

TMC Privacy Notice

Who we are

TMC Pharma Services Ltd is registered with the UK Information Commissioners Office as a Data Controller registration number Z8450896. We are specialists in supporting Pharmaceutical Development through a full range of expert Pharma / Biotech services.

Scope

The scope of this notice applies to Personal Data which we collect through direct contact with you, through our website or other TMC online applications, e-mails and other offline means of communication. This will normally relate to engagement with potential client contacts and individuals making enquiries, applications or medical product related reports to us. Separately, a Privacy Policy is in place for clinical trial investigators and their staff, whose personal data we have collected for our own purposes.

This notice does not cover Personal Data which you have provided to other organisations or agencies who have shared it with us. In this case you should refer to that organisation's Privacy Information but be assured that we will be under a contractual obligation with them, to protect your data. The permitted processing of your Personal Data will be detailed in the contractual agreements we have with these specific organisations and you can find out more information about our processing by contacting the organisation to whom you gave your Personal Data.

Your Privacy

Your privacy matters to us and we are committed to the highest data privacy standards confidentiality and compliance with UK GDPR / Data Protection Act 2018.

To disclose this to you, our Privacy Notice includes the following:

- What data we collect from you.
- How and why we process it.
- Who we share it with and why.

We adopt the six core principles of data protection law which are:

1. **Lawfulness, fairness and transparency** - we process personal data lawfully, fairly and in a transparent manner in relation to you, the data subject.
2. **Purpose limitation** - we only collect personal data for a specific, explicit and legitimate purpose. We clearly state what this purpose is in this Privacy Notice, and we only collect data for as long as necessary to complete that purpose.
3. **Data minimisation** - we ensure that personal data we process is adequate, relevant and limited to what is necessary in relation to the processing purpose.
4. **Accuracy** - we take every reasonable step to update or remove data that is inaccurate or incomplete. You have the right to request that we erase or rectify erroneous data that relates to you, and we will complete this task as soon as possible but guarantee to do so within a month.
5. **Storage limitation** - we delete personal data when we no longer need it. Whilst the timescales in most cases aren't set, we outline our retention strategy within this Privacy Notice.
6. **Integrity and confidentiality** - we keep personal data safe and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Collection of your Personal Data

We collect your personal information via disclosure directly from you or in some cases someone you have nominated. This might be via our website, online portal, E mail, post, telephone, or face to face engagement.

Categories and Type of Personal Data Collected and processed.

We may collect contact details from you, when relevant, including:

- Name
- Address / Work Address
- Telephone number(s)
- email addresses

In addition to this contact information, you may in some cases also have provided us with other personal data which could include age, sex, medical or health related information. The detail and type of this information will be related to the type of engagement with us.

We treat all personal data as confidential but acknowledge that we also may process special category data.

Reason for Data collection and processing activities.

Contact information is captured to enable us to communicate effectively with you and ensure we provide you with the outcome your engagement with us requires.

Additional information beyond contact details will only be required if it is relevant to the enquiry, application or report you are making to us and is needed in order to assist you or meet our regulatory obligations. It will be with your agreement that this information is processed and/or as provided by you.

We will only use Personal Data supplied by individuals for the purposes of marketing when we believe it would be of interest to the organisations they represent. In all cases an option will be provided to Opt out of receiving marketing materials from us.

Sharing of Personal Data

Your personal data will only be shared with our own staff, if they are required to assist in providing you with assistance or information.

We utilise the services of a number of organisations who maintain and manage our IT infrastructure and facilities. Whilst these organisations aren't permitted to use your data, they are able to access systems in which it is stored. Their access is restricted and controlled by us and they are contractually bound to strict confidentiality.

The processing of your data within scope of this Privacy Notice may in some cases require us to share this information with other organisations. If this is the case, we will inform you of this and the details of who will receive it. In these cases, we will have contractual agreements in place with them to ensure they undertake adequate measures to protect your data.

There are some organisation with whom we may share your personal data, that are located outside the UK and in countries which have not been granted adequacy by the UK. In these situations will ensure that appropriate safeguards are undertaken to protect your personal data and in accordance with legal requirements.

There may also be legal obligations under which we have to share data as requested by nationally recognised regulators or authorities.

Securing and Processing of your Personal Data

We employ physical, electronic, and administrative measures that are designed to protect your Personal Data from loss, misuse and unauthorised access, disclosure, alteration, and destruction.

We undertake regular reviews of our processing activities, their risks and technical and organisational measures in place to ensure that the integrity and confidentiality of your data is protected.

In the unlikely event that we lose your data, or a device on which your data resides, or it is accessed by someone unauthorised, we have a duty to inform you immediately. If the loss or unauthorised access of your data has potential to cause you harm, we will also report this to the Information Commissioners Office; who are responsible for regulating data protection legislation in the UK.

<https://ico.org.uk/>

Our legal basis for processing your personal data

We are required to identify one of six possible legal grounds for processing. These are:

- consent
- contract
- legitimate interests
- vital interests
- public task
- legal obligation

Our legal basis for the processing of your Personal Data, will depend on the nature of your engagement with us.

In general, you will have provided your personal data to us and the processing of that data will be primarily on the basis of contract or legitimate interest.

The processing of your data on systems supported by contracted organisations is done so on the basis of legitimate interests.

Where special category of data is processed, we do so under:
Article 9 (2) b – employment, social security or protection law
Article 9 (2) f – legal claims
Article 9 (2) i – for reasons of public health

How long do we keep your personal data for

We will keep your data for the as long as it is needed in relation to the nature of contact we have with you and to satisfy any legal requirements.

You may contact us if you require further information about specific retention of your personal data.

Your rights in relation to personal data

Under the UK GDPR / Data Protection Act 2018, you have rights to access and control your personal data. These rights include:

- access to personal information
- correction and deletion
- withdrawal of consent (if processing data on condition of consent)
- data portability

- restriction of processing and objection
- lodging a complaint with the Information Commissioner's Office

You can exercise your rights by emailing our Data Protection Officer on tmcpharmadpo@clinicaldpo.com

If you are unhappy with anything we have done with your data, you have the right to complain to the Information Commissioners Office.

To make a complaint to the Information Commissioners Office use the link below or call their hotline on Tel No.: 0303 123 1113.

<https://ico.org.uk/concerns/>

Cookies

"Cookies" are text files that a website can send to your device through your browser, which is then used to identify your device by the website. Cookies can be both "session level" (stored only for until you close your web browser), which help you efficiently navigate our web-based sites during a visit, and "persistent" (stored for a longer period, even after you close your browser), which remember relevant information such as your language preference. TMC may use both session level and persistent cookies.

The information gathered by some cookies will provide analytical information to us about your browsing of our site, IP Address and general location.

Our website provides a Cookie Policy which provides details about the types of Cookies in use and also options for setting preferences for the types of Cookies which you are comfortable to allow.

How to contact us

For all data protection matters or questions relating to how we manage your data, you can contact our Data Protection Officer via these means:

Data Protection Officer:	Clinical DPO.
Phone Number	+44 (0) 203 411 2848
Email:	tmcpharmadpo@clinicaldpo.com