

# PRIVACY POLICY

## **1. Who are we?**

Crownz Limited is a company incorporated and registered in England and Wales (company number 16150460 ) with its registered office at Apartment 1706 3 Tidal Basin Road, London, England, E16 1UX (the “Company” or “we” or “us”).

Your trust in the way we safeguard and handle personal data is central to everything we do. Being clear and transparent about how we use any personal information you provide is essential to maintaining that trust. We will always comply with the applicable data protection legislation, in particular the **General Data Protection Regulation (Regulation (EU) 2016/679 of 27 April 2016)**, known as the **GDPR and the Data (Use and Access) Act 2025**.

This Privacy Notice explains the basis on which we process personal information about you – whether collected directly from you, provided on your behalf, or obtained from other sources. It sets out the principles we follow when collecting, handling, processing, transferring and storing personal data, and the legal conditions that apply.

## **2. Data protection principles**

We are responsible for demonstrating compliance with the GDPR’s six core principles. Personal data must be:

1. processed lawfully, fairly and in a transparent way;
2. collected only for specified, explicit and legitimate purposes and not further processed in a way incompatible with those purposes;
3. adequate, relevant and limited to what is necessary;
4. accurate and, where necessary, kept up to date;
5. retained only for as long as necessary;
6. processed securely, ensuring integrity and confidentiality.

## **3. Definitions**

Personal information: In this document, when we use the term “personal information” we mean any information relating to an identified or identifiable human being. (An “identifiable natural person” is one who can be identified, directly or indirectly, for example, 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, biometric, mental, economic, cultural or social identity of that person).

**Sensitive personal information:** In this document, when we use the term “sensitive personal information” we mean special categories of information which are personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying someone, data concerning health or data concerning someone’s sex life or sexual orientation.

#### **4. Information we hold about you**

In the course of our communications with you, we may collect certain personal information. This may be obtained either directly from you or indirectly from other sources, and may include some or all of the following:

- a. Personal details such as name and title
- b. Contact details such as addresses, telephone numbers and email addresses
- c. Date of birth
- d. If you are a doctor, your GMC registration details
- e. Gender
- f. Bank account or debit/credit card details
- g. Details of transactions you carry out through our website or by other means, the fulfilment of your instructions and any subsequent communications with you about any of these
- h. Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own administrative purposes or otherwise and the resources that you access
- i. Information about your health, including any medical condition, health and sickness records.

#### **5. Methods of personal data collection**

We may collect personal information directly from you:

- when you provide details in connection with products and services we may deliver to you;
- when you submit an enquiry about our products and services;
- when you share personal information directly with members of our team.

We may also obtain personal information about you from other sources, such as:

- doctors or other medical professionals who refer you to us;
- other healthcare organisations (for example, your GP).

Information may be collected through email, telephone, social media, our website, in-person interactions, the chat function, cookies on our website, pixels in our emails, as well as from publicly available sources (including your employer's website or your social media profile).

We will only collect personal information where it is necessary for the specific purpose communicated to you, and we will retain it only for as long as required for that purpose.

## **6. Reasons for processing personal data**

We will only use your personal information when the law allows us to do so, relying on an appropriate lawful basis in each instance. We may use your information in the following circumstances:

### **1) Performance of a contract**

- To provide you with information, products or services that you request, i.e. for dispensing and supply of medicines in accordance with prescriptions (contact details).
- To fulfil our contractual obligations to you (contact details, medical information, payment information).
- To maintain basic details about you and your transaction history in order to deliver services tailored to your preferences (contact details, payment history, personalisation data).

### **2) Legitimate interests**

Where it is necessary for our legitimate interests (or those of a third party) and these are not overridden by your rights and freedoms, in particular:

- to ensure website content is presented in the most effective way for you and your device (online identifiers, location data, technical information);
- to help develop, operate, deliver and improve the quality of care, products and services we provide;
- for safeguarding purposes;
- to allow you to use interactive features of our services (online identifiers, location data, technical information);
- to notify you about changes to our products and services (contact details);
- if you are a referring doctor, to contact you and verify details relating to your practice and/or the client in question (contact details, GMC registration).

### **3) Compliance with legal or regulatory obligations**

- To retain transaction details for tax reporting and record-keeping (contact details, transaction history).

- Regulatory compliance, including obligations to maintain records, cooperate with regulators such as the General Pharmaceutical Council (GPhC) or the Medicines and Healthcare products Regulatory Agency (MHRA), and to report adverse drug reactions.
- For clinical review of prescriptions to identify contraindications, interactions, allergies or other safety concerns;
- Audit and quality assurance processes to ensure the ongoing safety, effectiveness, and compliance of our pharmacy services.

#### **4) Consent**

Where you have provided consent:

- to send you information about products or services we believe may be of interest to you (contact details, personalisation preferences);
- to send direct marketing communications via email, text message, post or telephone (contact details);
- to share your information with third parties (including group companies) for direct marketing purposes.

You may withdraw your consent at any time by contacting us. Please note that withdrawing consent will not affect the lawfulness of processing already carried out.

#### **5) Other important points**

- We may process your personal information for more than one lawful basis, depending on the purpose for which we use it.
- We will only use your personal data for the purposes for which it was collected, unless we reasonably consider that it must be used for another purpose that is compatible with the original one.
- Where we are required by law or by contract to collect certain personal information and you fail to provide it, we may be unable to perform our contractual obligations and may need to cancel or be unable to provide the services requested.
- In limited circumstances, we may process your personal information without your knowledge or consent, where permitted or required by law.
- We do not currently make decisions about you using automated means (automated decision-making). If this changes, we will notify you in writing.
- It is important that the personal information we hold about you is accurate and up to date. Please inform us promptly if your details change during your relationship with us.

### **7. Sensitive personal information**

Crownz Ltd, as a registered distance selling pharmacy, processes categories of personal information which are classified as special category data under the UK General Data Protection Regulation and the Data Protection Act 2018. Special category data includes information relating to an individual's physical or mental health, medical history, prescriptions, treatment records, genetic and biometric data where processed for the purpose of uniquely identifying an individual, as well as other information that reveals health status.

Crownz Ltd process sensitive personal data only where one or more of the following lawful bases, as provided under Article 9 GDPR and relevant provisions of the DPA 2018, apply:

- Article 9(2)(h) GDPR – Provision of health or social care

Processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, the provision of health or social care or treatment, or the management of health or social care systems and services, carried out by or under the responsibility of a health professional subject to the obligation of professional secrecy.

- Article 9(2)(g) GDPR – Substantial public interest

Processing may be undertaken where necessary for reasons of substantial public interest on the basis of domestic law (including the DPA 2018, Schedule 1), for example safeguarding of individuals at risk or ensuring equality of treatment in the provision of healthcare.

- Article 9(2)(i) GDPR – Public health

Processing may be required for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of medicinal products and healthcare services.

- Article 9(2)(a) GDPR – Explicit consent

In limited circumstances, where no other lawful basis applies, we may seek your explicit, informed consent to process specific categories of health information. Consent may be withdrawn at any time without affecting the lawfulness of processing carried out prior to withdrawal.

- Legal obligation (Article 6(1)(c) GDPR)

Processing may be required to comply with statutory obligations to which the pharmacy is subject, including medicines regulation, pharmacovigilance requirements, and record-keeping obligations under healthcare law.

## **7a. Purposes of processing**

Crownz Ltd processes personal data for the following purposes:

- Dispensing and supply of medicines in accordance with prescriptions and applicable legislation;
- Maintenance of patient medication records to ensure safe and effective pharmaceutical care;
- Clinical review of prescriptions to identify contraindications, interactions, allergies or other safety concerns;
- Provision of pharmacy services, including vaccinations, health checks, medication reviews and other NHS or private healthcare services;
- Regulatory compliance, including obligations to maintain records, cooperate with regulators such as the General Pharmaceutical Council (GPhC) or the Medicines and Healthcare products Regulatory Agency (MHRA), and to report adverse drug reactions;
- Safeguarding of patients and public health, including the identification and reporting of potential risks to patients' health or safety in line with legal duties;
- Audit and quality assurance processes to ensure the ongoing safety, effectiveness, and compliance of our pharmacy services.

## **8. Data sharing**

We may share or transfer your personal information in accordance with data protection laws, as set out below.

### **International transfers**

- We may transfer personal information we collect about you to countries within the **European Economic Area (EEA)**. These countries are subject to adequacy regulations and are therefore deemed to provide an appropriate level of protection for your personal data.
- In limited circumstances, we may transfer personal information outside the EEA. Where we do so, we ensure that your personal data is treated in a way that is consistent with UK data protection law. This is achieved through measures such as data protection agreements, standard contractual clauses, binding corporate rules, and appropriate technical and organisational safeguards. If you would like further details about these protective measures, please contact us at [contact@crownz.uk](mailto:contact@crownz.uk)

### **Why we may share your personal information with third parties**

We may disclose your personal information:

- to any member of our group, including subsidiaries, our ultimate holding company and its subsidiaries;
- in the event that we sell or purchase a business or assets, or if the Company itself is sold, to the prospective seller or buyer;
- where we are under a legal obligation to do so;
- in order to enforce or apply our contracts or other agreements;
- to protect the rights, property or safety of our employees, clients or others.

This may include exchanging personal data with other companies and organisations for fraud prevention and credit risk reduction purposes.

### **Internal reporting**

We may share personal information within our group as part of routine reporting activities, such as assessing service demand and resource needs. Where appropriate, personal data will be anonymised before use in performance reviews and reporting.

### **Third-party service providers**

We may share personal information with carefully selected third parties who provide services on our behalf. These providers are only permitted to process your data for specified purposes and in accordance with our instructions. They are not allowed to use your personal data for their own purposes. Examples include:

- **Analytics providers** – to monitor and analyse the use of our services;
- **Payment processors** – when you purchase paid products or services. We do not store or collect your payment card details. These are provided directly to our payment processors, whose use of your data is governed by their own privacy policies.
- **IT providers** - to ensure the security of network and information systems.

Our payment processors comply with **PCI-DSS standards** (Payment Card Industry Data Security Standard), managed by the PCI Security Standards Council (a joint initiative of Visa, Mastercard, American Express, and Discover). These standards are designed to ensure the secure handling of payment information.

## **9. Data security**

We take the security of your personal information seriously and have implemented appropriate technical and organisational measures to protect it against:

- accidental or unlawful destruction;
- accidental loss, alteration, or damage;

- unauthorised disclosure or access, particularly where data is transmitted over a network;
- any other unlawful forms of processing.

We also take reasonable steps to ensure the reliability of employees who have access to personal data. Employees are only permitted to process personal information in line with this Privacy Notice. Any breach of these obligations may result in disciplinary action, up to and including dismissal.

We maintain internal procedures to identify and respond to any suspected data security breaches. Where required by law, we will notify both you and the relevant regulator of such breaches without undue delay.

## **10. Data retention**

We will not retain personal information in a form that allows individuals to be identified for longer than is necessary to fulfil the purposes for which it was collected. Once personal data is no longer required, we will take reasonable steps to securely delete or erase it from our systems.

When determining the appropriate retention period, we take into account:

- the amount, nature and sensitivity of the data;
- the potential risk of harm from unauthorised use or disclosure;
- the purposes for which the data is processed and whether those purposes could be achieved through other means;
- applicable legal, regulatory or contractual requirements.

In some cases, we may anonymise personal information (so that it can no longer be linked to you). Anonymised data may be used for research or statistical purposes indefinitely, without further notice to you.

## **11. Your rights**

Under data protection laws, you have a number of rights in relation to your personal information, which are summarised below.

You have the right to:

- **Access your personal information** (commonly known as a “*data subject access request*”). This allows you to receive a copy of the personal data we hold about you
- **Request correction** of the personal information we hold about you. This enables you to have incomplete or inaccurate data corrected, although we may need to verify the accuracy of the new information you provide.



- **Object to processing** of your personal information where it is causing, or is likely to cause, damage or distress.
- **Prevent processing for direct marketing purposes**, meaning you can ask us to remove you from any direct marketing activities.
- **Request erasure** of your personal information in certain circumstances, for example where there is no good reason for us to continue processing it.
- **Request the transfer of your personal information** to you or to a third party. Where applicable, we will provide your personal data in a structured, commonly used, machine-readable format (data portability).
- **Withdraw consent** at any time where we rely on your consent to process personal information. Withdrawing consent will not affect the lawfulness of processing carried out before your withdrawal, but may mean we are unable to provide certain products or services to you.

If you wish to exercise any of these rights, please contact us at [contact@crownz.uk](mailto:contact@crownz.uk)

We aim to respond to all legitimate requests within one month. If your request is particularly complex or you have made multiple requests, we may need more time. In such cases, we will inform you and keep you updated.

You will not be required to pay a fee to exercise your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. In such cases, we may also refuse to comply.

For security purposes, we may need to request specific information from you to confirm your identity and ensure that your personal data is not disclosed to anyone who is not entitled to receive it. We may also contact you for further details to help us respond more quickly.

## **12. Complaints**

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

## **13. Changes to this policy**

We reserve the right to change this policy at any time. Where appropriate, we will notify individuals of those changes by post or email. Each time you enter or use our website, you agree that the privacy policy current at that time shall apply to all information we hold about you.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

## **14. Contact**

Questions, comments and requests to [contact@crownz.uk](mailto:contact@crownz.uk)