

# CUSTOMERS, SUPPLIERS AND CONTACTS PRIVACY NOTICE

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# Customers, Suppliers and Contacts Privacy Notice

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THIS NOTICE IS FOR MEDICALDIRECTOR UK CUSTOMERS AND OTHER CONTACTS. MEDICALDIRECTOR UK COLLECTS PERSONAL INFORMATION ABOUT YOU WHEN YOU USE OUR TOOLS OR SERVICES, WHEN YOU ENQUIRE ABOUT WHAT WE CAN DO FOR YOU OR BY IDENTIFYING THAT WE COULD PROVIDE SERVICES THAT MAY BE OF INTEREST TO YOU. WE USE THIS FOR CONTRACTS ADMINISTRATION, TO DELIVER SERVICES TO YOU, TO KEEP YOU UPDATED ABOUT MEDICALDIRECTOR UK, TO MAINTAIN SECURITY AND TO INFORM DEVELOPMENT.

## What information we collect about you

### Website users

No identifiable information collected. We use anonymised cookies on our website through Google Analytics to analyse traffic and improve the way it works and cannot identify individuals. You can control cookies settings in your browser. For more information on which cookies we use please see our Cookies notice.

### Suppliers

We process contact details and correspondence relating to current, former and prospective suppliers. This includes correspondence about how suppliers meet their data protection and security obligations. The information is processed to negotiate and enter into contracts and to provide evidence of compliance with our legal and contractual obligations.

- Name
- Organisation name
- Job title
- Email address
- Telephone number
- Content of communications
- Digital or handwritten signatures on contracts
- Interaction with digital signature providers when reviewing or signing contracts.

### Customers and other contacts

We collect prospective customer data from a number of sources, through recommendations, networking events and directories of public sector contact information.

We collect your information when you contact us to enquire about our products and services and during the course of any contract you may take with us. This will include correspondence such as emails, letters, notes of telephone conversations and queries made via our support team. The information we process includes:

- Name
- Organisation name
- Job title

- Email address
- Telephone number
- Content of communications
- Areas of interest or specialisms
- Communications preferences
- Feedback and market research
- Digital or handwritten signatures on contracts
- Interaction with digital signature providers when reviewing or signing contracts
- Interaction with marketing emails (number of times the email has been opened).

### Permitted users

A permitted user from a customer organisation has satisfied the security criteria and has been authorised to access our services. Initial set-up information for permitted users will be provided by your organisation's administrator. Cookies will be set when you use our online tools to help us deliver those services to you. The information we process when providing access to and during your use of the services include:

- Name
- Username
- Organisation name
- Job title
- Email address
- Telephone number
- Roles or features than can be accessed
- IP address
- Logs including date and time of access or other events
- Profile settings and status
- Content of support queries
- Communications preferences
- Additional authorisation as necessary to verify permission to access data, including confirmation from your organisation's Caldicott Guardian.

## How we use your information and the legal bases for processing it

The legal bases for processing your information are that it is necessary:

- For a contract or to enter into a contract
- For purposes of legitimate interests
- To comply with a legal obligation.

In some circumstances we may ask for your consent to process your personal information.

### Entering into and fulfilling contracts, purposes include:

- Verifying identity
- Processing payments
- Communicating with you about the contract and the services
- Systems notifications
- Protecting and maintaining the security of our systems and the data, including through authentication, prevention, detection and investigation methods, audit logs and analysis of usage
- Providing training and support
- Complying with our obligations under our agreements with NHS Digital, as well as the requirements of the NHS Data Security and Protection Toolkit and our ISO 27001 certification, such as ensuring that only authorised users have access to the data we process.

### Purposes of legitimate interests include:

- Entering into and fulfilling contracts
- Processing payments
- Communicating with you about the contract and the services
- Providing additional information about the products and services we offer, including marketing communications
- Protecting and maintaining the security of our systems and the data, including through authentication, prevention, detection and investigation methods, audit logs and analysis of usage
- Providing training and support
- Complying with our obligations under our agreements with NHS Digital, as well as the requirements of the NHS Data Security and Protection Toolkit and our ISO 27001 certification, such as ensuring that only authorised users have access to the data we process
- Gathering feedback, customer testimonials and market research.

## Compliance with legal obligations

- Protecting the private, confidential and proprietary information of MedicalDirector UK, its employees, its clients and third parties.
- Complying with data protection laws and responding to requests from individuals as data subjects or from the Information Commissioner's Office (ICO) or other authorities.
- Responding to requests from law enforcement and national security agencies, and other government and regulatory authorities, as required or authorised by law and subject to safeguards and review.

## Consent

We do not routinely rely on consent to process your information, however in some cases we may ask for your consent. Any consent that you provide must be freely given, for specific purposes, informed and clearly indicated. You have the right to refuse or withdraw your consent.

## Information processed by third party organisations and where it is processed

In some cases, we may need to disclose your personal information to related entities, partners and other organisations, both within and outside the UK, for purposes related to the services we are providing to you. This will be the minimum data necessary to meet the purpose and, where possible, we will use anonymised or pseudonymised data.

In some cases we may need to transfer your information outside of the United Kingdom. We rely on one or more of the following mechanisms – standard contractual clauses, adequacy decisions, consent (in certain, limited circumstances). Companies processing data on our behalf include:

ORGANISATION	PURPOSE	PROCESSING LOCATIONS
Adobe	Digital signatures and document verification through Adobe Sign.	<u>USA, India, Republic of Ireland and in locations where apps are accessed.</u>
MailChimp	Email marketing	<u>US, with some sub-processing in Germany</u>
Microsoft	Microsoft 365	<u>UK and Australia</u>

## How long we keep your information

We keep your data as long as it is necessary for the purpose it was collected. Contracts are held in Adobe Sign until they have been agreed by all parties, they are then removed from that platform and stored within our internal contracts management system. Correspondence and usage data is retained as necessary throughout the contract to support our customers. Information relating to contracts and finance is generally kept for six years after the contract's end in line with standard practice and legislation including the Limitation Act 1980.

## Your rights

INFORMED	✓	This notice and the information on <a href="https://www.medicaldirector.co.uk/privacy">medicaldirector.co.uk/privacy</a> are to inform you about how we use your data.
ACCESS	✓	You can request a copy of personal data we hold about you.
OBJECTION	✓	You can object to your data being processed on the basis of legitimate interests. We will cease processing unless there are compelling grounds to continue or an overriding legal obligation.
PORTABILITY	✗	Not applicable.
CORRECTION OR CHANGE	✓	Request that the information we hold about you is corrected or changed.
ERASURE	✓	This is your 'right to be forgotten'. You can request that we erase your personal data.
RESTRICTION	✓	You can request that the use of your personal information is limited to storage only.
INFORMED OF AUTOMATED DECISION MAKING	✗	We do not use your data to produce decisions made solely by computers rather than people.
WITHDRAW CONSENT	✓	Where you have consented to us processing your personal data you can withdraw this at any time.

## How to complain

If you feel that we have let you down in relation to your information rights then please contact our Data Protection Officer using the details above. You can also make complaints directly to the Information Commissioner's Office (ICO). The ICO is the independent authority upholding information rights for the UK. Their website is [ico.org.uk](https://ico.org.uk) and their telephone helpline number is 0303 123 1113.