

## Data Usage Policy

VSM Healthcare is the UK's leading oral healthcare marketing and communications agency providing strategic services to healthcare companies, associations and government agencies through a variety of channels. VSM have been providing this information since 2001.

Central to these communications is our database of healthcare professionals, government agents and educators, all with an interest in improving oral health.

This policy sets out how we look after your personal data and tells you about your privacy rights and how the law protects you.

We may need to update this policy from time to time (you can check it at any time on our website.)

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 your relationship with us.

## What information do we hold?

VSM Europe Limited (trading as VSM Healthcare) is the controller responsible for your personal data. Sometimes we act as a processor of personal data for oral healthcare companies. Whether as controller or as processor, we process the following information about you:

- Name
- Place of work
- GDC Number & registration address
- Practice address
- Work Telephone Number
- Work email address
- Marketing preferences
- Financial data, including bank account and payment card details
- Usage data about how you use our services
- *Dietary requirements\**
- *Access requirements\**
- *Mobile phone number\**

*\*Applies only when booking face to face events where the information is needed in order to organise any requirements with the booked venue. This information is asked for but data subjects are under no obligation to provide this information should they choose not to. The information is only shared with the venue and generally is anonymised for planning purposes only. Such information is removed from any shared lists after the event is completed.*

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific service feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly

or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this data usage policy.

### How is the information collected?

The information has been gathered over the last 17 years and has been gathered from the GDC register which, until 2016 published the information on their website. Subsequently, information has been gathered from registration to published events. From January 1<sup>st</sup> 2018, when you book for an event or webinar we process your data for that event or webinar and add you to our database for publicising future news and events unless you tell us you do not want to receive this information, which you can do at any time.

### Why is the information collected and processed?

VSM, alongside our healthcare partners believe it important to share news, patient education leaflets, product samples in order to ensure and promote improved patient outcomes.

We rely on the following legal justifications to process your data:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests in conducting and managing our business (or legitimate interests of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via post, email or text message. You have the right to withdraw consent to marketing at any time by contacting us using the details set out below. Where you opt out of receiving marketing messages and news from us, we will remove you from our marketing lists but we will not remove personal information processed as part of our transaction data.

We may process your personal data on more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal basis we are relying on to process your personal data.

### How is the information used?

The information is used to communicate in order to promote improved patient outcomes and to offer recipients the chance to further their professional development.

Please note that we may process your personal data without your knowledge or consent, and otherwise in compliance with this policy, where this is required or permitted by law.

### Who is the information shared with?

We do not share or sell your information with any 3<sup>rd</sup> parties other than in the execution of the above activities and the administration of our business. Specifically:

1. We will pass your information to our mailing house in order to achieve the activities. Our Mailing house is GDPR compliant and destroys securely any data shared 24hrs after shipping. Their client data is not backed up and not linked to a server

2. We may share any specific dietary / access requirements with venues in order to make the necessary arrangements. Where possible, and usually, this information is anonymised and shared as a number / requirement only (i.e. 3 x vegetarians, 2 halal, 1 wheelchair user) in order to maintain privacy levels.
3. Where an oral healthcare company is the controller, we may share the information with them
4. We may also share with our client anonymous results of surveys, tracked emails in order to confirm the success, i.e. return on investment of any campaign
5. Service providers acting as processors based [in the United Kingdom] who provide IT and system administration services.
6. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based [in the United Kingdom] who provide consultancy, banking, legal, insurance and accounting services.
7. HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom.
8. We will get your express opt-in consent before we share your personal data with any company outside VSM Healthcare for marketing purposes.
9. We do not transfer your personal data outside the European Economic Area (EEA).

### What will the effect be on individuals?

The desired outcome of any communication where we are using your personal data is to educate, inform and improve patient outcomes. The sharing of this information should not effect individuals adversely.

### Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### Data Retention

If you are a dental professional, then as long as you remain on the GDC Register, which we check every 2 years, or unless you ask us to stop processing your personal data and we agree, then we will retain and process your personal data in accordance with this policy.

In all other cases we retain your personal data for as long as necessary to achieve the purpose for which it was collected and then it will be deleted.

### Your right to see what information we hold on you

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [admin@vsmhealthcare.com](mailto:admin@vsmhealthcare.com) and we will get back to you with a response within a month.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### Unsubscribe

If at ANY time you wish to no longer be contacted to receive the communications we share then please let us know at [admin@vsmhealthcare.com](mailto:admin@vsmhealthcare.com) or write to us at the address below and we will remove you from our marketing mailing list.

### Complaints

If you have any complaints regarding our processing of your data then in the first instance please contact us at [admin@vsmhealthcare.com](mailto:admin@vsmhealthcare.com)

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8 Salmon Fields  
Oldham  
OL2 6HT  
Tel: 0161 665 2882

If you wish to raise a complaint with the Information Commissioner's Office you can find how to do so by visiting their website: <https://ico.org.uk/>