

Minim Healthcare Privacy Policy

In view of new General Data Protection Regulation (GDPR) requirements from 25 May 2018, Minim Healthcare Ltd has revised its statement related to how we gather, store and use data held on our customers.

Preface

Minim Healthcare Ltd is an independent specialist medical devices distributor. We work with manufacturers as their exclusive representatives in the UK and Ireland. Our customers are clinicians and managers in the National Health Service and the private healthcare sector. We make every effort to try to ensure that our communication with customers is relevant, specific and of legitimate interest to them. We generally avoid mass-marketing exercises but from time to time send out product literature and information to those we think would be interested to know about our products and services. We hold our own secure database of customers that we are constantly refining to ensure that we avoid duplication or irrelevant communication. We do not share our information with anyone outside the company, nor do we acquire information from third parties such as database suppliers. Our aim is to ensure that our customer information is accurate and up to date, that we use it responsibly, and that we use it minimally so as to make our communications with customers relevant, useful and welcome.

Data Collection

Minim Healthcare Ltd gathers customer information from a number of sources, including, but not limited to:

- Conferences and exhibitions: where we take product enquiry lead forms and meet customers who share their contact information with us.
- Delegate lists: where we attend a meeting and delegates have given their permission for their name to appear on a delegate list, we are sometimes sent the list by the meeting organisers as part of our support of the meeting.
- Hospital visits: where, as part of our promotional work and product support, our personnel spend time in the hospital environment and we collect information directly from customers about their contact details and relevant personnel.
- Referral: where some of our contact information comes from recommendation or referral from other clinicians.
- Public information: where information made publicly available, such as on hospital websites that list details of personnel, is used so that we are more able to be specific and relevant as to who we contact about which products.

Minim Healthcare Ltd does not purchase data from third parties.

Data Storage

Customer data is held internally across a small number of physical and virtual locations directly controlled by Minim Healthcare Ltd.

- 1 Within email programs such as Outlook. Any email correspondence is retained in the program address book. No additional details such as telephone number or additional personal information is appended to this data other than name and email address related to the correspondence itself. Emails are stored securely on our system (see section on IT).
- 2 Customer Database. We have a single, centrally stored and secured database with an on-site and cloud-based copy of that database for the purpose of back-up, also fully secured. It is used to record verified details of customers, including their place of work (hospital), any special interests (such as rhinology or skull base etc.) and any contact details we have such as email address or secretary telephone number. This is in Microsoft Excel format, password protected and behind a firewall. We do not hold any private residential addresses or other private information. In general, the information we hold on a customer is available in the public domain - an internet search will reveal that a certain surgeon works at a certain hospital. Often the email address is a generic hospital Trust email address which can also easily be found. Where a customer prefers to use a private email address for contact, which would be held in our system, this is only stored and used when granted to us by the customer or approved customer representative.

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Data Storage - continued

- 3 Written correspondence. We write to customers and are written to by customers, which may include purchase orders, remittance advisory notes invoices or other related information. We retain copies of these securely in locked cabinets.
- 4 ERP System: some customer contact information relating to purchases and payments is retained securely in our Enterprise Resource Planning (ERP) system, used for processing orders, invoicing, stock control, etc. The data is relevant to information provided to us by customers on documents such as official purchase orders, remittance advice and other correspondence relating to our supply to our customers.
The data is held securely within the software program by password protection and is only accessible to a very limited number of personnel in the company - those responsible for order processing. We have documented assurances from any third parties in our supply chain (such as our couriers, the organisations who support our IT infrastructure and those involved in our data storage such as cloud-based storage) that they too are compliant with GDPR.

Appropriate handling of such data is written into our contracts of employment; all Minim Healthcare personnel have received appropriate training and guidance with reference to the customer data that they may be able to access.

I.T.

Minim Healthcare's computer system and network is all secure and compliant with data protection law as laid out the General Data Protection Regulation. This includes anti-virus, firewall and anti-ransomware software as well as local password protection, encryption of back-up storage and appropriate maintenance of hardware to ensure correct functionality. Our IT support partner has appropriate accreditation and their access to our data is strictly controlled and limited.

Website

Minim Healthcare's website captures no personal data of site visitors for purposes of advertising, marketing or purchases. It does not track or record an individual's site browsing, with no local machine data storage or linked databases. Cookies are used purely functionally and solely for the purpose of visitor numbers to the site. It does not record any personal individual website use and exists solely as an introduction to Minim Healthcare Ltd. In this respect, it serves to provide accurate information about the company and its personnel, specific details on the range of products offered by Minim Healthcare on behalf of manufacturers, information related to the areas of specialism of Minim Healthcare and direct contact opportunity with the company, but only if customer initiated.

Use of Data

We use gathered customer data to communicate effectively with clients and potential clients. Our products and services are promoted in a number of ways and we go to all reasonable lengths to ensure that our promotions are carefully targeted towards those who we think will have a genuine interest in our products. As an example, we would not send information to a neurosurgical customer about a product designed for ENT surgery.

Our communication with customers is often by letter, or by email and by telephone, designed for direct personal contact. We do not use random sales procedures in the form of mass emailing (spam), mass direct mailshots, telephone call centres or other forms of unrequested communication. In addition, we meet up with customers in person - some of our communication will be to agree to such face-to-face meetings. Above all, we use customer information responsibly to notify our customers of products and services that will be of interest to them, and hopefully, useful and helpful to them as well. We do not share our data with anyone outside the company and access to our database of customer information is restricted within the organisation.

All our communications include a statement referring to our privacy policy and offer customers the opportunity to have their names removed from the Minim Healthcare database or to stop receiving any communications in the future.

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Data Disposal

Customers who indicate that they wish to be removed from our database or to no longer receive communication from us will, at their request, be carefully removed from our database and from any address books that we have (such as email) to prevent any further communication, unless they indicate a requirement in future to communicate with us.

In the event of any change in physical hardware, due to IT asset disposal, that is used to store customer information in the form of databases, address books, emails and other such personal data stored, as outlined, in the relevant sections of our policy, we guarantee that all data will be deleted from those physical storage media.

Further to this, the storage media, in the form of redundant hardware, will be disposed of through secure data shredding and data destruction as appropriate and certification of this may be provided as requested.

Summary

Minim Healthcare Ltd aims to be a completely responsible organisation with respect to customer data as part of our company ethos and continuing commitment to customer privacy. We respect the privacy of our customers and their right to expect us not to pester them with irrelevant or unhelpful promotional information. Where we make contact with customers, it is with the genuine intent to help or to provide information that could be of interest or use.

We take very seriously the security and integrity of the data we hold about our customers; it is stored responsibly and safely and not distributed outside the company.

Verification

Signed by

Print Name

Date

Company Position