

QPHL Privacy Notice – Customers, Contractors, Suppliers

This notice tells you how we look after your personal data if you are a customer, contractor, or supplier of any of the companies within the Qualasept Pharmaxo Holdings Limited (“QPHL”) Group.

The QPHL is the parent company to each of the following subsidiaries:

- Qualasept Limited (trading as “Bath ASU”)
- Pharmaxo Pharmacy Services Limited
- Microgenetics Limited
- Corsham Science Limited

QPHL employees carry out a number of functions to support the subsidiaries, such as Marketing, IT, Finance Information Governance, HR, and Legal.

1. Purpose of this Privacy Notice

This notice sets out what information we collect about you, what we use it for, and who we share it with. It also explains your rights and what to do if you have any concerns.

We may sometimes need to update this notice to reflect any changes to the way companies within the QPHL group manages their operations, or to comply with new legal requirements. We will notify you of any important changes before they take effect, and the latest version is always available on our company websites:

- QPHL – <https://qphl.co/privacy>
- Bath ASU – <https://bathasu.com/privacy/>
- Pharmaxo – <https://pharmaxo.com/privacy/>
- Microgenetics - <https://www.microgenetics.co.uk/privacy>
- Corsham Science - <https://corshamscience.com/privacy>

2. Who we are and other important information

Data privacy is governed at QPHL level, and all companies within the QPHL group have a shared Data Protection Officer.

QPHL

Qualasept Pharmaxo Holdings Group, a company registered in England under company number 06981369 whose registered office is at 3 Corsham Science Park, Park Lane, Corsham, Wiltshire, SN13 9FU. QPHL is also registered with the Information Commissioners Office (“ICO”), registration number ZB051861.

bathasu

Qualasept Limited, a company registered in England under company number 05548345, whose registered office is at 3 Corsham Science Park Lane, Corsham, Wiltshire, SN13 9FU. ICO registration number: Z123853X

pharmaxo

Pharmaxo Pharmacy Services Limited, a company registered in England under company number 06982573 whose registered office is at 1

Corsham Science Park Lane, Corsham, Wiltshire, SN13 9FU. ICO registration number: Z3088075



Corsham Science Limited, a company registered in England under company number 11317798 whose registered office is at 3 Corsham Science Park Lane, Corsham, Wiltshire, SN13 9FU. ICO registration number: ZA723440



Microgenetics Limited, a company registered in England under company number 09350372 whose registered office is at 3 Corsham Science Park, Park Lane, Corsham, Wiltshire, SN13 9FU. ICO registration number: ZA723402.

3. Contact details

If you have any questions about this privacy notice or the way that we use information, please get in touch using the following details:

FAO: Data Protection Officer

Email address: DPO@gphl.co

Postal address: 3 Corsham Science Park, Park Lane, Corsham, Wiltshire, SN13 9FU

4. The information we collect about you

Personal data means any information which does (or could be used to) identify a living person either directly or indirectly.

We have grouped together the types of personal data that we collect and where we receive it from below:

	Type of Personal Data	Received from
	Identity Data – name, title.	<ul style="list-style-type: none">• You• Joint controller
	Contact Data – work address, work telephone numbers, work email address	<ul style="list-style-type: none">• You• Joint controller
	Location Data – your place of work, device location if you log into our systems remotely	<ul style="list-style-type: none">• You (including via cookies and similar technologies)

	Feedback – information and responses you provide when completing surveys and questionnaires	<ul style="list-style-type: none"> You
	Photo and Image Data – images, videos, and audio (e.g., video calls)	<ul style="list-style-type: none"> You
	Profile Data – username, password, chat logs, audit trail of systems used, and documents accessed and downloaded	<ul style="list-style-type: none"> You (including via cookies and similar technologies)
	Sensitive Data – information you choose to provide as part of our diversity or other questionnaires / surveys	<ul style="list-style-type: none"> You
	Technical Data – internet protocol (IP) address, browser type and version, time zone setting and generic location, browser plug-in types and versions, operating systems, and platform on the devices you use to access QPHL systems	<ul style="list-style-type: none"> You (via cookies and similar technologies)

We may **anonymise** the personal data we collect (so it can no longer identify you as an individual) and then combine it with other anonymous information, so it becomes **aggregated data**.

Aggregated data helps us identify trends (e.g., what percentage of our customers live within a certain radius of a particular location). Data protection law does not govern the use of aggregated data and the various rights described below do not apply to it.

5. How we use your information

We are required to identify a legal justification (also known as a **lawful basis**) for collecting and using your personal data. There are six legal justifications which organisations can rely on. The most relevant of these to us are where we use your personal data to:

- do something that you have given your **consent** for;
- pursue our **legitimate interests** (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms (e.g., your right to privacy);
- comply with a **legal obligation** that we have; and
- (in very rare circumstances) to protect yours or another person's **vital interests** (e.g., disclose medical information to an attending paramedic, inform your nominated emergency contact)

The table below sets out the lawful basis we rely on when we use your personal data.

If we intend to use your personal data for a new reason that is not listed in the table, we will update our personnel privacy notice and notify you.

Purposes	Justification
Providing and receiving goods and services	Contract
Asking you to participate in surveys and other types of feedback	Consent
Carrying out quality audits	Legitimate interests (necessary to improve and optimise our practices)
Monitoring physical presence at premises (e.g., sign in at reception, CCTV footage)	Legitimate interests (necessary to monitor physical building security, to investigate allegations of inappropriate behaviour)
To review the circumstances of specific incidents, complaints, or queries.	Legitimate interests (necessary to improve and optimise our practices)
Reporting specific incidents to regulatory authorities such as the Health and Safety Executive and Public Health England.	Legal obligation
Reporting specific incidents to our insurers	Legitimate interests (necessary to engage the cover arranged under our insurance policies and to maintain appropriate insurance cover in relation to our activities)
Dealing with legal disputes involving you or our staff	Legitimate interests (necessary to defend legal claims)
Trialling new applications and technology that would improve our ability to provide services	Legitimate interests (necessary to improve and optimise the provision of our services)

6. Who we share your information with

We share (or may share) your personal data with:

- **QPHL personnel:** QPHL employees (or other types of workers) who have contracts containing confidentiality and data protection obligations. Some examples are the legal team and the IT team.
- **Joint Controllers:** where you are working with us through a partner organisation.
- **Regulatory authorities:** such as Public Health England, and the Health and Safety Executive.
- **QPHL professional advisers** such as our legal advisors where we require specialist advice

- **Our insurers:** to the extent necessary to ensure that QPHL and its subsidiaries can engage the cover arranged under its insurance policies and maintain appropriate cover in relation to our activities.
- **Certain suppliers:** to trial new applications and technology that would improve our ability to provide services. We would seek to carry out this activity using mock data in the first instance, and aggregated data in the second instance. Where it was necessary to use actual customer data, we would use the minimum data required to effectively test the system.

If QPHL and its subsidiaries were asked to provide personal data in response to a court order or legal request (e.g., from the police), we would seek legal advice before disclosing any information and carefully consider the impact on your rights when providing a response.

7. Where your information is located or transferred to

We will only transfer information outside of the UK where we have a valid legal mechanism in place (to make sure that your personal data is guaranteed a level of protection, regardless of where in the world it is located, e.g., by using contracts approved by the European Commission or UK Secretary of State).

If you access our systems whilst abroad then your personal data may be stored on services located in that country.

8. How we keep your information safe

We have implemented security measures to prevent your personal data from being accidentally or illegally lost, used or accessed by those who do not have permission. These measures include:

- access controls and user authentication
- internal IT and network security
- regular testing and review of our security measures
- staff policies and training
- incident and breach reporting processes
- business continuity and disaster recovery processes

If there is an incident which has affected your personal data and we are the controller, we will notify the regulator and keep you informed (where required under data protection law).

Where we act as a joint controller for the affected personal data, we notify the other joint controller to arrange between ourselves who will lead the investigation and submit any report to the regulator.

If you have any concerns about the security of your data shared with us, please notify our Data Protection Officer at this email address: DPO@qphl.co

9. How long we keep your information

Where we act as the controller, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

To decide how long to keep personal data (also known as its **retention period**), QPHL and its subsidiaries considers the volume, nature, and sensitivity of the personal data, the potential risk of harm

to you if an incident were to happen, whether we require the personal data to achieve the purposes we have identified or whether we can achieve those purposes through other means (e.g., by using aggregated data instead), and any applicable legal requirements.

10. Your legal rights

You have specific legal rights in relation to your personal data. If you wish to exercise any of these rights, please email our Data Protection Officer: DPO@qphl.co

It is usually free for you exercise your rights and we aim to respond within one month (although we may ask you if we can extend this deadline up to a maximum of two months if your request is particularly complex or we receive multiple requests at once).

We can decide not to take any action in relation to a request where we have been unable to confirm your identity (this is one of our security processes to make sure we keep information safe) or if we feel the request is unfounded or excessive. If this happens, we will always inform you in writing. We may charge a fee where we decide to proceed with a request that we believe is unfounded or excessive.

Where we act as a joint controller, we inform the other organisation that acts with us that you have made a request. We will always let you know in writing what our approach will be.

Your legal rights



Access: You must be told if your personal data is being used and you can ask for a copy of your personal data as well as information about how we are using it to make sure we are abiding by the law.



Correction: You can ask us to correct your personal data if it is inaccurate or incomplete. We might need to verify the new information before we make any changes.



Deletion: You can ask us to delete or remove your personal data if there is no good reason for us to continue holding it or if you have asked us to stop using it (see below). If we think there is a good reason to keep the information you have asked us to delete (e.g., to comply with regulatory requirements), we will let you know and explain our decision.



Restriction: You can ask us to restrict how we use your personal data and temporarily limit the way we use it (e.g., whilst you check that the personal data we hold for you is correct).



Objection: You can object to us using your personal data if you want us to stop using it. We always comply with your request if you ask us to stop sending you marketing communications but in other cases, we decide whether we will continue. If we think there is a good reason for us to keep using the information, we will let you know and explain our decision.



Portability: You can ask us to send you or another organisation an electronic copy of your personal data.



Complaints: If you are unhappy with the way we collect and use your personal data, you can complain to the ICO or another relevant supervisory body, but we hope that we can respond to your concerns before it reaches that stage. You should speak to our Data Protection Officer (DPO@qphl.co) in the first instance.