



PUBLIC

**Resonant Group Limited, (consisting of Anthem, Bedrock & Origins)
External Privacy Notice**

Document Control

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Resonant Group Limited, (consisting of Anthem, Bedrock & Origins)

External Privacy Notice

Last Updated: 18/09/24

1. Who we are and what we do.

Who we are.

We are Resonant Group Limited, (consisting of Anthem Public Relations, Origins Healthcare Communications & Bedrock Healthcare Communications) (“Resonant”, “us”, “we”, “our”). We are a limited company registered in England and Wales under registration number Resonant Group - 11537520, and we have our registered offices at Wey Court West, Union Road, Farnham, Surrey, United Kingdom, GU9 7PT. Bedrock, Origins and Anthem are registered with the UK supervisory authority, Information Commissioner’s Office (“ICO”), in relation to our processing of Personal Data under registration numbers Bedrock: ZA099333, Origins: ZA517024, Anthem: ZB231006.

What we do

We are a group of healthcare agencies specialising in patient research, public communications, and public relations services. We [and our affiliates, subsidiaries, and related entities] are committed to protecting the privacy and security of the Personal Data we process about you.

Controller

Unless we notify you otherwise, we are the controller of the Personal Data we process about you. This means that we decide what Personal Data to collect and how to process it.

2. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the ‘How to contact us’ section.

3. Who this privacy notice applies to

This privacy notice applies to you if:

1. You visit our websites.
2. You purchase goods or services from us.
3. You enquire about our products and/or services.
4. You use our App.



5. You sign up to receive newsletters and/or other promotional communications from us

4. What Personal Data is

‘Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

‘Special Category Personal Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation.

5. Personal Data we collect.

The type of Personal Data we collect about you will depend on our relationship with you. For the type of Personal Data, we collect see the table below in the section entitled ‘Purposes, lawful bases, and retention periods.’

6. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text, or email and/or via our website.

However, we may also collect your Personal Data from third parties such as:

- reputable companies who provide lead generation contact lists.
- others to whom you have provided consent.
- publicly available sources such as social media platforms

7. Purposes, lawful bases, and retention periods

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:



Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
<i>Patient</i>	<i>Name, address, email address, medical condition, Patient ID Number, opinion of product/service interview recording, social media handles, any other information shared with us</i>	<i>To participate in research and projects</i>	<i>Consent</i>	<i>6 years from the end of project</i>
<i>Client</i>	<i>Name, job title, work email address, work phone number, company you work for</i>	<i>To manage our business relationship with client</i>	<i>Legitimate interests – to manage our business relationship with you</i>	<i>6 years from the end of contract with client</i>
<i>Recruitment agencies</i>	<i>Name, job title, work email address, work phone number, company you work for</i>	<i>To manage our agency relations</i>	<i>Legitimate interests – to manage our business relationship with you</i>	<i>6 years from the end of contract with recruitment agency</i>
Healthcare Professional	Name, work email address, job title company you work for	To participate in research and projects	Contract	6 years from the end of contract
Healthcare Professional	Name, work email address, work phone number, job title, company	To send and receive documents	Contract	6 years from the end of contract



	you work for, passport details, bank details			
Healthcare Professional	Name, job title, work email address, work phone number, company you work for	To arrange travel	Contract	6 years from the end of contract
Patient Organisations	Name, job title, work email address, work phone number, company you work for	To engage with us or participate in our research and projects	Legitimate interests	2 years from the end of project
Third party suppliers	Name, job title, work email address, work phone number, company you work for	To manage supplier relationship	Legitimate interests – to manage our supplier relationship with you	6 years from the end of contract with supplier
Existing/Prospective, Patient client, HCP, Supplier, Patient Organisation	Name, email address, any other information shared	To enquire about our services	Legitimate interest – to communicate with you to provide assistance about your enquiries	1 year following last meaningful contact



Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

8. Sharing your Personal Data

We may pass your personal data on to third-party service providers contracted to Bedrock, Anthem or Origins in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil specific services they provide to complete medical communications projects. When they no longer need your data to fulfil this service, they will dispose of the details in line with Resonant's procedures. In the event we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your explicit consent (both to record your sensitive personal information and to pass along to a third party) unless we are legally required to do otherwise.

9. International Transfers

[For organisations established in the UK]

Your Personal Data will not be processed outside the UK.

10. Your rights and how to complain.

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a "Subject Access Request")
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)
You have the right to ask us to delete your Personal Data.
- **Right to object to processing**
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing**
You have the right to restrict our use of your Personal Data.

- **Right to portability**
You have the right to ask us to transfer your Personal Data to another party.
- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
- **Right to withdraw consent**
If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.
- **Right to lodge a complaint**
You have the right to lodge a complaint with the relevant supervisory authority if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in the UK is the Information Commissioner's Office who can be contacted online at:

[Contact us | ICO](#)

Or by telephone on 0303 123 1113

How to exercise your rights

You will not usually need to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

11. Children's Privacy

We do not offer our products and services to children, and we do not knowingly collect Personal Data of children without parental consent, unless permitted by law. If you are a child, you must have your parent's permission to use our services. If you learn that a child has provided us with their Personal



Data without parental consent, you may contact us, as described below, and if appropriate, we will securely and permanently delete it, in accordance with applicable law.

12. How to contact us and our Data Protection Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact us as follows:

Resonant Data Protection Officer

Resonant Group
145 Frimley Road
Camberley
Surrey
GU15 2PS

E: dataprotection@resonantgrp.com

T: 01252 240200

We have also appointed a Data protection Officer (“DPO”). Our DPO can be contacted as follows:

contactDPO@resonantgrp.com

13. Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified 18/09/2024