

medeConnect Ltd Privacy Notice

Contents

1.	Introduction	2
2.	Controller’s contact details.....	2
3.	Collection and use of personal data	2
4.	Sharing of personal data	3
5.	Links to other websites	4
6.	International transfers of your personal data	4
7.	Protection of your data.....	4
8.	Data Retention.....	4
9.	Your rights	5
10.	Visitors to our website.....	5
11.	Changes to the Privacy Notice	6
12.	Complaints or queries	6

1. Introduction

MedeConnect Limited is part of M3 (EU) Limited and this privacy notice aims to inform you about how MedeConnect Limited (referred to as "MedeConnect", "we", "us" or "our" in this privacy notice) processes your personal data and tells you about your privacy rights under data protection laws.

MedeConnect takes your privacy very seriously and we are committed to protecting your personal data. This includes information you provide to us and the statement below describes what data we will obtain, how the data is used and how the data is protected.

2. Controller's contact details

MedeConnect is the controller for all information we process, unless otherwise stated and is responsible for the management, processing and protection of data that you provide to us.

MedeConnect can be contacted on the details below.

Postal:

101 Park Drive, Milton Park, Abingdon, Oxfordshire OX14 4RY UK.

Email: info@medeconnect.net

Tel: +44 (0)1235 828400.

Any questions about your data or our privacy policy can be addressed in writing to our Data Protection Officer at DPO@eu.m3.com

3. Collection and use of personal data

Purpose of processing and legal basis

MedeConnect obtains personal data that is disclosed or otherwise processed by us upon entering into and performing agreements, communicating with Business Associates in relation to agreements and making and receiving payments under agreements. We also may obtain Representatives' personal data from public sources in anticipation of a prospective business relationships.

We use a variety of public sources to collate information about potential Business Associates we believe may be suitable for our services. We may also receive a referral from one of your colleagues and process that information in a similar way. Personal data is any information that allows an individual (in this case, the Representative) to be identified.

We may process the following types of personal data about Representatives:

- Names, postal or e-mail addresses, fax numbers, and phone numbers
- Employment information (e.g. job titles) relating to Representatives
- Communication preferences

As a matter of practice, we will not collect any sensitive personal data relating to Representatives. To the extent that there is a need for us to process sensitive personal data, we will obtain the Representative's prior written consent.

The legal bases we rely upon to offer these services to you are:

- Where we have a legitimate interest;
- To fulfil a contractual obligation that we have with you; and/or
- Your consent for direct marketing.

Accuracy of your personal data

It is important that the personal information we hold about you is accurate and current. Please keep us informed by contacting us if your personal information changes during the period which we hold your data.

4. Sharing of personal data

We will not sell access to your data to other businesses for marketing or any other purpose. We may share your personal data only with:

Group Companies

MedeConnect may share your data with other members of our group for the purposes of monitoring and managing the services provided by us.

Members of our group include:

- M3 Inc (Japan)
- M3 Medical Holdings Ltd (UK)
- QQFS (Sweden)
- Vidal Group Holdings Ltd including subsidiaries in France, Germany and Spain
- IQUS Ltd t/a Rotamaster (UK)
- M3 USA
- M3 (EU) Ltd which includes trading styles:
 - Doctors.net.uk (UK)
 - medeConnect (UK)
 - M3 Global Research (UK, Sweden and USA)

Service Providers

MedeConnect may be required to share data with our Service providers that are retained to perform services on its behalf, such as, but not limited to, IT service providers. Service providers are not permitted to use the personal data for their own purposes and are prohibited from onward transfer of the personal data.

Law Enforcement

Where required by law or reasonably necessary to protect the rights, property, and safety of others or ourselves, We may be required to pass personal details to Law enforcement and other government authorities.

Industry Standards

Industry standards or guidelines that require disclosure about our Business Associates we may be required to pass on your details.

5. Links to other websites

Where we provide links to websites of our group companies, partners or other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

6. International transfers of your personal data

Where we are required to transfer data to our other group companies as listed in section 4, we will ensure all personal data is protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission and/or EU-US Privacy Shield and Switzerland-US Privacy Shield. For further details please contact us.

The hosting facilities for our website is situated in the EEA.

7. Protection of your data

We are committed to taking all reasonable and appropriate technical and organizational security safeguards to protect the personal data against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure, or use.

Access to your data is restricted to ensure it can only be accessed by authorised users. We have minimised the need for data to be accessed unless this is strictly necessary to meet our obligations or to respond to any reasonable and lawful request. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your personal data. Information is regularly backed up to reduce the risk of loss or corruption.

8. Data Retention

MedeConnect will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time.

9. Your rights

Please be aware, you have the following Data Protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in respect of any data that has been provided to us directly by you;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent (where consent has been freely and lawfully provided by you) at any time.

Where you have consented to medeConnect processing your personal data you have the right to withdraw that consent at any time by contacting us.

You can also contact us if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

10. Visitors to our website

Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Managing cookies

17.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-deletemanage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

Analytics

When you visit www.medeconnect.net, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behavior patterns. We do this to find out such things as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

If we do collect personal data through our website, we'll be upfront about this. We'll make it clear when we collect personal information and we'll explain what we intend to do with it.

11. Changes to the Privacy Notice

This Privacy Notice was last updated on 27 June 2019. If it is necessary for us to alter the terms of this Privacy Notice, we will post the revised policy on this website.

12. Complaints or queries

MedeConnect is committed to meeting the highest standards when collecting and using personal information and expects all staff to share this commitment. For this reason, we take any complaints very seriously. We encourage you to bring it to our attention if you think that our collection or use of your information is unfair, misleading or inappropriate.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the email address below.

If you wish to complain about this privacy notice or any of the procedures set out in it please contact our Data Protection Officer – DPO@eu.m3.com

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns>, if you believe that your data protection rights have not been adhered to.