



## Privacy Policy

**Effective:** 01 March, 2024

Welcome to Ayrton Saunders (Ayrtons) privacy policy. We appreciate you taking the time to read this notice carefully. This notice applies to anyone who interacts with us, our products and services in anyway, for example, via email, via our website or our telephone helplines.

### 1. Objectives

This Privacy Policy notices explains the following:

- The type of information we may collect about you whether through Ayrtons websites or through other means such as services we offer, telephone calls, emails or communications in our dealing with you;
- How the information about you is used;
- When we may use details to contact you;
- Whether you information will be shared with anyone else;
- Legitimate grounds of processing you information;
- Your rights of erasure; and
- Your right to respect the information we hold about you

As used in this Privacy Policy, “**personal information**” means data that identifies, relates to, describes, or that could be linked to a particular identified or identifiable natural person or is otherwise considered personal information under applicable privacy and/or data protection laws or regulations. **By using or accessing the Ayrtons Website or otherwise providing personal information to Ayrtons through other means such as email, post or telephone, you signify your acknowledgment and agreement to this Privacy Policy.**

### 2. Personal Information

In order to provide our group services we may need to collect certain personal information about you. The information processed will depend on your relationship with us (such as customer, supplier, client or other person relating to our business). We may obtain personal information about you from yourself in forms or agreements you have filled out, submit an inquiry to us by form, email, telephone conversation, or letter and from individuals and/or entities whom you have authorized to act on your behalf, our affiliates or Service Providers or others; or from other communications with us:

Personal information collected about you may include the below in accordance with the purpose being used for:

- Contact information – such as mailing address, email address, phone number
- Personal characteristics – such as age or date/year of birth, gender, initials and other personal information as required



- Identification Information – such as name, unique personal identifier such as passport or drivers licence, online identifier, device/product unique identifier
- Medical and health status – such as injuries sustained or medical conditions
- Financial data – such as bank details, billing address and other financial information
- Other sensitive information – We may obtain sensitive information if you voluntarily provide it to us through the course of business that we carry out
- CCTV footage – If you visit our premises, you may be recorded by CCTV cameras in communal areas.

The data we collect will only be relevant to the services you require and by submitting these details to us you enable us to process your information to perform our obligations under a contract or for the purpose provided for to enable us to carry out this service for you efficiently and effectively.

We will only use your information for the purposes of the business we carry out with you.

### **3. Storage and Sharing Information**

Personal information is stored in secured servers and storage systems. This is done within the UK or European Economic Area (“EEA”) where possible. We will not transfer your information outside the EEA unless it is to a country which is considered to have equivalent data protection laws or we have taken all reasonable steps to ensure the firm has suitable standards in place to protect your information.

Ayrtons will only share your personal information with third parties where it is necessary to enable us to provide a service to you and may include:

- Other third parties – We may share personal information with other third parties such as international health authorities and regulatory bodies in line with legal and regulatory restrictions;
- Ayrtons Saunders and its affiliates, the relevant licence holder for your medicine/device if it's not Ayrton Saunders;
- Pharmaco and medicovigilance service providers

### **4. Your Rights**

We will take appropriate steps to ensure that your information is safe and secure at all times. This will include physical security to our offices, technical security of our IT systems and ensuring that any paperwork we hold about you is stored securely.

We will always process your personal information fairly and lawfully and for the specified purpose of our business dealings or in connection with our contractual obligations with our clients that you may be under a contract with.

We will ensure that the personal information that we hold is relevant, not excessive and will not be held any longer than is necessary and in line with Ayrtons retention policy and as reasonably needed to maintain business records



for audit purposes, meet regulatory requirements, defend or bring potential legal claims, and respond to post-termination inquiries. An example of the typical period of time we may hold onto your personal data is 7 years following our last dealing with you. However, there may be times where we need to hold onto certain personal information longer. If this is the case we will ensure that we have a legitimate processing ground for this. If you wish to request that we no longer use your personal information to provide you with products or services, contact us using the contact information provided in Section 6.

You have the right to request a copy of the information we hold about you under a Subject Access Request (“SAR”). In order for Ayrtons to comply with your SAR if we are the data controller we will provide a response to you within 30 days. If Ayrtons are the data processor and we are only processing your information on behalf of one of our clients under a contract, we may have to refer your request to them. They may ask for our assistance in obtaining the relevant information you have requested. We will notify you of this once we have transferred your request, or you may hear directly from the data controller if we are unable to contact you directly.

If you believe that any of the information that we hold about you is incorrect, or out of date, you have the right to request that we amend your details accordingly. We may have to ask you some security questions in order to do this and may require evidence relating to the change of details where necessary.

You have the right to be forgotten, also known as the right to erasure. You are able to make this type of request in any manner, but we would suggest that this request is made in writing wherever possible. There may be some instances where we are unable to comply with your request if there are legal or regulatory requirements for continuing to hold this information.

You have the right to request that processing is restricted where for example you contest that the data we hold is inaccurate or where you believe the processing is unlawful. You have the right to receive personal data about you in a machine readable format and to give that data to another controller.

You have the right to object to the processing of your personal data where our processing is based on legitimate interest or public interest.

We do not use the information you provide to make any automated decisions that might affect you.

Occasionally Ayrtons may want to use your personal data for a different purpose than it was originally provided. If Ayrton want to do this we require your specific and informed consent. We may need to contact you via telephone, email or post in order to obtain your consent and if you choose not to opt in Ayrton endeavour not to contact you again relating to this matter unless it is in the normal course of business.



## 5. Reporting Breaches

In order for Ayrtons to deal with any breaches of this notice effectively, and should any employee, client, website user, customer or other third party become aware of any potential or actual breach of this notice, please notify Ayrtons on [post@ayrtons.com](mailto:post@ayrtons.com) so that we may fully investigate the breach and resolve any causes found.

## 6. General

In respect of the General Data Protection Regulation (2016/679) GDPR, Ayrtons are data controllers when it comes to our employees, and any data where we decide the method and means of processing. For all other types of data Ayrtons are a data processor which means our processing of your data is controlled by a third party that you are under a contract with.

Our group address is Ayrtons House, Parliament Business Park, Commerce Way, Liverpool, L8 7BA, UK. You can contact us by post at the above address or by email at [post@ayrtons.com](mailto:post@ayrtons.com).

Our company is not required to have a data protection officer, so any enquiries about our use of your personal data should be addressed to the contact details above.

## 7. Changes to Privacy Policy

This Privacy Policy may be updated from time to time to reflect changes to our information practices. The top of the Privacy Policy details the effective date. We encourage you to periodically review our posted Privacy Policy for the latest information on our Privacy Policy. Any changes to this Privacy Policy will be effective upon our posting or notification of the new terms, and your continued use of the Website or our other products and services thereafter indicates acceptance of the modified Privacy Policy. If you do not agree to any part of a modified Privacy Policy, then you must stop accessing the Website and otherwise providing personal information.