

## 1.0 INTRODUCTION

This Privacy Policy sets out the terms upon which Fox Pharma Ltd (We/Us) processes your personal information. We take the protection of your personal data very seriously and strictly adhere to the rules laid out by data protection laws and the General Data Protection Regulation (GDPR-EU and GDPR-UK).

## 2.0 WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal data for one of the following purposes:

- To manage communications between you and us
- Where we need to perform the contract we have entered into with you
- To provide you with information you have requested or which we may feel may be of interest to you
- To ensure the safe operation of our website and to monitor the performance of our website
- For marketing and advertising purposes
- To fulfil Prescription orders

## 3.0 LAWFUL BASIS OF PROCESSING INFORMATION

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place.
- If the processing is necessary for the performance of a contract
- If the processing is necessary for compliance with a legal obligation to which the controller is subject
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners in particular, ensuring our business premises are kept secure through the monitoring of CCTV.

Where legitimate interest is identified as a lawful basis we will undertake a legitimate interest assessment which is a three-part test covering:

**The purpose test** – to identify the legitimate interest

**Necessity test** – to consider if the processing is necessary for the purpose identified

**Balancing test** – considering the individual's interests, rights or freedoms and whether these override the legitimate interests identified.

## 4.0 WHAT INFORMATION WE COLLECT AND WHERE FROM

We collect personal information from you, for example, if you register to our website, request product information, call us or use any of our services. The categories of personal information that we may collect, store and use about you may include but not limited to:

- Your name
- DOB
- Address
- Telephone number
- Email address
- Postcode
- Signature
- CCTV images (on premises)
- Insurance and Certification details
- Prescriber Information

#### 4.1 SPECIAL CATEGORY DATA

We collect the following special category data from you:

- Health data

We will only process special category data where we have an Article 9 exception allowing us to do so, in this case, this is the Provision of Health and Social Care Treatment and Explicit Consent from you.

#### 4.2 THIRD PARTY COLLECTION OF PERSONAL DATA

We may also collect your data through Third Parties which may include Third Party Medics and Prescribers.

#### 4.3 PERSONAL DATA ABOUT YOUR PATIENTS AND CLIENTS

When you collect personal data on behalf of a patient/client and then provide us with that information to forward the data to fulfil a prescription, you are making a declaration that the personal information you have collected and submitted to us has been carried out lawfully under the Data Protection Act 2018.

## 5.0 HOW LONG WE KEEP INFORMATION FOR

We pride ourselves on ensuring that your personal data is only retained for the period that Fox Group International needs it for, or in accordance with laws, regulations and professional obligations that we are subject to. All personal information we collect has a defined retention period, which is in-line with our retention policy. If you would like to find out how long your information is being retained, please see "additional information", section 10 of this policy.

## 6.0 SECURITY OF PERSONAL INFORMATION

We take the responsibility for protecting your privacy very seriously and we will ensure your data is secured in accordance with our obligations under the Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent your personal data from being accessed in an unauthorised way, altered or disclosed. We have in place a robust access control policy which limits access to your personal data to those employees, contractors and other third parties who only have a business need to know. The processing of your personal data will only take place subject to our instruction.

We have policies and procedures to handle any potential data security breaches, data subjects, third parties and any applicable regulators will be notified where we are legally required to do so.

We have ensured that all employees have had information security and data protection training. If you would like more details of the security we have in place, please see "additional information", section 16 of this policy.

## 7.0 CHILDREN'S INFORMATION

We do not knowingly collect information on children. If we have collected personal information on a child, please contact us immediately using the details in section 16, so we can remove this information without any undue delay.

## 8.0 YOUR INDIVIDUAL RIGHTS

In this Section, we have summarised the rights that you have under the General Data Protection Regulation. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under the General Data Protection Regulation are:

- Right to Object
- Right of Access
- Right to be informed
- Right to Rectification
- Right to Erasure
- Right to Restrict Processing
- Right to Data Portability
  
- The right to object

You can exercise this right if:

- Processing relies on legitimate interest
- Processing is for scientific or historical research
- Processing includes automated decision making and profiling
- Processing is for direct marketing purposes
- The right of access
  - You or any third party acting on your behalf with your authority may request a copy of the personal data we hold about you without charge.
  - We will ask to verify your identity or request evidence from the third party that they are acting on your behalf before releasing any personal data we hold about you.
- The right to be informed
  - We are required to provide clear and transparent information to you about how we process your personal data. This privacy notice addresses this right.
- The right of rectification
  - If you believe the personal data we hold about you is incorrect or incomplete you have the right to correct this and you may exercise this right along with the right to restrict processing until these corrections are made.

- The right to erasure
  - If there is no legal basis or legitimate reason for processing your personal data, you may request that we erase it.
- The right to restrict processing
  - You may ask us to restrict the processing of your personal data. This means we will still hold it but not process it. This is a conditional right which may only be exercised when:
    - Processing is unlawful
    - We no longer need the personal data, but it is required for a legal process
    - You have exercised your right to object to processing and require processing to be halted while a decision on the request to object is made.
    - If you are exercising your right to rectification
- The right to data portability
  - You can request that your personal data is transferred to another controller or processor in a machine-readable format if:
    - Processing is based on consent
    - Processing is by automated means (i.e. not paper based)
    - Processing is necessary for the fulfilment of a contractual obligation

If you have any question about these rights, please see "additional information", section 16 of this policy.

## 9.0 CONSENT

Where you have given consent for processing, or explicit consent in relation to the processing of special category data, you have the right to withdraw this consent at any time, but this will not affect the lawfulness of processing based on consent before its withdrawal.

## 10.0 FAILURE TO PROVIDE PERSONAL INFORMATION

Where we need to collect personal data by law or in order to process your instructions or perform a contract we have with you and you fail to provide that data when requested, we may not be able to carry out your instructions or perform the contract we have or are trying to enter into with you. In this case, we may have to cancel our engagement or contract you have with us, but we will notify you if this is the case at the time.

## 11.0 COOKIES

Our website uses cookies. Please see our Cookies Policy for full details of the cookies used.

## 12.0 AUTOMATED DECISION MAKING

Your personal data is not used in any automated decision making (a decision made solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain conditions about an individual).

## 13.0 TRANSFERS TO THIRD PARTIES

Fox Group International may disclose your personal data, listed in section 4 to some third parties to help us deliver our services/products. All third parties are contractually bound to protect the personal data we provide to them. We may use several or all of the following categories of recipients:

- Our Group Companies – We may share your personal information with our other companies in the Fox Group of Companies which include Fox Group International Ltd, Revolax Ltd, Fox Pharma Ltd and Fox Risk Solutions Ltd. Where they have access to your personal information, they will only use it for the purposes set out in this Privacy Policy.
- Our Service Providers – This includes external third-party service providers, such as accountants, auditors, experts, lawyers and other outside professional advisors; IT systems, support and hosting service providers; printing, advertising, marketing and market research and analysis service providers; document and records management providers; technical engineers; data storage and cloud providers and similar third-party vendors and outsourced service providers such as Royal Mail, DPD, Aguri Ltd/Pure Tone Aesthetics etc that assist us in carrying out business activities.
- Governmental Authorities and Public Authorities – We may share your (or your Patient/client's) personal information with governmental or other public authorities (including, but not limited to, regulatory authorities, courts, law enforcement, tax authorities and criminal investigations agencies); and third-party civil legal process participants and their accountants, auditors, lawyers and other advisors and representatives as we believe to be necessary or appropriate: (a) to comply with applicable law (b) to comply with legal process; (c) to respond to requests from public and government authorities (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our group companies; (f) to protect our rights, privacy, safety or property, and that of our group companies, you or others; and (g) to allow us to pursue available remedies or limit our damages.
- Data processing is occurring by Mention Me. We use Mention Me as a 3rd party service provider who will place cookies if you interact with the programme in order to support functionality of the technology. For more information on this, please visit Mention Me's privacy policy which details what those cookies are and why we use them. [https://mention-me.com/help/privacy\\_policy\\_s#cookies](https://mention-me.com/help/privacy_policy_s#cookies)

## 14.0 TRANSFERS OUTSIDE OF THE EEA

In this section, we provide information about the circumstances in which your personal data may be transferred and stored in countries outside the European Economic Area (EEA).

We may share personal information to third parties outside of the European Economic Area (EEA). Any personal information transferred will only be processed on our instruction and we ensure that information security at the highest standard would be used to protect any personal information as required by the Data Protection laws.

Where personal data is transferred outside of the EEA to a country without an adequacy decision, we will ensure appropriate safeguards are in place prior to the transfer. These could include:

Standard Contractual Clauses

An exception as defined in Article 49 of the EU GDPR

For more information about transfers and safeguarding measures, please contact us using the information in section 16.

## 15.0 RIGHT TO COMPLAINT

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact us via email on [gdpr@foxgroupint.com](mailto:gdpr@foxgroupint.com) or write to FAO Data Privacy, Fox Group International, 5300 Cinnabar Court, Daresbury Park, Warrington, Cheshire, WA4 4GE.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

## 16.0 ADDITIONAL INFORMATION

Your trust is important to us. Please contact us if you have any questions about our privacy policy or information we hold about you or the basis upon which we process such information:

You can contact us at [gdpr@foxgroupint.com](mailto:gdpr@foxgroupint.com) or write to FAO Data Privacy, Fox Group International, 5300 Cinnabar Court, Daresbury Park, Warrington, Cheshire, WA4 4GE.

## 17.0 POLICY REVIEW AND AMENDMENTS

We keep this Policy under regular review. This Policy was last updated on 19/08/2024

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.