

Privacy Policy

OPTIMUM STRATEGIC COMMUNICATIONS LTD respects your privacy and is committed to protecting your personal data.

This privacy policy will inform you as to how we look after your personal data when you provide us with your data when we are working with you (or a company you are working for as part of a project we are working on) or more generally when you visit our website (regardless of where you visit it from). It will also tell you about your privacy rights and how the law protects you.

1. IMPORTANT INFORMATION AND WHO WE ARE

OPTIMUM STRATEGIC COMMUNICATIONS LTD is the controller and responsible for your personal data (collectively referred to as "Optimum", "we", "us" or "our" in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Full name of legal entity: OPTIMUM STRATEGIC COMMUNICATIONS LTD

Email address: contact@optimumcomms.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2. YOUR DUTY TO INFORM US OF CHANGES

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.

3. THIRD-PARTY LINKS

Our 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.

4. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Generally, when we work with you on a project, we would expect to only collect business data from you which will allow us to identify you and communicate with you to provide our

services. We do not expect to receive the financial information of individuals as we anticipate that our services will mainly be used by corporate entities. Based on this we have grouped together the following types of personal data we may collect:

- **Identity and Contact Data** includes first name, maiden name, last name, username or similar identifier, email addresses and telephone numbers.
- **Employer Data** includes details of any employer if you are corresponding with us as part of a project we are working on with your employer or any other person whom you are working with who is contracting with us for our services.
- **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 and services.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services).

5. HOW IS YOUR PERSONAL DATA COLLECTED?

We may use different methods to collect data from and about you including:

- Direct interactions with us when we are communicating with you to provide services or when you may be considering using our services.
- We may receive personal data about you from various third parties and public sources in the course of working with you or your employer.
- As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies,. Please see our [cookie policy](#) for further details.
- We may receive and collect Technical Data from the following parties:
 - analytics providers such as Google based outside the UK.
- We may receive Identity and Contact Data:
 - from data brokers or aggregators.
 - publicly available sources such as Companies House and LinkedIn.

6. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you or any employer engaging us to provide our services.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we will not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email. Typically, the latter refers to the Optimum Annual Healthcare Investor Conference and other events which we are sponsoring. You have the right to withdraw consent to marketing at any time by contacting us.

7. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you or record how you will be working with us	(a) Identity and Contact Data	Performance of a contract with you or your employer
To manage our relationship with you and to provide our services to your employer.	(a) Identity and Contact Data (b) Employer Data (c) Profile Data	(a) Performance of a contract with you or your employer (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support,	(a) Identity and Contact Data (b) Technical Data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of

reporting and hosting of data)		a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you as an employee of your employer (a corporate entity) and measure or understand the effectiveness of the advertising we serve to you	(a) Identity and Contact Data (b) Technical Data (c) Usage Data	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical Data (b) Usage Data	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to your employer	(a) Identity and Contact Data (b) Technical Data (c) Usage Data	Necessary for our legitimate interests (to develop our services and grow our business)

8. MARKETING

We may use your Identity and Contact Data, Technical Data and Usage Data to form a view on what we think your employer may want or need, or what may be of interest to your employer.

Generally we would only anticipate sending you our Newsletter and details in respect of the Optimum Annual Healthcare Investor Conference or other events which we are sponsoring.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

9. 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. For more information about the cookies we use, please see <https://www.optimumcomms.com/wp-content/uploads/2022/01/Cookie-Policy.pdf>

10. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties - Other companies who may be in Optimum's group acting as joint controllers or processors.
- External Third Parties – including:
 - Service providers who may be acting as processors including those who provide IT and system administration services.
 - Professional advisers who may be acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
 - HM Revenue & Customs, regulators and other authorities who may be acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

11. INTERNATIONAL TRANSFERS

Some of our external third parties may be based outside of the UK so their processing of your personal data may involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.
- Where we have obtained your consent.

12. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third

parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

13. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

14. YOUR LEGAL RIGHTS

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data.

- **Request access** to your personal data (commonly known as a "data subject access request").
- **Request correction** of the personal data that we hold about you.
- **Request erasure** of your personal data.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing** of your personal data.
- **Request the transfer** of your personal data to you or to a third party.

If you wish to exercise any of the rights set out above, please contact us using the details at the start of this Privacy Policy.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests, as set out above, within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.