

# Privacy Notice

## 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

## 2. Responsibilities

- 2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Bedrock Group companies collecting/processing their personal data.
- 2.2 All Employees/Staff of Bedrock Group companies who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3. Privacy notice

### 3.1 Who are we?

Bedrock Group is the holding company for Bedrock Healthcare Communications a medical communications agency and Origins an insights agency. Both companies provide services to healthcare bodies, pharmaceutical organisations and their subsidiaries, and patient groups/not for profit organisations. Bedrock Group is headquartered in the UK and works on an international basis.

Our Data Protection Officer and data protection representatives can be contacted directly here:

- [dataprotection@bedrock-health.com](mailto:dataprotection@bedrock-health.com)
- 01252 240200

The personal data we collect will be used for the following purposes:

- Conducting day-to-day business (including business development and on-going projects)
- Logistical purposes (e.g. to send and receive documents or arrange travel)

Our legal basis for processing for the personal data:

- Legitimate interests

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Business development
- Development of work/projects that you have explicitly agreed to participate in

No special categories of personal data will be collected without your explicit consent

### 3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Bedrock Group companies to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting the Bedrock Group Data Protection officer who will send a removal of content form to be filled in.

### 3.3 Disclosure

Bedrock Group companies will not pass on your personal data to third parties without first obtaining your consent.

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal data can be accessed by or transferred to the following categories of recipients, on a need to know basis to achieve such purposes:

- our personnel (including personnel, departments or other companies Part of Bedrock Healthcare Communications);
- our consultants, suppliers and service providers (including IT system providers, cloud service providers, etc.) and our independent agents or brokers (if any);
- our business partners who offer products or services jointly with us;
- any third party to whom we assign or novate any of our rights or obligations;
- our advisors and external lawyers in the context of the sale or transfer of any part of our business or its assets.

The above third parties are contractually obliged to protect the confidentiality and security of your personal data, in compliance with applicable law.

### 3.4 Retention period

Bedrock Group companies will process personal data for only the amount of time necessary to complete the task and will store the personal data for 2 years after completion of the task unless otherwise stated or required by law. Third party involvement in the processing of your personal data does not occur unless explicitly stated.

### 3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Bedrock refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

### 3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Bedrock Group companies (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Bedrock Group's data protection representatives Data Protection Officer.

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>Data Protection Officer (DPO)</b>
Contact Name:	Information Commissioners Office	Bedrock Group Data Protection Officer
Address line 1:	Wycliffe House	Bedrock Healthcare Communications

Address line 2:	Water Lane	One Fleet, Ancells Road
Address line 3:	Wilmslow	Fleet
Address line 4:	Cheshire	Hampshire
Address line 5:	SK9 5AF	GU51 2UN
Email:	<a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a>	dataprotection@bedrock-health.com
Telephone:	01625 545 745	01252 240200

#### 4. Privacy statement

##### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

##### How we use your information

This privacy notice tells you how we, Bedrock Healthcare Communications and Origins, will collect and use your personal data for the development of medical communications and research projects

##### Why does Bedrock Healthcare Communications and Origins need to collect and store personal data?

In order for us to provide you Medical Communications and Insight services we need to collect personal data for correspondence and research purposes. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Bedrock Healthcare Communications or Origins would contact you for additional consent.

##### Will Bedrock Group companies share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Bedrock or Origins in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil specific services they provide to complete Medical communications projects. When they no longer need your data to fulfil this service, they will dispose of the details in line with Bedrock's procedures. In the event we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your explicit consent (both to record your sensitive personal information and to pass along to a third party), unless we are legally required to do otherwise.

##### How will Bedrock Group companies use the personal data it collects about me?

Bedrock or Origins will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Bedrock is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

##### Under what circumstances will Bedrock Group companies contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

Bedrock Group companies, at your request, can confirm what information we hold about you and how it is processed. If Bedrock or Origins does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Bedrock or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Bedrock Group companies accepts the following forms of ID when information on your personal data is requested: Passport, driving licence, birth certificate, utility bill (from last 3 months)

Contact details of the Data Protection Officer :

Contact Name:	Bedrock Data Protection Officer
Address line 1:	Bedrock Healthcare Communications
Address line 2:	One Fleet, Ancells Road
Address line 3:	Fleet
Address line 4:	Hampshire
Address line 5:	GU51 2UN
Email:	dataprotection@bedrock-health.com
Telephone:	01252 240200