

•Smartway



Website Privacy Notice

This website privacy notice provides information on how Smartway Pharmaceuticals Limited (“**Smartway**”, “**we**” or “**us**”) collects and processes your personal data when you visit our website to sign up for a newsletter, engage with our online chat service or request that we contact you. Our website is available at www.smartwaypharma.co.uk and www.smartwaypharma.com (our “**Website**”).

It is important that you read this privacy notice as it contains more information about our data processing of information that you provide to us via our Website. This privacy notice only applies to information processed by us as a result of your engagement with our Website.





1. Important information and who we are

Smartway Pharmaceuticals Limited is the controller and responsible for your personal data. Smartway has appointed a data protection officer (DPO) to assist with meeting compliance with our legal obligations. If you have any questions about this privacy notice or our data protection practices please contact the DPO using the details below:

Full name of legal entity: [Smartway Pharmaceuticals Limited](#)

Email address: regulatory@smartwaypharma.co.uk

Postal address: [10 Lyon Road, London, SW19 2RL](#)

2. The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, the company you work for, job title and date of birth.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We use different methods to collect data about you. We collect data from when you engage with us in one of three ways via our Website:

- Your communication with us via our online chat service.
- Your communication with us via our contact us form.
- Your request to be added to our newsletter or updates.

If you email us using any of the contact details on our Website, we will handle your data in accordance with our own established systems and not necessarily in line with this website privacy notice. This is because this contact is outside the scope of our Website privacy notice.



3. How we use your personal data

We will only use your personal data for the purpose for which we collected it which include the following:

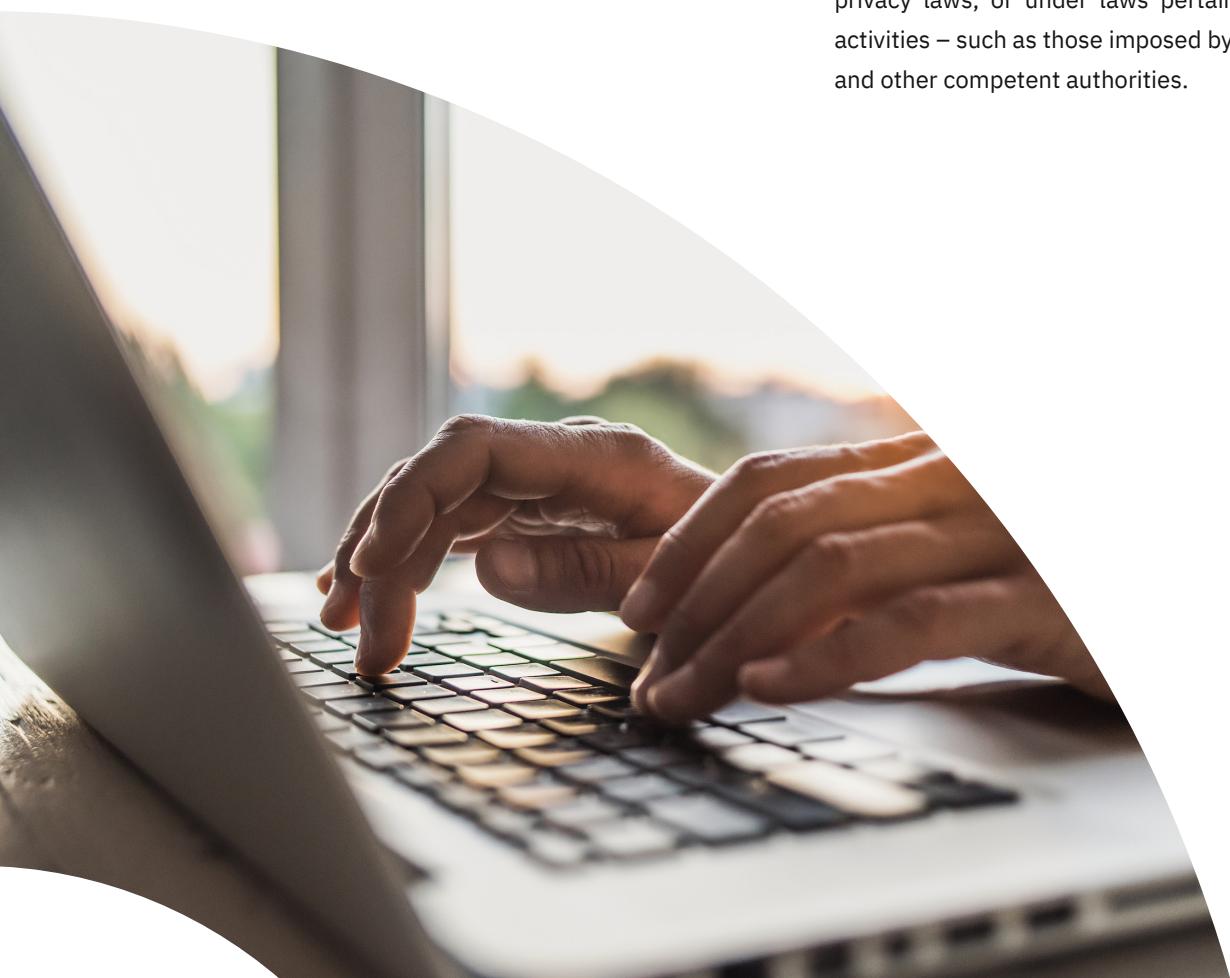
- To register you as a new customer or supplier.
- To process and deliver your order.
- To manage your relationship with us.
- To improve our Website, products/services, marketing or relationships.
- To recommend products or services which may be of interest to you.

4. How we share your personal data

We may share your personal data within the Smartway group or any of our associated companies, but we do not routinely share data outside of our group.

5. Retention of personal data

We will generally retain personal data for the minimum necessary period. This varies depending on the nature of the personal data and what it is being used for. We may be required to retain data under the data processing and privacy laws, or under laws pertaining to our regulated activities – such as those imposed by medicines regulators and other competent authorities.



6. International transfers

We may transfer, store and process your personal data outside the UK. However, where we do so it will only be for purposes where it is necessary.

8. Other matters

8.1 Cookies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

8.2 Third Party Links. This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

9. Further details

If you are looking for more information on how we process your personal data including on data security, data retention and lawful processing bases, please contact our DPO using the details above and we will deal with your enquiry.

7. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data including the right to receive a copy of the personal data we hold about you and the right to make a complaint at any time to the Information Commissioner's Office, the UK regulator for data protection issues (www.ico.org.uk).

8.3 Changes. We keep our privacy policy under regular review. This version was last updated on 2 March 2022 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.

8.4 Jurisdiction. This website privacy notice and any matters arising out of it will usually be the subject of the jurisdiction of England and Wales.



Smartway

**Transforming lives by empowering
access to medicines globally**