

Privacy Policy

Pure Healthcare Strategy is committed to protecting the privacy of our users' personal information. The following statement explains our information gathering and dissemination practices as they relate to Pure Healthcare Strategy.

What Personal Data do we collect?

Personal Data is collected from you when you complete a form on our Site, commission one of our Services or take part in a market research survey or interview.

The Personal Data we collect is clearly set out on each web page or in the explanation of each market research project. We may collect your name, company name, job title, email address, postal address, phone number(s), IP address and other information you provide to us on our Sites and via the use of our Services.

In addition, we may use cookies unless you configure your web browser not to accept them. You can read about how we use cookies on our Cookies page.

We will not sell, share, transfer, or rent any Personal data to any third-parties in ways different from what is disclosed in this Privacy Notice and our Terms and Conditions. We shall not process Personal Data in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by you. To that end, we will take reasonable steps to ensure that Personal Data is reliable for its intended use, accurate, complete, and current. We use reasonable efforts to maintain the accuracy and integrity of Personal Data and to update it as appropriate.

How will we use your Personal Data?

We use Personal Data that we collect for the following business purposes, without limitation:

- 1) maintaining and supporting our Services, delivering and providing the requested Services, and complying with our contractual obligations related thereto (including managing transactions, reporting, invoices and other operations related to providing/receiving services);
- 2) satisfying governmental reporting, tax, and other requirements;
- 3) storing and processing data, including Personal Data, in computer databases and servers located in the United Kingdom and Ireland;
- 4) verifying identity
- 5) as requested by you;
- 6) for other business-related purposes permitted or required under applicable local law and regulation; and
- 7) as otherwise required by law.

Our legal bases for the processing of your Personal Data are:

- 1) your consent;
- 2) our contractual obligations to you in the delivery of our Services;
- 3) our legitimate interest in engaging in commerce and offering Services of value to you via direct marketing.

We reserve the right to make automated decisions, including using machine learning algorithms, about you to optimize the Services offered and/or delivered.

We will retain your information for as long as your profile or Client account is active and

for at least twenty-four (24) months thereafter. We will also retain your information as necessary with our legal obligations, to resolve disputes and enforce our agreements.

To whom will we disclose your Personal Data?

We will only share your Personal Data with third-parties such as mailing houses or email software providers to enable us to perform services requested by you and with your prior consent. We may provide Personal Data to such third-parties for the following purposes, without limitation: marketing, auditing purposes and governmental reporting, tax, and other requirements.

We may share your information in connection with a merger, sale of company assets, financing or acquisition of all or a portion of our business to another company, if any. In this event, we will notify you before information about you is transferred and becomes subject to a different privacy policy.

We may also disclose Personal Data under the following circumstances:

- Responding to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;
- When we believe it is necessary to share information to investigate or prevent fraud, or to take action regarding illegal activities, situations involving potential threats to the physical safety of any person, or as otherwise required by law;
- In rare situations, it may be necessary to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We are potentially liable in cases of onward transfers of Personal Data to third-parties, such as when third-parties that act as agents on our behalf process Personal Data in a manner inconsistent with the data protection principles. We will ensure that any third-party to which we disclose personal information provides the same level of privacy protection as is required by the applicable data protection principles and agrees in writing to provide an adequate level of privacy protection. Except as otherwise provided herein, we disclose Personal Data only to third-parties who reasonably need to know such data. Such recipients must agree to abide by confidentiality obligations that adequately comply with our compliance requirements.

We recognise that you have the right to limit the use and disclosure of your Personal Data, and we are committed to respecting those rights. We offer individuals the opportunity to opt in to disclosures of Personal Data to a third-party or the use of Personal Data for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by you. We will comply with the applicable data protection principles with respect to disclosures of Sensitive Data including, when applicable, obtaining the explicit consent (i.e., opt in consent) of an individual prior to disclosing Sensitive Data to a third-party or using Sensitive Data for purposes other than those for which it was originally collected or subsequently authorized by the individual.

How do we protect your Personal Data?

We have implemented physical and technical safeguards to protect Personal Data from loss, misuse, and unauthorized access, disclosure, alternation, or destruction.

For example, electronically stored Personal Data is stored on a secure network with

firewall protection, and access to our electronic information systems requires user authentication via password or similar means. To the extent that we keep physical records containing your Personal Data, we limit access to such Personal Data to staff members whom we reasonably believe need that information to provide our services to you.

Despite these precautions, no data security safeguards guarantee 100% security all the time.

Our personnel will receive training, as applicable, to effectively implement this Privacy Notice.

How can you access and update your Personal Data?

Access:

You have the right to obtain confirmation about whether Personal Data is included about you in our databases. Upon request, we will provide an individual access to your Personal Data within thirty (30) days of receipt of such request. We will permit an individual to know what Personal Data about him/her is included in our databases and to ensure that such Personal Data is accurate and relevant for the purposes for which we collected the Personal Data.

You may review your Personal Data stored in the databases and correct, update, modify, or delete any data that is incorrect or incomplete.

Your right to access your Personal Data may be restricted in exceptional circumstances, including, but not limited to:

when the burden or expense of providing this access would be disproportionate to the risks to your privacy in the case in question; or
where the rights of persons other than you would be violated by the provision of such access.

If we determine that your access should be restricted in a particular instance, we will provide you with an explanation of our determination and respond to any enquiries you may have.

We will track each of the following and will provide notice to the appropriate parties under law and contract when either of the following circumstances arise:

- (a) legally binding request for disclosure of the Personal Data by a law enforcement authority unless prohibited by law or regulation; or
- (b) requests received from you

Rectification and Erasure

You may request that we rectify or delete any of your Personal Data that is incomplete, incorrect, unnecessary or outdated. In making modifications to your Personal Data, you must provide only truthful, complete, and accurate information.

Objection

You may object, at any time, to your Personal Data being processed for a specific purpose.

Restriction of Processing

You may restrict processing of your Personal Data for certain reasons, such as, for example if you consider your Personal Data collected by us to be inaccurate or you have objected to the processing and the existence of legitimate grounds for processing is still under consideration.

Data Portability

You may request the Personal Data you provided to us in a commonly used and machine-readable form.

Right to Withdraw Consent

You have the right to withdraw your consent at any time, without affecting the lawfulness of our processing based on such consent before it was withdrawn, including processing related to existing contracts for our Services.

To exercise any of the abovementioned rights, please contact us by phone, postal mail or email at the How to contact us section of this Privacy Notice.

We recommend that you include documents that prove your identity and a clear and precise description of your request. Please note that in some cases, especially if you wish us to delete or cease the processing of your Personal Data, we may no longer be able to provide our Services to you.

Changes to this notice

This Privacy Notice may be amended from time to time, consistent with applicable data protection and privacy laws and principles. We will notify you if we make changes that materially affect the way we handle Personal Data previously collected, and we will allow you to choose whether your Personal Data may be used in any materially different manner.