

Privacy policy

On 25th May 2018, the General Data Protection Regulation (GDPR) came into force giving individuals in the European Union enhanced rights over the use of their personal data. As a result, we updated our privacy policy to give you transparency about how we collect, use, and keep your data safe, and what your rights are under the GDPR.

Seven Stones

Seven Stones limited (whose registered address is: Olympic House, 317 – 321 Latimer Road, London W10 6RA) is a healthcare communications agency, that deliver global, international and UK advertising solutions for pharmaceutical, healthcare and sports & tech clients.

The privacy of our website users and the security of their personal information is very important to us, and this policy provides information about what we collect, how we use it and how long we keep it. Seven Stones complies with its obligations under applicable UK Data Protection Legislation (including the UK GDPR and the Data Protection Act 2018) by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access, and disclosure and by assuring that appropriate technical measures are in place to protect personal data.

We may change our privacy policy from time to time. If we make changes to this Privacy Policy, we will post those changes on the homepage and other places deemed appropriate so that you are aware of what information we may collect. We reserve the right to modify this privacy policy at any time, so please review it frequently.

Seven Stones is a 'data controller' in respect of the data that it collects and stores.

There are two types of data under GDPR:

Personal data (that can be used to identify you directly or indirectly): Such as name, job title, contact details, bank details, passport details, date of birth, etc.

Sensitive personal data (that could be used in a discriminatory way to profile you): Such as religious beliefs and opinions, sexual orientation, biometric data, physical and mental health conditions, ethnicity, etc.

1. What personal data information do we collect?

Our collection of personal data is limited and proportionate to its legitimate purpose which is business-related only. We collect personal data about you, including:

Name, job title, organisation

Contact information including email and phone number

2. What sensitive personal data information do we collect?

In some cases, we also collect sensitive personal data about your health. We only do this if (a) you have subscribed to receive information through a patient support programme we are delivering on behalf of our client, or (b) if you tell us that you have had problems with our pharmaceutical clients' medication or device, and we need to manage and report those problems to our client and their pharmaceutical governing bodies.

3. How do we collect it?

We collect personal data about you when you:

Contact or interact with us directly

Through third-party suppliers

Visit our website

Engage with us on social media i.e., LinkedIn and Twitter

4. What do we do with this personal data?

We require this data to supply services to our clients and to provide you with relevant information that either relates to your role or because you have asked us to send it to you. We also need to keep it to comply with our business, legal and regulatory obligations (such as pharmaceutical compliance, HMRC, reporting to pharmaceutical governing bodies, legal processes, and laws).

5. Legitimate interest

5.1 If you are a client, or have been a client in the last seven years

We collect, store, and handle the personal data of current and historic clients based on legitimate interest. We only collect personal data that we need to provide you with information that is relevant to your job or the services we have provided to you. We do not hold any sensitive personal data on current or historic clients.

Our ability to communicate with you serves your interest, as a client, or historic client, who has engaged our services.

We use your data to:

- Provide you with our services

- Comply with our business obligations (such as pharmaceutical compliance, HMRC, Pharmaceutical governing bodies)

- Comply with laws and legal proceedings (for example if we must respond to court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims)

5.2 If you are a supplier, or have been a supplier in the last seven years

We collect, store, and handle the personal data of current and past suppliers based on legitimate interest. We only collect personal data that we need to provide you with information that is relevant to your job or the services we have engaged you to provide. We do not hold any sensitive personal data on current or past suppliers.

Our ability to communicate with you serves your interest, as a current or past supplier, whose services we have purchased.

We use your data to:

- Engage with you for service delivery

- Comply with our business obligations (such as pharmaceutical compliance, HMRC, Pharmaceutical governing bodies)

- Comply with laws and legal proceedings (for example if we must respond to court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims)

5.3 If you are a healthcare professional

We collect, store, and handle the personal data of healthcare professionals based on legitimate interest. We only collect personal data that we need to provide you with information that is directly relevant to you. We do not hold any sensitive personal data on healthcare professionals.

Our ability to communicate with you serves your interests, as a healthcare professional who manages patients with conditions that our clients provide care solutions for.

We use your data to:

- Provide information on educational opportunities relevant to your field

- Invite you to educational events that are relevant to your field

- Report adverse events (relating to your patients on our clients' medications/devices)

- Comply with our business obligations (such as pharmaceutical compliance, HMRC, pharmaceutical governing bodies)

- Comply with laws and legal proceedings (for example if we must respond to court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims)

5.4 If you are a patient

We collect, store, and handle the personal data of patients based on legitimate interest. We collect both personal data and sensitive personal data about your health.

We only do this if you tell us that you have had problems with our pharmaceutical clients' medication or devices or if you have subscribed to receive information through a patient support programme we are delivering on behalf of our client. We do this for the purposes of managing and reporting information about side effects or product failures to pharmaceutical governing bodies.

Our ability to communicate with you serves your interests, as a patient who has:

Subscribed to a patient support programme that we are managing for our pharmaceutical client

If you, or a relative or healthcare professional, advise us that you have had problems with your medication

We use your data to:

Manage your subscription to a patient support programme

Advise our clients and their pharmaceutical governing bodies of any problems you have had with their medications or devices

Comply with our business obligations (such as pharmaceutical compliance, HMRC, pharmaceutical governing bodies)

Comply with laws and legal proceedings (for example if we must respond to court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims)

5.5 If you are enquiring about a job

If you make an enquiry about job opportunities, we will also gather personal information that you provide to us, via your CV and covering letter, which may include: your name, gender, contact details, education/work history, nationality ("Career Information").

Some of the Career Information identified above is classed as sensitive personal information. We will only collect and process sensitive personal data in so far as it is necessary to ensure that we conform with legal requirements, for example under equality of opportunity laws and to monitor our success in reaching out to a diverse prospective workforce. To fulfil our obligations under the GDPR we require your explicit consent to be able to process sensitive personal data. You will be asked to do this when you submit your Career Information.

6. How long do we keep your data?

6.1 Personal data: All personal data is deleted after a period of 12 months if there is no legitimate interest or legal basis requiring us to retain it (e.g. HMRC require companies to retain financial information for seven years).

6.2 Sensitive personal data: For legal reasons we need to keep a copy of your sensitive personal data for a longer period:

If you have subscribed to a patient support programme that we are managing for our client, our policy is to deactivate (rather than delete) your data if you advise us that you want to come off that programme because we are required, by pharmaceutical governing bodies, to hold your data whilst the programme is running and for two years after the patient support programme terminates. At that time, we will then securely destroy your sensitive personal data

If you, or a relative or healthcare professional, advise us that you have had problems with your medication or device, we are required by law to share this information with the pharmaceutical company and retain the information for seven years

If you submit career information, we retain this for 12 months. If your application is successful, it will be retained for the period you work at Seven Stones and in accordance with our standard employment procedures

7. How do we protect your data privacy?

We are committed to ensuring that your data is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure your data. All the personal data that we handle is processed by our trained staff. We have comprehensive internal policies around the storage and management of your data. Your personal data is stored securely on our firewalled server. Your data is also password protected and access is restricted to relevant individuals within the team at Seven Stones.

We have not, and do not, sell data.

For the purposes of IT maintenance, we back-up your data onto our password protected servers. We do not carry out any automated decision-making which is likely to have a legal or similar effect on you. All our staff are aware of our data protection policies.

We take appropriate technical and organisational measures to safeguard the personal data that you provide to us but no transit over the internet can ever be guaranteed so we cannot guarantee the security of any data that you transfer over the internet to us.

8. How we share your personal data and who we share it with

We may share your data with:

- Relevant clients
- Selected staff members

In addition to sharing your personal data as indicated above, we disclose data under the following circumstances:

Third-party service providers: to facilitate or to provide certain services on our behalf. This may include:

- Our IT maintenance company
- Our relevant client

A third-party (if we are jointly working with one on a particular programme)

Mailing and database management companies

Pharmaceutical companies and pharmaceutical governing bodies, if you, a relative, or a healthcare professional, advises us that you have a problem with your medication or device

To comply with laws and legal proceedings, for example if we must respond for legal reasons or are required by law to provide supporting data

Digital Marketing Service Processors; our carefully selected partners and service providers may process personal information about you on our behalf as described below:

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include:

Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: <http://sopro.io>. Sopro are registered with the ICO Reg: ZA346877. Their Data Protection Officer can be emailed at: dpo@sopro.io

9. Links to other websites

Our website may contain links to enable you to visit other websites easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

10. How we use cookies

Cookies are small pieces of data, stored in text files, that are stored on your computer or other device when websites are loaded in a browser. They are widely used to 'remember' you and your preferences, either for a single visit (through a 'session cookie') or for multiple repeat visits (using a 'persistent cookie'). They ensure a consistent and efficient experience for visitors, and perform essential functions such as allowing users to register and remain logged in. Cookies may be set by the site that you are visiting (known as 'first-party cookies'), or by third parties, such as those who serve content or provide advertising or analytics services on the website ('third-party cookies').

We use cookies for several different purposes. Some cookies are necessary for technical reasons; some enable a personalized experience for both visitors and registered users; and some allow the display of advertising from selected third-party networks. Some of these cookies may be set when a page is loaded, or when a visitor takes a particular action (clicking the 'like' or 'follow' button on a post, for example).

Below the different categories of cookies set by Seven Stones are outlined, with specific examples detailed in the tables that follow. This includes their name and purpose. Certain cookies are only set for logged-in visitors, whereas others are set for any visitors, and these are marked below accordingly. Where a cookie only applies to specific subdomains, they are included under the relevant header.

Strictly Necessary: These are the cookies that are essential for WordPress.org to perform basic functions. These include those required to allow registered users to authenticate and perform account related functions.

Functionality: These cookies are used to store preferences set by users such as account name, language, and location.

Performance: Performance cookies collect information on how users interact with websites hosted on WordPress.org, including what pages are visited most, as well as other analytical data. These details are only used to improve how the website functions.

Tracking: These are set by trusted third-party networks (e.g., Google Analytics) to track details such as the number of unique visitors, and pageviews to help improve the user experience.

Third-Party/Embedded Content: WordPress.org makes use of different third-party applications and services to enhance the experience of website visitors. These include social media platforms such as Facebook and Twitter (using sharing buttons), or embedded content from YouTube and Vimeo. As a result, cookies may be set by these third parties, and used by them to track your online activity. We have no direct control over the information that is collected by these cookies.

11. Controlling your personal data

Under the GDPR you have more control about the personal data we hold on you. You can restrict the collection or use of your personal data in the following ways:

You can withdraw your consent to the processing of your personal data

You can request we delete your personal data

You can restrict how we process your personal data

You can ask us what personal data of yours we hold, how we obtained it and how long we intend to keep it

You can ask us to change your personal data because it is inaccurate or incomplete

You can let us know if you don't want your personal data shared with a third-party

Your rights above can be exercised free of charge by:

Sending an email to info@sevenstones.co.uk or

By writing to us at Seven Stones, Olympic House, 317 – 321 Latimer Road, London, W10 6RA, UK

For security purposes, and to comply with GDPR, we will need to satisfy ourselves of your identity before we can action a request to see your data. Please note that, if by exercising one or more of your rights requires deletion of your file, or restriction on the special personal data we have access to, we may not be able to provide you with some of our clients' services. We also may only be able to deactivate your data (rather than permanently deleting it) if it contains information required to meet our clients', and our own, legal obligations. If we are unable to comply with your request, we will let you know what the reason is.

If you feel that any of your rights have been infringed, please contact us in the first instance. You are also entitled to lodge a complaint with the Information Commissioner's Office (www.ico.org.uk).

This policy is effective from April 2022.