

M+F Health External Privacy Policy

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1. THIS POLICY

- 1.1. M+F Health Communications Limited (**We**) are the data controller in relation to personal data (**Data**) we collect from you.
- 1.2. We are committed to protecting and respecting your privacy.
- 1.3. We are registered in England and Wales under company number 10283626 and our registered office is at 2nd Floor, St John's House, 53–54 St John's Square, Clerkenwell, London EC1V 4JL. You can contact us by email at data.compliance@mandfhealth.com or by telephone on 07818 424718.
- 1.4. This policy sets out the basis on which we will process any Data we collect from you, that you provide to us, or that we receive from third-party sources. Please read this policy carefully to understand our practices regarding your Data and how we will treat it.

2. Information We Collect About You

2.1 We collect and process the following Data:

- **Information you give us:** You may give us information about yourself by completing forms (whether on our website or otherwise) or by corresponding with us by phone, email, or otherwise. This includes your name, address, email address, phone number, and financial or payment card details. Where relevant, it may also include special category Data (such as health data).
- **Information we collect automatically:** During each of your visits to our website, we automatically collect technical information and technical browsing data, including traffic data, location data, weblogs, network communication logs, and the resources you access on our site.
- **Information we receive from other sources:** We may receive Data about you if you use any other websites we operate or other services we provide. We also receive information from social media platforms, publisher websites, business partners, and other commercial third parties.

Collecting this Data is essential for us to provide public relations and public affairs consultancy services.

3. Cookies and Similar Technologies

Our website uses cookies to distinguish you from other users of our site. A cookie is a small file of letters and numbers stored on your browser or your device's hard drive if you agree.

In accordance with the Privacy and Electronic Communications Regulations (PECR) and the Data (Use and Access) Act 2025, we use the following categories of cookies:

- **Strictly Necessary Cookies:** Essential for the operation of our website (e.g., core navigation, site security, and user accessibility).
- **Analytics & Performance Cookies:** Used to count visitor numbers, measure site traffic, identify technical errors, and understand how visitors navigate the site. Under the DUAA 2025, non-intrusive analytics cookies may be placed without prior explicit consent, provided you are given clear information and an easy way to opt out at any time.
- **Functionality Cookies:** Used to recognise you when you return to our website, enabling us to personalise content (such as greeting you by name or remembering your language/region preferences).
- **Targeting & Advertising Cookies:** These record your visit to our website, the pages viewed, and links followed. We use this information to make our content and advertising more relevant to your interests, and we may share this information with trusted third parties for this purpose.

Managing Cookies: You can manage or block cookies by adjusting your browser settings or using our cookie management controls. Please note that if you block all cookies (including essential cookies), you may not be able to access parts of our site. Third-party services (such as external web traffic analysis tools) may also set cookies over which we have no direct control.

4. How We Use Your Information (Lawful Bases)

Under UK Data Protection law, we must have a lawful basis for processing your Data. We process your Data on the following grounds:

4.1 Performance of a Contract

Where Data is required to fulfil a contract with you, we process it on the basis that it is necessary for contractual performance, including:

- Presenting website content effectively on your device;
- Carrying out obligations arising from any agreements between you and us (including debt recovery); and
- Notifying you about updates to our services or products.

4.2 Legal Compliance

We process Data where necessary to comply with our statutory obligations under UK law, including retaining records to establish, exercise, or defend legal claims within statutory limitation periods.

4.3 Legitimate Interests & Recognised Legitimate Interests

We process Data where necessary for our legitimate commercial interests (or those of a third party), provided these are not overridden by your fundamental rights and freedoms. In accordance with Section 15 of the Data (Use and Access) Act 2025, our commercial legitimate interests include:

- Storing contact details of prospective and existing clients to provide service updates and commercial proposals; and
- Collecting, compiling, and formatting Data regarding journalists, politicians, and policy influencers, and sharing this with clients strictly in connection with providing public relations and public affairs consultancy services.

Recognised Legitimate Interests: Where processing is strictly necessary for statutory *Recognised Legitimate Interests* (such as crime prevention, safeguarding vulnerable individuals, or responding to public emergencies), we rely on Article 6(1)(ea) of the UK GDPR as introduced by the Data (Use and Access) Act 2025. For these specific statutory grounds, formal Legitimate Interest Assessment (LIA) balancing tests are exempt by law.

You have the right to object at any time to processing based on our commercial legitimate interests (see Section 8).

4.4 Consent & Special Category Data

Where processing relies on your consent, you may withdraw it at any time.

Where we process special category Data (such as health data), we do so only where a valid lawful condition under Article 9 of the UK GDPR and Schedule 1 of the Data Protection Act 2018 applies. This includes circumstances where:

- You have given your explicit consent;
- The Data has been manifestly made public by you; or
- The processing is necessary for reasons of substantial public interest, legal claims, or health care purposes under applicable statutory conditions.

5. Disclosures to Third Parties

We may share your Data with selected third parties in the following circumstances:

- **Group Companies:** To our ultimate holding company, Exclaim Communications Limited (registered in England and Wales under company number 10283748).
- **Business Transfers:** If we sell or acquire any business or assets, in which case Data may be disclosed to the prospective buyer or seller and their professional advisers.
- **Data Processors:** To third-party service providers acting on our documented instructions in compliance with UK Data Protection requirements.

- **Professional Advisers:** To legal advisers, accountants, auditors, or insurers where necessary.
- **Legal Obligations & Fraud Prevention:** To law enforcement, courts, or regulatory bodies to comply with legal duties, enforce contract terms, or protect rights, property, and safety (including exchanging information with debt recovery agencies and credit risk databases).
- **Client Work:** To clients or third parties where strictly required to deliver our agreed public relations or public affairs services.

6. Where We Store Your Data & International Transfers

We take all steps reasonably necessary to ensure your Data is treated securely. All information provided to us is stored on secure servers, and online payment transactions are encrypted using current industry standards.

International Transfers

We store our primary data within the United Kingdom. However, where Data is transferred or accessed outside the UK (including via global cloud infrastructure, IT service providers, or client engagements), we comply strictly with UK Data Protection law. Under the DUAA 2025 framework, international transfers outside the UK are made only:

- To destinations covered by **UK adequacy regulations**;
- Where the transfer satisfies the statutory **UK Data Protection Test** (ensuring the standard of protection for individuals is not materially lower than that provided under UK law);
- Using ICO-approved transfer mechanisms, including the **UK International Data Transfer Agreement (IDTA)** or the **UK Addendum to EU Standard Contractual Clauses**; or
- Where an explicit statutory derogation applies (such as your explicit consent or performance of a contract).

Transmission over the internet carries inherent risks; while we maintain strict physical, technical, and organizational procedures to prevent unauthorized access, any online transmission is performed at your own risk.

7. How Long We Keep Your Data

We retain personal Data only for as long as is reasonably necessary to fulfil the purposes for which it was collected, including satisfying any legal, accounting, reporting, or regulatory requirements. Retention periods are determined in accordance with our Data Retention and Deletion Policy.

8. Your Data Rights

Under UK Data Protection legislation, you have the following rights:

- **Right of Access (Subject Access Requests):** You have the right to request a copy of the personal Data we hold about you. In accordance with the Data (Use and Access) Act 2025:
 - We are required to conduct reasonable and proportionate searches to respond to your request.

- If we require clarification to identify the specific information requested, we may pause the statutory response timeframe until clarification is received ("stop-the-clock").
- Where a request is manifestly unfounded, excessive, or vexatious, we reserve the right under statutory provisions to charge a reasonable administrative fee or to refuse to act on the request.
- **Right to Rectification:** You may request that inaccurate or incomplete information be corrected without undue delay.
- **Right to Erasure (Right to be Forgotten):** You may ask us to delete your Data where there is no ongoing legal ground for us to retain or process it.
- **Right to Object:** You may object at any time to processing based on legitimate interests or direct marketing.
- **Right to Withdraw Consent:** Where processing relies on consent, you may withdraw your consent at any time.
- **Right to Data Portability:** You may request the transfer of Data you provided to us in a structured, commonly used, and machine-readable format where processing is automated and based on consent or contract.
- **Automated Decision-Making & Profiling:** You have rights in relation to automated decisions that produce legal or similarly significant effects, including the right to request human intervention and to express your point of view.

To exercise any of these rights, please contact our Data Compliance Lead using the details in Section 1.

9. Direct Complaints and Supervisory Policy

9.1 Internal Complaints Process

If you have any concerns or complaints about how we process your Data, we ask that you contact our **Data Compliance Lead** in the first instance at data.compliance@mandfhealth.com or via our registered address. In accordance with the Data (Use and Access) Act 2025, we will acknowledge receipt of your complaint within 30 days, investigate the matter thoroughly, and provide you with a substantive written response outlining our findings and any remedial action taken.

9.2 Escalation to the Regulator

If you are unsatisfied with our response or believe that our processing of your Data does not comply with UK Data Protection law, you have the right to lodge a complaint with the UK data protection supervisory authority:

The Information Commission

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113 | **Website:** www.ico.org.uk

10. Changes to Our Privacy Policy

Any future updates to this policy will be posted on our website and, where appropriate, notified to you by email. Please check back regularly to view any changes.

11. Contact

Questions, comments, and requests regarding this privacy policy should be addressed to our Data Compliance Lead at data.compliance@mandfhealth.com or via the postal details in Section 1.