahko vaše osebne podatke posreduje naslednjim uporabnikom za namene, navedene v tem obvestilu (vsi tukaj navedeni subjekti skupaj imenovani »**uporabniki**«):

- matični družbi Abbott in njenim povezanim družbam,
- družbam, s katerimi sodelujemo (v Sloveniji in globalno) in nam zagotavljajo določene storitve, ki so potrebne za naše poslovanje (npr. ponudniki rešitev upravljanja odnosov s strankami (CRM), ponudniki razvojnih storitev, IT in tehnične podpore za sisteme, ki jih uporablja družba Abbott, marketinške agencije, ki zagotavljajo določene vidike promocije izdelkov Abbott, ponudniki telekomunikacijskih storitev, potovalne agencije, ki jih družba Abbott najame za storitve organizacije simpozijev, konferenc in drugih znanstvenih in izobraževalnih programov, internet in druge poslovne organizacije, ki se ukvarjajo s promocijo, distribucijo in razvojem izdelkov in storitev družbe Abbott),
- potencialnim kupcem, v primeru, da se družba Abbott iz poslovnih razlogov odloči odsvojiti del ali vse svoje poslovne dejavnosti preko prodaje, združitve ali prevzema, tako da vam lahko kupec še naprej zagotavlja informacije in storitve,
- strankam v pravnih postopkih in njihovim svetovalcem (npr. pravnim, finančnim, strokovnjakom s posebnimi področji), če tako zahteva veljavna zakonodaja,
- pristojnim organom v Sloveniji in v drugih državah, kjer posuje družba Abbott, za namene izpolnjevanja obveznosti glede poročanja na podlagi uradnih zahtev ali če tako zahteva zakon (npr. obveznost vigilance

Do we share your personal information with third parties?

Abbott may share your information with following recipients for purposes listed in this notice (all entities listed hereunder, jointly: "Recipients"):

- Abbott mother-company and its affiliates,
- companies we collaborate with (in Slovenia and globally) who supply specific services necessary to support our business operations (e.g. providers of customer relationship management solutions, providers of development, IT and technical support services to systems used by Abbott, marketing agencies concerned with certain aspects of promotion of Abbott products, telecommunication service providers, travelling agencies engaged by Abbott for services of organization of symposia, conferences and other scientific and educational programs, Internet and other commercial organizations concerned with promotion, distribution and development of Abbott's products and services),
- prospective purchasers, in the event that, for business reason, Abbott decides to divest part or all of its business through sale, merger or acquisition so that the buyer can continue to provide you with information and services,
- parties in relevant legal procedures and their advisors (e.g. legal, financial, experts in special areas) to the extent required by applicable law,
- competent authorities in Slovenia and in other countries where Abbott performs it's business in fulfilment of reporting obligation following official requests or otherwise required by law (e.g. vigilance duties and

in poročanja o varnosti slovenski Agenciji za zdravila in medicinske pripomočke).

safety reporting to Slovenian Agency for Medicinal Products and Devices).

Podatki, ki se posredujejo tretjim osebam, pa ne bodo uporabljeni v marketinške namene, prodani v komercialne namene ali licencirani brez vašega dovoljenja.

Information provided to third parties will not, however, be used for marketing purposes, sold for commercial purposes, or licensed without your permission.

Ali bomo prenašali in hranili vaše osebne podatke izven Slovenije?

Will we transfer and store your personal data outside Slovenia?

Glede na to, da se lahko zaposleni, računalniški strežniki, podatkovne baze ali procesi, ki jih nadzorujejo uporabniki, nahajajo v drugih državah, se lahko vaši osebni podatki prenašajo iz Slovenije v druge države, znotraj in zunaj Evropske unije, kar vključuje, a ni omejeno na Združene države Amerike, za namene obdelave, ki so navedeni v tem obvestilu. Vsi takšni prenosi ali razkritja bodo potekali v obsegu, kot to dovoljuje veljavna zakonodaja o varstvu podatkov. Družba Abbott bo vedno izvajala ustrezne ukrepe za zaščito vaših podatkov.

Given the fact that the staff, computer servers, databases or processes controlled by Recipients may be located in another countries, your personal information may be transferred from Slovenia to such countries, inside and outside European Union, including but not limiting to the United States, for processing purposes mentioned in this notice. All such transfers or disclosures will be made within the scope of applicable privacy laws. Abbott will always implement appropriate measures to safeguard your information.

Koliko časa hranimo vaše osebne podatke?

How long do we retain your personal information for?

Družba Abbott bo vaše osebne podatke hranila toliko časa, kot je potrebno za namene, za katere so bili zbrani, in vedno v skladu z internimi politikami družbe Abbott o hrani podatkov ter veljavno zakonodajo.

Your personal information will be retained by Abbott for as long as is necessary in connection with the purposes for which it was collected, and always in accordance with Abbott's internal data retention policies and applicable law.

Vaše pravice

Your rights

Ob upoštevanju izjem v skladu z veljavnimi zakoni imate ves čas pravico:

Subject to exemptions under valid laws, you will always have a right:

- do prejemanja informacij oz. dostopa do vaših osebnih podatkov (»**Zahteva za informacije/dostop**«),
- zahtevati popravek, če so vaši podatki netočni ali nepopolni (»**Zahteva za popravek**«),
- zahtevati izbris vaših osebnih podatkov (»**Zahteva za izbris**«) ali omejitev obdelave (»**Zahteva za omejitev**«),
- zahtevati kopijo vaših osebnih podatkov v strojno berljivi obliki ali njihovo

- to receive information about or access your personal information ("Information/Access Request"),
- to ask for rectification of any inaccurate or incomplete information about you ("Rectification Request"),
- to ask for erasure of your personal information ("Erasure Request") or restriction of processing ("Restriction Request"),
- to receive a copy of your personal information in a machine-readable format

posredovanje drugemu subjektu (»**Zahteva za prenosljivost**«),

- ugovarjati obdelavi vaših osebnih podatkov na podlagi razlogov, povezanih z vašim posebnim položajem (»**Zahteva za ugovor**«) in
- da za vas ne velja odločitev, ki temelji zgolj na avtomatizirani obdelavi, vključno z oblikovanjem profilov, če je ustrezno (»**Zahteva glede oblikovanja profilov**«).

Pravico imate kadar koli preklicati svojo privolitev za prejemanje informacij o izdelkih in storitvah družbe Abbott, kot je navedeno spodaj. Takšen preklic ne vpliva na zakonitost obdelave pred preklicem privolitve.

Potrudili se bomo, da bomo pravočasno odgovorili na vse razumne zahteve, vedno pa v skladu z našimi internimi politikami in veljavnim zakonom. Če boste z našim ravnanjem glede morebitne pritožbe v zvezi z našo obdelavo vaših osebnih podatkov nezadovoljni, lahko svojo pritožbo naslovite na Informacijskega pooblaščenca Republike Slovenije kot nacionalni nadzorni organ.

Če bi želeli uveljavljati katere koli izmed vaših pravic ali potrebujete dodatne informacije, nam pišite na:

**Abbott Laboratories d.o.o.
Dolenjska cesta 242c
1000 Ljubljana
Za: Pooblaščena oseba za varstvo podatkov**

V vseh sporočilih za družbo Abbott navedite:

- vaše kontaktne podatke (poštni in elektronski naslov, telefonske številke), da vas lahko kontaktiramo v zvezi z vašim zahtevkom/zahtevo,
- podrobno opredelitev vaše zahteve (in vrsto zahteve, po možnosti uporabite pojme, ki so zgoraj navedeni z veliko začetnico, na primer: »Zadeva: Zahteva za informacije/dostop«).

or to have it sent to another entity (“**Portability Request**”),

- to object to the processing of your personal information based on grounds relating to your particular situation (“**Objection Request**”) and
- not to be subject to a decision based solely on automated processing, including profiling, if applicable (“**Profiling Request**”).

You always have right of withdrawal of your consent for receiving information about Abbott products and services, as given hereunder. Such withdrawal shall not affect the lawfulness of processing prior to withdrawal of consent.

We will do our best to respond to all reasonable requests in a timely manner and always in accordance with our internal polices and applicable law. Should you remain unsatisfied with our handling of any complaint you may have regarding our processing of your personal information, you may refer your complaint to Information Commissioner of the Republic of Slovenia as national supervisory authority.

If you would like to exercise any of your rights or if you need any further information please write to us at:

**Abbott Laboratories d.o.o.
Dolenjska cesta 242c
1000 Ljubljana
Att: Data Protection Officer**

In all communications to Abbott, please include:

- your contact information (postal and e-mail address, telephone numbers) in case we need to contact you about your claim/request,
- detailed explanation of your request (and the type of request, preferably using capitalized terms stated above for example: „Subject: Information/Access Request“).

PRIVOLITEV za neposredno komunikacijo/ CONSENT for direct communication
NOTE: consent to receive e-marketing messages

S svojim podpisom / By virtue of signing hereunder:

- potrjujem prejem enega (1) izvoda tega obvestila in / I confirm receipt of one (1) counterpart of this notice, and
- s kljukico v okencu soglašam s prejemanjem informacij o izdelkih in storitvah družbe Abbott: / by ticking the box you consent with receiving information on Abbott products and services:

<input type="checkbox"/>	<p>Soglašam s prejemanjem informacij o izdelkih in storitvah družbe Abbott in želim, da mi družba Abbott takšna sporočila pošilja prek navedenih komunikacijskih kanalov (<u>obkrožite ustrezno črko</u>) / I consent with receiving information on Abbott products and services and I wish to receive such messages from Abbott via specified communication channels (<u>please circle the letter of your answer</u>)</p> <p>A. prek vseh komunikacijskih kanalov: pošte, elektronske pošte, telefona (klici), mobilnega telefona (klici, pošiljanje SMS in MMS sporočil) / by all communication channels i.e. by post, e-mail, telephone (calls), mobile phone (calls, SMS and MMS messaging)</p> <p>B. po pošti / by post</p> <p>C. po elektronski pošti / by e-mail</p> <p>D. po telefonu (klici) / by telephone (calls)</p> <p>E. prek mobilnega telefona (klici, pošiljanje SMS in MMS sporočil) / by mobile phone (calls and by SMS and MMS messaging)</p>
<input type="checkbox"/>	<p>Ne soglašam s prejemanjem informacij o izdelkih in storitvah družbe Abbott / I do not consent with receiving information on Abbott products and services</p>

KONTAKTNI PODATKI/ CONTACT INFORMATION:

Če soglašate s prejemanjem naših informacij, vas prosimo, da spodaj vnesete svoje pravilne kontaktne podatke za namene neposredne komunikacije (prek vseh ali izbranih kanalov) in posodobitve naših evidenc z vašimi kontaktnimi podatki, pridobljenimi v okviru našega obstoječega razmerja. / **If you consented with receiving our information**, please insert your correct Contact Information hereunder for the purpose of direct communication (via all or selected channels) and up-dating our records with your Contact Information obtained in the context of our existing relationship.

ime in priimek name	<hr/> VPIŠITE Z VELIKIMI TISKANIMI ČRKAMI
e-mail naslov e-mail	<hr/>

	VPIŠITE ČITLIVO
mobilni telefon mobile phone	<hr/> VPIŠITE ČITLIVO
telefon telephone	<hr/> VPIŠITE ČITLIVO
poštni naslov postal address	<hr/> VPIŠITE ČITLIVO

Podpis Signature	<hr/>
Datum Date	<hr/> VPIŠITE ČITLIVO