1. Introduction

1.1. This privacy policy aims to inform you about how M3 (EU) Limited, which operates Doctors.net.uk, (referred to as “M3”, “Doctors.net”, “we”, “us” or “our” in this privacy policy) processes your personal data and tells you about your privacy rights under data protection laws.

1.2. For the purposes of EU data protection laws, we are the ‘controller’ of the personal data we collect about you through and in connection our operation of the Doctors.net.uk platform.

1.3. Doctors.net incorporates privacy controls for members which affect how we will process your personal data. By using the privacy controls, you can specify your marketing and communications preferences and limit the publication of your information. You can access the privacy controls via https://www.doctors.net.uk/updateyourprofile/default.aspx.

2. How we use your personal data

2.1. In this Section 2 we have set out:

- the general categories of personal data that we process;
- in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- the purposes for which we may process personal data; and
- the legal bases of the processing.

2.2. Usage data: We process data about your use of our website and services. The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking systems and system logs. We process usage data for the purposes of analysing the use of the website and services and serving targeted content and invitations to participate in relevant market research activities to you. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services and the performance of market research services on behalf of our clients.

2.3. Account data: We process personal data that you provide when registering to become a Doctors.net member and set up a Doctors.net account. Your account data comprises some personal data that is mandatory in order to join Doctors.net and set up an account and some personal data that is optional once you have become a member and set up an account. Once you have joined Doctors.net we will create an @doctors.net.uk email address for you, which will form part of your account data. We may also link the information you provide via
your account with additional data sets provided by third parties for verification and internal reporting purposes.

We will use the data that you provide as part of registration for the purpose of verifying that you are a GMC-registered doctor or medical student, as membership of Doctors.net is only available to GMC-registered doctors and medical students. We will also use the name you provide for the purpose of creating a doctors.net.uk email address for you. The legal basis for this processing is our legitimate interests, namely the proper administration of Doctors.net membership.

We will also use this data for the purposes of creating an account for you, authenticating access to your account, identifying you as the account holder, controlling and enabling you to access areas of our website and services that are restricted to members and enabling you to reset your password and gain access to your account if you forget your username or password.

The legal basis for this processing is our legitimate interests, namely ensuring the security of our network, IT systems and information and providing Doctors.net members with a means of accessing our website and services.

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

- inviting you to take part in market research activities relevant to your specialty and seniority
- 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 members (using automated means) on the basis of their specialty and seniority so that only members 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.

We may invite you to participate in relevant market research activities by email to your doctors.net.uk email address, by using messages delivered to your homepage when you login to your doctors.net account, or (if you have so requested) by text or telephone call.

You can opt-out of receiving these email invitations at any time and indicate whether you would like to receive invitations via text or telephone call by changing your communications preferences at https://www.doctors.net.uk/updateyourprofile/default.aspx.

The legal basis for this processing is our legitimate interests, namely providing market
research services to our clients, and the legitimate interests of our clients in obtaining market research data about their products or businesses in compliance with legal obligations to which they are subject. 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.

2.5 **Use of your account data for marketing and communications purposes:** We will use your account data to send marketing and communications that is relevant to our products and services.

You can opt-out from any specific communications by using the unsubscribe facility in the communication itself or via the Doctors.net website. We may also prompt you from time to time to revisit and update your communication preferences with the aim of ensuring that we only send you relevant and wanted communications.

We will also use your account data to serve you with targeted advertising on behalf our clients and other advertisers on our website.

The legal basis for this processing is legitimate interests, namely:

- our interests in providing marketing, advertising, communications, market research and recruitment-related services to our clients, providing relevant information to our members and operating our business and website
- our clients' interests in promoting and advertising their products or recruiting suitable candidates for jobs with them.

2.6 **Using your account data for our own marketing purposes:** We will use your email address and/or postal address in order to let you know about our range of products and services for our own internal marketing purposes. This may, for example, include postal mailings about our products and services if you have not visited our website recently. The legal basis for this processing is our legitimate interests, namely to communicate our range of products and services, and improvements to them, to our members.

2.7 **Using your account data to create your profile:** If you choose to have a visible profile in our Member Directory, the following account data will by default be displayed in your profile:

- name
- specialty
- seniority
- year of graduation
- profile picture (if you have uploaded one)

You can choose to display a visible profile, or remove your visible profile once published, at any time by using the settings made available via your Doctors.net account.

2.8 **Data collected as a result of your participation in market research activities:** If you take part in any market research activities, we will process some of your account data as
necessary to enable you to participate in the research. Except in the limited circumstances explained below, we do not disclose your account data to the client for whom we are conducting the research.

We will also process the information given by you in response to the survey questions ("market research data").

We may disclose certain personal data about you to the client for whom we are conducting the research in the following circumstances: if your responses include any information pertaining to the safety of, or an adverse event connected with, a pharmaceutical product (an "adverse event"), we are required by law and under our contract with the client to report such adverse event to the client, we will always gain your consent before passing any Personal Data to our Client. The client will then be required by law to take certain actions in respect of the adverse event. This may include contacting you to obtain further information about the adverse event.

2.9 **Publication data:** If you post any content for publication on our website or through our services when you are logged into Doctors.net, such as forum posts and the submission of clinical cases and images, we will process your username and any personal data contained in the content you post. The publication data will be processed for the purposes of enabling such publication and identifying you as the source of the content. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business, which is based upon a community website with member contributions.

2.10 **Enquiry data:** We will process information contained in any enquiry you submit to us regarding products and/or services advertised on our website, such as when you complete a form requesting more information. We will process your enquiry data for the purposes of responding to your enquiry, and if you request to be contacted directly by a relevant third party organisation, we will pass the contact details you used to make your enquiry to the relevant third-party organisation for this purpose. The legal basis for this processing is our legitimate interests in communicating with our members and our clients' legitimate interests in contacting our members where requested by an individual member.

2.11 **Transaction data:** We may process information relating to transactions, including purchases of goods and services that you enter into with us and/or through our website, such as the conversion of eSR (electronic Surfing Reward) points to cash to buy merchandise or vouchers or donate to charity. The transaction data may include your email address, name and home address, and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services, the legal basis for this being the performance of a contract between you and us. We will also keep records of those transactions, the legal basis for this being our legitimate interests in the proper administration of our business.

2.12 **Correspondence data:** We will process information contained in or relating to any communication that you send to us. The correspondence data provided via email or telephone calls may be processed for the purposes of communicating with you, logging your communication through our Member Services system, and for the management of your account. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
2.13 **Using your personal data for other purposes:** In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for:

- compliance with a legal obligation to which we are subject;
- protecting your vital interests or the vital interests of another natural person;
- obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice; and/or
- the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

2.14 **Other peoples’ personal data:** Please do not supply any other person’s personal data to us, unless we prompt you to do so.

### 3. Automated decision-making

3.1 We will use your relevant account data for the purposes of automated decision-making in relation to deciding what content you will see on the site, what content will be delivered to you, and which market research surveys will be offered to you. This will usually require an element of screening against your specialty and seniority for the purposes of delivering relevant and suitable content and invitations. This is described in more detail in section 2.

3.2 The significance and possible consequences of this automated decision-making are that it will affect what content you will see on our site or receive and what invitations to participate in market research you will receive.

3.3 We encourage you to keep your account data up to date, to ensure that the content and invitations delivered to you are relevant and suitable.

### 4. Providing your personal data to others

4.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.

Members of our group include:

- M3 Inc (Japan)
- M3 Medical Holdings Ltd (UK)
- QQFS (Sweden)
- Vidal Group Holdings Ltd including subsidiaries in France, Germany and Spain
- IQUS Ltd t/a Rotamaster (UK)
- M3 USA
- M3 (EU) Ltd which includes trading styles:
  - Doctors.net.uk (UK)
  - medeConnect (UK)
  - M3 Global Research (UK, Sweden and USA)
4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

4.3 We may disclose your profile data to our suppliers or subcontractors insofar as reasonably necessary in order to deliver and/or evaluate key parts of our website services. We may disclose part or all of your data to selected third-parties who supply additional services under the Doctors.net brand.

4.4 Financial transactions relating to our website and services may be handled by our payment service providers. We will share transaction data with these service providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints or queries.

4.5 We may disclose your enquiry data to one or more of those selected third-party organisations identified on our website, for the purposes of the third-party organisations offering relevant products and/or services to you.

Categories of these third-party organisations are as follows:

- Pharmaceutical companies
- Other companies in the healthcare industry
- Medical device companies
- Financial services companies
- Medical indemnity organisations
- Medical jobs boards
- Charities

Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and such third party’s own privacy policy will govern that third party’s use of your personal data.

4.6 In addition to the specific disclosures of personal data set out in this Section 4, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. **International transfers of your personal data**

5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

5.2 Where we are required to transfer data to our other group companies as listed in section 4, 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 and/or EU-US Privacy Shield and Switzerland-US Privacy Shield. For further details please contact us.

5.3 The hosting facilities for our website are situated in the EEA.

5.4 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 We will retain and delete your personal data as follows:

(a) Your account data, financial transaction data and correspondence data may be deleted after three years from the date on which your account has become inactive. (For the definition of ‘inactive’, see our Terms and Conditions for details)

(b) Your usage data and market research data are anonymised and will be retained.

6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Security of personal data

7.1 We will take appropriate technical and organisational precautions and apply industry best practice to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

7.2 We will store all your personal data on secure servers, personal computers and mobile devices.

7.3 Data relating to your enquiries and financial transactions that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.

7.4 You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. GMC and BMA guidance states that doctors should not send any patient identifiable data across the internet. You should not post patient identifiable information on the website (including the forum). The email service that we provide as part of your membership is not encrypted, so it is especially important that you do not use it for the
transfer of patient identifiable data. If you choose to use the Doctors.net.uk email service to transfer such data that you have yourself encrypted, then you do so at your own risk.

7.5 You should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our website confidential and your password will only be used when you log in to our website. We will never ask you for your password.

8. Amendments

8.1 We may update this policy from time to time by publishing a new version on our website.

8.2 This Privacy Policy was last updated on 12 March 2020.

9. Your rights

9.1 In this Section 9, we have summarised the rights that you have under data protection law. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

9.2 Your principal rights under data protection law are:

(a) the right to access;
(b) the right to rectification;
(c) the right to erasure;
(d) the right to restrict processing;
(e) the right to object to processing;
(f) the right to data portability;
(g) the right to complain to a supervisory authority; and
(h) the right to withdraw consent.

9.3 You have the right to confirmation as to whether we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data, after you supplied appropriate evidence of your identity (this will require you to log in). The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your account data by visiting https://personal-data.doctors.net.uk/ when logged into the website.

9.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. You can update and complete your account data yourself on the ‘Update Your Profile’ page on the website.
9.5 In some circumstances, you have the right to the erasure of your personal data. These circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary for exercising the right of freedom of expression and information and for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

9.6 In some circumstances, you have the right to restrict the processing of your personal data. These circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

9.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims. If you object specifically to the processing of your account data, then fulfilment of this request will require the termination of your membership of Doctors.net.uk.

9.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

9.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

9.10 To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

9.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
9.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

9.13 You may exercise any of your rights in relation to your personal data by contacting our Member Services team by telephone or email.

10. Third party websites

10.1 Our website includes hyperlinks to, and details of, third party websites.

10.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

11. Personal data of children

11.1 Our website and services are targeted at persons over the age of 18.

11.2 If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

12. Updating information

12.1 Please let us know if the personal information that we hold about you needs to be corrected or updated. You can also update this on the ‘Update your profile’ section of the website.

13. Cookies that we use

13.1 Blocking all cookies will have a negative impact upon the usability of many websites.

13.2 If you block cookies, you will not be able to use all the features on our website.

13.3 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.

14. Our Details

14.1 This website is owned and operated by M3 (EU) Ltd.

14.2 We are registered in England and Wales under registration number 3527430, and our registered office is at 101 Park Drive, Milton Park, Abingdon, Oxfordshire, OX14 4RY.
14.3 Our principal place of business is at 101 Park Drive, Milton Park, Abingdon, Oxfordshire, OX14 4RY.

14.4 You can contact us:
   (a) by post, using the postal address given above;
   (b) by telephone, on +44(0)1235 828400; or
   (c) by email, using help@doctors.org.uk.

15. Data protection registration

15.1 We are registered as a data controller with the UK Information Commissioner's Office.

15.2 Our data protection registration number is Z5861600.

16. Data protection officer

16.1 We have appointed a data protection officer who can be contacted via DPO@eu.m3.com. If you wish to complain about this privacy notice or any of the procedures set out in it please contact our Data Protection Officer.

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