

M3(EU)Limited Privacy Policy

1. Introduction

This privacy notice aims to inform you about how M3 (EU) Limited (referred to as “M3 (EU) Ltd”, “M3”, “we”, “us” or “our” in this privacy notice) processes your personal data and tells you about your privacy rights under data protection laws.

M3 (EU) Ltd takes your privacy very seriously and we are committed to protecting your personal data. This includes information you provide to us, and the statement below describes what data we will obtain, how the data is used and how the data is protected.

2. Controller’s contact details

M3 (EU) Ltd is the controller for all information we process, unless otherwise stated and is responsible for the management, processing, and protection of data that you provide to us.

M3 (EU) Ltd can be contacted on the details below.

Postal: One Valentine Place, London, SE1 8QH, UK

Email: reachdoctors@eu.m3.com

Tel: +44 (0)1235 828400

Any questions about your data or our privacy policy can be addressed in writing to our Data Protection Officer at DPO@eu.m3.com.

3. Collection and use of personal data

Purpose of processing and legal basis

Most of the information we process is provided to us directly by you for one of the following reasons:

- You have made an enquiry to us.
- You have made an information request to us.
- You subscribe to our e-newsletter.
- You participate in market research with us.
- You have applied for a job with us.
- You are representing your organisation.

The legal bases we rely upon to offer these services to you are:

- Where we have a legitimate interest;
- To fulfil a contractual obligation that we have with you; and/or
- Your consent.

4. Source of your personal data

Email Enquiry

When emailing us from this website we may keep your personal details on file to provide you with further information requested and to respond to your queries.

It is important that the personal information we hold about you is accurate and current. Please keep us informed by contacting us if your personal information changes during the period which we hold your data.

Market Research

If you have indicated that you want to receive invitations to participate in market research, we will use your contact data for the purposes of:

- inviting you to take part in market research activities relevant to your specialty and seniority; and
- monitoring and enabling your participation in market research activities via our website, to ensure that you can only participate in the same activity once and that any incentives offered for taking part in such activities are correctly credited to you.

This use of your data involves an element of profiling and automated decision making, in that we screen our respondents (using automated means) on the basis of their specialty and seniority so that only respondents falling within the specialty and seniority criteria specified by our clients for specific market research activities are invited to participate in those activities. This screening process is necessary in order to ensure that our clients are able to comply with their legal obligations under the Association of the British Pharmaceutical Industry (ABPI) code to target market research activities at medical professionals for whom the market research is relevant/suitable according to their specialty and seniority. You may contact our team at any time to discuss this screening process.

You can opt-out of receiving email invitations at any time by using the unsubscribe link at the bottom of the emails, by contacting us by email or phone, or if you are a Doctors.net.uk member, you can change your communications preferences at <https://www.doctors.net.uk/updateyourprofile/default.aspx>.

The legal basis for processing your data for market research activities is via your consent to participate. Where incentives are offered in return for taking part, the legal basis for our processing of your account data for the purposes of crediting you with those incentives will be performance of a contract.

Employee Recruitment

When emailing us in relation to recruitment in the 'careers' section of the website, we will use the information you provide to contact you in relation to job opportunities.

The information you provide during recruitment is processed to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements if necessary.

We use <https://www.smartrecruiters.com> as our recruitment portal to process our applications however we will not share or sell any of the information you provide with third parties for marketing purposes.

We will use the contact details you give us to contact you to progress your application. We will use the other information you provide to assess your suitability for available roles.

For further information on how we process your personal data in relation to a job application, please refer to our candidate privacy policy on our recruitment portal.

5. Sharing of personal data

We will not sell access to your data to other businesses for marketing or any other purpose.

Group Companies

M3 (EU) Ltd may share your data with other members of our group of companies for the purposes of monitoring and managing the services provided by the company. When sharing data across companies, we ensure safeguards required by Data Protection Laws are in place and adhered to.

Members of our group include:

- M3 Inc (Japan)
- M3 Medical Holdings Ltd
 - QQFS (Sweden)
 - M-Panels Research Services Pvt Ltd T/A M360 Research (India)
 - IQUS Ltd T/A RotaMaster (UK)
 - OneHealth Communications (UK)
 - Data4NHS (UK)
 - Ekas Marketing Research Services (Australia)
 - iDoctus (Spain and Mexico)
- Vidal Group Holdings Ltd including subsidiaries in France, Germany and Spain
- M3 USA
- M3 (EU) Ltd which includes trading styles:
 - Doctors.net.uk (UK)
 - medeConnect (UK)
 - M3 Global Research (UK)

6. Links to other websites

Where we provide links to websites of our group companies, partners or other organisations, this privacy notice does not cover how that organisation processes personal data. We encourage you to read the privacy notices on the other websites you visit.

7. International transfers of your personal data

Where we are required to transfer data to our other group companies as listed in section 5, we will ensure all personal data is protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission or UK International Data Transfer Agreement. For further details please contact us.

The hosting facilities for our website is situated in the EEA.

8. Protection of your data

We are committed to taking all reasonable and appropriate technical and organisational security safeguards to protect the personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use.

Access to your data is restricted to ensure it can only be accessed by authorised users. We have minimised the need for data to be accessed unless this is strictly necessary to meet our obligations or to respond to any reasonable and lawful request. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your personal data. Information is regularly backed up to reduce the risk of loss or corruption.

9. Data Retention

M3 (EU) Ltd will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time.

10. Your rights

Please be aware, you have the following Data Protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in respect of any data that has been provided to us directly by you;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- Rights related to automated decision-making including profiling; and
- Where you have consented to M3 (EU) Ltd processing your personal data you have the right to withdraw that consent at any time by contacting us.

You can also contact us if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

11. Visitors to our website

Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome)
- (b) <https://support.mozilla.org/en-US/kb/block-websites-storing-cookies-site-data-firefox> (Firefox)
- (c) <https://help.opera.com/en/latest/web-preferences/#cookies> (Opera)
- (d) <https://support.microsoft.com/en-gb/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d> (Internet Explorer)
- (e) <https://support.apple.com/en-gb/guide/safari/sfri11471/mac> (Safari)
- (f) <https://support.microsoft.com/en-us/windows/microsoft-edge-browsing-data-and-privacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd> (Edge)

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

We use cookies for the following purposes:

- (a) authentication - we use cookies to identify you when you visit our website, if you are logged in, as you navigate our website, and to protect our website and services generally.
- (b) personalisation - we use cookies to store information about your preferences and to personalise our website for you.
- (c) advertising - we use cookies to help us to display advertisements that will be relevant to you.
- (d) analysis - we use cookies to help us to analyse the use and performance of our website and services.

Analytics

When you visit www.eu.m3.com, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out such things as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

If we do collect personal data through our website, we'll be upfront about this. We'll make it clear when we collect personal information, and we'll explain what we intend to do with it.

12. Changes to the Privacy Policy

This Privacy Notice was last updated on 22 July 2022. If it is necessary for us to alter the terms of this Privacy Policy, we will post the revised policy on this website.

13. Complaints or queries

M3 (EU) Ltd is committed to meeting the highest standards when collecting and using personal information and expects all staff to share this commitment. For this reason, we take any complaints very seriously. We encourage you to bring it to our attention if you think that our collection or use of your information is unfair, misleading, or inappropriate.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of M3 (EU) Ltd.'s collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the email address below.

If you wish to make any comments or complaints about this privacy notice or any of the procedures set out in it, please contact our Data Protection Officer – DPO@eu.m3.com.

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/make-a-complaint>, if you believe that your data protection rights have not been adhered to.