



## Privacy Notice

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## Privacy Notice

1<sup>st</sup> May 2018

**Our Privacy Notice describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR).**

## 1. Introduction

**1.1** We take your privacy seriously and you can find out more here about your privacy rights and how we gather, use and share your personal information – that includes the personal information we already hold about you now and the further personal information we might collect about you, either from you or from a third party.

**1.2** Our Data Protection Officer (DPO) provides help and guidance to make sure we apply the best standards to protecting your personal information. Our DPO can be reached by post at Merchants Warehouse, Castle Street, Castlefield, Manchester, M3 4LZ or by email on [DPO@bestwaymedhub.co.uk](mailto:DPO@bestwaymedhub.co.uk) if you have any questions about how we use your personal information.

See section 3 [Your Privacy Rights](#) for more information about your rights and how our DPO can help you.

**1.3** This Privacy Notice provides up to date information about how we use your personal information and will update any previous information we have given you about using your personal information (also referred to as personal data). If we make any changes affecting how we use your personal information, we will update this web page with an updated date displayed at the top of this page, so please check back regularly for updates. Our website will always show our most up to date version of our Privacy Notice.



## 2. About us

We are what is known as the 'controller' of personal information we gather and use. When we say 'we' or 'us' in this Privacy Notice, we mean the companies Bestway Pharmacy NDC Limited trading under the brand name 'Bestway Medhub' and Donald Wardle & Son Limited trading under the brand name 'Wardles Dispensing Appliance Contractors'. These companies are registered with the data protection supervisory authority, the Information Commissioner's Office (ICO), as a data controller.

When we say 'Group' in this Privacy Notice, we mean other members of our group of companies, including trading and subsidiary companies.

## 3. Your privacy rights

**3.1** You have the right to object to how we use your personal information. You also have the right to see what personal information we hold about you, to ask us to correct any inaccuracies and to ask for some of your personal information to be provided to someone else. In addition, when permitted by law, you can ask us to delete or restrict personal information we hold about you.

To exercise your right to access your personal information please contact our Data Subject Access Request Team at 'DSAR Team, Merchants Warehouse, Castle Street, Castlefield, Manchester, M3 4LZ'. To exercise any of your other rights in this Privacy Notice please contact our DPO by post at Merchants Warehouse, Castle Street, Castlefield, Merchants, M3 4LZ or by email on [DPO@bestwaymedhub.co.uk](mailto:DPO@bestwaymedhub.co.uk).

### Read more about your Privacy Rights

You can contact our DSAR Team to access your personal information or our DPO to exercise any of your other privacy rights as follows:

#### 3.2 Right to object:

You can object to our processing of your personal information by providing details of your objection to us.

#### 3.3 Access to your personal information

You can request access to a copy of your personal information that we hold, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge by contacting our Data Subject Access Request team at 'DSAR Team, Merchants Warehouse, Castle Street, Castlefield, Manchester, M3 4LZ'. Please make all requests for access in writing, and



provide us with evidence of your identity. See [Proof of identity checklist - GOV.UK](#) for information on the documents you'll need to provide.

### 3.4 Right to withdraw consent

If you have given us your consent to use personal information, you can withdraw your consent at any time.

### 3.5 Rectification

You can ask us to change or complete any inaccurate or incomplete personal information held about you.

### 3.6 Erasure

You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

We have the right to refuse to comply with a request for erasure where the personal data is processed for one of the following reasons:

- we need to use the information to perform a task carried out in the public interest, to provide healthcare or treatment or it is necessary for the reasons of public health in the public health arena;
- we need to use the information to comply with our legal obligations;
- archiving purposes in the public interest, scientific research, historical research or statistical purposes; or
- the exercise or defence of legal claims.

### 3.7 Portability

You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

### 3.8 Restriction

You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.



### 3.9 Make a complaint

You can make a complaint to us about how we have used your personal information, by contacting our DPO by post at Merchants Warehouse, Castle Street, Castlefield, Manchester, M3 4LZ or by email on [DPO@bestwaymedhub.co.uk](mailto:DPO@bestwaymedhub.co.uk). You can also make a complaint to the data protection supervisory authority, the ICO, at <https://ico.org.uk>.

We will not make any charge for responding to any request from you to exercise your privacy rights, and we will respond to your requests in accordance with our obligations under data protection law.

## 4. What kinds of personal information we use

4.1 To enable you to open an account with us and to enable us to process your order we may collect the following personal information:

- your name, address, email address, telephone number(s) and other contact details;
- information required to provide you with products and services and details of the products and services we have supplied to you;
- your company's name, your position in the company, the company's address, company's email address and telephone number(s);
- your payment information such as credit or debit card details or your bank account and sort code details; and
- details of any enquiry or complaint you make to us.

4.2 Please note that we require certain types of personal information so that we can fulfill a contract to supply products and services to you or to meet a legal obligation. If you do not provide us with that personal information, or if you ask us to delete your personal information or account, we will no longer be able to provide our products and services to you.

## 5. How we gather your personal information

We obtain personal information:

- **directly from you** when you register or open an account with us, purchase products or services from us, contact us by post, phone or via our website or give us feedback;
- **automatically when you access our website.** We collect certain usage information when you utilize our website such as Internet Protocol ("IP") addresses, log files, unique device identifiers, pages viewed, browser type, any links you click on to leave or interact with our website and the products and



services we offer, and other usage information collected from cookies and other tracking technologies. For example, we collect IP addresses to track and aggregate non-personal information, such as using IP addresses to monitor the regions from which users navigate our website. We may also collect IP addresses from users when they log into our website as part of our log-in and security features. We may also, when you enable location based-services, collect Global Positioning System (GPS) location data and/or motion data;

- **from third parties** for example when we [acquire third party marketing lists or] obtain information from the electoral roll, get authorization for a payment you make or when we undertake an identity or credit reference check.

We also may obtain some personal information from monitoring or recording calls. We may record or monitor phone calls with you for regulatory purposes, for training and to ensure and improve quality of service delivery, to ensure safety of our staff and customers, and to resolve queries or issues.

## 6. How we use your personal information

We use your personal information:

- **account registration and checking your authorizations.** We use your personal information to register your account and to check that you have the correct authorizations in place to purchase our products and services.
- **to provide our products and services and to operate our business.** We may use your personal information to operate our business, including providing you with the products and services you have requested, providing you with support related to our products and services and to help us protect our business, including carrying out credit reference checks and to combat fraud and to protect your information.
- **customer service and technical support.** We may use your personal information and information about your computer configuration to resolve questions you may have about our products and services and to follow up with you about your experience.
- **communicate with you and tell you about other products and services.** We may use your information to communicate with you about our website and our products and services and to contact you about appropriate other products and services which we offer. If you provide your consent to do so, we may communicate with you to send you offers for third party products and services that we think may be of use to you. Please see section 12, Keeping you up to date, clause 12.2 to manage your consent to receiving marketing information from us.



- **to improve our products and services and our website.** We will utilize your information to personalize or customize your experience and our website and to develop new features or services on our website and to improve the range, variety and quality of the products and services we offer.
- **feedback.** We may use any information you volunteer by any means, including in surveys you answer for us and combine them with answers from other customers in order to better understand how our website is used and the products and services we offer and how we may improve them. Answering any survey and giving feedback is optional.

## 7. Automated decision making

We do not use any automated decision making processes.

## 8. Our legal basis for using your personal information

We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information where:

1. we have your consent (if consent is needed);
2. we need to use the information to comply with our legal obligations;
3. we need to use the information to perform a contract with you; or
4. it is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you – this can include where it is in our interests to contact you about appropriate products or services or collaborate with others to improve our products and services.

Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent. See section 12 [Keeping you up to date](#), clause 12.2 for details about how to withdraw your consent to marketing.

## 9. Sharing your personal information with others

From time to time, we may need to share your personal information with others:

- **third party service providers** who perform various functions to enable us to provide our website and our products and services, such as IT suppliers, couriers, mailing house and suppliers. Our contracts with these third parties require them to maintain the confidentiality and security of the information we provide to them, only act on our behalf and under our instructions and to not use personal information for purposes other than the product or service they are providing to us or on our behalf;



- **response to legal requests** may involve us sharing your information with courts, law enforcement agencies or other government bodies when we have a good faith belief we are required or permitted to do so by law;
- **protection of our business and others** may involve us sharing your personal information and usage data when we believe it is appropriate to enforce our Terms and Conditions and other agreements, for example with organizations for fraud protection and credit risk reduction, or to protect the rights, property or safety of our business, our users and others;
- **sharing information within our Group** for everyday business purposes such as to process your transactions, maintain your accounts, operate our business etc.
- **sale of our business** if we sell, merge or transfer any part of our business, we may be required to share your information.

## 10. Transfers outside the UK

**10.1** We may need to transfer your information outside the UK to service providers, agents and subcontractors in countries where data protection laws may not provide the same level of protection as those in the European Economic Area, such as the USA.

### Find out more about how we transfer your data outside of the UK

We may need to transfer your personal information to territories that are outside the EEA. We will only transfer your personal information outside the EEA where either the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal information, or we have put in place our own measures to ensure adequate security as required by data protection law. These measures include ensuring that your personal information is kept safe by carrying out strict security checks on our overseas partners and suppliers, backed by strong contractual undertakings approved by the relevant regulators such as the EU style model clauses. We also use the EU Commission approved EU-US [Privacy Shield \(Link opens in new window\)](#) when personal information is transferred to the US.

You can find out more information about standard contractual clauses as detailed by the ICO. Visit their website at [ico.org.uk \(Link opens in a new window\)](http://ico.org.uk) and search for 'International transfers'.

Details of any third party data processor we use can be obtained by contacting our DPO by post at Merchants Warehouse, Castle Street, Castlefield, Manchester, M3 4LZ or by email on [DPO@bestwaymedhub.co.uk](mailto:DPO@bestwaymedhub.co.uk).



## 11. How long we keep your personal information for

We need your personal information for as long as we have a legal or business reason to do so, which generally means as long as you remain a customer of our business or as requested to meet our legal obligations, resolve disputes or enforce our agreements. When you cease to be a customer, we may continue to communicate with you about our products and services, give you important business updates that may affect you, and let you know about products and services that may interest you, unless you have withdrawn or opted out of receiving marketing communications.

## 12. Keeping you up to date

**12.1** We will communicate with you about products and services we are delivering using any contact preferences you have given to us - for example by post, email, text message, social media, and notifications on our website.

**12.2** Where you have given us consent to receive marketing, you can withdraw consent by contacting our DPO by post at Merchants Warehouse, Castle Street, Castlefield, Manchester, M3 4LZ or by email on [DPO@bestwaymedhub.co.uk](mailto:DPO@bestwaymedhub.co.uk).

You can also update your contact preferences by contacting our DPO by post at Merchants Warehouse, Castle Street, Castlefield, Manchester, M3 4LZ or by email on [DPO@bestwaymedhub.co.uk](mailto:DPO@bestwaymedhub.co.uk).

## 13. Your online activities

**13.1** We use cookies and other tracking technologies to:

- fulfill your requests for products and services and to improve our website;
- remind us of who you are on return visits in order to deliver to you a better and more personalized service;
- estimate our audience size and measure traffic patterns regarding usage of our website; and
- customize the advertising and content you see.

### 13.2 Find out more about cookies and other tracking technologies

A cookie is a small file which is sent to your browser and stored on your computer's hard disc and helps us understand and track your use of our website and where we can improve the information and services provided. We use cookies solely to gather information on IP addresses, to analyze trends, administer the website, track your movements on the website and gather broad demographic information for aggregate





use. For information about blocking the use of cookies, please refer to the instructions/help screen on your internet browser. Please note that you may not be able to use or access certain parts of the website or online services if you block the use of all cookies. For further information on our use of cookies and other tracking technology visit:

- [Use of Cookies and other tracking technology](#)