# Privacy Notice

The following Privacy Notice explains how we Sciensus Pharma Services Ltd (SPSL) intend to use the information you have provided to us and we have captured as part of your service with us, along with your rights, our reasons for requesting it and who will have access to it.

The privacy notice below sets out how we process your personal information. This notice is regularly reviewed, and changes made from time to time. Any changes we make will be posted on this page.

We do not carry out automated decision making or make a significant decision based solely on automated processing unless that decision is required or authorised by law.

If you have any questions relating to this notice, please contact our Data Protection officer on

Telephone number: 0800 917 4980

Email Address: DPO@sciensus.com

Address: 20 Eastbourne Terrace, London W2 6LG UK.

We will collect some identifiable information from the use of our Cookies. If you would like to read more about this, please click here

## Where we get your information

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| **Referring Establishment / Centre** – Hospital, Private Medical Consultants, GPs, others involved in your care |
| **From You** – when you complete our forms, contact us, when we visit you as part of patient support and nurse programme, during our delivery process of your medicine, online, etc. |
| **Clinicians**, Nurses & Therapist– when they visit you to provide a service they will gather information from you which is noted on our clinician evaluation forms and your patient record. |
| **Laboratories** – as part of any medical blood testing results. |
| **Legal** – Solicitors, Legal Representatives acting on your behalf or managing any claim, arranging your treatment for you and paying for your care. |

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| **Regulators** – Where you have approached them independently to act on your behalf |
| **Medical Insurance Companies** – where they fund your care, we will receive information about you and your insurance policy |
| **Research and Survey companies** – when we supply limited information e.g. name and contact details to carry out these activities on our behalf. |
| **Social Care and Safeguarding agencies** – to enable us and them carry out our legal obligations for patient safety and care. |
| **Third Parties** – Advertising networks, analytics & IT providers, persistence and adherence management providers. |

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| **Other People** – "recipient" you have authorised to act on your behalf or receive medicine when we carry out our deliveries. We will also hold their minimal personal information on your patient record. |
| **Parent, Guardian or Responsible Person** – assigned and recorded to act on behalf of a paediatric patient (infant, children and adolescents) or someone who lacks capacity |

## How we use your information

We receive your information from many sources to deliver our services to you and we collect and process personal information about you from these sources.

We primarily use your personal information in the following ways:

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| • Create and maintain a record of your care and treatment and to communicate with your referring establishment (E.G hospital and doctors) |
| • Contact your next of kin, carer or representative on your behalf to claim any money owed from the patients estate & in case of emergencies. |
| • Create and manage your prescription records |



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| • Contact you to arrange your delivery via sms, email, postal, app or via telephone, including automated voice calls. |
| • Allow us to dispense and deliver the correct medication to you |
| • Facilitate a nurse or healthcare professional to visit you or a virtual visit using our patient consultation room (if necessary) |
| • Answer any questions or concerns you may have and provide customer support |
| • Provide pharmacy services to you and give you information about your medication |
| • Ensure that we charge the NHS or other bill payer the correct amount for our services delivered to you |
| • Provide regular reminders to you in accordance with your service, e.g. for deliveries, nurse visits or medication |
| • Provide advice to help you to get the best from your treatment and understand your level of engagement with your treatment through statistical and monitoring information |
| • Provide remote care, using technology platforms and assessments, as required for your service |
| • Enhance staff safety, we utilise secure audio recording devices that may be activated in emergency situations |
| • Capture CCTV images for training purposes and for the prevention and detection of crime |
| • Where your care is funded, to communicate with private medical insurance companies, or solicitors managing a claim to fund your treatment |
| • Where Live Chats are used we will store a copy of the live chat on your patient record or live chat helper document storage vault, if you are not a patient but a member of the public and/or if you are a consultant or Clinician, we may hold this in a communication file outside of our patient management system. |



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| • When contacting us through our helplines we will collect your Telephone or mobile number you are calling from; however, you can withhold this information before contacting us and therefore we will not collect it. Where we collect this information, we may use it to update your patient record. Personal data input into live chat may be visible to our staff and trusted partners who support this application. |
| • Where you have emailed SPSL, we will keep a copy of the email or extract the contents of the email within your patient record. |
| • We profile data & use predictive analytics to tailor our communication with you. |
| • We use anonymised & pseudonymised data for adherence and persistence purposes |
| • We use anonymised information to help us improve our services and support research that benefits patients. |

We may also use your information for service improvement/health and safety purposes such as:

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| • To train our staff in providing services to you. |
| • To manage and resolve any issues you may have – missed or late deliveries, complaints, incidents |
| • To record and manage (where appropriate) any adverse events or side effects relating to your medication that you tell us about. We will share pseudonymised data with the pharmaceutical company known as “manufacturer” unless you have provided your consent to share your personal information with them. Please note, depending on where the pharmaceutical/ manufacturer company is located, we may need to share your data outside of the UK. |
| • To capture information regarding an incident to ensure the safety of our employees |
| • To escalate concerns regarding you and your care to ensure you are safe |
| • To enable us to register and investigate incidents and complaint |
| • To enable the storage, archive and disposal of paper & electronic documentation |



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| • Contact you to help us improve the quality of our services based on the feedback we have collected from your reviews and comments. We may also contact you to support us on marketing activities. |
| • To conduct patient engagement surveys and see how well we are doing. These surveys could be generated by SPSL or referring establishments and managed by a third party on our behalf. We may carry out the surveys by email or by phone and may send you a text message to direct you to the survey link. |
| • To keep an audit trail for the services we provide, e.g. recording of calls, system logs |
| • Occasionally we will use third parties to process your personal data outside the EEA for IT Support and Statistical and Analysis purposes. Where we do this, we ensure appropriate controls and safeguards are in place to protect your data and where we can we use anonymisation or pseudonymisation techniques. |
| • We routinely produce pseudonymised reports for internal and external purposes. Pseudonymised means replacing your personal identifiable information, that may lead you to being identified. The information cannot be identified without the use of additional information, known as a key and is reversible. |
| • We may also use anonymised data for Statistical and Monitoring purpose. |
| • Should you have issues with the App that require troubleshooting, the analytics within the App will record your session and these details may be available to our trusted analytic company. |

Please see what personal information we collect on you, including the lawful grounds for us to process your information:

| **Type of Data** | **Why do we need this data?** | **What is our lawful ground for processing?** |
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| **Personal data**<br>· Name, contact details and address<br>· NHS number, SPSL number, IP address/Device ID | To enable us to provide Healthcare or treatment on behalf of the referring establishment/centre. | **Article 6 (A) Consent**<br>The individual (you) has given clear consent for SPSL to process their personal data for a specific purpose. |



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| · Date of Birth<br>· Gender<br>· Authorised recipients/Next of Kin & Carers details: Name, contact telephone number, address and relationship | | **Article 6 (B) Performance of a contract**<br>processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract<br>**Article 6 (F) Legitimate operational interest**<br>Non personal identifiable information to help SPSL fulfil its operational and contract requirements.<br>**Article 6 (D) Vital Interest**<br>The processing if necessary to protect an interest which is essential to life of the data subject<br>**Article 6 (E) Performance of a task**<br>processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller |
| **Special Category data**<br>· Medical Indication/history<br>· Ethnicity<br>· Health Information<br>· Pregnancy information<br>· Medication<br>· Known allergies<br>· Genetic Information (this is service-specific for select oncology patient's). | To enable us to provide Healthcare or treatment on behalf of the referring establishment/centre.<br>Pharmacovigilance Reporting - Reporting adverse events/side effects to the manufacturers (patient safety) | **Article 9 (A) Explicit Consent**<br>The individual has given explicit consent for SPSL to process their personal data for a specific purpose.<br>**Article 9 (H) Health and Social**<br>Care The processing is necessary for the provision of health or social care or treatment of the management of health or social care systems and services or pursuant to |



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| · Information about your mental and physical wellbeing<br><br>· Accessibility markers (Hearing impairment, Visual impairment, Mobility impairment) | To provide a base line assessment against which we can measure our services<br><br>To review and adapt our services in line with your accessibility markers. | contact with a health professional. |
| **Pseudonymised** (personal information which has been replaced and can only be identified using a key) & **Anonymised data** (Non identifiable information) | For Statistical & monitoring reports, performance and sales reports, including research and analysis.<br><br>This data is locked so a person cannot be identified from the strands of data. | **Article 6 (F) Legitimate operational interest**<br><br>Non personal identifiable information to help SPSL fulfil its operational and contract requirements. |

## Use of Artificial Intelligence (AI)

We use artificial intelligence (AI) technologies to assist in delivering and improving our services. These systems may help analyse data, generate responses, or automate certain processes to enhance efficiency, accuracy, and user experience.

We utilise the use of AI on two processes where your data is processed:

- Automation of our prescription process
- Identification of adverse events
- Pilot concept – support translation of nurse visits
- Pilot concept - Support tailored communication for patients (SMS)

Human Oversight

While AI plays a role in these processes, we always have human oversight. Our team reviews and monitors or validates AI generated outputs where necessary to ensure accuracy, fairness and alignment with our standards and values.

Your Data and AI:

Rest assured the AI technologies we use to process your data remain within our internal network which ensures greater control over data security and privacy and is strictly controlled and limited to authorised employees only.

When AI technologies are deployed within Sciensus we ensure we are utilising AI ethically. We complete rigorous assessments to ensure they are fair, transparent, accountable and that privacy and security is at the centre of these technologies.

If you have any questions about our use of AI or would like to know more, please contact us at DPO@sciensus.com



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## How we keep your information safe

During your service with us, we collect lots of personal and sensitive information about you, and we take keeping your data safe very seriously. To accomplish this, we have our own expert teams and use a mature information security management system so that your data will be treated appropriately and won't end up in the wrong hands. To achieve this, we use a three-layered approach: People, Processes and Technology.

We use a number of technology systems to control how your data is accessed and secured. Our technology covers multiple levels of our systems to ensure we can control your data from end to end. All our users are trained in the best ways of handling personal data and confidentiality and follow strict policies and procedures to ensure security is kept to a high level.

We operate role-based access control which means users access to your personal information is limited dependant on the task they carry out as part of their role.

We test our systems regularly using both internal and external testers and auditor to ensure weaknesses are identified and rectified.

We are ISO27001 accredited, which is an internal standard for information security. We also maintain cyber essentials certification which is a set of technical controls we comply with to protect ourselves against common online security threats.

In all our operations we will:

- Keep your information confidential
- Staff and third parties attend annual Data Protection training
- Only share your information with authorised and vetted third parties, agencies or people
- Use it lawfully, fairly and in a transparent way
- Keep your personal information for as long as necessary for the purposes we have told you about
- Protect your data and keep it secure
- Have contractual obligations for data management and protection when outsourcing functions to third parties to process your personal information on our behalf
- Carry out security and cyber security checks

## Who we will share your information with

We want to maintain your trust and protect your personal information, and when we share your personal information we are doing so because it is essential to enable SPSL to provide a service to you.

In "Where we get your information from" section we have detailed the sources from which we may receive personal information about you, but we also share your personal information with the same sources, including partners and suppliers which work on behalf of us.



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- **Companies in the SPSL Group** – who carry out functions on our behalf.

- **Referring establishment** (NHS/Private consultants/GP surgeries/ and other health professional) on whose behalf we deliver services.

- **Delivery Agents** – companies/organisations that deliver your medication and any devices on our behalf

- **Professional service providers** – our IT providers and website hosts who help us run our business

- **Regulators** – Care Quality Commission, Information Commissioner's Office, Medicines and Healthcare Products Regulatory Agency

- **Insurance Companies and Legal representatives** – for the purposes of defending or instigating a claim

- **Private Medical Insurance** – if they fund your care

- **Legal** – Solicitors, Legal Representatives acting on your behalf or managing any claim, arranging your treatment for you and paying for your care.

- **Law Enforcement Agencies** – for the purposes of prevention and detection of crime or fraud

- **Auditors** – external or internal as part of our performance reporting or compliance with legal / regulatory obligations

- **Pharmaceutical Companies/medicine manufacturers**– in a pseudonymised format which does not identify a specific patient, unless you have consented to your personal details being shared with them.

- **Other third parties** who require access to your personal information for specific and limited purposes.



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## How long we keep your information for

We will only hold your information for as long as it is needed to able us to provide a service to you and in line with our retention schedule, which is aligned with the NHS Code of Practice and other Legal & Regulatory guidance.

We may hold onto your data for longer due to meet the following:

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| **Necessary or required to meet Legal or Regulatory requirements** |
| **Resolve disputes** |
| **Prevent fraud and abuse** |
| **Enforce terms and conditions** |
| **Medical Negligence claims** |

We may keep an anonymised form of your personal data, which will no longer identify you, for statistical, research and analysis purposes without time limits, to the extent we have a legitimate and lawful interest in doing so.

## Your rights

You have a number of rights regarding how SPSL use your data including the Right to: Access, Rectify, Erase, restrict, transport, and object to the processing of your personal information.

These rights will not all apply in every situation but to exercise them at any time, have a complaint or just have a question contact us on the following:

Information Governance & Security Team

Telephone number: 0800 917 4980

Email Address: DPO@sciensus.com

Address: 107, Station Street, Burton Upon Trent, DE14 1SZ.

### Your right of access

You have the right to ask us for copies of your personal information we hold on you, whether in paper or electronic form. Each request will be dealt with on an individual basis.

### Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.



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### Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

### Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances, including automated processing and profiling and where automated processing operations are taking place for human intervention.

### Your right to object to processing

You have the right to object to the processing of your personal data in certain circumstances.

### Your right to data portability

You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances where it is technically feasible. This is not an absolute right and may not be possible on all occasions.

### Your right to complain

You have the right to make a complaint if you have any concerns about how we collect, use or store your personal data, or if you believe your data protection rights have been violated.

We encourage you to contact us directly in the first instance so that we can try to resolve the issue promptly. If you lodge a complaint directly with the Information Commissioner, they will ask you to direct the complaint to us first, so we can try and resolve your complaint directly with you.

If you wish to make a complaint, you can do this via multiple routes:

- Email our patient advocacy team at: patientadvocacy@sciensus.com
- Contact our Patient Services Team directly on 0333 103 9499
- Or contact our Information Governance Team:

  Telephone number: 0800 917 4980

  Email Address: DPO@sciensus.com

We aim to acknowledge your complaint within 2 working days and ensure you receive a full response within 20 working days. For further information regarding Sciensus complaints process, please click here.

If you are not satisfied with the response you have received, you have the right to lodge a complaint with the relevant data protection regulator if you believe your personal data is not being processed in accordance with applicable data protection law. To contact the Information Commissioners Office Click Here.

## The National Data Opt-Out

The national Data Opt-Out is an NHS initiative that allows patients to opt-out of their confidential patient information being used for research and planning.

We confirm that we carry out minimal processing of your confidential patient information for purposes beyond your individual care (e.g. research and planning).

Furthermore, we confirm that we comply with the requirements of this standard by having in place procedures to ensure that any future processing always takes this into account.



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To find out more you can visit http://www.nhs.uk/your-nhs-data-matters.

## Sciensus In-Touch App

This is an online app which provides patients with functionality to help you manage your treatment and interactions with SPSL online. For example, viewing information about your treatment or obtaining useful information relevant to your condition and booking your deliveries.

We will collect minimum information from you that is necessary to provide the service, such as your App experience using Data Analytics tools to track your usage of the App.

For further details on how we process your personal information, please see our main patient privacy notice or you can view this via the app.

PAR6600226 Implementation Date: 27/02/2026

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