Privacy Notice

The law is changing around the protection of your personal data.

The EU has approved the **General Data Protection Regulation (GDPR)**, which is the largest change to the protection of personal data since the Data Protection Regulation Directive 95/46/EC.

We are a Data Controller under the terms of the Data Protection Act 2017 and the requirements of the EU General Data Protection Regulation.

In order for Red Line Pharmacovigilance Limited to comply with this regulation, we need to inform you about what personal data the Company holds about you, why we hold and process it, who we might share it with, and your rights and freedoms under the Law. We also need your permission for us to contact you.

Types of Personal Data

Red Line Pharmacovigilance holds personal data in the following categories:

- 1. Patient clinical and health data and correspondence.
- 2. Staff employment and Applicant recruitment data.
- 3. Suppliers /Contractors data.
- 4. Clients' data.

Why we process Personal Data (what is the "purpose")

"Process" means we obtain, store, update and archive data.

- 1. Patient data is held for the purpose of providing patients and/or prescribers with information about pharmaceutical medicines, to ensure they are used appropriately.
- 2. During our activities we may intercept reports of adverse effects related to a medicinal product, which we are required by law to investigate and report to the authorities. These reports may include personal data related to the reporter, particularly when the reporter is a healthcare professional.
- 3. Staff employment data is held in accordance with Employment, Taxation and Pensions law. We may also keep staff employment data for Payroll, HR and IT purposes.
- 4. Applicant recruitment data is held for the purpose of providing a record of the recruitment process.
- 5. Suppliers / Contractors data is held for the purpose of good management and to maintain any contracts.
- 6. Clients' data is held for the purpose of good management and to maintain contracts.

What is Red Line Pharmacovigilance Limited Lawful Basis for processing Personal Data?

The Law says we must tell you this:

- 1. We hold patients' data because it is in our **Legitimate Interest** to do so. Without holding the data we cannot work effectively.
- 2. We hold staff employment data because it is a **Legal Obligation** for us to do so.
- 3. We hold Suppliers' data because it is needed to **Fulfil a Contract** with us.

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4. We hold Clients' data because it is required to **Fulfil a Contract** with us.

Who might we share your data with?

We can only share data if it is done securely and it is necessary to do so.

- 1. Patient data may be shared with other professionals who need to be involved. Patient data is also securely stored for back-up purposes with our computer software supplier.
- 2. Employment data will be shared with government agencies such as HMRC.

Your Rights

You have the right to:

- 1. Be informed about the personal data we hold and why we hold it.
- 2. Access a copy of your data that we hold by contacting us directly: we will acknowledge your request and supply a response within one month or sooner.
- 3. Check the information we hold about you is correct and to make corrections if not.
- 4. Have your data erased in certain circumstances.
- 5. Transfer your data to someone else if you tell us to do so and it is safe and legal to do so.
- 6. Tell us not to actively process or update your data in certain circumstances.

How long is the Personal Data stored for?

- 1. We will store all pharmacovigilance data for ten (10) years, as per Good Pharmacovigilance Practice Guidelines. We will archive your data (that is, store it without further action) for as long as is required for legal purposes.
- 2. We must store Employment data for a minimum of six (6) years after an employee has left.
- 3. We must store Recruitment data for a minimum of six (6) months.
- 4. We must store Contractors' data for seven (7) years after the contract is ended.
- 5. We must store Clients' data for ten (10) years after the contract is ended.

What if you are not happy or wish to raise a concern about our data processing?

You can complain directly to Red Line Pharmacovigilance Limited where we will do our best to resolve the matter. Our Data protection Officer is Shirley-Ann van der Spuy (shirley-ann@redlinepv.co.uk). If this fails, you can complain to the Information Commissioner at <u>www.ico.org.uk/concerns</u> or by calling 0303 123 1113.