

Privacy Policy

Here at talkhealth we are committed to safeguarding your privacy. At all times we aim to respect any personal data you share with us, or that we receive from other organisations, and keep it safe. This Privacy Policy (“Policy”) sets out our data collection and processes practises and your options regarding the ways in which your personal information is used.

This Policy contains important information about your personal rights to privacy. Please read it carefully to understand how we use your personal data. We may update this Policy from time to time without notice to you, so please check it regularly.

The provision of your personal data to us is voluntary. However, without providing us with personal data, you will be unable to (as appropriate), take part in surveys, be apart of the online talkhealth community, be involved in forums and blogs, or be apart of our Patient Support Programmes.

1. We collect information about you:

- (a) When you give it to us DIRECTLY – This will be when you sign up as a member of the talkhealth community, or if you take part in one of our online surveys without being a member.
- (b) When you give it to us INDIRECTLY – This will be Healthcare Professionals, Pharma Companies, Charities, NHS Trusts and all other Sponsors who contact us indirectly.
- (c) When you visit our WEBSITE – We use cookies to identify you when you visit our website and to enable us to personalise your online experience

2. What information do we collect?

We may collect, store and use the following kinds of personal data:

- (a) We will typically hold your name and contact details, including email address.
- (b) We will also ask you as a member to add your year of birth, gender and location. This is for statistical and marketing use only.
- (c) Information about your computer and about your visits to and use of the talkhealth website including your IP address, geographical location, browser type, referral source, length of visit and number of page views.
- (d) Information about the areas and products of interest to you or any marketing and/or communication preferences you give; and/or
- (e) Any other information shared with us as per clause 1.

let's talk health!

talkhealth is a digital healthcare and market research company specialising in patient engagement and experience.

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The General Data Protection Regulations require talkhealth as a data collector to process data in accordance with the principles of data protection. These require that data shall be:

1. Fairly and lawfully processed
2. Processed for limited purposes
3. Adequate, relevant and not excessive
4. Accurate
5. Not kept longer than necessary
6. Processed in accordance with the data subjects' rights
7. Kept securely
8. Not transferred to countries outside the European Union.

Data will be reviewed on an annual basis to ensure that it is accurate, and incorrect data will be removed from the system.

2.1 Cookies

Cookies are text files placed on your computer to collect standard internet log and visitor behaviour information. This information is used to track use of the website, to compile statistical reports on Website activity to help us make recommendations that are relevant to you.

If you would like more information about this practice including how to prevent it, please visit www.aboutcookies.org

3. Do we process sensitive personal information?

Applicable law recognises certain categories of personal information as sensitive and therefore requiring more protection, including religious beliefs, ethnicity and political opinions. In some cases, we may collect sensitive personal data about you, such as gender or health issues. We would only collect sensitive personal data if there is a clear reason for doing so; and will only do so with your explicit consent.

4. How and why will we use your personal data?

Personal data, however provided to us, will be used for the purpose specified in this Policy or in relevant parts of the website.

We may use your personal information to:

- (a) Enable you to use all of the services we offer;
- (b) Send you information about our work, in newsletters, campaigns, Patient Support Programmes, Clinics and other information, products or services that we provide (this will not be done without your consent);
- (c) Provide you with information you have requested;
- (d) Create reports and analysis about surveys and feedback you have given about health conditions and product reviews;

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- (e) Improve your browsing experience by personalising your interaction with our website;
- (f) Conduct surveys and research into the impact of our campaigns, Patient Support Programmes and Clinics;
- (g) Deal with enquiries and complaints made by or about you relating to the website or us in general;
- (h) Audit and administer our accounts.

5. Supporter research and profiling

We may use your personal information to undertake research to gather further information about you from publicly accessible sources. This helps us to get a better understanding of your background, interests and preferences in order to improve our communications and/or interactions with you, to help ensure they are targeted to be relevant and appropriate, and to provide information about surveys and other aspects of our services which we consider may be of interest to you.

Facebook Marketing

We may use some of your personal information to participate in Facebook's Custom Audience and Lookalike Audience programs, which enable us to display adverts to both existing and prospective supporters when they visit Facebook.

Google Analytics

We may use some of your personal information to analyse our digital performance, for example to see how our website can be improved to help us achieve the purposes set out in section 10 below, to record how you are using our website or to access the popularity of marketing campaigns.

Twitter Marketing

We may use some of your personal information to participate in creating engagement and driving performance, which enable us to display adverts to both existing and prospective supporters when they use Twitter.

Instagram Marketing

We may use some of your personal information to through hashtags and influencers, to enable us to display adverts to both existing and prospective supporters when they use Instagram.

6. Communications and marketing

Where you have provided us with a personal email address and where you have provided appropriate consent we will contact you by email, with targeted communications to let you know about events and/or activities that we consider may be of particular interest.

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7. Children's data

We do not knowingly process data of any person under the age of 16. If we come to discover, or have reason to believe, that you are 15 and under and we are holding your personal information, we will delete that information within a reasonable period and withhold our services accordingly.

8. Other disclosures

In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this Policy, we will disclose your information to regulatory and/or government bodies and/or law enforcement agencies upon request only when required to do so in order to satisfy legal obligations which are binding on us.

9. Security of and access to your personal data

We endeavour to ensure that there are appropriate and proportional technical and organisational measures to prevent the loss, destruction, misuse, alteration, unauthorised disclosure of or access to your personal data.

Your information is only accessible by appropriately trained staff.

Otherwise than as set out in this Policy, we will only ever share your data with your informed consent.

10. Your rights

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for direct marketing purposes or to be unsubscribed from our email list at any time. You also have the following rights:

- (a) Right to be informed – you have the right to be told how your personal information will be used. This Policy and statements used on our website and in our communications are intended to provide you with a clear and transparent description of how your personal information may be used.
- (b) Right of access – you can email us to ask for confirmation of what information we hold about you and to request a copy of that information. Provided we are satisfied that you are entitled to see the information requested and we have successfully confirmed your identity, we will have 30 days to comply.
- (c) Right of erasure / Right to be forgotten – you can ask for your personal information to be deleted from our records. In many cases, we would propose to suppress further communications with you, rather than delete it.
- (d) Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated.

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- (e) Right to restrict processing – you have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.
- (f) Right to data portability – where we are processing your personal information you may ask us to provide it to you - or another service provider – in a machine readable format.

To exercise these rights please log into your mytalk**health** area to change your notification preferences or contact us on info@talkhealthpartnership.com to discuss your data protection rights.

Please note that some of these rights only apply in limited circumstances. For more information, we suggest that you consult Information Commissioner's Office guidance - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You are further entitled to make a complaint about us or the way we have processed your data to the Information Commissioner's Office. For more information, please see the guidelines at <https://ico.org.uk/for-the-public/personal-information>

11. Lawful processing

We are required to one or more lawful grounds to process your personal information. The ones which are relevant to talkhealth are:

- Personal information is processed on the basis of a person's consent
- Personal information is processed on the basis of a contractual relationship
- Personal information is processed on the basis of legal obligations
- Personal information is processed on the basis of legitimate interests.

Consent

We will ask for your consent to use your information to send you electronic communications such as newsletters and marketing emails for targeted advertising and if you share sensitive personal information with us.

Contractual relationship

The contractual relationships will be with our client base.

Legal obligations

Sometimes we will be obliged to process your personal information due to legal obligations which are binding on us. We will only ever do so when strictly necessary.

Legitimate interests

Applicable law allows personal information to be collected and used if it is reasonably necessary for our legitimate activities (as long as its use is fair, balanced and does not unduly impact individuals' rights).

12. Data retention

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed, we remove your personal information for our records eight years after the date it was collected. However, if before that date your personal information is no longer required in connection with such purpose(s), or we are no longer lawfully entitled to process it, or you validly exercise your right of erasure, we will remove it from our records at the relevant time.

In the event that you ask us to stop sending you direct marketing/other electronic communications, we will keep your name on our internal suppression list to ensure that you are not connected again.

13. Policy amendments

We keep this Policy under regular review and reserve the right to update it from time-to-time by posting an updated version on our website. We recommend that you check this Policy occasionally to ensure you remain happy with it. We may also notify you of changes to this Policy via email. This Policy was last updated on 13 April 2018.

14. Third party websites

We link our website directly to other sites. This Policy **does not** cover external websites and **we are not responsible** for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.

15. Updating information

Members can check the personal data we hold about them and update it by logging into the mytalk**health** area. Alternatively, you can ask us to update it where necessary, by emailing us at info@talkhealthpartnership.com.

16. Contact

We are not required by law to have a “Data Protection Officer” – however if you do have any concerns or queries about the way your data is being processed you can contact us at info@talkhealthpartnership.com, or by writing to us at the following address:

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