

## Drug Tariff Pro Privacy Policy

This Privacy Policy applies between you, the user of the Website/Services (as such terms are defined in the Drug Tariff Pro Licence Agreement and Conditions of Use), and us, Drug Tariff Pro Ltd with company number 15673972 (hereinafter referred to as “Drug Tariff Pro”), the owner and provider of the Website.

We take the privacy of your information very seriously. This Privacy Policy applies to our use of any and all Personal Data collected by us or provided by you in relation to your use of the Website/Services.

**Please read this Privacy Policy carefully.**

### 1. Definitions and Interpretation

- 1.1. “**Cookies**” shall mean the small text files placed on your computer or device when you visit certain parts of the Website and/or when you use certain features of the Website;
- 1.2. “**Data Controller**” shall have the meaning ascribed to it in the applicable Data Protection Laws;
- 1.3. “**Data Processor**” shall have the meaning ascribed to it in the applicable Data Protection Laws;
- 1.4. “**Data Protection Laws**” shall mean any laws relating to the processing of Personal Data, including but not limited to the General Data Protection Regulation as implemented in the United Kingdom through the Data Protection Act 2018 (hereinafter “**GDPR**”) and any other national implementing and supplementary laws, regulations and secondary legislation;
- 1.5. “**Data Subject**” shall have the meaning ascribed to it in the applicable Data Protection Laws;
- 1.6. “**Personal Data**” shall have the meaning ascribed to it in the applicable Data Protection Laws;
- 1.7. “**UK and EU Cookie Law**” shall mean the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 and the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2018;
- 1.8. “**you**” and “**your**” shall mean any third party that accesses, uses and/or subscribes to the Website unless that third party is subject to terms agreed with us which expressly override the terms of this Privacy Policy;
- 1.9. “**Website**” shall mean **www.drugtariffpro.com** and any subdomains of such site unless expressly excluded by their own terms and conditions;

1.10. “we”, “our” and “us” shall mean Drug Tariff Pro.

## 2. Background

For purposes of this Privacy Policy, unless the context requires a different interpretation:

- 2.1. The singular shall include the plural and vice versa;
- 2.2. References to subclauses, clauses, schedules and appendices are to subclauses, clauses, schedules and appendices of this Privacy Policy unless otherwise specified;
- 2.3. References to “person” shall include natural persons and legal persons such as firms, companies, government entities, organisations, trusts and partnerships;
- 2.4. The term “including” shall mean “including but not limited to”;
- 2.5. References to any statutory or regulatory provision shall include any and all modifications and amendments to it;
- 2.6. The headings and subheadings to this Privacy Policy shall not form part of this Privacy Policy.

## 3. Scope

- 3.1. This Privacy Policy applies only to the actions of us and you. It does not apply to websites owned and controlled by third parties, including websites that can be accessed through links provided on the Website. You are advised to read the privacy policies and/or statements of other websites prior to using them.
- 3.2. For purposes of the applicable Data Protection Laws, we are the Data Controller and the Data Processor (except where a third party data processor is used as set out in this Privacy Policy) and you are the Data Subject. We will determine the purposes for which and the manner in which your Personal Data is processed and will collect and process such Personal Data in accordance with the applicable Data Protection Laws.

## 4. Personal Data Collected

4.1. We may collect the following Personal Data from you:

- 4.1.1. Full name;
- 4.1.2. Contact information such as business name and address, email address, and telephone number;
- 4.1.3. Job role;
- 4.1.4. Financial information such as debit and/or credit card details;

in each case, in accordance with this Privacy Policy.

## 5. Manner of Collection

5.1. We may collect Personal Data in the following ways:

5.1.1. Personal Data is given to us by you, such as:

5.1.1.1. When you contact us through the Website, or by telephone, post, email or any other means;

5.1.1.2. When you set up an account to use the Website/Services;

5.1.1.3. When you subscribe for a payment plan to use the Website/Services;

5.1.1.4. When you make payments to us, through the Website or otherwise; and

5.1.1.5. When you elect to receive marketing communications from us,

in each case, in accordance with this Privacy Policy.

5.1.2. Personal Data is collected automatically. We automatically collect some information about your visit to the Website. This information is collected to help us make improvements to the Website content and navigation, and may include:

5.1.2.1. Your IP address;

5.1.2.2. The date, times and frequency of your access to the Website; and

5.1.2.3. The way you use and interact with the content on the Website,

in each case, in accordance with this Privacy Policy.

## 6. Cookies Policy

6.1. The Website may place and access certain Cookies on your computer or device. We use Cookies to improve your experience of using the Website and to improve our range of Services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.

6.2. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

6.3. Before the Website places Cookies on your computer or device you will be presented with the message bar requesting your consent to set those Cookies. By giving your consent you are enabling us to provide a better experience and service to you. You may, if you wish, deny consent to the placing of certain Cookies, but if you do so then certain features of the Website may not function fully or as intended.

6.4. The Website may place the following Cookies:

<b>Type of Cookie</b>	<b>Purpose</b>
<i>Strictly necessary Cookies</i>	<i>These Cookies are required for the operation of the Website, including Cookies that enable you to log into secure areas, use a shopping cart or use e-billing services.</i>
<i>Analytical/performance Cookies</i>	<i>These Cookies allow us to recognise and count the number of visitors to the Website and see how visitors move around the Website when using it, which allows us to improve how the Website works by, for example, ensuring that users are finding what they are looking for easily.</i>
<i>Functionality Cookies</i>	<i>These Cookies are used to recognise you when you return to the Website, which enables us to personalise content for you, greet you by name and remember your preferences such as your choice of language or region.</i>
<i>Targeting Cookies</i>	<i>These Cookies record your visit to the Website, the pages you have visited and the links you have followed, which will be used to make the Website and advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.</i>

6.5. You can find a list of the Cookies we use in the Drug Tariff Pro Cookies Schedule.

6.6. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed.

6.7. You can choose to delete Cookies at any time, but you may lose information that enables you to access the Website quicker and more efficiently, including, for example, personalisation settings.

6.8. We recommend that you ensure your internet browser is up to date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

6.9. For further information on Cookies generally, the following links may be helpful:

6.9.1. Cookies settings in Firefox: [http://support.mozilla.com/en-US/kb/Enabling and disabling cookies](http://support.mozilla.com/en-US/kb/Enabling_and_disabling_cookies)

6.9.2. Cookies settings in Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

6.9.3. Cookies settings in Google Chrome:  
<http://www.google.com/support/chrome/bin/answer.py?answer=95647>

6.9.4. Cookies settings in Safari (OS X):  
[http://support.apple.com/kb/PH17191?viewlocale=en\\_US&locale=en\\_US](http://support.apple.com/kb/PH17191?viewlocale=en_US&locale=en_US)

6.9.5. Cookies settings in Safari (iOS): <https://support.apple.com/en-us/HT201265>

6.9.6. Cookies settings in Android:

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=en&oco=0>

6.10. We take no responsibility for information provided via the third party websites set out above. Links are provided only for purposes of assisting you in understanding this Privacy Policy and we cannot and do not verify or guarantee the accuracy of any information provided therein.

## 7. Processing of Personal Data

7.1. Any or all of the Personal Data collected as described above may be used by us from time to time in order to provide you with the best possible service and experience when using the Website/Services. This may include:

7.1.1. Internal record keeping;

7.1.2. Improvement of the Website and our Services;

7.1.3. Transmission by email of marketing materials that may be of interest to you;

7.1.4. Contact for research purposes, which may be done using email, telephone, fax, mail or any other means, which information may be used to update or customise the Website,

in each case, in accordance with this Privacy Policy.

7.2. We may use your Personal Data for the purposes set out in Clause 7.1 above if it is deemed necessary for the legitimate interests of Drug Tariff Pro. If you are not satisfied with the use of your Personal Data in this way, you have the right to object under certain circumstances, as set out in Clause 11 below.

7.3. For the delivery of direct marketing to you via email, we will require your consent, whether by opt-in or soft-opt-in, as follows:

7.3.1. A soft-opt-in consent applies when you have previously engaged with the Website (for example, you have previously agreed to receive marketing information and we are now sending similar marketing information). In such circumstances we will take your consent as given unless you opt out.

7.3.2. For other types of marketing, we will require your express consent, meaning you need to take an affirmative step to give consent by, for example, checking a tick-box that we provide on the Website.

7.3.3. If you are not satisfied with our approach to marketing, you have the right to withdraw your consent at any time. To find out how to withdraw your consent, please see Clause 11 below.

7.4. When you set up an account and/or subscribe to the Website to receive our Services, the legal basis for the collection and processing of your Personal Data is the performance of a contract between you and Drug Tariff Pro Ltd and/or taking steps, at your request, to enter into such a contract.

8. Sharing of Personal Data

8.1. We may share your Personal Data with the following persons:

8.1.1. Third party service providers who provide services to us which require the processing of Personal Data;

8.1.1.1. The purpose is to help third party service providers in receipt of any shared Personal Data to perform functions on our behalf to ensure the Website/Service runs smoothly and to perform marketing, sales, inventory and accounts analysis;

8.1.2. Third party payment providers who process payments made over the Website;

8.1.2.1. The purpose is to enable third party payment providers to process user payments, refunds, exchanges, credits, discounts and promotions,

in each case, in accordance with this Privacy Policy.

8.2. We currently use the following third party data processors:

<b>Third Party</b>	<b>Purpose</b>
<b><i>Stripe Inc.</i></b>	<b><i>We use Stripe for payments, analytics, and other business services. Stripe may collect personal data including via Cookies and similar technologies.</i></b>  <b><i>The personal data Stripe collects may include transactional data and identifying information about devices that connect to its services. Stripe uses this information to operate and improve the services it provides to us, including for fraud detection, loss prevention, authentication, and analytics related to the performance of its services.</i></b>  <b><i>You can learn more about Stripe and read its privacy policy at <a href="https://stripe.com/privacy">https://stripe.com/privacy</a>.</i></b>
<b><i>Google Analytics</i></b>	<b><i>Where you have provided your consent to the use of analytical/performance Cookies, we use Google Analytics to monitor your use of the Website as set out in our Cookies Schedule.</i></b>

<i>Microsoft Clarity</i>	<i>Where you have provided your consent to the use of analytical/performance Cookies, we use Microsoft Clarity to monitor your use of the Website as set out in our Cookies Schedule.</i>
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9. Security of Personal Data

9.1. We will use technical and organisational measures to safeguard your Personal Data, including the following:

9.1.1. Access to your account is controlled by a username and password combination that is unique to you;

9.1.2. We store your Personal Data on secure servers;

9.1.3. Payment details are encrypted using SSL technology.

9.2. Technical and organisational measures include measures to handle any suspected data breach. If you suspect any misuse or loss of, or unauthorised access to, your Personal Data, please let us know immediately by contacting **support@drugtariffpro.com**.

9.3. If you would like to request detailed information from Get Safe Online on how to protect your information, computers and devices against fraud, identity theft, viruses and other online issues, we suggest you visit **www.getsafeonline.org**. We take no responsibility for information provided via Get Safe Online. The link is provided only for purposes of assisting you in understanding how to protect your Personal Data and we cannot and do not verify or guarantee the accuracy of any information provided therein.

10. Personal Data Retention

10.1. Unless a longer period is required or permitted by law, we will only hold your Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Policy or the purposes for which the particular Personal Data is collected until you request that your Personal Data be deleted.

10.2. Once your Personal Data has been deleted by us it may persist on backup or archival media for legal, tax or regulatory purposes.

11. Your Rights

11.1. In connection with the collection and processing of your Personal Data, you have the following rights:

11.1.1.1. **Right to access**, which includes the right to request:

11.1.1.1.1. Copies of the Personal Data we hold about you at any time; and/or

11.1.1.1.2. Modifications, updates and/or deletions of such Personal Data.

If we provide you with access to the Personal Data held about you, you will not be charged for this unless your request is manifestly unfounded or excessive. Where legally permitted to do so we may refuse your request, and if your request is refused you will be told the reasons why.

11.1.1.2. **Right to correct**, which is the right to have your Personal Data rectified or altered if it is inaccurate or incomplete.

11.1.1.3. **Right to erase**, which is the right to request that we delete or remove your Personal Data from our systems.

11.1.1.4. **Right to restrict the use of your Personal Data**, which is the right to block us from using your Personal Data or to limit the way in which your Personal Data can be used.

11.1.1.5. **Right to data portability**, which is the right to request that we move, copy or transfer your Personal Data.

11.1.1.6. **Right to object**, which is the right to object to our use of your Personal Data including where it is used for our legitimate interests.

11.2. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Personal Data (where consent is the legal basis for processing your Personal Data), please contact **support@drugtariffpro.com**.

11.3. If you would like to delete your account on the Website including your Personal Data associated with it, please contact **support@drugtariffpro.com** to request this.

11.4. If you are not satisfied with the way in which a complaint you make in relation to your Personal Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK this is the Information Commissioner's Office (ICO). Contact details for the ICO can be found on their website **www.ico.org.uk**. We cannot verify or guarantee the accuracy of any information provided therein.

11.5. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during the period for which it is held.

## 12. Changes of Business Ownership and Control

12.1. We may from time to time expand or reduce business operations and this may involve the sale and/or transfer of control of all or part of Drug Tariff Pro. Personal Data provided by you will, where it is relevant to any part of the business so transferred, be transferred along with that part of the business and the new owner



and/or newly controlling party shall, under the terms of this Privacy Policy, be permitted to use the Personal Data for the purposes for which it was originally supplied to us, unless or until you withdraw your consent.

12.2. We may also disclose Personal Data to a prospective purchaser of the business and/or any part of it where there is a legal basis to do so.

12.3. In relation to Clauses 12.1 and 12.2 above, we will take appropriate steps with the goal of ensuring Your privacy is protected.

### 13. General

13.1. You may not transfer any of your rights under this Privacy Policy to any other person. We may transfer our rights under this Privacy Policy where legally permitted to do so and where we reasonably believe that your rights will not be affected.

13.2. If any court or competent authority finds that any provision (or part of any provision) of this Privacy Policy is invalid, illegal or unenforceable, that provision (or part of it) shall, to the extent required, be deemed deleted and the validity and enforceability of the remaining provisions of this Privacy Policy shall not be affected.

13.3. Unless otherwise agreed, no delay, act or omission by any party in exercising any right or remedy in connection with this Privacy Policy shall be deemed a waiver of that or any right or remedy.

13.4. This Privacy Policy shall be governed by and interpreted in accordance with the laws of England, and any and all disputes arising under this Privacy Policy shall be subject to the exclusive jurisdiction of the courts of England.

13.5. This Privacy Policy shall be deemed incorporated by reference into the Drug Tariff Pro Licence Agreement and Conditions of Use which you will be asked to accept in order to use the Website/Services. To the extent that there is any express conflict between the terms of the Drug Tariff Pro Licence Agreement and Conditions of Use and the terms of this Privacy Policy, the terms of this Privacy Policy shall prevail unless otherwise expressly stated.

### 14. Changes to this Privacy Policy

14.1. We reserve the right to change this Privacy Policy unilaterally as we may deem necessary from time to time or as may be required by law.

14.2. Any changes to this Privacy Policy will be promptly posted on the Website and we will notify you via available contact information which you have provided. You are deemed to have accepted the terms of the Privacy Policy on your first use of the Website following the changes. If you no longer wish to accept the terms of the Privacy Policy, please cease using the Website/Services immediately.

**You may contact us to ask about this Privacy Policy at [support@drugtariffpro.com](mailto:support@drugtariffpro.com)**

## Drug Tariff Pro Cookies Schedule

Below is a list of the Cookies that the Website currently uses. Drug Tariff Pro will ensure this is kept complete and up to date but if you believe a Cookie has been missed or there is some discrepancy please contact [support@drugtariffpro.com](mailto:support@drugtariffpro.com).

### Strictly Necessary

The Website uses the following strictly necessary Cookies:

<b>Description of Cookie</b>	<b>Purpose</b>
<i>Superbase Authentication</i>	<i>This Cookie enables you to log into the platform and store your active session on the Website, so that you can use the Website for its intended purposes.</i>

### Analytical/Performance

The Website uses the following analytical/performance Cookies:

<b>Description of Cookie</b>	<b>Purpose</b>
<i>Microsoft Clarity</i>	<i>This Cookie enables us to track your activity on the Website such as what pages you visit, what features you interact with, and your time spent on such pages/features. This enables us to analyse your use of the Website/Services so that we can monitor the site's performance and make any necessary changes or improvements.</i>
<i>Google Analytics</i>	<i>This Cookie enables us to track your activity on the Website such as what pages you visit, what features you interact with, and your time spent on such pages/features. This enables us to analyse your use of the Website/Services so that we can monitor the site's performance and make any necessary changes or improvements.</i>

### Functionality

The Website uses the following functionality Cookies:

<b>Description of Cookie</b>	<b>Purpose</b>
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We currently do not use any functionality Cookies.	We currently do not use any functionality Cookies.
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Targeting

The Website uses the following targeting Cookies:

<b>Description of Cookie</b>	<b>Purpose</b>
We currently do not use any functionality Cookies.	We currently do not use any functionality Cookies.