Privacy Policy

Introduction

Welcome to the Pharmora Limited’s privacy notice. Pharmora respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Pharmora collects and processes your personal data through your use of this website, including any data you may provide through this website when you enquire about career opportunities with us.

Controller

Pharmora is made up of different legal entities. This privacy notice is issued on behalf of the Pharmora and its subsidiary Pharmora Global Solutions Limited so when we mention “Pharmora”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a service with us. Pharmora Ltd is the controller and responsible for this website. We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

Our full details are: Full name of legal entity: Pharmora Ltd Title of DPO: Managing Director, Email address: finance@pharmora.solutions Postal address: Charles Roe House, 60-62 Chestergate, Macclesfield, Cheshire SK11 6DY Telephone number: +44 1625 838382. You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Changes to the privacy notice

This version was last updated on 1 November 2022.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

1. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

* + **Identity Data** includes first name, last name, username or similar identifier.
	+ **Contact Data** includes your address, telephone number or email address etc.
	+ **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
	+ Usage Data includes information about how you use our website.
1. How is your personal data collected?

We use different methods to collect data from and about you including through:

* + **Direct interactions**. You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you contact us about career opportunities.
	+ Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy below for further details.
1. How we use your personal data

We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal data in the following circumstances:

* + To progress your recruitment application.
	+ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
	+ Where we need to comply with a legal or regulatory obligation.

Purposes for which we will use your personal data

| Purpose/activity | Type of data | Lawful basis for processing including basis of legitimate interest |
| --- | --- | --- |
| To progress your recruitment application | * + Identity
	+ Contact
	+ Technical
 | * + Necessary for our legitimate interests (to progress your application through our recruitment process)
 |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | * + Identity
	+ Contact
	+ Technical
 | * + Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or restructuring exercise)
	+ Necessary to comply with a legal obligation
 |
| To deliver relevant website content | * + Identity
	+ Contact
	+ Usage
	+ Technical
 | Necessary for our legitimate interests (to study how customers use our service, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, services, marketing and customer relationships | * + Technical
	+ Usage
 | Necessary for our legitimate interests (to define types of customers for our service, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |

We have set out below, in a table format, a description of all the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Use of cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The table below explains the cookies we use and why.

| Cookie | Name | Purpose |
| --- | --- | --- |
| Google Analytics | * + \_ga
	+ \_gali
	+ \_gat\_UA98100618-1
	+ \_gid
 | These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the website from and the pages they visited.[Read Google’s overview of privacy and safeguarding data](https://support.google.com/analytics/answer/6004245) |

How do I change my cookie settings

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org. To opt out of being tracked by Google Analytics across all websites visit http://tools.google.com/dlpage/gaoptout.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to receive an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

1. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

* + Specific third parties such as Google Analytics.
	+ Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

1. International transfers

We share your personal data within the Pharmora Group. This may involve transferring your data outside the European Economic Area (EEA). Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

* + We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see *European Commission: Adequacy of the protection of personal data in non-EU countries.*
	+ Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

1. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

1. Data retention

How long will you use my personal data for?

* + Recruitment: If you are successful in the recruitment process, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes records of any security checks and references. Information generated throughout the assessment process, for example interview notes, is retained by us for 12 months following the closure of the campaign. We may ask if you would like your CV to be retained in our talent pool for a period of twelve months. If you say yes, may proactively contact you should any further suitable vacancies arise.
	+ Data analytics: Google analytics will hold data for 26 months.
1. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out within the Glossary, please contact the DPO.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request under these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

1. Glossary

LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contact us](https://www.bioscriptgroup.com/privacy-notice/contact).
**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

* + Google Analytics acting as processors who provide data analytics.

YOUR LEGAL RIGHTS

You have the right to:
**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machinereadable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.