

## Community Privacy Policy

This Privacy Policy applies to the collection, use and disclosure of personal information (i.e. personal data under applicable data privacy laws) relating to potential and existing customers of PCM Scientific. PCM Scientific is an operating division of PCM Healthcare Ltd (140 London Wall, London, EC2Y 5DN, United Kingdom). PCM Healthcare Ltd is a subsidiary of Cogora Group Limited.

**Please read this policy carefully as it explains the kinds of personal information we collect about you and how it is handled.**

**This version of the privacy policy is effective as of the 3<sup>rd</sup> May 2018.**

The data controller (or "controller" as defined in the General Data Protection Regulation) is Cogora Group Limited, 140 London Wall, London, EC2Y 5DN, United Kingdom. Recipients of your data will in the first instance be Cogora Group Limited, our employees, agents and subcontractors. Other recipients of your data are as set out in this Privacy Policy.

*PCM Scientific is a member of the good CME practice group and as such is voluntarily firewalled from the wider Cogora Group Ltd. This means that PCM Scientific will not share your information with other divisions within Cogora Group Ltd.*

If you have queries on this Privacy Policy or how we process your personal information please contact us by:

- Emailing our Data Protection Manager, Victoria Stanway, at [data@kogora.com](mailto:data@kogora.com)
- By writing to us at Cogora Group Limited, 140 London Wall, London, EC2Y 5DN, United Kingdom, or call +44 (0)20 7214 0500.

### **Why we need your personal data; the consequences of not supplying it**

We require personal data from you in order to be able to provide goods, content and/or services to you. If you fail to provide any personal data requested we may not be able to provide our goods, content and/or services to you as intended. We may also not be able to contract with you and/or be unable to charge you and therefore be unable to provide our goods, content and/or services to you.

### **What personal information do we collect about you?**

#### **Information you give us:**

Should you choose to visit our websites or interact with our services there are a number of ways you may provide us with your personal information, such as:

- by completing a registration form on one of our websites
- by corresponding with us via email
- by consenting to have your badge scanned at a congress where PCM Scientific is an exhibitor or running an event
- by registering for an event or
- by interacting with our other bespoke services and through our website

We collect information about you when you register with us, which may include personal details such as your full name, GMC number or other professional registration numbers, email address and payment processing information, as well as other personal information.

We also collect information when you voluntarily complete surveys, provide feedback for one of our products or services, or participate in competitions or interact with one of our websites.

#### **Information we collect about you:**

With regard to each of your visits to our site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products or information you viewed or searched for, page response times, [download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

#### **Information we receive from other sources**

This is information we may receive about you if you use any of the other websites we operate or the other services we provide or where third parties provide is with this information or where we collect it from a third party (including publicly available sources). We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). These may provide us with personal information about you.

#### **How will we use information about you (and the legal basis for our processing)?**

As a reflection of the diverse products and services we provide to our expert community of healthcare professionals and influencers, we process personal data in a number of different ways.

#### **(a) In relation to personal information you give us:**

The reasons we may need to process this personal information include to

- administer the website and enable you to logon and access the site and any areas you are permitted to access;
- enable your use of the account settings section available on our websites
- send you email notifications when action needs to be taken by you to maintain an uninterrupted service
- deal with enquiries and complaints made by or about you relating to the website or our services
- process your payments
- ensure a sponsor company can comply with Regulation 726/2004 (as amended by Regulation 1235/2010) and Directive 2001/83/EC (as amended by Directive 2010/84/EU), we may share details of adverse events mentioned by you during the course of market research with the sponsor company

## MAKING CHANGE HAPPEN

- supply you with products and services requested or purchased via our websites e.g. event registration
- contact you for market research purposes
- tailor what we provide to you
- tailor any marketing or other communications or content or services we share with you to reflect your interests or anticipated needs
- create a user profile whereby we can pre-fill registration forms with the latest information we hold on you for your speed and convenience
- create a user profile whereby we can identify products, events or services that may be of interest to you
- supply you with CME certificates following completion of an appropriate educational programme

**Legal basis for processing:** where you have registered with one or more of our websites, or otherwise entered into an agreement with us, we may process your information in order to fulfil our contractual obligations or to take relevant pre-contractual steps. Otherwise we will process the information where the processing is necessary for the legitimate interests of PCM Scientific or a third party.

- comply with The Human Medicines Regulations 2012, we may professionally validate our community who could encounter advertisements for prescription-only medications while using our services
- share details of any transfers of value and with a sponsor company who are obligated to comply with The Bribery Act 2010

**Legal basis for processing:** the processing is necessary for PCM Scientific to comply with the law.

- provide you with updates regarding new educational material or events we think may be of interest to you by email
- provide you with marketing communications relating to our business which we think may be of interest to you by post
- share details of adverse events mentioned by you during the course of market research with details relating to the event and your contact information with the sponsor company
- share details of transfers of value provided to you by a sponsor pharmaceutical or medical device company where appropriate with your full name

**Legal basis for processing:** We will process the information where the processing is necessary for the legitimate interests of PCM Scientific or a third party except that where we are required by law to obtain your consent for the processing in question we will do so.

**(b) Information we collect about you:**

- to provide you with a bespoke service, tailored to your individual interests, on your repeat visits to our websites.
- tailor any marketing or other communications or content or services we share with you to reflect your interests or anticipated needs
- better understand how people interact with our websites, events and other products and services

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- determine the effectiveness of promotional campaigns and advertising
- create a user profile whereby we can identify products, events or services that may be of interest to you
- monitor usage of our website

**Legal basis for processing:** the processing is necessary for the legitimate interests of PCM Scientific or a third party

**(c) Information we receive from other sources:**

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

**Legal basis for processing:** where you have registered with one or more of our websites, or otherwise entered into an agreement with us, we may process your information in order to fulfil our contractual obligations or to take relevant pre-contractual steps. Otherwise we will process the information where the processing is necessary for the legitimate interests of PCM Scientific or a third party.

**How do we use your IP address and Cookies?**

We may use your IP address to help diagnose problems with our server, or to administer our websites. We may conduct analyses of user traffic to measure the use of our sites and improve the content of our websites and our services. These analyses will be performed through the use of IP addresses and cookies.

We may use additional software to collect website usage information for each of our registered users. This information will be used to personalise your repeat visits to our website and to help us get to know our users in order to provide a more relevant and improved service.

[Our cookie policy is here.](#)

**Who are the recipients of your personal data outside of PCM Scientific?**

We may disclose your information to third parties as set out below. The legal basis for this processing is as already noted above.

**Third party marketing opt-in**

Where you have given your consent to do so, we may share your personal data with a named third-party organisation in order for them to supply you with marketing information. We will not share your personal data for marketing purposes unless you have opted in to receiving such communications from the third party. Whenever possible, we will provide you with a link to the third-party privacy policy otherwise you can obtain further information about third-party privacy policies by visiting their websites.

**Events**

Should you choose to attend an event, you may encounter exhibitions or stands that are sponsored and/or provided by third parties. Should you choose to interact with a third-party sponsor the information you provided to us may be shared with one or more third parties.

Generally, your information will not be shared unless you, as the user, consent to having your badge scanned by the sponsor or third-party representative. We will let you know at the time of registration if an event is sponsored and when your details will be shared.

### **Service providers**

We may disclose personal information about you to third parties for processing purposes associated with payment processing, the supply of goods and services to you, for website supply and administration, or for other purposes where we appoint a processor.

### **Other recipients**

In addition, we may disclose your personal information:

- To any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 where we reasonably need to do so.
- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If our company or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction, where relevant.
- To sponsor companies and exhibitors at our events
- To those entities which provide market research services

### **When is your data transferred to third countries?**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers as well as by our service providers where they are outside the EEA. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

Where we transfer your personal data outside of the EEA we will only do so where permitted to do so by law e.g. the country in question is subject to an adequacy decision or where there are appropriate safeguards required by law (typically these will be standard data protection clauses adopted by the European Commission). Please contact us if you require further details of the countries to whom we may transfer your data and safeguards we use by contacting us at [data@cogora.com](mailto:data@cogora.com).

### **How do we keep your data secure?**

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access.

### **What are your rights?**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us by:

- Emailing our Data Protection Manager, Victoria Stanway, at [data@cogora.com](mailto:data@cogora.com)
- By writing to us at Cogora Group Limited, 140 London Wall, London, EC2Y 5DN, United Kingdom, or call +44 (0)20 7214 0500.

You also have the right to:

- request access to and rectification or erasure of your personal data;
- restrict processing of personal data relating to you;
- withdraw your consent to the processing of your personal data at any time where the legal basis of our processing is your consent; and
- object to processing or require that your data is moved elsewhere,

as such rights are further provided in accordance with the Data Protection Act 1998 and the GDPR (as applicable from time to time).

You also have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data.

If you wish to exercise these rights or to opt out of receiving marketing communications please email [subscriptions@cogora.com](mailto:subscriptions@cogora.com) with the words EMAIL UNSUBSCRIBE, POST UNSUBSCRIBE or PHONE UNSUBSCRIBE in the subject box.

You can lodge a complaint regarding processing of your personal data by us with the Information Commissioner's Office.

### **How will you know if the privacy policy changes?**

We reserve the right to add to or amend this privacy policy at our sole discretion, without prior notice to you. Please review our privacy policy on a regular basis to make sure you have read the latest version and you understand what we do with your personal information.

Should we plan a fundamental change to the nature of how we process your information or which may impact upon you, we will alert you to this change in advance by emailing you and/or advertising the change on our websites.

This version of the privacy policy is effective as of the 3<sup>rd</sup> May 2018.

**How long will we keep your data?**

**We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us or as otherwise set out in the Retention schedule below.**

**Retention schedule**

| Data type            | Retention period (unless otherwise stated, from the point of data collection) | Justification(s)   |
|----------------------|---|--|
| Event registration   | Five years from closure of the event  | <p>PCM Scientific will retain personal information provided to register for an event for a period of five years from the last day of the event. Revalidation happens every five years and therefore it is possible a healthcare practitioner might only attend an event once every five years when they require additional CPD points. Where PCM Scientific offers annual events and a healthcare practitioner has not attended for one-two years, PCM Scientific may email the data subject to remind them of the upcoming event where they have consented to receiving marketing information.</p> <p>PCM Scientific analyses its data to measure the relative popularity of successive events and the characteristics of attendees to inform their event planning.</p> |
| Webinar registration | Two years   | PCM Scientific will retain personal information provided   |

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|   |   | to register for a webinar for a period of two years following a live webinar.   |
| Event logistics   | Immediately following the event, or, where applicable, following attendee reimbursement | The purpose for processing the data is fulfilled once the event has passed  |
| Honoraria / expenses payment details  | For the length of the contract or agreement and six years afterwards                    | PCM Scientific will retain contractual agreements for a period of six years, as recommended by Section 5 of the Limitation Act 1980   |
| Delegate event contracts e.g. roundtable agreements   | For the length of the contract or agreement and six years afterwards                    | PCM Scientific will retain contractual agreements for a period of six years, as recommended by Section 5 of the Limitation Act 1980   |
| Post event surveys - survey monkey  | Two years   | Where the event attendee has given their consent, PCM Scientific may use direct and identifiable quotes for promotional purposes. In the development of promotional materials, PCM Scientific may mine quotes for two years following the event completion                          |
| Market research surveys   | One year, and then to be anonymised   | Unless otherwise stated in a contractual agreement, research findings containing respondent personal data will be held for a period of one year following project completion, during which time it may be necessary to revisit the raw data if the reported findings are challenged |
| Sponsored market research discussion transcripts (inc. roundtables, telephone discussions etc.) | Three years, and then to be anonymised  | Unless otherwise stated in a contractual agreement, research findings containing respondent personal data will be held for a period of three years following project completion, during which time it may be necessary to revisit   |



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|   |  | the raw data if the reported findings are challenged  |
| Other market research data                    | One year, and then to be anonymised  | Unless otherwise stated in a contractual agreement, research findings containing respondent personal data will be held for a period of one year following project completion, during which time it may be necessary to revisit the raw data if the reported findings are challenged |
| PCM Scientific marketing email communications | Five years, where the data subject is given the opportunity to unsubscribe or amend preferences in every communication | PCM Scientific will retain mailing list subscriptions for a period of five years from the point at which the subscriber last updated their preferences  |
| Speaker contracts                             | For the length of the contract or agreement and six years afterwards   | PCM Scientific will retain contractual agreements for a period of six years, as recommended by Section 5 of the Limitation Act 1980   |
| Third-party data                              | As designated in third-party provider contract   | PCM Scientific will retain data purchased or rented from third-party providers for the time period designated in the third-party contractual agreement  |
| Online registration                           | Following five years of non-activity   | PCM Scientific will retain online registration information required to access an online account while an account is active, and for a further five years of inactivity  |