

DATA PRIVACY NOTICE FOR SCRIPT-EASY™ BD CUSTOMERS

Script-easy™ is a prescription dispensing service operated by Bard Limited, registered office address Forest House, Brighton Road, RH11 9BP Crawley, United Kingdom, wholly owned by Becton, Dickinson and Company, NHS license registered at 26-28 Decoy Road, Worthing, West Sussex, BN14 8ND, United Kingdom.

Bard Limited (hereafter referred to as “**BD**”, “**we**” or “**our**”) is responsible for the processing of personal data through Script-easy™ since it determines why and how such data is processed, thereby acting as the “**controller**”, according to the Regulation (EU) 2016/679 (known as General Data Protection Regulation - GDPR).

BD is committed to respecting and safeguarding your privacy by handling your personal data in accordance with applicable data protection laws. This Privacy Notice for Script-easy™ Customers, Patients and Website Users, (“**Privacy Notice**”) explains BD’s practices as the responsible controller in relation to the collection, processing, and use of personal data of individuals who are in the United Kingdom (or to whom UK data protection law otherwise applies). Such individuals may include healthcare professionals, carers, website users, Employees, procurement staff, technical or support staff, and other staff members, as well as business contacts at hospitals, GP Surgeries, Care Homes, Clinics, companies, institutions, purchasing organizations, distributors, wholesalers, agents, and other intermediaries. If you fall into one of those categories, this Privacy Notice will help you understand what data BD may collect about you, how BD uses and safeguards that data, with whom we may share it, and how you can exercise your privacy rights.

We may update this Privacy Notice from time to time in response to changing legal, regulatory, or operational requirements. We will notify you of any such changes, including when they will take effect, by updating the footnote or as otherwise required by applicable law.

Please note that we do not accept responsibility or liability for any external websites that you may access via a link found within our webpage and that the use, control, and processing of your personal data will be controlled by the controller of that external website.

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1. What categories of personal data do we collect about you?

BD may collect and process personal data about you in accordance with applicable laws and to the extent permitted or required, either from you or certain third parties (e.g., your employer or the healthcare institution you work for, or other business contacts) or through trusted publicly available sources (collectively, “**personal data**”). Such data may include information about you, such as your identification data and contact details, professional data, data relating to BD products and services, financial or payment data as well as special categories of data, such as patient data or health-related data, only if permitted or required by applicable law or with your consent, to comply with transparency, anti-bribery and anti-corruption laws and regulations, and/or applicable industry codes of practice.

If you intend to provide us with personal data belonging to other individuals (e.g., your colleagues), you must provide a copy of this Privacy Notice to the relevant individuals, directly or through their employer, and get the other individual's consent to share the data.

For more detailed information

- **Identification data and contact details**, such as name, first name, last name, gender, email and/or postal address, NHS Number, date of birth, GP details, fixed and/or mobile phone number;
- **Professional data**, such as title, position, name of the health care institution or company you work for, business website, area of expertise, job title and description, department, professional experience;
- **Data relating to BD products and services**, such as the types of products and services used or purchased by you and related data (including user ID), your preferences information such as product wish lists, order history, medical history, medication history marketing preferences, reviews;
- **Relationship history and communication details**, such as customer service requests including when you report a problem or query, transaction records, correspondence, notes of calls or meetings, and other customer care or technical service interactions;
- For services we collect information such as your medical history, medication history, gender, NHS number, date of birth, GP details;
- **Authentication data**, such as unique user IDs, usernames, passwords, identifiers, or codes;
- **Information regarding your utilization, responses and/or preferences**, such as types of messages exchanged, channels of communication and frequency, marketing preferences;
- **Data you provide to us**, for example when filling in forms on this website or attending events, or when you answer questions during a conversation or in a survey;
- **Training data**, such as details of a product or clinical training received;
- **Financial or payment data**, such as credit card details, bank account details, VAT or other tax identification number, dates and amounts of payments made or received;
- **Special categories of data**, such as patient data or health-related data, only if permitted or required by applicable law or with your explicit consent, to comply with transparency, anti-bribery, and anti-corruption laws and regulations, and/or applicable industry codes of practice. When engaging with us as a consumer, you may also disclose health-related information related to the specific product or service that you request from us. In either case, the use of special categories of data will be highlighted, and appropriate choices will be given to you.

2. For what purposes do we use your personal data and why is it justified?

BD collects and processes certain types of personal data about you, depending on the relationship that you have with us. Unless the processing of your personal data is required or permitted by applicable law, or explicitly authorized by you, BD may process your personal data only as far as necessary to perform the contract with you, to comply with a legal obligation and otherwise for its legitimate business interests, such as processing and delivery of orders, managing marketing and customer relationship activities, preserving the company's economic interests, ensuring compliance with internal policies, reporting and improving BD's products and services.

We may collect your personal data directly from you, via our contractual relationship, at congresses or via our contact forms or indirectly from public sources or third parties, such as address brokers.

The provision of personal data as described in this Privacy Notice is necessary for the processing purposes described herein. While the provision of your personal data is generally voluntary, you may not be able to benefit from the processing purposes if you do not provide the personal data.

For more detailed information

Customer relationship

We process the personal data collected as necessary to perform a contract with you or the company/institution you work for, or to take steps at your request prior to entering into a contract with you or the company/institution you work for, and for our legitimate interest to administer and maintain the relationship with you, in particular for

- developing and managing our relationship with you (e.g., through the storage of your data in our databases);
- managing, planning and executing communications and interactions with you (e.g., through the operation of a database keeping records of interactions with you or managing call planning and call reporting);
- tracking our activities (e.g., measuring interactions, purchases, number of appointments/calls);
- answering your requests and providing you with efficient support;
- keeping you informed of the changes to this Privacy Notice in accordance with applicable data protection laws and regulations;
- delivering products and services;
- billing and invoicing;
- taking pre-contractual steps at your request;
- providing you or the customer with services related to BD products or services, via BD or an authorized third party;
- providing you with warranty services in connection with BD products or services, via BD or an authorized third party;
- Conducting customer surveys to measure and improve our performance;
- To provide you with our services;
- To process your Electronic Prescription Service (EPS) nominations and repeat prescription requests. This will involve send your request to your GP surgery with your personal details. We may provide some services on our website which are supplied by a third party. By using these services, the third party providers will have access to your personal details;
- Send you alerts about booked service such as nurse visits, medication and product review and other private services;
- Respond to requests;
- Process your payments for such products and services;
- Create and maintain your account;
- Send you a newsletter if you have consented;
- Respond to your questions and concerns;
- Review and enhance the quality of our services and products;
- Assist in the detection of fraud;
- To process your booking.

Marketing activities

Based on our legitimate interest or, if you are a prospective customer, your explicit consent, we process the personal data collected as necessary for performing marketing activities, in particular

- for communicating, conducting customer surveys relating to new products or services, event management and invitations to events or promotional meetings sponsored by us you may be interested in, categorizing your potential interests in BD products and services for customized marketing;
- subject to your explicit consent, for using your e-mail address for electronic direct marketing purposes and using tracking technologies via our marketing management system to monitor user behavior.

Ensuring compliance with applicable laws and regulations

We process the personal data collected as necessary to comply with EEA member state laws or Union laws as applicable to BD or as necessary for our legitimate interest to comply with foreign laws applicable to BD and regulations, in particular for

- preserving the company's economic interests and ensuring compliance and reporting, such as complying with our policies and legal and regulatory requirements, including money laundering, anti-bribery, and anti-corruption laws and regulations, tax deductions, managing cases of alleged misconduct or fraud; misuse of IT systems, physical security, IT and network security, internal investigations, audits and defending litigation;
- complying with legal proceedings or government authorities' orders which can include orders from public and government authorities outside your country of residence, when we believe, we are legally required to do so and when disclosing your personal data is necessary to comply with the said legal obligations, proceedings or government orders to provide you or the customer with services related to BD products or services, via BD or an authorized third party;
- pursuing legal rights and remedies; defending litigation and managing any internal complaints or claims;
- complying with transparency laws and regulations governing interactions with HCPs and equivalent laws and regulations, and industry standards and codes such as the MedTech Europe Code of Ethical Business Practice, details of training given to distributors and other intermediaries relating to compliance;
- keeping training records of clinical and other staff;
- archiving, record keeping and reporting purposes.

Performing other legitimate business purposes

We process the personal data collected as necessary for our legitimate interest to perform other business purposes, in particular for

- developing our products and services and improving their quality and functionality;
- conducting business intelligence reporting and analytics for sales, finance, supply chain, technical services, and customer care;
- managing our IT resources, including infrastructure management and business continuity;
- managing mergers and acquisitions involving our company.

3. Who might BD share your personal data with?

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal data may be accessed by or transferred to BD Group companies, service providers such as the NHS, IT, logistics and marketing providers, certain acquiring or acquired entities or other third parties such as professional advisors, regulators or governmental authorities, on a need-to-know basis to achieve such purposes.

For more detailed information

- **Within the BD Group:** BD may share your personal data with the BD Group affiliates as necessary for the processing purposes as described in this Privacy Notice. This may be the case, for example, if certain knowledge or skills of other BD Group affiliates are required for the fulfilment of a specific purpose, e.g., for the remote access to provide support to certain products or to answer specific questions about our products. Communication or material transmitted to BD or its affiliate companies via the script-easy@bd.com email address including data, questions, comments and suggestions will be treated as non-confidential and non-proprietary and may be shared within the BD or its affiliate companies worldwide including but not limited to; the improvement of customer experience, and product conformance/non-conformance investigation, development of products and services.
- **With certain acquiring or acquired entities:** If BD is sold or transferred in whole or in part, or if another entity is being acquired by or integrated into BD (or any similar transaction is being contemplated), your personal data may be transferred, as far as necessary, to the other entity prior to or after the transaction, subject to any rights provided by applicable law, including in jurisdictions where the other entity is located.
- **With data processors:** Certain service providers such as IT support providers, logistics and marketing providers ("**processors**") will receive your personal data to process such data on our behalf and under appropriate instructions as necessary for the processing purposes described in this Privacy Notice, in particular to provide IT and other administrative support, and to assist in complying with applicable laws. The processors will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard your personal data, and to process the personal data only as instructed. For more information about our service providers, please contact us as described in section 7.

- **With certain other third parties:** Your personal data may need to be shared with professional advisors, regulators, governmental authorities, and other similar bodies, for example where we have an obligation to be transparent about interactions we have with healthcare professionals or government officials in connection with our business.

Any access to your personal data within the BD Group is restricted to those individuals who have a need-to-know authorization in order to fulfil their professional responsibilities.

Whilst the data recipients are contractually obliged to protect the confidentiality and security of your personal data, in compliance with applicable laws, your personal data may also be accessed by or transferred to any national and/or international regulatory, enforcement, or public body or court, when we are required to do so by applicable laws or regulations or at their request.

Some of the recipients with whom we may share your personal data may be located in countries that do not ensure the same level of data protection like in your country. Before disclosing your personal data to persons in those countries, we take appropriate safeguards, such as entering into International Data transfer Agreements (“**IDTA**”) as approved by the UK Information Commissioner. For further information about these safeguards or to receive a copy, please contact us as described in section 7.

4. How do we protect your personal data?

We take appropriate technical and organizational measures to secure your personal data from unauthorized access, loss, and misuse. These measures include instructions to employees, access regulations and restrictions as well as the encryption of data carriers. Whenever third party data processors who provide services to us are required, Contractual agreements are in place to ensure they cannot process your personal data unless instructed them to do so by BD. They may not share your personal data with any other organisation and will hold it securely and retain it for the period we instruct.

5. How long do we store your personal data?

We will only retain personal data that we may have about you for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements, but no longer than NHS recommendations for retention of pharmacy records. When the BD Group no longer needs to use your personal data, we will remove it from our systems and records and/or take steps to anonymize it so that you can no longer be identified from it (unless we need to keep your data to comply with legal or regulatory obligations to which the BD Group is subject). If we anonymize data, we may use such data without further notice.

6. What are your privacy rights and how can you exercise them?

According to applicable data protection law and under the conditions and within limits outlined in the law, you have the right to (i) request access to your personal data; (ii) request rectification of your personal data; (iii) request erasure of your personal data; (iv) request restriction of processing of your personal data; (v) request data portability; and/or (vi) object to the processing of your personal data. Further, you have the right to withdraw consent at any time for future processing. Please note that these rights might be limited under the applicable local data protection law.

For more detailed information

You may exercise the following rights under the conditions and within the limits set forth in law:

- The **right to withdraw your consent:** if, in accordance with applicable law, you have declared your consent regarding certain types of processing activities (in particular regarding the receipt of direct marketing communication via email, SMS/MMS, fax, and telephone), you can withdraw this consent at any time with respect to future processing by using the methods mentioned in the original or any related communication (e.g., for newsletters by clicking on the link “Unsubscribe” at the bottom of a marketing email or otherwise by contacting our Data Protection Officer via email, mail or phone as described in section 7 of this Privacy Notice). Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. You can also withdraw your consent by contacting us as set out in section 7;

- the **right to request access** to your personal data, respectively to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to the personal data;
- the **right to request rectification** of inaccurate personal data concerning you;
- the **right to request erasure (right to be forgotten)** of your personal data, under certain conditions;
- the **right to request restriction of processing**, under certain conditions: In this case, the respective data will be marked and may only be processed for specific purposes as defined by law;
- the **right to request data portability**: As provided by applicable data protection law, you may – in cases where processing is based on consent or the performance of a contract, and the processing is carried out through automated means – have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit those data to another entity without hindrance from us;
- the **right to object**: For processing based on our legitimate interest, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data by us. In this case, we will no longer process your personal data unless we can demonstrate a compelling legitimate ground for the processing which overrides your interests, rights and freedoms, or as necessary for the establishment, exercise, or defense of legal claims.

Please note that these rights are not absolute, and we reserve the right to enforce the restrictions imposed by law.

To exercise your rights, [please complete this form](#) or contact us as described in section 7 below. You also have the right to lodge a complaint with the data protection supervisory authority in the UK, the Information Commissioner's Office (ICO) (for further information, see the [ICO's website](#)) or the competent supervisory authority in the relevant Member State (for example, the place where you live or work - contact details can be found [here](#)).

7. How can you contact us?

If you have any questions about this Privacy Notice, wish to contact BD's Data Protection Officer, or if you wish to exercise your rights or withdraw your consent as mentioned above, please contact us at:

By email: EMEA_Privacy@bd.com

By mail:

Data Protection Officer
BD Switzerland Sàrl
Route de Crassier 17,
Business Park Terre-Bonne,
Bâtiment A4, 1262 Eysins,
Switzerland