

# MEDIX MEDICAL SERVICES EUROPE LIMITED

## PRIVACY POLICY

### Introduction

Medix Medical Services Europe Limited ("**we**" or "**Medix**") are committed to protecting and respecting the confidentiality, integrity and security of personal information we hold about individuals.

This policy applies to personal data we hold about companies with whom we have contracts (and their directors and employees), about business contacts and about users of our website ("**you**" and "**your**"). The policy sets out how such personal data is collected, for what purposes it will be processed and how Medix complies with its responsibilities under applicable data protection laws, including, the General Data Protection Regulation (Regulation (EU) 2016/679) ("**Data Protection Laws**").

Please read this policy carefully.

### Data controller

For the purpose of the Data Protection Laws, the data controller of your personal information is Medix Medical Services Europe Limited, 118 Piccadilly, London, W1J 7NW.

We have appointed a Data Protection Compliance Manager who is responsible for overseeing compliance with Data Protection Laws and this privacy policy.

### Personal data

We may collect, hold and use personal data about you including:-

- Name;
- Company;
- Address, email address, telephone number and other contact details;
- Job title;
- Notes from any meetings or other conversations with you;
- internet protocol (IP) address, operating system, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this site;
- your interests, preferences, feedback and survey responses.
- information about how you use our website

### How is your personal data collected?

We may collect personal data about you through:

- **Direct interactions;** you may give us your personal data directly when we meet, when you give us your business card or when you contact us electronically through our website, by post, phone, email or otherwise.
- **Third parties or publicly available sources.** We may receive personal data about you from various social media sites, including LinkedIn and other publicly available sources.

### **Purposes for which we use your personal data**

We use personal information held about you in the following ways:

- To administer our website and to ensure that content from our site is presented in the most effective manner for you and for your computer.
- To administer and manage our relationship with you, including to contact you periodically to ask you to correct/update the information we hold about you and/or to confirm your preferences;
- To comply with any contract between us;
- To provide you with any information you request from us.
- To provide you with information about the services we offer where we think this may be of interest to you.
- To allow you to participate in interactive features of our site, when you choose to do so.
- To notify you about changes to our services.
- To allow us to comply with a legal obligation on us.

### **Legal basis for processing your information**

We will only use your personal information as the law permits. By law we are required to tell you the legal bases upon which we rely in processing your personal information. The legal bases we principally rely upon are these:-

- (i) it is necessary for the performance of a contract between us for the provision of services or in order to take steps at your request prior to entering into such a contract; and/or
- (ii) it is necessary for the purposes of the legitimate interests of pursuing and developing our business, where such interests are not overridden by your rights or interests.

We may also rely upon the following legal bases for processing:-

- (i) you have given your consent to the processing; and/or
- (ii) it is necessary for us to comply with a legal obligation on us; and/or
- (iii) it is necessary to protect your vital interests or those of another individual.

Where we rely on consent to process your personal information, you may withdraw that consent at any time by contacting us using the contact details set out under Contact below or by emailing us at [gdpsteam@medix-europe.com](mailto:gdpsteam@medix-europe.com)

We may process your personal data relying on more than one lawful bases depending on the specific purpose for which we are using your data. Please contact us using the contact details set out below (see **Contact Us**) if you need details about the specific lawful basis on which we are relying to process your personal data in any particular circumstance.

### **Sending marketing material to you**

You may receive marketing communications from us:-

- (i) if you have specifically requested that information from us; or
- (ii) by email, text or post, if you are a customer of Medix services (or an employee or director of a customer) and you have not opted out of receiving that marketing (which you may do by contacting us using the contact details set out under Contact Us below or by emailing us at [gdpsteam@medix-europe.com](mailto:gdpsteam@medix-europe.com)); or
- (iii) by post, if you have not opted out of receiving that marketing (which you may do by contacting us using the contact details set out under Contact below or by emailing us at [gdpsteam@medix-europe.com](mailto:gdpsteam@medix-europe.com)).

Otherwise, we will not send you any marketing communications unless we have your consent.

Please note, you can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time using the contact details set out under Contact Us below or by emailing us at [gdpsteam@medix-europe.com](mailto:gdpsteam@medix-europe.com).

While we will follow any marketing preferences you have advised to us, in addition we may use various profiling tools to help us determine people's interests which we may then use to try to direct marketing materials to you only when we believe they will be appropriate for, and of interest to, you. You can opt out of this profiling by contacting us at any time using the contact details set out under Contact below or by emailing us at [gdpsteam@medix-europe.com](mailto:gdpsteam@medix-europe.com).

Please note that we are not able to send marketing information to anyone under 16 without parental/guardian consent. Accordingly we may ask for confirmation of age from anyone requesting/ signing up to receiving any marketing materials from us.

## Your right to access your personal information and your other rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

- **to request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- **to request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
- **to request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. It also enables you to request that we delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- **to object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- **to request restriction of the processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- **to request transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note however that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; or
- **to withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us by using the contact details set out under Contact Us below or by emailing us at [gdperteam@medix-europe.com](mailto:gdperteam@medix-europe.com).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

If you wish to exercise any of those rights we may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Accuracy of personal data**

We try to ensure that the information we hold about you is accurate and kept up-to-date by contacting you at regular intervals. However, if in the meantime you believe that any information we are holding about you is inaccurate, out-of-date or incomplete, please contact us by using the contact details as set out below (see **Contact Us**). We will promptly correct or delete any information found to be incorrect.

### **Security**

We have put in place what we consider to be appropriate security measures against unlawful or unauthorised processing of your personal data we hold, and against the accidental loss of, or damage to, your personal data.

We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Disclosure of your personal information**

We may disclose your personal data to third parties who are providing services to us.

We may also disclose personal data we hold to third parties:

- (a) in the event that we sell any business or assets, in which case we may disclose personal data we hold to the prospective buyer of such business or assets; and/or
- (b) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation. This could include for example exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

To the extent we transfer any of your personal data to any third party, we will only do so if that third party puts in place appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, the personal data.

## **Transferring personal data outside the EEA**

We do not intend to transfer any personal data we hold about you to a country outside the European Economic Area ("EEA"). If we do transfer any of your personal data outside the EEA, we will ensure that at least one of the following safeguards is implemented:

- the personal data is transferred only to a country that has been deemed to provide an adequate level of protection for personal data by the European Commission;
- we have put in place with the transferee specific contracts approved by the European Commission which give personal data the same protection it has in Europe; or
- where the transferee is based in the US, the transferee is registered with the Privacy Shield (which requires the transferee to provide similar protection to that required for personal data in Europe).

## **Retention of Data**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **Cookies**

Our website uses cookies to distinguish you from other users of our website. For detailed information on the cookies we use and the purposes for which we use them please refer to our Cookies Policy, available here [\[link\]](#).

## **Links to other websites**

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **Changes to this policy**

We may make changes to this data protection policy at any time. Any changes we make will be posted on this page and, where appropriate, notified to you in writing. Please refer back to this page regularly to see any changes or updates to this policy.

## **Contact Us**

If you have any queries about this policy or your personal data, or you wish to submit an access request or raise a complaint about the way your personal information has been handled, please do so

in writing and address this by post to Data Protection Compliance Manager at Medix Medical Services Europe Limited, 118 Piccadilly, London, W1J 7NW or by email to [gdperteam@medix-europe.com](mailto:gdperteam@medix-europe.com).

### **Complaints**

If you are not satisfied with our response to any queries or complaints you raise with us or believe we are not processing your personal data not in accordance with the Data Protection Laws you can complain to the Information Commissioner's Office (<https://ico.org.uk/>).