
PRIVACY NOTICE

BACKGROUND:

FMC Marketing Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

FMC Marketing Limited.

registered in England under company number 04780577.

Registered address: Hampshire House, 204 Holly Road, Aldershot, Hampshire, GU12 4SE

Main trading address: 69 Old Street, London, EC1v 9HX

VAT number: GB 825888087.

Data Protection Officer: Richard Adams.

Email address: richard@fmcmarketing.co.uk.

Telephone number: 0203 176 0021.

Postal Address: 69 Old Street, London, EC1v 9HX.

We are regulated by the Care Quality Commission (CQC).

We are a member of Federation of Small Businesses

We are registered with the Medicines and Healthcare products Regulatory Agency (MHRA).

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- 5.1 name;
- 5.2 date of birth;
- 5.3 gender;
- 5.4 contact information such as email addresses and telephone numbers;
- 5.5 demographic information such as address, post code;
- 5.6 health information;
- 5.7 financial information such as credit / debit card numbers;
- 5.8 you demographic IP address;

6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This

may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for the following purposes:

- 6.1.1 Supplying Our products to you (please note that We require your personal data in order to enter into a contract with you);
- 6.1.2 Personalising and tailoring Our products for you;
- 6.1.3 Communicating with you. This may include responding to emails or calls from you.
- 6.1.4 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by changing this preference in your detail section within your login area);

With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email with information, news, and offers on Our products. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the Data Protection Act 1998 and GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Personal data will be kept for a maximum of 8 years from the last time that you have logged in. After that the records will be deleted in line with our Data Retention Policy;

8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

9. Do You Share My Personal Data?

- 9.1 We will share some of your data with other companies in order to provide you with the goods we supply. This includes Our GPHC registered Pharmacies and our GMC registered Doctors.
- 9.2 Under the instructions of our prescribing doctors we may pass on your prescription details to your registered GP.
- 9.3 Under your instructions we will pass on to prescription details to your registered GP.
- 9.4 We use a company called Adestra who act as an intermediary for sending emails on our behalf.

10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

You can also access your personal data by logging into your online account and clicking on the Personal Details link. Your previous orders can also be accessed by clicking the View Complete Order History link towards the bottom of the login home page.

11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Richard Adams):

Email address: richard@fmcmarketing.co.uk.

Telephone number: 0203 176 0021.

Postal Address: 69 Old Street, London EC1v 9HX.

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our web site.