

Introduction

This privacy policy is issued on behalf of the Mawdsleys Group so when we mention "Mawdsleys" "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Mawdsleys Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. Mawdsley-Brooks & Company Limited is the controller and responsible for the following website: www.mawdsleys.co.uk.

Mawdsleys respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Purpose of this privacy policy

This privacy policy aims to give you information on how Mawdsleys collects and processes your personal data when you interact or otherwise do business with us, including any data you may provide through our websites or when you contact us to purchase products or services. We operate on a B2B basis, and we do not knowingly collect data relating to consumers or children.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other policies and is not intended to override them.

Controller

The Mawdsleys Group is made up of different legal entities, details of which are set out below:

- Mawdsley-Brooks & Company Limited
- Positive Solutions Limited
- MBI Pharma Limited
- Mawdsleys Pharmaceuticals Do Brazil Ltd

We have appointed a data protection manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

Full name of legal entity: Mawdsley-Brooks & Company Limited



Contact: Data Privacy Manager:

Email address: Privacy@Mawdsleys.co.uk

Postal address: Mawdsleys, Number Three, South Langworthy Road, Salford M50 2PW

You have the right to make a complaint 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 policy

We keep our privacy policy under regular review. This version was last updated on 01 June 2022. Historic versions can be obtained by contacting us.

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 policy of every website you visit.

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 follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers (as stated above we operate on a B2B basis so these details are usually not your personal details unless you provide them to us for a particular purpose).
- **Financial Data** includes bank account and payment card details (as above B2B unless you provide them for a particular purpose).
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **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.

- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you use our website, products, and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Unless the above data is collected in the context of your actual or potential employment with Mawdsleys or on CCTV, we will not collect any Identity, Contact, Financial, Transaction data that is personal to you. Your name will be collected in relation to any B2B enquiries you make on behalf of your organisation including any email address and other contact details you provide in relation to the same.

We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity.

For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Except in response to a specific request from you to us or our partners (for example, in the context of our supply of products to you on behalf of a third party at your request) or in response to adverse drug reporting, we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data); nor do we collect any information about criminal convictions and offences.

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, 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:
 - Enquire about or apply for our products or services.
 - create an account on our website.
 - subscribe to our mailing list service or publications.
 - request marketing material to be sent to you.



- enter a competition, promotion, or survey; or
- give us some feedback.

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.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public source as set out below:

- Identity and Contact Data from our partners, on whose behalf we distribute products.
- Identity and Contact Data from those to whom we have supplied our products in response adverse drug reporting requirements.
- Technical Data from analytics providers such as Google based inside or outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

How we use your personal data

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

- 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.
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Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message where you operate as a sole trader or partnership. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to 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. Please [contact us](#) if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To respond to enquiries, you make via the contact form on our website, by phone, email or post or at a face-to-face meeting	a) Identity (b) Contact As we are a B2B provider the contact details you provide will usually be your corporate contact details, unless you are a sole trader or partnership	(a) Performance of a contract with you (if we have entered into a contract with you or otherwise agreed to provide products or services to you (this is typically a contract with the organisation with whom you are employed as opposed to a personal contract with you); (b) Necessary for our legitimate interests (in order to respond to your enquiry or provide you with useful information about our products and services). This will be for a B2B purpose, and we will only use your corporate personal data unless you provide otherwise.
To process and deliver your order	(a) Identity (b) Contact	(a) Performance of a contract with you (typically the organisation for whom you work) (b) Necessary for our legitimate interests (to make enquiries in relation to your order)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a) Technical	a) 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 group restructuring exercise) (b) Necessary to comply with a legal obligation

<p>To deliver relevant advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical As we are a B2B provider the contact details you provide will usually be your corporate contact details unless you are a sole trader or partnership.</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile As we are a B2B provider the contact details you provide will usually be your corporate contact details unless you are a sole trader or partnership.</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if there is otherwise a legitimate business interest (in the context of your corporate personal data unless you are a sole trader or partnership) and, in each case, you have not opted out of receiving that marketing.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

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 get 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.

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 above.

- Internal Third Parties.
- 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 policy.

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.

International transfers

For EU based visitors to our website, it is unlikely that we would transfer your data outside the UK. However, we have group companies based in Israel and Brazil and may share your personal data with these group companies. This may involve transferring your data outside the UK.

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data.

Whenever we transfer your personal data out of the UK, 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 Information Commissioner's Office (ICO).
- Where we use certain service providers, we may use specific contracts approved by the ICO which give personal data the same protection it has in the UK.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

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.

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our document retention policy which you can request from us by [contacting us](#). By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further policy to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

The rights are described as:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please [contact us](#).