

DITA ESTFARM LLC | IDNO: 1002600046359
Website: www.dita.md
Last updated: 07.07.2026 | Version: 1.0

Version / Status:	V1.0 July 2026
Prepared by	Lucian Chete, DPO Consultant — Contract QSDTA01 / 09.07.2026
Approved by	Administrator of DITA ESTFARM LLC, Grigore Moraru
Applicability:	Users of the www.dita.md website and all online forms available thereon.
Legal Reference	Law No. 195/2024 on the Protection of Personal Data Law No. 133/2011 (applicable until 23.08.2026) Law No. 48/2023 on Cybersecurity ePrivacy Directive 2002/58/EC (applicable to cookies)
Review	Annually or in the event of significant changes to processing activities or the legal framework.

1. IDENTITY AND CONTACT DETAILS OF THE CONTROLLER

The controller of the personal data collected through www.dita.md is DITA ESTFARM LLC, which determines the purposes and means of processing your personal data.

Legal name	S.R.L. DITA ESTFARM
IDNO	1002600046359
Registered Office Address	23 Burebista Street, Chisinau Municipality, Republic of Moldova
General Telephone	+373 22 405 419
General Email	office@dita.md
Website	www.dita.md
DPO Contact (Data Protection Officer)	Lucian Chete, DPO Consultant dpo@ditaestfarm.md telephone +373 22 405 447. Available for data protection-related inquiries Monday–Friday, 08:30–17:30.

2. WHAT DATA DO WE COLLECT THROUGH THE WEBSITE AND WHY?

The website www.dita.md collects personal data through the following mechanisms, each with distinct purposes and legal bases:

2.1. General Contact Form

Data Collected	Full name Email address Telephone number (optional) Content of the submitted message
Purpose of Processing	Responding to requests, inquiries, or comments submitted; establishing a business or cooperation relationship with DITA ESTFARM
Legal Basis	Legitimate interest of the controller (Art. 6(1)(f) of Law No. 195/2024) — responding to requests voluntarily submitted through the contact form
Storage Period	2 years from the date of the last contact, after which the email/message and associated data are deleted or anonymised
Recipients	Exclusively relevant DITA ESTFARM personnel responsible for managing the request (commercial department, logistics, management — depending on the nature of the request). Data submitted through the contact form is not disclosed to third parties.

2.2. Adverse Reaction Reporting Form (Pharmacovigilance)

Data collected	Reporter's data (physician/patient) + patient's medical data — please refer to the Pharmacovigilance Privacy Notice [link]
Purpose of processing	Collection and reporting of adverse drug reactions (pharmacovigilance) — legal obligation
Legal basis	Legal obligation (Art. 6(1)(c) of Law No. 195/2024 + Order of the Ministry of Health No. 358/2017) + Public interest in the area of public health (Art. 9(2)(i) of Law No. 195/2024) with regard to the patient's health data
Recipients	AMDM (legal obligation) + Contractual partner/MAH (contractual obligation) — please refer to the Pharmacovigilance Privacy Notice
Important note	The processing of pharmacovigilance data is regulated in detail by the Pharmacovigilance Privacy Notice — the dedicated document available at [link] . This Policy applies to the general aspects of the website; for pharmacovigilance matters, please refer to the Pharmacovigilance Privacy Notice.

2.3. Technical browsing data (automatically collected)

Data collected	Device IP address Browser type and version Operating system Pages visited and duration of the visit Date and time of access Referring URL (the page from which you accessed the website)
Purpose of processing	Ensuring the technical functionality of the website Troubleshooting technical errors Ensuring website security (detection of attacks and abnormal traffic) Aggregated usage statistics
Legal basis	Legitimate interest of the Controller (Art. 6(1)(f) of Law No. 195/2024) — ensuring the security and functionality of the website
Storage period	Maximum 12 months in an identifiable format; thereafter, the data is deleted or anonymised
Recipients	Website hosting provider of DITA ESTFARM S.R.L. — based on a data processing agreement (DPA) DITA ESTFARM IT personnel for monitoring and maintenance purposes

2.4. Data collected through cookies and similar technologies

Data collected	User preference data (e.g., selected language) Session data (authentication, shopping cart) Browsing behaviour data (pages visited, time spent, interactions) — exclusively with your prior consent for non-essential cookies
Legal basis	Strictly necessary cookies: legitimate interest (Art. 6(1)(f)) — no consent required Analytics and marketing cookies: user consent (Art. 6(1)(a) of Law No. 195/2024) — collected through the cookies banner
You may manage your cookie preferences at any time through the Cookie Settings available in the website footer (the “Manage Cookies” link) or through your browser settings. Withdrawal of consent for non-essential cookies does not affect access to the website content.	

3. COOKIES — DETALIED TABLE

The website www.dita.md uses the following categories of cookies:

Category	Cookie name	Provider	Duration	Purpose	Consent?
Strictly necessary	session_id csrf_token	DITA ESTFARM (first party)	Session (deleted when the browser is closed)	Maintaining the user session during browsing; protection against CSRF attacks	No — always active
Preference	user_prefs lang_pref	DITA ESTFARM (first party)	12 months	Retaining the user’s language and display preferences	NO — necessary for functionality
Analytics / Statistics	_ga_ga_[ID] _gid	Google Analytics (third party)	_ga: 2 years _gid: 24 hour	Analysis of website traffic and user behaviour — aggregated data, anonymised at user level. Helps improve content and browsing experience.	YES — consent required
Cookies consent	cookie_consent	DITA ESTFARM (first party)	12 month	Retaining your cookie preferences in order to avoid displaying the banner on each visit	NO — necessary for consent management

Data collected through Google Analytics is transferred to Google LLC (USA). The transfer to the USA is covered by the European Commission’s adequacy decision regarding the EU–US Data Privacy Framework (adopted in July 2023) and Google’s Data Processing Terms. The data is anonymised at user level prior to transfer (IP anonymisation enabled). Google Privacy Policy: <https://policies.google.com/privacy>

4. INTERNATIONAL DATA TRANSFERS

In the context of using the website www.dita.md, certain data may be transferred to recipients located outside the Republic of Moldova, including countries within the European Union or other third countries. The applicable safeguards are described below:

Recipient	Country	Data Transferred	Transfer Safeguards
Google Analytics	SUA (global servers)	Anonymized browsing data (analytics cookies)	EU Adequacy Decision – EU–US Data Privacy Framework 2023 + Google DPA + IP anonymization enabled
Website hosting provider – company's own infrastructure DITA ESTFARM S.R.L.	Republic of Moldova (own servers)	Technical server data, forms completed on the website	No international transfer to a hosting provider is carried out. Data is stored and processed on the company's own infrastructure. Technical and organizational security measures are applied (access control, firewall, backup, monitoring, etc.)
PV contractual partners	Denmark / EU	PV data – only from the adverse reaction reporting form	Standard Contractual Clauses (SCC) 2021 included in the pharmacovigilance agreement
International contractual partners (MAHs, distributors, suppliers)	Located outside the EU/Republic of Moldova	Data necessary for contract performance (identification data of representatives, commercial data, PV data where applicable)	Standard Contractual Clauses (SCC) issued by the European Commission, included in the contracts with these partners, in accordance with Article 46(2)(c) of Law No. 195/2024

5. HOW LONG DO WE RETAIN THE DATA ?

Source / Data category	Retention period	Action upon expiry
Messages received through the contact form	2 years from the date of the last contact	Permanent deletion or irreversible anonymization
Technical server data (logs)	Maximum 12 months	Automatic deletion upon expiry of the retention period
Analytics cookies (Google Analytics)	According to Google Analytics: _ga — 2 years; _gid — 24 hours	Automatic expiry or deletion upon withdrawal of consent
Consent cookie	12 months (retention of your preference)	Automatic expiry — upon revisiting the website, the cookie banner will be displayed again
PV data (adverse reaction reporting form)	Minimum 10 years — in accordance with pharmacovigilance regulations	In accordance with the PV archiving procedure. Please refer to the PV Privacy Notice.

6. WHO DO WE SHARE YOUR DATA WITH?

DITA ESTFARM S.R.L. does **not sell, rent, or commercialize** your personal data collected through the website. The data may be disclosed exclusively to the following categories of recipients:

Recipient	Data disclosed / Reason for disclosure	Legal basis for disclosure
Website hosting provider — company's own infrastructure DITA ESTFARM S.R.L.	Technical server data and form content — the provider hosts the website and the servers where the collected data is stored	DPA (Data Processing Agreement) signed with the hosting provider
Google LLC (through Google Analytics)	Anonymized browsing and website behavior data (analytics cookies) — only with your consent	Consent + Google DPA + EU Adequacy Decision 2023
DITA ESTFARM IT team	Technical access to the website servers for maintenance and remediation of technical issues	Intra-Group DPA signed
CNPDCP (in case of a data breach)	Information regarding a data breach affecting website users	Legal obligation (Article 33 of Law No. 195/2024 — mandatory notification within 72 hours)
Judicial or criminal investigation authorities	Data requested by court order/judicial decision within legal proceedings	Specific legal obligation (judicial decision or order)
Supervisory Authority ASC (in case of a significant cybersecurity incident)	Information regarding significant cybersecurity incidents affecting the website	Legal obligation (Law No. 48/2023 — notification of significant incidents)

7. DATA SECURITY

S.R.L. DITA ESTFARM implements appropriate technical and organizational measures to protect personal data collected through the website www.dita.md, including:

7.1. Technical Measures

- **Secure HTTPS connection:** the entire website www.dita.md uses the HTTPS protocol with a valid SSL/TLS certificate — all data transmitted between your browser and our server is encrypted in transit.
- **SSL/TLS certificate:** the certificate is verified and renewed periodically — your connection is secured every time you visit the website.
- **Protection against web attacks:** the website is protected against common attacks (SQL injection, XSS, CSRF) through technical measures implemented at application and server level.
- **Firewall and monitoring:** the servers hosting the website are protected by a firewall and monitored to detect abnormal traffic or unauthorized access attempts.
- **Hosting infrastructure security:** the website is hosted on the company's own IT infrastructure, which is internally administered and monitored. The servers are protected through access control mechanisms, regular security updates, authentication policies, network segmentation, and measures designed to prevent unauthorized access. Data is stored and processed within the company's-controlled environment, with the application of internal IT security procedures and periodic backups. **Backup and service continuity:** periodic backup procedures and data

restoration measures are implemented in the event of an incident, in order to ensure service availability and reduce the risk of data loss.

7.2. Organizational Measures

- Access to data collected through the website is limited to DITA ESTFARM personnel with relevant responsibilities (the commercial team for the contact form, the IT team for technical data, and the PV team for the FV form).
- All employees having access to data collected through the website have signed confidentiality undertakings and have received training regarding data protection.
- External providers (hosting, web analytics) have signed Data Processing Agreements (DPAs) and are required to implement appropriate security measures.

8. YOUR RIGHT

As a user of the website www.dita.md, you have the following rights under Law No. 195/2024:

Right	What it means in practice	How to exercise it
Right of access (Art. 15)	You may request confirmation that your personal data is being processed and obtain a copy thereof, together with information regarding the purpose, retention period, and recipients of the processing.	Email to dpo@dita.md
Right to rectification (Art. 16)	You may request the correction of inaccurate data (e.g., an incorrect email address provided in the contact form) or the completion of incomplete data.	Email to dpo@dita.md
Right to erasure (Art. 17)	You may request the deletion of data collected through the contact form or through analytics cookies, insofar as there is no legal obligation to retain such data or a prevailing legitimate interest requiring its retention.	Email to dpo@dita.md or withdraw your cookies consent from the settings.
Right to data portability (Art. 20)	You may request the personal data voluntarily provided by you (e.g., the message submitted through the contact form) in a structured, commonly used, and machine-readable format (CSV, JSON).	Email to dpo@dita.md
Right to object (Art. 21)	You may object to the processing of technical browsing data based on the legitimate interest of the controller. You cannot object to strictly necessary cookies (which are essential for the operation of the website).	Email to dpo@dita.md
Right to withdraw consent (Art. 7(3))	You may withdraw your consent at any time for analytics or marketing cookies, without affecting the lawfulness of processing carried out prior to the withdrawal or your access to the website.	Click on "Manage Cookies" in the website footer.
Right to lodge a complaint (Art. 77)	You have the right to lodge a complaint with the CNPDCP if you consider that your personal data has been processed in violation of the law.	CNPDCP: info@datepersonale.md 022 820 801 www.datepersonale.md

The response period for any request regarding the exercise of your rights: a maximum of 30 calendar days from the receipt of the request. In complex cases, the deadline may be extended by an additional 60 days, with prior notification of the applicant.

The website www.dita.md may contain links to external websites (of partners, pharmaceutical manufacturers, regulatory authorities, etc.). This Data Protection Policy applies exclusively to the website www.dita.md. We are not responsible for the privacy policies or data processing practices of external websites accessed through links provided on our website. We recommend that you review the privacy policy of each external website you visit.10. ACTUALIZAREA PREZENTEI POLITICI

This Data Protection Policy may be updated periodically to reflect:

- Changes to the applicable legal framework (e.g., the entry into force of Law No. 195/2024 on 23.08.2026);
- Changes to the services or functionalities of the website www.dita.md;
- Changes to providers or types of cookies used;
- Recommendations of supervisory authorities (CNPDCP, EDPB) regarding best practices.

The date of the latest update to the Policy is indicated in the header of the document and on the webpage where it is published. In the event of significant changes affecting your rights, you will be notified through a message displayed on the website's homepage or, if your contact details are registered, by direct email.

Prepared by: Lucian Chete, DPO Consultant
Date of preparation: July 2026

Approved and published by:
Administrator of S.R.L. DITA ESTFARM

Date of approval: 09.07.2026
Date of publication on the website: _____

Signature: _____