

Counter Intelligence Pharmacy Courses Privacy Policy

1. Introduction and Definitions

Welcome to **Counter Intelligence**, providers of accredited pharmacy training courses. **Counter Intelligence** is owned and provided by Communications International Group Limited.

Communications International Group Limited understands that your privacy is important to you and that you care about how your personal data and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of our site or enrol for a course.

This policy covers the processing of Personal Data by Communications International Group Limited (registered in England & Wales; Company No 01241120) (VAT number GB 735 5539 15) whose registered address (and principal place of business) is at 239 Linen Hall, 162-168 Regent Street, London, W1B 5TB, United Kingdom and its subsidiary and associated group companies ("**CIG**", "**We**", "**Our**" or "**Us**").

It is important that you read this document in conjunction with Terms and Conditions.

In this Policy the following terms shall have the following meanings:

"Account" means an account required to purchase and/or to enrol for courses on Our Site.

"Data" and/or "Personal Data" means any data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case it means collectively all the personal data you submit or provide to Us via Our Site. This definition shall, where applicable, incorporate the definition provided in the General Data Protection Regulation

"GDPR" means the General Data Protection Regulation (GDPR) ((EU) 2016/679) until GDPR is no longer directly applicable in the UK and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in England and Wales and successor legislation to GDPR.

2. Scope of this Policy

This Privacy Policy applies only to your use of our website which may contain links to other websites. Please note that We have no control over how your Personal Data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

3. The types of Data We collect and how We collect it:

3.1 The Data We collect

In relation to sales of, or enrolment to, our courses We may collect some or all of the following personal and non-personal Data:

3.1.1 Candidate Name

- 3.1.2 Candidate job title
- 3.1.3 Candidate date of birth
- 3.1.4 Registered disability status (Optional)
- 3.1.5 Ethnicity (Optional)
- 3.1.6 Supervisor name
- 3.1.7 Supervisor GPhC number
- 3.1.8 Pharmacy name
- 3.1.9 Pharmacy address
- 3.1.10 Email address
- 3.1.11 Telephone number

3.2 How We collect the Data

3.2.1 Information you provide upon registration: In order to enrol and purchase courses provided through Our site you need to register an Account with Us. When you do so, you will provide Us with information about yourself. We will only use your Data as set out in this Privacy Policy.

3.2.2 Information you provide upon ordering from Us: If you order a course from us you will need to provide certain personal details/Data so that the order can be fulfilled. In some cases we may share your details with to a third-party to fulfil your order.

4. How We use the Data that We collect:

4.1 All Personal Data is processed and stored securely for no longer than is necessary in light of the reason(s) for which it was collected.

4.2 Our use of your Personal Data will always have a lawful basis, either because you have consented to Our use of your Personal Data (e.g. by registering an Account with Us) or because it is necessary for Our performance of a contract with you.

4.3 Specifically the Data may be used for the following purposes:

- to provide you or the candidate with services or information that have been requested
- to contact you regarding your registered Account with Us
- to notify you or the candidate of the results of course assessment and examinations
- to update you with any notifications concerning changes to course requirements
- to monitor or improve the performance of our website
- to monitor compliance with Our Terms and Conditions of Use
- to send you invitations to take part in research
- for internal record keeping and to manage your Account
- replying to e-mails from you
- providing and managing your access to Our Site
- for any purpose if we are required to do so by any law or other regulatory or government authority.

4.4 By providing us with your Personal Data, you consent to Us processing your information as set out in this Privacy Policy

4.5 You have the right to withdraw your consent to Us using your Personal Data at any time and to request that We delete it.

5. Sharing of Personal Data:

5.1 We may share your Data with other companies in our Group (this means our subsidiaries and associated companies) insofar as reasonably necessary for the purposes and on the legal bases set out in this Policy (including marketing purposes).

5.2 We may use third parties to perform certain functions on Our behalf including fulfilling orders, sending emails, research, removing repetitive information from customer lists, traffic analysis, data analysis and processing credit card payments. These third parties may have access to your Data to perform their services, but any Data used by such parties is used only to the extent required by them to perform the services that CIG request. Further, any Data that is processed by third parties shall be processed within the terms of this Policy and in accordance with the GDPR.

5.3 In specific circumstances We may have to share your Data with other third parties for their own purposes. Such specific circumstances include, but are not limited to:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity on Our Site. This may include sharing Data with law enforcement bodies.
- We may be required to disclose your Personal Data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take your privacy into consideration.
- We may, from time to time, expand, reduce or sell CIG and this may involve the transfer of divisions of CIG, or the whole business, to new owners. Any Personal Data that you have provided will, where it is relevant to any part of CIG's business that is being transferred, be transferred along with that part and the new owner or controlling party will, under the terms of this Privacy Policy, be permitted to use that Data only for the same purposes for which it was originally collected by Us.

6. How and where We store your Data:

6.1 We primarily store and process your Personal Data in the EU/European Economic Area ("the EEA") (The EEA consists of all EU member states plus Norway, Iceland and Lichtenstein). If we do transfer your Personal Data outside the EEA it will be because you have consented or because we have a legal reason to do so. Some examples of reasons your data may be processed outside of the EEA include:

- Order fulfilment
- Payment processing
- Technical support services

If your Personal Data cannot be processed within the EEA, we will:

- Comply with all other data protection principles
- Where possible, process in a country that is on the list of the EU Commissions' countries that provide adequate protections for the rights and freedoms of data subjects
- If the transfer is to the United States of America, use reasonable endeavours to make sure they participate in the Privacy Shield program
- Make sure we have assessed the adequacy of protections in all other cases.

6.2 Data security is of vital importance to Us, and to protect your Data We have taken suitable measures to safeguard and secure Data collected through Our Site. Steps We take to secure and protect your Data include working with a third party to manage the secure storage and transfer of candidate data, and data is transferred between them and CIG using secure data transfer (AMS File transfer).

7. Security/Transmission:

We adopt appropriate security procedures (suitable physical, electronic and managerial procedures) to seek to safeguard against unauthorised access to your information. Please be aware, however, that the transmission of data via the internet is never completely secure. Whilst CIG has taken all reasonable steps to ensure that the Data you provide will be kept secure from unauthorised access We cannot guarantee the security of your Data as it is transmitted to and from Our Site.

8. Policy changes:

We may amend this Privacy Policy from time to time or as may be required by law. If we do so, we will post an updated version on our website and you are deemed to have accepted the revised terms on your first use of our website following the alterations.

9. Accessing your own Data:

You have the right to ask for a copy of any of your Personal Data held by CIG (where such data is held) by contacting our Data Protection Compliance Manager at the address given in paragraph 10. Under the GDPR no fee is payable and We will provide any and all information in response to your request free of charge. If you wish to amend or have your Personal Data removed from Our records please contact CIG at the address in para 10.

10. Questions about the Pharmacy Network and the information we hold about you:

If you have any general questions about The Pharmacy Network or the information We have collected about you and how We use it, you can contact our Data Protection Compliance Manager, Tim Langford, at Communications International Group Limited, 2nd Floor, Linen Hall, 162-168 Regent Street, London W1B 5TB, United Kingdom. He can also be contacted by e-mail at datacompliance@1530.com and by telephone on +44(0) 20 7434 1530.

If We are unable to resolve the matter, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office (<https://ico.org.uk>) or seek further information your local Citizens Advice Bureau

This version of the Privacy Policy is effective as of 24 November 2020.