

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The Data Protection Officer (DPO) is responsible for ensuring that this notice is made available to data subjects prior to Pharmahouse Ltd collecting/processing their personal data.
- 2.2 All Employees of Pharmahouse Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject’s attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

Pharmahouse is a leading wholesaler and exporter of Pharmaceuticals and selected Medical Devices.

Our Data Protection Officer (DPO) and data protection representatives can be contacted directly here:

- chris.scott@pharmahouse.co.uk
- +44 (0) 870 720 3349

The personal data we would like to collect from you is:

Personal data type:	Example:
Contact information	such as name, postal or email address, and phone number
Business contact information	such as job title, department and name of organization
Professional information	Such as experience with products supplied by Pharmahouse Ltd or other services
Payment details	Bank Name, Address, Account Numbers & Payment References
Shipping information	including the shipping address, courier information and associated phone numbers
Information you choose to provide in connection with an employment application	such as veteran status, gender and ethnicity

Information generated by us in the course of managing our relationship with you	such as a history of our interactions with you, your purchases from us and information about your use of products we have supplied
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The personal data we collect will be used for the following purposes:

- Manage our business relationship with you, for example: (i) process your transaction; (ii) manage and maintain your account with us; (iii) respond to your questions and comments and provide customer support; (iv) allocate a dedicated account manager
- Marketing, advertising and public relations, for example: (i) marketing our business and products to you; (ii) provide you with information you have requested about our company, our products and our services; (iii) provide you with information about, or samples of, our product range for marketing purposes; (iv) contact you through email, telephone or postal mail
- Maintenance and statistics, for example: (i) help diagnose problems with our server; administer the website, and compile broad statistical data; (ii) update and maintain our website;
- Recruitment purposes, for example; (i) evaluate your interest in employment and contact you regarding possible employment with Pharmahouse Ltd; (ii) process your application, monitor recruitment statistics, and comply with government reporting requirements; and
- Compliance, legal, regulatory and ethical purposes, for example (i) enforce our Terms & Conditions or other legal rights; (ii) comply with applicable laws, regulations and requests from governmental agencies; (iii) and comply with industry standards and our policies;
- Research and product development, for example we may use information about your experience of using our products & services to help us improve them.

Our legal basis for processing for the personal data:

- EU Data protection law requires us to have a legal basis before processing any Personal Data about you. The legal basis' for us processing your Personal Data for the above purposes may be because: (i) you have provided your consent; (ii) it is necessary to for the performance of a contract with you; (iii) the processing is necessary for our compliance with a legal obligation; or (iv) the processing is in our legitimate interests of operating and promoting our business.
- To the extent provided by applicable law, you may withdraw any consent you previously provided to us, or object at any time on legitimate grounds, to the processing of your Personal Data. In some circumstances, withdrawing your consent to Pharmahouse's use or disclosure of your Personal Data will mean that you cannot take advantage of certain Pharmahouse products or services.

3.2 **Consent**

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Pharmahouse to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting the Data Protection Officer (DPO) in writing.

3.3 Disclosure

Pharmahouse will pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

Third country (non-EU)/international organisation	Safeguards in place to protect your personal data
to our subsidiaries, branches or associated offices in order for us to comply with our legal obligations, e.g. where we are required to disclose certain information to tax authorities;	We intend to keep your Personal Data confidential, in compliance with our legal obligations. We do not sell, rent, trade or otherwise disclose this information to third parties, other than as described in this Privacy Statement, for the purposes described above, or as we disclose to you at the time the data is collected. Pharmahouse will take appropriate physical, technical and organisational security measures designed to safeguard and secure any information you provide to us.
to protect the security or integrity of our business, including our databases and systems;	
to any of our outsourced service providers, suppliers or distributors to facilitate the provision of contracted services or goods or to provide expanded services to our customers	
for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event	

3.4 Retention period

Your Personal Data will be retained for the duration of our business relationship and for a period of time thereafter as required by applicable local law or where we have a legitimate and lawful purpose.

Pharmahouse will retain applications of unsuccessful candidates for a reasonable period after the application process to enable us to contact you if another suitable position arises or to comply with our legal obligations.

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.

- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Pharmahouse (or third parties as described in 3.3 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Pharmahouse's data protection representatives Data Protection Officer (DPO).

The details for each of these contacts are:

	Supervisory authority contact details	[Data Protection Officer (DPO)] / [GDPR Owner] contact details
Contact Name:		Mr Chris Scott
Address line 1:	Information Commissioner's Office	Pharmahouse Ltd
Address line 2:	Wycliffe House Water Lane	1 Chancerygate Way
Address line 3:	Wilmslow	Farnborough
Address line 4:	Cheshire	Hampshire
Address line 5:	SK9 5AF	GU14 8FF
Email:	casework@ico.org.uk	chris.scott@pharmahouse.co.uk
Telephone:	0303 123 1113	0870 720 3349

Document Owner and Approval

The Data Protection Officer (DPO) is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the internal shared price and is published on our website.

Signature:



Date: 28. 11. 2019

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Mr Chris Scott	28.11.2019

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