

Privacy policy

This privacy notice sets out how Tillomed Laboratories Limited collect and use personal data and information.

1. The types of personal data we collect about you

The organisation collects and processes personal data relating to:

- reports of adverse effects potentially arising from consumption of products referred to as PV-related personal data
- reports of potential product quality defects where there are no pharmacovigilance consequences, referred to as product quality complaint-related personal data
- medical enquiries about products where there are no pharmacovigilance consequences, referred to as medical enquiry-related personal data
- enquiries relating to product availability where there are no pharmacovigilance consequences, referred to as product enquiry-related personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** As a pharmaceutical company we collect and use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.

Purposes for which we will use your personal data

We have set out below in a table format, a description and details of the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We may collect personal data for:

Purpose/Use. Data relating to	Type of data	Legal basis [and retention period]
Pharmacovigilance (reports of adverse effects potentially arising	Identity, Contact, i.e. Patient's / Reporter's	Article 6 (1) (c) - processing is necessary for compliance with a legal obligation to

<p>from consumption of products referred to as PV-related personal data)</p> <p>To fulfil the data controller's legal obligation to collect, manage and report suspected adverse reactions associated with medicinal products</p>	<p>Name Address Telephone number, occupation, i.e. for HCPs et al. Contact number, Email address</p>	<p>which the controller is subject. We will retain this data for as long as the product is authorised and for at least 10 years after the marketing authorisation has ceased to exist</p>
<p>Product Quality (reports of potential product quality defects where there are no pharmacovigilance consequences, referred to as product quality complaint-related personal data)</p> <p>We collect and process data to fulfil the data controller's legal obligation to implement a system for recording and investigating complaints about its medicinal products</p>	<p>Reporter's: name address telephone number email address</p>	<p>Article 6 (1) (c) Article 9 (2) (i) if reporter is user of product We will retain this data for 6 years from end of calendar year in which report is made</p>
<p>Medical enquiry-related personal data (medical enquiries about products where there are no pharmacovigilance consequences)</p>	<p>Enquirer's: name address telephone number email address</p>	<p>Article 6 (1) (f) The personal data will be kept confidential with access limited to the medical enquiries team and, if applicable, the quality assurance team. It will not be used for any</p>

		<p>purpose other than those listed under 'Why data is processed'. On balance, the organisation's legitimate interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. We will retain this data for for 10 years from end of calendar year in which enquiry was made</p>
<p>Product enquiry-related personal data (enquiries relating to product availability where there are no pharmacovigilance consequences)</p>	<p>Enquirer's identity and contact details, i.e. name address telephone number email address</p>	<p>Article 6 (1) (f) - The personal data will be kept confidential with access limited to the customer services team. It will not be used for any purpose other</p>

		<p>than that listed under 'Why data is processed'. On balance, the organisation's legitimate interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data We will retain this data for 3 months from end of month in which enquiry is received.</p>
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2. Disclosures of your personal data

We may share your personal data where necessary with third parties including pharmacovigilance providers.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

3. International transfers

We may share your personal data within the Group. This may involve transferring your data outside the UK/EU to our overseas offices in India.

Whenever we transfer your personal data out of the UK/EU to countries which have laws that do not provide the same level of data protection as the UK/EU law, we always ensure that a similar degree of protection is

afforded to it by ensuring that the following safeguards are implemented: STANDARD CONTRACTUAL CLAUSES ARE USED FOR THE INTRA-GROUP TRANSFERS:

We use specific standard contractual terms approved for use in the UK/EU which give the transferred personal data the same protection as it has in the UK/EU, namely the International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers. To obtain a copy of these contractual safeguards, please contact us at dp@tillomed.com

4. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

5. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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

6. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data 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 data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. 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 data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data. In some cases, we may

demonstrate that we have compelling legitimate grounds to process your information which override your right to object.

If you wish to exercise any of the rights set out above, please contact us at dp@tillomed.com.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

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 data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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 could 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.

7. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please email us at dp@tillomed.com

8. Complaints

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

9. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.