

The General Data Protection Regulation introduces new and more stringent requirements for organisations to be explicit about their retention of individuals' personal information and prevents them from holding or processing such information without lawful grounds. Pharmacy Management has approved this privacy policy pursuant to our legal obligations under the Regulation and other relevant laws.

The directors of Pharmacy Management believe that they have a legitimate interest in the holding, processing and sharing of the personal information of the users of the company's website in the manner set out in this policy in pursuance of our legitimate business interests and in view of both its traditional governance and administrative processes. In particular, our ability to hold personal data is founded on permitted processing conditions:

- 6(1)(a) - Consent of the data subject
- 6(1)(c) - Processing is necessary for compliance with a legal obligation
- 6(1)(e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- 6(1)(f) - Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject

"Special categories of data" require additional safeguards. These are defined as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. We do not record any of these data; insofar as dietary preferences that we record relate to religious beliefs we believe this is justified under 9(2)(c) - Processing is necessary to protect the vital interests of a data subject.

Such legitimate interests are recognised as lawful grounds for the holding and processing of data. Pharmacy Management undertakes that the personal information of website members will be held and processed only as is necessary for the purposes of the legitimate interests of the company and in accordance with this policy.

### **Definitions of 'members' and 'personal information'**

'Members' here includes all those who have voluntarily registered on our website. All the data held are visible to the subject and most can be amended by them. Data relating to payments and past attendances at events cannot be altered by the

members, but errors will be corrected by Pharmacy Management within 7 days of a request.

'Personal information' in this regard includes: the member's name; any declared institutional affiliation; contact details including postal address, correspondence address if different, email address and telephone number.

Additional information is stored where received and is used to ensure that contacts (for which consent has been given) are managed to ensure their relevance to the individual.

### **Collection of members' personal information**

A member's personal information is collected through that member's completion and submission of the website registration form.

### **Sharing of members' personal information with third parties**

Pharmacy Management works with third parties to fulfil its business purposes. It necessarily shares members' personal information with those third parties in furtherance of these endeavours.

Data are shared for three purposes:

- a) Event management
- b) Disclosure and compliance
- c) Targeted mailing

### **Event Management**

Pharmacy Management contracts with external event managers to manage certain of its events. These companies are UK-based and have undertaken to use the data held only for the purposes for which they are contracted, to erase it when it is no longer required and to adhere to GDPR while they hold it. Those who attend events have given consent to the sharing of these data as part of the terms and conditions of attending our events, to which they are directed at the time of booking.

### **Disclosure and Compliance**

Both attendees and companies supporting our events have mandatory disclosure requirements. The sharing of data to meet these is justified by processing conditions 6(1)(c) and 6(1)(e). When a member asks that their record should be deleted, we are unable to do so immediately if this will prevent adherence to disclosure and compliance requirements. This will be explained to them at the time. Instead, their record will be marked as inactive and will be deleted when no longer needed for these purposes, currently three years after the end of the disclosure period in which the request was made.

## Targeted Mailing

Pharmacy Management is committed to respecting the right of members to receive only communications of relevance to them. Accordingly, it employs a specialist agency based in Australia to manage its mailings. This agency does not hold data but has passworded access to Pharmacy Management's UK server in order to conduct its processing. The agency has undertaken to use the data only for the purposes for which they are contracted and to adhere to GDPR while they hold it. The requirements of GDPR and variations from current Australian data protection legislation have been explained to the agency.

Pharmacy Management has sought or will seek assurances that any third parties with whom it works will maintain the confidentiality of members' personal information and process that information only as is necessary to meet its legitimate business interests.

## Financial transactions

In order to process payments by credit and debit card, Pharmacy Management passes some of your personal data to the credit card processing company along with details of your cards provided at the time of transaction. We do not retain that information to use again. Information relating to past transactions is held for three years in accordance with the requirements of our card processor.

## Members' rights relating to their personal information

Members have the right to ask for a copy of the personal information held on them or to correct that information at any time. They can access all the information held by logging in to their personal profile on our website. Complaints or queries about data handling or breaches of privacy as well as any members' request for rectification or deletion of or access to their personal data should in the first instance be directed to the Data Protection Officer, who will normally take steps to address the communication within five working days.

## Images

At our events there may be photographers taking photographs or videos which we use to promote our services and as part of reports on those events. If you do not wish your photograph to be used please contact us beforehand or speak to a Pharmacy Management representative at the event. Please note that this does not preclude fair use of photographs of audiences.

We may video-record any online meeting and may publish it, including questions, on our YouTube channel, website, or otherwise. Your participation in such an event is taken as permission to include your name and video from the Zoom meeting in the published video.

### Contact details

Pharmacy Management has appointed a Data Protection Officer, Graham Brack. He can be contacted at the address below.

Those who, for reasons related to a disability, require this statement in a different format should contact the Pharmacy Management office to discuss their requirements.

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