

# Website Privacy Policy for www.purewickathome.co.uk

Last revised March 2020.

We, Bard Limited (“**Bard**” or “**we**” or “**our**”), take data privacy seriously. This Website Privacy Notice (“**Notice**”) informs the users of purewickathome.co.uk on which this Notice is displayed (“**Website**”) how Bard as controller within the meaning of the General Data Protection Regulation (“**GDPR**”), collects and processes the personal data and other information of such users in connection with their usage of the Website.

Note that other websites or mobile apps of Bard and its affiliates (together referred to as “**Becton Dickinson Group**” or “**BD Group**”) may be governed by other privacy policies.

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## **1. Summary of Notice**

Below please find a short summary of the content of the Notice.

**What personal data do we process about you and why?** Bard will process the following personal data about you in connection with the Website: first and last name, email address, phone number and shipping address, preferences for marketing as well as sensitive data related to your health, in particular information on previous medical prescription, kind and quantity of sample requested, and reason for sample request. We will use your personal data in particular to provide you with the requested sample, to answer any queries and to provide you with marketing information. [Find out more here.](#)

## **What are the legal justifications for the processing of your personal data?**

One of the key privacy law requirements is that any processing of personal data has to have a legal justification. We generally use the following legal justifications: the processing is necessary for the performance of the contract (Art. 6(1) (b) GDPR or you have given your express consent Art. 6 (1) (a) GDPR to the processing. [Find out more here.](#)

## Who might Bard share my personal data with?

To the extent necessary, your personal data might be accessible to other affiliates of the BD Group, our service providers, our distribution partners, and, in accordance with applicable law, governmental authorities, courts, external advisors, and similar third parties. [Find out more here.](#)

## How long will the Local Bard Entity keep my personal data for?

We typically delete contracts, communications, and business letters, including any personal data contained therein, 10 years after their termination or creation. Any other personal data will in principle be deleted 3 years after the last interaction and business contact between you and Bard. [Find out more here.](#)

## What rights do I have in respect of my personal data?

You have a number of rights in relation to your personal data. These include a right to access, correct and erase your data, to object to certain types of processing activities as well as more technical rights to restrict the way we process it, and to transmit your data as part of data portability. You also have the right to withdraw your consent at any time with effect for the future. Your rights are important, and we have set them out in detail here.

## Who can I contact if I have questions?

If you have concerns or questions regarding your personal data, you can find our contact details [here](#).

## 2. Categories of Personal Data and Processing Purposes - *What personal data do we process about you and why?*

- **Metadata:** You may use the Website without providing any personal data about you. In this case, we will collect only the following metadata that result from your usage of the Website: browser type and version, operating system and interface, website from which you are visiting us (referrer URL), webpage(s) you are visiting on our Website, date and time of accessing our Website, and internet protocol (IP) address.

Your IP address will be used to enable your access to our Website. Once the IP address is no longer necessary for this purpose, we will shorten your IP address by removing the last octet of your IP address. The metadata, including the shortened IP address, will be used to improve the quality and services of our Website and services by analysing the usage behaviour of our users in anonymised form and to prevent fraud, misuse of our IT systems, as well as to ensure physical, IT and network security.

- **Sample Order Data:** When you order a sample product online, we collect and process the following categories of personal data about you: first and last name, email address, phone number and shipping address, preferences for marketing. We also collect the following sensitive data related to your health: information on previous medical prescription, kind and quantity of sample requested, reason for sample request.

We process such personal data for purposes of handling your sample request, answering any queries, analysing your interests for marketing purposes, providing marketing information, improving our Website according to usage patterns, and for technical administration or other purposes to which you have agreed.

## 3. Processing Basis and Consequences – What is the legal justification for processing your personal data and what happens if you choose not to provide it?

We rely on the following legal justifications for the collection, processing, and use of your personal data:

- The processing of metadata for purposes of improving the quality and services of our Website and services by analysing the usage behaviour of our users in anonymised form, preventing fraud and misuse of our IT systems, and ensuring physical, IT and network security is based on the

balancing of interest (Art. 6 (1) (f) GDPR) as this is necessary for those legitimate interests of Bard.

- The processing of Sample Order Data is partly based on the balancing of interest test (Art. 6 (1) (f) GDPR) as we want to provide you with the service and sample requested by you, partly necessary to perform the sample order contract with you (Art. 6 (1) (b) GDPR), and partly, to the extent your health data is concerned, on your express consent (Art. 9 (2) (a) GDPR).

The provision of your personal data is not required by a statutory or contractual obligation. The provision of your personal data is necessary to receive the sample product as requested by you. However, the provision of your personal data is voluntary for you. Not providing your personal data may result in disadvantages for you – for example, you may not be able to receive the sample product. However, not providing your personal data will not result in legal consequences for you.

#### **4. Categories of Recipients and International Transfers – *Who do we transfer your personal data to and where are they located?***

You should expect that we will transfer your personal data to third parties for the processing purposes described above as follows. Your personal data will in no event be shared with any recipients located outside of the EU/EEA:

- **Within the BD Group:** Some of our affiliates (“**BD Affiliate**”) within the global BD Group [www.bd.com](http://www.bd.com) may receive your personal data as necessary for the processing purposes described above. For example, the EMEA IT department has access to your personal data for IT support purposes on a need-to-know basis.
- **Other recipients:** We may transfer – in compliance with applicable data protection law – personal data to law enforcement agencies, governmental authorities, judicial authorities, legal counsel, external consultants, or business partners. In case of a corporate merger or acquisition, personal data may be transferred to the third parties involved in the merger or acquisition. We will not disclose your personal data to third parties for advertising or marketing purposes or for any other purposes without permission.

Any access to your personal data is restricted to those individuals that have a need-to-know in order to fulfill their job responsibilities.

#### **5. Retention Periods – *How long do we keep your personal data?***

Your personal data will be retained as long as necessary to provide you with the sample request and marketing materials. If you have not given your consent for marketing or if you have withdrawn your consent for marketing, we will delete your personal data after provision of the sample. Thereafter, we will remove your personal data from our systems and records and/or take steps to properly anonymise it so that you can no longer be identified from it.

#### **6. Your Rights – *What rights do you have and how can you assert your rights?***

**Right to withdraw your consent:** If you have declared your consent regarding the processing of your personal data for handling the sample request and/or for email marketing, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. You can withdraw your consent as follows: via email ([customer.services@bd.com](mailto:customer.services@bd.com)), by post (Bard Limited/BD, Forest House, Tilgate Forest Business Park, Brighton Road, Crawley, West Sussex, RH11 9BP), or by telephone (01293 527888).

**Additional data privacy rights:** Pursuant to applicable data protection law, you may 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 (including objection to profiling). Below please find further information on your rights to the extent that the GDPR applies. Please note that these rights might be limited under the applicable local data protection law.

- **Right to request access to your personal data:** As provided by applicable data protection law, you have the right to obtain from us confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, to request access to the personal data. This access information includes – inter alia – the purposes of the processing, the categories of personal data concerned, and the recipients or categories of recipient to whom the personal data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access.

You may have the right to obtain a copy of the personal data undergoing processing free of charge. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

- **Right to request rectification:** As provided by applicable data protection law, you have the right to obtain from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- **Right to request erasure (right to be forgotten):** As provided by applicable data protection law, you have the right to obtain from us the erasure of personal data concerning you and we may be obliged to erase such personal data.
- **Right to request restriction of processing:** As provided by applicable data protection law, you have the right to obtain from us that we restrict the processing of your personal data. In such case, the respective data will be marked and may only be processed by us for certain purposes.
- **Right to request data portability:** As provided by applicable data protection law, you 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.
- **Right to object:**

**Under certain circumstances, 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, and we are required to no longer process your personal data. Such right to object especially applies if we collect and process your personal data for profiling purposes in order to better understand your interests in our products and services or for certain types of direct marketing.**

**If you have a right to object and if you exercise this right, your personal data will no longer be processed for such purposes by us. You may exercise this right by contacting us as stated in Section 8 below.**

**Such a right to object may, in particular, not exist if the processing of your personal data is necessary to take steps prior to entering into a contract or to perform a contract already concluded.**

**If you have given your consent to receive direct marketing via certain communication channels, you need to withdraw your consent as explained.**

To exercise your rights, please contact us as stated under Section 7 below. You also have the right to lodge a complaint with the competent data protection supervisory authority in the relevant Member State (e.g., the place where you reside, work, or of an alleged infringement of the GDPR).

## **7. Cookies and other tracking technologies**

This Website uses cookies and other tracking technologies. For further information, please visit our Cookie Policy [<https://www.bd.com/europe/legal/privacy.asp>].

## 8. Questions and Contact Information

If you have any questions about this Notice or if you want to exercise your rights as stated above in Section 6, please contact us: via email (customer.services@bd.com), by post (Bard Limited/BD, Forest House, Tilgate Forest Business Park, Brighton Road, Crawley, West Sussex, RH11 9BP), or by telephone (01293 527888) .

Bard's Data Protection Officer can be contacted at: [bd\\_in\\_europe@europe.bd.com](mailto:bd_in_europe@europe.bd.com)

## 9. Changes to this Notice

We may update this 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 "Last revised" date above or as otherwise required by applicable law. Your continued use of our Website after any such updates take effect will constitute acceptance of those changes. If you do not accept updates to this Notice, you should stop using our Website.



Freephone:  
**0800 0121 699**

Nurse Advice Line Freephone:  
**0808 168 4048**

Email:  
**[script-easy@bd.com](mailto:script-easy@bd.com)**

Web:  
**[www.scripteasy.co.uk](http://www.scripteasy.co.uk)**

BD, Forest House, Tilgate Forest Business Park,  
Brighton Road, Crawley, West Sussex RH11 9BP

**[www.bardcare.uk](http://www.bardcare.uk)**

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