



# **PENTLAND MEDICAL LIMITED**

# **PRIVACY POLICY – May 25<sup>th</sup> 2018**

Last Updated: 23/05/2018

## Introduction

Pentland Medical Ltd. is a UK medical supplies distributor based in Edinburgh, Scotland. We aim to improve patient safety outcomes by supplying patented products/devices to the healthcare sector.

We fully respect privacy and your rights to control your personal data. We will be clear about the data we collect and why. We do not and will not sell your data to third parties.

This Privacy Statement (the 'Statement') explains the personal information we collect from you, either directly or indirectly, and how we will use it. Personal information is any information that can be used to identify you or that we can link to you. The Statement also elaborates on the choices you can make about the data we collect, and how you can control these decisions. It applies to our website(s), licensed data from a third party, as well as other offline interactions, such as visiting our exhibition stand during a conference. Please read this Statement carefully to understand how we may collect, use and share your personal information. The terms 'we', 'us', 'Pentland Medical' are each intended as reference to:



Pentland Medical Ltd, 48 Craighall Road, Edinburgh, EH6 4RU

## Point of Contact

If you have any questions about the use of your personal information, please email or call:

**Arron Cornall**

**Communications Manager**

**T: 0131-467-5764**

**E: [arron@pentlandmedical.co.uk](mailto:arron@pentlandmedical.co.uk)**

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## Types of Personal Information We Collect

We collect information from you and third parties, some of which is deemed to be personal.

This includes:

- First and last name (personal)
- Name of healthcare facility
- Job title
- Department
- Email address (personal work email)
- Facility phone number and/or relevant extension

# Methods of Data Collection

Pentland Medical collects information in three possible ways:

## **When you directly give it to us (“Directly Provided Data”) via:**

### **Website**

Directly provided data is gathered via our website ([www.pentlandmedical.co.uk](http://www.pentlandmedical.co.uk)) when;

- You actively complete the ‘Contact Us’ form on our website;
- Engage in conversation with one of representatives via the LiveChat application;
- A request is made for product samples via form completion.

### **Conferences**

During a conference/exhibition that Pentland Medical is attending, we will request that a prospect form is completed at the point an interest is expressed in our product range. This will allow us to contact you in due course to arrange a meeting and/or provide samples for evaluation purposes.

### **Inbound Telephone Enquiry**

We will endeavour to accurately record your personal information during an inbound call to progress with a product enquiry that is sales-related. If the inbound call is a general product enquiry, we may not always collect your data.

## **Licensed data via a third party (Wilmington Healthcare Ltd).**

Pentland Medical also licenses personal data provided by Wilmington Healthcare PLC.

Part of Wilmington’s business model includes:

**“Data, marketing and marketing insight with an up-to-date named contacts database of more than 450,000 healthcare professionals. Wilmington Healthcare can help you find and reach your key audience with targeted marketing campaigns.”** <https://wilmingtonhealthcare.com/>

In this instance, Pentland Medical act as a data processor on behalf of Wilmington Healthcare, who are the data controller. Wilmington process data under the lawful basis of ‘legitimate interest’.

## Outbound Phone Call

In certain circumstances, we may endeavor to call a relevant department of a hospital that we do not have an on-going business relationship with. This is purely to expand our current database with the hope of providing information to a prospect/department that may deem our products to be of use in their given field. Any data collected in this manner will be processed under the lawful basis of 'legitimate interest'.

## How We Use Personal Information

### Processing Requests

We use the data we collect to process sales enquiries, product sample requests, and meeting scheduling.

### Business Operations

We use data to operate, protect, make informed decisions, and report on the performance of our business. This processing is necessary to serve our legitimate interest.

### Communication, Marketing and Advertising

We use the data we collect to deliver and personalise our communications with you. For example, we may contact you by email or other means of electronic communication to inform you about new products, healthcare-related guidelines, or any other communications relating to our business. This processing is necessary to serve our legitimate interest.

As transparency is important to us, we've added statements and links to the updated Privacy Policy at personal data processing points on our website, as pictured:

|   |  |
|---|--|
| <b>Title</b><br><input type="text"/>      | <b>Hospital</b><br><input type="text"/>      |
| <b>First Name</b><br><input type="text"/> | <b>Department</b><br><input type="text"/>    |
| <b>Surname</b><br><input type="text"/>    | <b>Phone Number</b><br><input type="text"/>  |
| <b>Position</b><br><input type="text"/>   | <b>Email address</b><br><input type="text"/> |

I'm not a robot  
  
**Submit**

**Message**  
  
 I'm not a robot  
  
**Submit**

We now meet the high standards required by the European Union's General Data Protection Regulation (GDPR) and have updated our privacy statement to reflect that.  
Please follow [this link](#) to learn about our data processing activities and view our updated Privacy Policy.  
If you have any questions about the use of your personal information, please email or call:  
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Communications Manager  
T: 0131-467-5764  
E: [aron@pentlandmedical.co.uk](mailto:aron@pentlandmedical.co.uk)  
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## Methods of Opt-Out

During our weekly email marketing campaigns, via Wired Plus and Outlook, we offer you the ability to 'opt-out' of our communications. Here are pictured examples of the process on each platform:

### Outlook emails:

- Simply reply to the email with 'opt-out' and we will remove you from our database, ceasing all further communication. We will endeavour to act on this immediately:

<https://healthcare-arena.co.uk/the-hemaclear-a-novel-tool-to-prevent-surgical-site-infection-and-promote-complete-exsanguination-in-limb-surgery/>

I look forward to hearing from you.

***\*If you do not wish to continue receiving electronic communications in relation to our patient safety range, please reply to this email to opt-out\****



### Wired Plus Emails:

- Click the 'unsubscribe' link, as pictured, and you will be automatically suppressed within our database:

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Kind regards,  
Arron Cornall  
Communications Officer  
Pentland Medical

Please click this [Unsubscribe](#) link if you no longer wish to receive information/guidelines on our patient safety products.



## How We Share Personal Information

We do not and will not sell personal information about our customers. We only disclose your data as described in this Statement. We only share information with the following third parties:

- **Wired Plus** – an email marketing platform for sending bulk communications
- **LiveChat** – the app to allow digital text conversation on our website
- **Worx24 / ITCentric** – our IT management company who provide cloud back-ups, custom-made CRM system
- **Xero** – the online accounting package for processing order information and managing credit control processes

All data shared with these platforms consists of the aforementioned data ‘types’ referred to on page 2.

## The Legal Bases for Using Personal Information

We process your personal information under the lawful basis of **legitimate interests**. For example, we rely on our legitimate interest to analyse (using tools such as Google Analytics) and improve our website. Furthermore, we aim to communicate information surrounding new product developments and related guidance that can improve patient outcomes within the healthcare sector. There is also a strong emphasis in helping to aid clinical practice through the advent of new medical devices.

## Security, Storage and Retention of Personal Information

### Security

Pentland Medical is committed to protecting the security of your personal information. However, while we take reasonable precautions to guard the personal information we collect, no security system is impenetrable.

While no service is completely secure, we take precautionary measures to help prevent information about you from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction. For example, we store the personal data you provide on computer systems that have limited access and that reside in controlled facilities. We also ensure that our third-party data centre vendors provide adequate security measures. Additionally, we’ve implemented AES-256 bit encryption with PBKDF2 SHA-256 via LastPass password protection. Other features of LastPass to aid security include:

- Two-factor authentication
- data is encrypted and decrypted at the device level

We also work closely with an IT service provider – IT Centric/Worx24 – to ensure all data is securely stored and firewall-protected.

## Storage

Personal data collected by Pentland Medical may be stored and processed in the UK or where third-party service providers (i.e. Google Analytics) are located / maintain facilities. We use an in-house customer record management system created by our IT service provider. This is securely managed on each employees' host machine hard drives, with regular updates and maintenance undertaken to ensure no problems exist locally, or on the cloud.

## Retention

We will retain your personal information for as long as we deem it necessary to enable you to use the website, to provide services to you, to comply with applicable laws (including those regarding document retention), resolve disputes with any parties and otherwise as necessary to allow us to conduct our business. All personal information we retain will be subject to this Privacy Statement.

Further to a request to erase your personal details, we will action and delete backup copies of that personal data from our archives as soon as is practically possible, to the extent allowed by our other data retention obligations (e.g. to protect other data stored in the same backup archives or meet other regulatory or legal requirements).

Furthermore, if no contact has been initiated with a prospect within a 24-month period, we will endeavour to remove all record of personal data from our CRM system and email marketing platform, Wired Plus.

## Rights of Individuals

Individuals have rights to their data which we must respect and comply with to the best of our ability. We must ensure individuals can exercise their rights in the following ways:

### 1. Right to be informed

- Providing privacy notices which are concise, transparent, intelligible and easily accessible, free of charge, that are written in clear and plain language, particularly if aimed at children.
- Keeping a record of how we use personal data to demonstrate compliance with the need for accountability and transparency.

### 2. Right of access

- Enabling individuals to access their personal data and supplementary information
- Allowing individuals to be aware of and verify the lawfulness of the processing activities

### 3. Right to rectification

- We must rectify or amend the personal data of the individual if requested because it is inaccurate or incomplete.
- This must be done without delay, and no later than one month. This can be extended to two months.

#### **4. Right to erasure**

- We must delete or remove an individual's data if requested and there is no compelling reason for its continued processing.

#### **5. Right to restrict processing**

- We must comply with any request to restrict, block, or otherwise suppress the processing of personal data.
- We are permitted to store personal data if it has been restricted, but not process it further.
- We must retain enough data to ensure the right to restriction is respected in the future.

#### **6. Right to data portability**

- We must provide individuals with their data so that they can reuse it for their own purposes or across different services.
- We must provide it in a commonly used, machine-readable format, and send it directly to another controller if requested.

#### **7. Right to object**

- We must respect the right of an individual to object to data processing based on legitimate interest or the performance of a public interest task.
- We must respect the right of an individual to object to direct marketing, including profiling.
- We must respect the right of an individual to object to processing their data for scientific and historical research and statistics.

#### **8. Rights in relation to automated decision making and profiling**

- We must respect the rights of individuals in relation to automated decision making and profiling.
- Individuals retain their right to object to such automated processing, have the rationale explained to them, and request human intervention.

We want you to be in control of how your personal information is used by us. Subject to local law, you can do this in the following ways:

- you can ask us for a copy of the personal information we hold about you;
- you can inform us of any changes to your personal information, or if you want us to correct any of the personal information we hold about you;
- you can ask us to erase, block or restrict the personal information we hold about you, or object to particular ways in which we are using your personal information
- (to do this please email: [arron@pentlandmedical.co.uk](mailto:arron@pentlandmedical.co.uk) from the email address in question);
- in certain situations, you can also ask us to send the personal information you have given us to a third party.

Where we process your personal information based on legitimate interest, you have the right to object at any time to that use of your personal information. We are committed to working with you to obtain a fair resolution of any complaint or concern you may have about our use of your personal information. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to file a complaint with the data protection authority or Information Commissioners Office.

## Changes to Our Privacy Statement

Pentland Medical Ltd. may modify or update this Statement when necessary. When we update this Statement, we will revise the 'Last Update' date at the top of the Statement. If there are material changes to the Statement or how we use your personal data, we will inform you either by posting a notice of such changes, prior to them taking place, or by directly sending you a notification. We encourage you to regularly review this Statement to learn more how we are using and protecting your information.

## FAQ

### Why are you updating privacy statement?

We now meet the high standards required by the European Union's General Data Protection Regulation (GDPR) and have updated our privacy statement to reflect that.

### What is the GDPR?

The GDPR is a regulation intended to strengthen and unify data protection for everyone within the European Union (EU). The GDPR requires greater openness and transparency from companies on how they collect, store and use personal data, while also imposing tighter limits on the use of personal data.

### How often do you anticipate updating your privacy statement?

We will update our privacy statement as necessary to ensure that our policies are in line with international regulations, our product and business practices.

## Further Questions?

If you have any questions about the use of your personal information, please email or call:

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