

Dated

08 June 2020

PharmZap



WEBSITE PRIVACY POLICY

This website is operated by PharmZap Ltd.

We have written this policy to help pharmacists understand how we use the information we collect. We take your privacy and that of your customers (collectively referred to as “your” and “you” in this policy) very seriously and we ask that you read this privacy policy carefully as it contains important information on:

- the information we collect about you,
- what we do with your information,
- who your information might be shared with, and
- how you can exercise your rights in relation to your information.

If you are a patient and would like to use PharmZap to communicate with a pharmacy in your area, please download the PharmZap App which is available on the [App Store](#) or [Google Play](#). To find out more about how we use the personal information we collect in relation to patients, please [[click here](#)].

Who we are?

PharmZap Limited ('we' or 'us') are a data controller for the purposes of the GDPR and are responsible for the processing of your personal information.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below:

contact@pharmzap.com

What information do we collect?

Information provided by you

You may provide us with personal information when you register with us, when you purchase services from us, when your customers use the Service or when you contact us for support. This can include your name, job title, email address, postal address, telephone number, pharmacy name and registered business address. If you are registered for a Silver account, you may also provide us with your bank account details. We need this information so that we can provide our service to you.

Use of cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you use our website. We may use cookies and other similar tracking technologies on our website.

For example, we may monitor how many times you visit the website and where your customers are located using the PharmZap App. This information helps us to build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. You can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, some of our website features may not function as a result.

For further information on our use of cookies, including a detailed list of your information which we and others may collect through cookies please see our [Website cookie policy](#).

For further information on cookies generally visit www.aboutcookies.org or www.allaboutcookies.org.

How will we use the information about you?

We collect information about you so that we can:

set your account up and carry out any account administration;

- respond to your questions and comments; and
- provide messaging services and enable you to communicate with patients that use the PharmZap App.

It is necessary for us to process your information in this way so we can provide you with the services you have requested.

It is in our legitimate interest to ensure that the services we provide are relevant to you. We may therefore also use your information to:

- conduct research, statistical analysis and behavioural analysis;
- carry out customer profiling;
- customise our website and its content to your particular preferences;
- notify you of any changes to our website or to our services that may affect you; and
- improve our services.
- It is also necessary for us to process your personal information to comply with laws that apply to us. We may process your information in order to:
 - detect and prevent fraud;
 - carry out credit checks; and
 - keep our website secure.

If you agree, we may also process your personal information to let you know about other products or services that may be of interest to you - for more detail on this, please see 'Marketing' section below.

Marketing

Depending on what you agree with us, we may send you information by post, email, telephone or text message about our products, services and special offers which may be of interest to you. Other businesses which we have selected carefully may also send you similar marketing messages.

We will only send you marketing messages (or permit third parties to send you marketing messages) if you agree by ticking the relevant boxes when you initially sign up to PharmZap or via email if you were not offered this option when you initially signed up.

If you have consented to such receive marketing from us, or other businesses, you can opt out at any time. See 'What rights do you have?' below for further information.

Who your information might be shared with?

We may disclose your personal information to:

- patients that register to use the PharmZap App;
- other companies within our group;
- our agents, professional advisers and service providers;
- credit reference agents;
- law enforcement agencies in connection with any investigation to help prevent unlawful activity; and
- if you have agreed to it, our business partners in accordance with the 'Marketing' section above.

1. Where we transfer information from the EEA to a country that doesn't provide an adequate level of protection, we will only do so using appropriate safeguards to protect your information, like standard contractual clauses.

Keeping your data secure

We will use technical and organisational measures to safeguard your personal data, for example:

- access to your account is controlled by a password and user name that are unique to you;
- we store your personal data on secure servers; and
- payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).

What can I do to keep my information safe?

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How long do we retain your personal information for?

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of your information, the purposes for which we process your information and whether we can achieve those purposes through other means, and applicable legal requirements for data retention.

Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal information. You have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for

specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the information's accuracy; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

What we may need from you?

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

How to contact us

Please contact us if you have any questions about this privacy policy or the information we hold about you.

If you wish to contact us, please send an email to contact@pharmzap.com or you can write to us at PharmZap Ltd, 49 Longwall Road, Pontefract, England, WF8 4SW.

Changes to the privacy policy

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access this website.

Do you need extra help?

If you would like this policy in another format (for example: audio, large print, braille) please contact us.