

Privacy Notice

Thornton and Ross is based in Huddersfield, West Yorkshire. We develop, manufacture and supply a wide and growing range of branded OTC medicines, dermatological preparations, niche generic medicines and other pharmaceutical, healthcare and hygiene products.

Thornton and Ross puts priority on protecting your personal information. Acknowledging the importance of your personal information, we strive to secure and carefully process the information you share with us. We value your trust. We hence provide notice regarding how we collect, use and share your information. Our collection, use and sharing of your information is only based on your permission or where allowed by law.

By using this website, you are deemed to have agreed with the terms of this Privacy Policy. Whenever you submit information via this site, you therefore consent to the collection, use and disclosure of that information in accordance with this Policy.

Scope of this Privacy Notice

This Privacy Notice applies to personal data we collect through the Site. It describes how we use your data and your data protection rights, including a right to object to some of the processing which we carry out.

Our Site may include links to other websites over which we have no control. Thornton and Ross is not responsible for the privacy policies or practices of other websites.

Personal data we collect

Personal Information is collected at several different points on this website with the informed consent of the visitor. The Information provided is used to improve the appropriateness of the information provided on the website, market research, and the provision of other services by the company, associated companies and other third parties.

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

Personal Information You Provide To Us: We or our service providers (acting on our behalf) may collect "Personal Information" (which is information that, on its own or when combined with other information, identifies you or relates to you as an identifiable individual) that you provide to us, such as your first and last name, email, telephone number(s), address or post code and any Usage Personal Information (explained below), such as IP address, to the extent that this allows you to be identified.

Personal Information Collected Automatically: Whenever you visit or interact with the Site, we, as well as our third party service providers, may use a variety of technologies that automatically or passively collect information about how the Site is accessed and used (collectively, "Usage Personal Information"). Usage Personal Information may include:

- IP address or other unique identifier ("Device Identifier") for the computer, mobile phone, tablet or other device you use to access the Site ("Device").

- Device type
- Demographics
- Location
- Language
- Type of browser software and operating system you are using
- Page(s) served, the time, and the preceding page views
- Event type (pages viewed/documents downloaded)
- Event date/time
- Page URL
- Downloaded item URL

How we use your information

We process the personal data we collect for the following purposes:

- with your consent to:
 - provide you with information on Thornton and Ross’s business activities, products or services
 - to send you email newsletters and notifications
 - place cookies and similar technologies, as described in the sites cookie policy.
- to allow us to pursue our legitimate business interests, in particular to:
 - respond to your queries or other correspondence you have submitted through the Site
 - to complete and fulfil any requests for products or services
 - analyse the use of our Site in order to continuously improve content and measure performance
 - To tailor content, advertisements, and offers we serve you
- to meet legal, regulatory, pharmacovigilance and compliance requirements, in particular to respond to requests for information from government authorities.

Will Thornton and Ross share my personal data with anyone else?

In general, Thornton and Ross Limited shares aggregated information and statistics about its customers, sales, traffic patterns and related website information with partners, third parties, marketing agencies, suppliers and advertisers.

We may pass your personal data on to third-party service providers contracted to Thornton and Ross in the course of dealing with you, as explained in this Privacy Policy, as disclosed at the time you provide your information and in the following circumstances:

- **Third Party Service Providers:** We instruct other companies and individuals to perform functions on our behalf. Examples may include sending e-mail, managing training courses, analysing data, providing marketing assistance, hosting data, for tax and financial advice, for legal advice, accountancy or auditing services, website management and development and providing customer service. In connection with their performance of these functions on our behalf, we may share Personal Information with such companies and individuals as needed for them to perform their functions.
- **Legal Disclosure:** We may transfer and disclose your Personal Information to third parties to comply with a legal obligation; when we believe in good faith that the law or a governmental authority requires it; to verify or enforce our Terms of Use or other applicable policies; to

address fraud, security or technical issues; to respond to an emergency; or otherwise to protect our rights or property or the security of third parties, visitors to our Site, or the public

When they no longer need your data to fulfil this service, they will dispose of the details in line with Thornton and Ross's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

Under what circumstances will Thornton and Ross contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that Thornton and Ross holds about me?

Thornton and Ross at your request, can confirm what information we hold about you and how it is processed. If Thornton and Ross does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the GDPR representatives, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Thornton and Ross or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

How to contact us about your personal data or this privacy policy

If you have any questions about this privacy policy or about your personal data, please email us at dataprotection@thorntonross.com or write to us at the following address:

GDPR representatives
Thornton and Ross Limited
Manchester Road
Huddersfield
HD7 5QH

What forms of ID will I need to provide in order to access this?

Thornton and Ross accepts the following forms of ID when information on your personal data is requested:

- Passport
- Driving Licence

Changes to this privacy policy

We aim to meet high standards and so our policies and procedures are constantly under review. From time to time we may change this privacy policy. Accordingly we recommend that you check this page periodically in order to review the latest version.

Where to make a complaint

If you have a complaint regarding any aspect of your personal data or this privacy policy, please write to us at the above address. If you are still not satisfied with the outcome of your complaint, you may write to the Information Commissioner's Office at the following address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

You can also contact the Information Commissioner's Office using their online form:

<https://ico.org.uk/global/contact-us/email/>