

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

Axis Medicare Limited ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Axis Medicare Limited is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Unit 1, Vanguard Industrial Estate, Henwood, Ashford, Kent, TN24 8DH. For all data matters contact info@axismedicare.co.uk.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- **Order Processing** – your data is used to enable us to provide you with the products you have requested. It will also be retained for billing, administrative and legal purposes and will enable us to contact you where necessary and used fairly and lawfully.
- **Due diligence** – To ensure that we are legally allowed to provide you with medicines under MHRA guidelines for Good Distribution Practice (GDP).
- To maintain our own accounts and records
- To inform individuals of pricing, news, events or activities

- To carry out Bona fide checks for MHRA licence requirements
- To manage our employees

You may give us information about you by filling in forms on our site www.axismedicare.co.uk (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our services, place an order, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data. The personal data you give us may include your name, address, e-mail address, phone number, professional accreditation.

We have obtained your personal data either directly from yourself during the course of normal business activities or if you have completed registration on our website or applied for information from our business via email or over the phone.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	<i>In order to process orders for products you have ordered from us</i>
Processing necessary for compliance with a legal obligation	<i>In order to process orders for products you have ordered from us, complete billing and to check whether you are allowed to receive medicines.</i>
Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	<i>In order to process orders for products you have ordered from us, including billing, Bona fide checks and to maintain an appropriate level of customer service in case of issues or queries concerning your order or delivery of goods.</i>

b) Special categories of personal data (article 9 of GDPR)

We do not process Special Categories of personal data

6. Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only with employees or contracted agents of Axis Medicare that are responsible for the processing of your orders. We will never share your personal data with third parties.

7. How long do we keep your personal data?

We will retain your information for a reasonable period or as long as the law requires

8. What steps do we take to secure your personal data against unauthorised access or use?

We employ security measures to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage.

9. Providing us with your personal data

You are under no statutory or contractual requirement or obligation to provide us with your personal data. But failure to do so will mean we could be unable to process your orders effectively or communicate things to you that may be in your best interests for example delivery problems or stock shortages as well as other legitimate normal business scenarios.

10. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing the data.
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

11. Transfer of Data Abroad

WE DO NOT TRANSFER PERSONAL DATA OUTSIDE THE EEA.

12. Automated Decision Making

WE DO NOT USE ANY FORM OF AUTOMATED DECISION MAKING IN OUR BUSINESS.

13. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

14. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

15. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our data representative on info@axismedicare.co.uk or call 01233 636662 and you will be directed to the correct person.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.