

The Association of Pharmacy Technicians UK

Privacy Policy

A MEMBER OF THE PHARMACY NETWORK

1. Introduction and Definitions

Welcome to **the Association of Pharmacy Technicians UK** a member of The Pharmacy Network, a learning system where you can read articles, take e-learning modules, keep an e-learning log, take part in community activities and more. The Pharmacy Network is operated and maintained by or on behalf of Communications International Group Limited.

Communications International Group Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We value and respect the privacy of everyone who visits a web site within The Pharmacy Network ("**Our Site**" and/or "**The Pharmacy Network**") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy you must stop using Our Site immediately.

This policy covers the processing of Personal Data by Communications International Group Limited (registered in England & Wales; Company No 01241120) (VAT number GB 735 5539 15) whose registered address (and principal place of business) is at 239 Linen Hall, 162-168 Regent Street, London, W1B 5TB, United Kingdom and its subsidiary and associated group companies ("**CIG**", "**We**", "**Our**" or "**Us**").

CIG is committed to protecting the privacy of your personal information whilst striving to provide the very best user experience. We want The Pharmacy Network to be safe and enjoyable for everyone. Under Data Protection legislation, We have a legal duty to protect the Personal Data We collect from you. If you have any concerns, questions or comments about this Privacy Policy or The Pharmacy Network you can contact Us using the contact details in paragraph 14 of this Policy. It is important that you read this document in conjunction with Our Site's Terms and Conditions.

In this Policy the following terms shall have the following meanings:

"Account" means an account required to access and/or use certain areas and features of Our Site

"Cookie" means a small text file placed on your computer by The Pharmacy Network when you visit certain parts of The Pharmacy Network and/or when you use certain features of The Pharmacy Network. Details of the cookies used by The Pharmacy Network are set out in Our Cookie Policy

"Data" and/or "Personal Data" means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case it means

collectively all the personal data you submit or provide to Us via Our Site. This definition shall, where applicable, incorporate the definition provided in the General Data Protection Regulation (“GDPR”)

“User” means anyone singularly or in groups or as part of an organisation that accesses The Pharmacy Network or related websites and is not an employee of CIG acting in the course of their employment.

2. Scope of this Policy

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your Personal Data is collected, stored or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

3. Your Rights

3.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of Personal Data have been designed to uphold:

3.1.1 the right to be informed about Our collection and use of Personal Data;

3.1.2 the right of access to the Personal Data We hold about you (see paragraph 13);

3.1.3 the right to rectification if any Personal Data We hold about you is inaccurate or incomplete (please contact Us using the details in paragraph 14);

3.1.4 the right to be forgotten – the right to ask Us to delete any Personal Data We hold about you (We only hold your Personal Data for a limited time, as explained in paragraph 5, but if you would like Us to delete it sooner, please contact Us using the details in paragraph 14);

3.1.5 the right to restrict (i.e. prevent) the processing of your Personal Data;

3.1.6 the right to data portability (obtaining a copy of your Personal Data to re-use with another service or organisation);

3.1.7 the right to object to Us using your Personal Data for particular purposes; and

3.1.8 rights with respect to automated decision making and profiling.

3.2 If you have any cause for complaint about Our use of your Personal Data please contact Us using the details provided in paragraph 14 and We will do our utmost to solve the problem for you. If We are unable to resolve the matter, you also have the right to lodge a complaint with the UK’s supervisory authority, the Information Commissioner’s Office.

3.3 If you need further information about your rights, please contact the Information Commissioner’s Office or your local Citizens Advice Bureau.

4. The types of Data We collect and how We collect it:

4.1 The Data We collect

Depending on your use of Our Site, We may collect some or all of the following personal and non-personal Data (please also see Our Cookie Policy on Our use of Cookies and similar technologies):

4.1.1 name;

4.1.2 date of birth;

4.1.3 gender;

4.1.4 job title/profession;

4.1.5 company/business name;

- 4.1.6 contact information such as e-mail addresses and telephone numbers;
- 4.1.7 IP address;
- 4.1.8 demographic information such as post code, preferences and interests;
- 4.1.9 web browser type and version;
- 4.1.10 operating system and a list of URLs starting with a referring site; and
- 4.1.11 your activity on Our Site and the website you exit to.

4.2 How We collect the Data

4.2.1 Information you provide upon registration: in order to make use of certain services provided through The Pharmacy Network such as the training logs and email notifications, you need to register an Account with Us. When you do so, you will provide Us with information about yourself and you will be able to select how We use your information for marketing purposes. You will be able to select how We use your information for marketing purposes. You can update your marketing preferences at any time by following the instructions to amend your details in the Account registration section. We will only use your Data in accordance with your instructions and as set out in this Privacy Policy.

4.2.2 Information you provide upon ordering a product or service from Us: if you order a product or service from Us (for example training plans), you will need to provide certain personal details/Data so that the order can be fulfilled. In some cases, We will direct you to a third-party partner site which will collect this information from you and fulfil your order.

4.2.3 Information you provide upon entering a promotion or competition: if you enter a promotion or competition you will either need to register an Account with Us or provide certain Personal Data which will be used in accordance with the terms of the promotion or competition.

4.2.4 Information you provide when taking part in a poll or survey: if you take part in a poll or survey you will either need to register an Account with us or provide certain Personal Data to Us which We will use in accordance with the terms of the relevant poll or survey.

4.2.5 Demographic and other data: The Pharmacy Network uses Cookies, web analytics and web logs to collect information about your use of The Pharmacy Network, information about your computer such as your computer's IP address and browser type, demographic data and, if you arrived at Our Site via a link from a third-party site, the URL of the linking page. If you have registered an Account with Us, it may also collect your name and email address. The Data collected through Cookies, web analytics and web logs may be transferred to third parties. For more information on how The Pharmacy Network uses Cookies, see Our Cookie Policy.

4.2.6 Email communications: We use web beacons in Our emails to track the success of Our marketing campaigns. If you open an email from Us, We can see which of the pages of Our Site that you visited. Our web beacons don't store any information on your computer but, by communicating with Our Cookies on your computer, they can tell Us when you have opened an email from Us. We may keep track of the emails that We send you. We also keep a record of what communications you have selected to receive or not to receive. If you would like to opt out of receiving such emails, please click the "unsubscribe" link in the email and follow the instructions.

5. How We use the Data that We collect:

5.1 All Personal Data is processed and stored securely for no longer than is necessary in light of the reason(s) for which it was collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see paragraph 7 below.

5.2 Our use of your Personal Data will always have a lawful basis, either because you have consented to Our use of your Personal Data (e.g. by registering an Account with Us and/or subscribing to e-mails), because it is necessary for Our performance of a contract with you, or because it is in Our legitimate interests.

5.3 Specifically the Data may be used for the following purposes:

- to provide you with services or information that you have requested
- to contact you regarding your registered Account with Us
- to send you email newsletters and CPD/learning notifications
- to inform you if you have won a prize
- to monitor or improve the performance of, and products and services available through, The Pharmacy Network
- to customise the advertising and content that you see
- to monitor compliance with Our Terms and Conditions of Use of The Pharmacy Network, enforce Our rights and protect the safety of others including investigating and if necessary removing any content about which We receive a complaint
- to send you promotional materials, special offers or competitions on Our behalf or on behalf of Our group companies and marketing partners. If you do not want to receive this marketing information you can notify Us of this as part of the registration process. You can stop receiving this information at any time by following the unsubscribe instructions on the correspondence you receive or by amending your marketing preferences
- to send you invitations to take part in research, surveys and polls
- to send you details of employment opportunities
- for internal record keeping and to manage your Account
- replying to e-mails from you
- providing and managing your access to Our Site
- for any purpose if we are required to do so by any law or other regulatory or government authority.

5.4 Please note that if you upload or post any content (which includes Data) to The Pharmacy Network, We may use it in accordance with our Terms and Conditions of Use and it may be viewed and used by others. CIG accepts no responsibility for this.

5.5 By providing us with your Personal Data, you consent to Us: (a) processing your information as set out in this Privacy Policy and in any other manner you expressly consent to; and (b) processing your sensitive Personal Data, such as health data (if provided).

5.6 You have the right to withdraw your consent to Us using your Personal Data at any time and to request that We delete it.

5.7 We will not keep your Personal Data for any longer than is necessary in light of the reason(s) for which it was collected.

6. Sharing of Personal Data:

6.1 We may share your Data with other companies in our Group (this means our subsidiaries and associated companies) insofar as reasonably necessary for the purposes and on the legal bases set out in this Policy (including marketing purposes).

6.2 We may use third parties to perform certain functions on Our behalf including fulfilling orders, sending emails, organising and managing competitions, promotions, surveys or polls, removing repetitive information from customer lists, comment hosting, traffic analysis, data analysis, translation services, audience auditing, and processing credit card payments. These third parties may have access to your Data to perform their services, but any Data used by such parties is used only to the extent required by them to perform the services that CIG request (unless you give consent to further use). Further, any Data that is processed by third parties shall be processed within the terms of this Policy and in accordance with the GDPR. To request a list of these third parties please contact Us using the details in paragraph 14.

6.3 Aggregate Information: We may share aggregate, non-personally identifiable information, such as demographics and usage statistics, with advertisers, sponsors and other organisations.

6.4 Options to receive marketing information from associated third parties: throughout The Pharmacy Network you may be given the opportunity to receive marketing information which may be of interest to you from associated third parties. If you elect to receive such information and consent to the sharing of your Personal Data, We share your Personal Data with our associated third parties and they are only permitted by Us to use it for the purpose of providing you with the marketing information you have requested. If you do not want to receive marketing information from associated third parties you can notify Us of this as part of the registration process. You can stop receiving this information at any time by following the unsubscribe instructions on the correspondence you receive or by amending your marketing preferences.

6.5 Products or services offered in partnership with third parties: certain products or services available through The Pharmacy Network may be provided to you in partnership with a third party. That third party may require you to disclose personal information to them in order to receive such products or services. If you request a product or service offered in partnership with a third party, the identity of the third party will be disclosed to you and (if you have agreed) your relevant Data will be submitted to that third party. The use of your personal information by that third party is subject to its privacy policy and practices and We are not responsible for the same.

6.6 Third-Party Ad Serving Services: We allow third party advertisers to show you advertising on The Pharmacy Network. We use third-party ad servers who may use cookies to control certain routine advertising concerns such as making sure that you do not see the same ad too many times or that the ads are shown in the format best suited for your browser. Advertising may also be targeted and as such you may be shown ads based on certain demographic information which We may provide (e.g. the size of your organisation or your professional responsibilities). We may also use third party ad servers to enable advertisers to re-target you based on an anonymous but unique profile across a number of unaffiliated websites, a method known as online behavioural advertising. You can find more information about each ad servers' practices (DoubleClick and Google AdSense) by reviewing their privacy policies. You can find more information or turn off targeting by member companies at YourOnlineChoices UK, <http://www.youronlinechoices.com/uk>.

6.7 Audience and Traffic Measurement Services: We may use third party services that allow Us to collect anonymous traffic and behavioural information by monitoring anonymous visitor activity. The Pharmacy Network advertisers, sponsors and/or traffic measurement services may themselves set and access their own cookies on your computer if you choose to have your cookies enabled in your browser. If you do not wish to have cookies enabled please update your device settings.

6.8 In specific circumstances We may have to share your Data with other third parties for their own purposes. Such specific circumstances include, but are not limited to:

- For fraud management, We may share information about fraudulent or potentially fraudulent activity on Our Site. This may include sharing Data with law enforcement bodies.
- We may be required to disclose your Personal Data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take your privacy into consideration.
- We may, from time to time, expand, reduce or sell CIG and this may involve the transfer of divisions of CIG, or the whole business, to new owners. Any Personal Data that you have provided will, where it is relevant to any part of CIG's business that is being transferred, be transferred along with that part and the new owner or controlling party will, under the terms of this Privacy Policy, be permitted to use that Data only for the same purposes for which it was originally collected by Us.

7. How and where We store your Data:

7.1 We only keep your Personal Data for as long as We need and/or for as long as We have your permission to keep it.

7.2 Your Data will only be stored within the European Economic Area ("the EEA") (The EEA consists of all EU member states plus Norway, Iceland and Lichtenstein)

7.3 Data security is of vital importance to Us, and to protect your Data We have taken suitable measures to safeguard and secure Data collected through Our Site. Steps We take to secure and protect your Data include:

7.3.1 ensuring all web pages are secure utilising https protocol; ensuring that all Personal Data at registration and login is transmitted in an encrypted form utilising a secure socket layer; using the industry standard AES-256 encryption algorithm to encrypt and store your Data on our hosting providers servers.

7.3.2 using a secure ISO27001 compliant data centre and hosting provider.

8. Links to other websites:

The Pharmacy Network contains links to a wide variety of other websites and We display advertisements from third parties on The Pharmacy Network. CIG has no control over such websites and is in no way responsible for the content thereof. This Policy does not extend to your use of such websites. Users are advised to read the privacy policy of such websites prior to using them.

9. Security/Transmission:

In accordance with Our responsibilities under the GDPR, We adopt appropriate security procedures (suitable physical, electronic and managerial procedures) to seek to safeguard against unauthorised access to your information. (See in particular paragraph 7 above). Please be aware, however, that the transmission of data via the internet is never completely secure. Whilst CIG has taken all reasonable steps to ensure that the Data you provide will be kept secure from unauthorised access We cannot guarantee the security of your Data as it is transmitted to and from Our Site.

10. Policy changes:

By using The Pharmacy Network, you agree to the terms of this Privacy Policy, Our Cookie Policy and Our Terms and Conditions of Use. We may amend this Privacy Policy from time to time or as may be required by law. If we do so, we will post an updated version on The Pharmacy Network and you are deemed to have accepted the revised terms on your first use of The Pharmacy Network following the alterations.

11. How can you control your Data?

In addition to your rights under the GDPR, set out in paragraph 3 above, when you submit Personal Data via Our Site, you may be given options to restrict Our use of your Data. In particular, We aim to give you controls on Our use of your Data for direct marketing purposes (including the ability to opt-out of receiving e-mails from Us which you may do by unsubscribing using the links provided in Our e-mails and at the point of providing your details and by managing your Account).

12. Your right to withhold information

12.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain Data.

12.2 You may restrict Our use of Cookies. For more information see our Cookie Policy.

13. Accessing your own Data:

You have the right to ask for a copy of any of your Personal Data held by CIG (where such data is held) by contacting our Data Protection Compliance Manager at the address given in paragraph 14. Under the GDPR no fee is payable and We will provide any and all information in response to your request free of charge.

14. Questions about the Pharmacy Network and the information we hold about you:

If you have any general questions about The Pharmacy Network or the information We have collected about you and how We use it, you can contact our Data Protection Compliance Manager, Tim Langford, at Communications International Group Limited, 2nd Floor, Linen Hall, 162-168 Regent Street, London W1B 5TB, United Kingdom. He can also be contacted by e-mail at datacompliance@1530.com and by telephone on +44(0) 20 7434 1530.

This version of the Privacy Policy is effective as of 24th April 2018.