

Torrent Pharma (UK) Limited
PRIVACY NOTICE

Torrent Pharma (UK) Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value your privacy 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

Torrent Pharma (UK) Limited is a limited company registered in England, company number 7249393.

Registered address: 4 Gatwick Road
3rd Floor
Crawley
England
RH10 9BG

Telephone number: 01293 574180

General enquiries email: reception@torrentpharma.co.uk

Data protection enquiries email: privacy@torrentpharma.co.uk

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”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) 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 Section 5, below.

4. What Are My Rights?

Under the Data Protection Legislation, 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 Section 1.

- b) The right to access the personal data we hold about you. Section 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 Section 1 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 hold. Please contact us using the details in Section 1 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 withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) 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.
- i) 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 Section 1.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

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. We would welcome the opportunity to resolve your concerns ourselves however, so please contact us first, using the details in Section 1.

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

Depending upon your use of our website, we may collect and hold some or all of the personal (and non-personal) data set out in the table below, using the methods also set out in the table. We do not collect any personal data relating to children.

Data Collected	How we Collect the Data
Identity and contact information including name, address, email address and telephone number.	Information you may provide when corresponding with us.
Business information including business name, job title and profession.	
Additional identity information including gender and date of birth.	Information you may give us if you report adverse event (side effects), medical information or product quality complaints directly to us instead of our pharmacovigilance agent.
Special category data including racial or ethnic origin and health.	

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What we Do	What Data we Use	Our Lawful Basis
Administering our business.	Identity and contact information including name, address, email address and telephone number. Business information including business name, job title and profession.	Legal obligation: the processing is necessary for us to comply with the law. Contract: the processing is necessary for a contract we have, or because we may be entering into a contract.
Administering our business.	Additional identity information including gender and date of birth Special category data including racial or ethnic origin and health.	Consent: you have given clear consent for us to process your personal data for a specific purpose.
Supplying our products and services to you. Managing payments for our products and/or services. Communicating with you.	Identity and contact information including name, address, email address and telephone number. Business information including business name, job title and profession.	Contract: the processing is necessary for a contract we have, or because we may be entering into a contract.

<p>Supplying you with information by email or post that you have opted-in to receive (opt-out information is provided in all communications).</p>	<p>Identity and contact information including name, address, email address and telephone number.</p> <p>Business information including business name, job title and profession.</p>	<p>Consent: If you have given clear consent for us to process your personal data for a specific purpose.</p>
---	---	---

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Section 1.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary considering 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):

Type of Data	How Long we Keep It
<p>Identity and contact information including name, address, email address and telephone number.</p>	<p>For a period of 2 years from last communication.</p>
<p>Business information including business name, job title and profession.</p>	<p>For a period of 2 years from last communication.</p>
<p>Special category data including racial or ethnic origin and health.</p>	<p>For a period of 30 years if the data relates to an adverse event (side effect).</p>

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

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus

Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We may share your data within the group of companies of which we are a part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the [European Commission](#).

We may share your data with external third parties, as detailed below in Section 9, that are based outside of the EEA. The following safeguard is applied to such transfers:

We use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the [European Commission](#).

Please contact us using the details in Section 1 for further information about the particular data protection mechanisms used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so;
- technical measures to encrypt and secure your personal data wherever practical.

9. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions:

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal

data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in our group for the purposes of fulfilling our legal or contractual obligations.

We may sometimes contract with the following third parties to supply products and/or services.

Recipient	Activity Carried Out	Location
APCER Life Sciences	Pharmacovigilance: Adverse Event (side effects) Report Collection, Medical Information and Product Quality Complaints	Europe 9th Floor, C.P. House, 97-107 Uxbridge Road, Ealing, London, W5 5TL
		Asia B1/F2 Mohan Cooperative Industrial Estate, Mathura Road, New Delhi 110 044, India
		Asia 1601 & 1602, Wing A, Mondeal Heights, Iscon Cross Road, SG Highway, Ahmedabad
		Americas 3 Independence Way, Suite 300, Princeton, NJ 08540

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Section 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Section 8.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

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 Section 1. To make this as easy as possible for you, a Subject Access Request Form is available for you to use upon request. 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.

11. **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.

An up to date copy of this Privacy Notice is available at <https://www.torrentpharma.co.uk/privacynotice.pdf> or by contacting us using the details in Section 1.

Version	Date	Notes
2.0	15/10/2020	Document re-written. Removed reference to withdrawn EU-US Privacy Shield.
2.1	15/12/2020	Corrected website link at bottom of document.